

# CONFEDERACION NACIONAL DE PRODUCTORES DE HORTALIZAS

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ESQ. CON ZARAGOZA PRIMER PISO  
CULIACAN, SINALOA.

EDIFICIO C.A.A.D.E.S.  
CODIGO POSTAL 80000

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Dockets Management Branch (HFA-305)  
Food and Drug Administration, 12420  
Parklawn Drive, room 1-23  
Rockville, MD 20857

Ref: Docket 97N-0451.

Dear Sirs:

My name is Basilio Gatzionis Torres, I've been in the produce business as a grower in West Mexico since 1970. In addition, I represent the National Confederation of Vegetable Growers (CNPH) as President of its Board of Directors. It is in this last position on which I would like to submit comments to the Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables.

CNPH represents the Mexican fresh vegetable industry. More than 20,000 growers in Mexico affiliated to 28 Regional Confederations and 245 Local growers Associations, grows an area of 600,000 hectares of close to 100 vegetable crops every year. The fruit and vegetable industry provides close to 9 million tons of fresh produce every year, but 3 million tons roughly, are exported every year to USA and Canada. 7 crops represents 80% of the domestic output and 6 of them concentrate 60% of the national exports.

The Mexican industry is widely spread. Thousands of small growers contribute to supply the Mexican food needs and many of them pack and ship their products for export, but 72% of the national exports can be found in 3 states located in West Mexico. In contrast, these 3 states perform the best of technology for growing, packing, pre-cooling and shipping.

Although the Guides will be voluntary it is not clear for the Mexican industry how this will contribute to the U. S. Food Safety. Some other initiatives at the U.S. Congress indicate that imports will be strongly enforced by the agencies involved at places of origin or at the border, so Guidelines will be voluntary for domestic purposes and enforceable for imports. Therefore, it will be more of a non tariff barrier or trade restriction. In addition, It's not clear at the same time the procedures the agencies involved in the Food Safety will perform in the case of imports.



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We believe in Free Trade and recognize the right every nation has to protect their citizens against possible contamination outbreaks caused by products coming abroad. Such right was recognized in the last GATT Round and now becomes a must if protection is not to be used to restrain trade, but it must be recognized the wide economic and social development differences among the supplier nations, before turning such regulations enforceable to the imports; that's why we would like to express our 10 big concerns about this initiative in the following principles:

- 1). Implementation of Guides should be feasible in the supplying countries.
- 2). Guides should have a solid scientific grounds.
- 3). It should not be applied in a discriminatory way.
- 4). It should be according to the World Trade Organization procedures.
- 5). It should define the liability of every participant agent in the distribution chain, including the consumer.
- 6). The Trace system should start from the consumer backwards, and be accurate.
- 7). Information about the origin of the product should not be released until real evidence does exist in the trace system.
- 8). Guides should contain provisions about remedy to growers when misleading information affects the selling of their product.
- 9). Responsible agencies should have the authority to enter agreements with supplying countries or private groups and recognize foreign certifications.
- 10). Responsible agencies should have the authority to recognize foreign Safety Zones.

The Mexican industry is developing a big effort to follow the Guidelines. We have conducted seminars in the major producing and exporting areas; the Federal Government has taken appropriate steps to conform technical groups at state level to inform and educate the growers about prevention of bacterial contamination and individual growers are now more concern about Good Growing and Manufacture Practices.

Most of the problems identified in the growing areas in Mexico related to the Guides compliance, have to do with the water source and its quality for irrigation and washing purposes, as well as workers Hygiene.



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Protect the water source of the strain contamination is something materially impossible. The irrigation water where major vegetables are grown in Mexico, comes in great extent from dams and its irrigation systems; other less important is subsoil pumped and the lesser volume is provided by rivers, lagoons and other water reservoirs. Growers could eventually take some caution measures inside their property to avoid contamination of the growing land via irrigation water and could provide treatment to the water used for washing, but they can not take responsibility about the basic source of water supply.

The isolation of the agricultural land used for vegetable growing from the cattle use land, when it belongs to a different owner, is something difficult to achieve in the short run. It would require Federal Government regulations about the use of and or to enact the applicable legislation that only the Mexican Congress can resolve.

The other important aspect related to water contamination is melted ice. Use of ice, top or melted, is a common cooling practice in many growing regions in Mexico. This is particularly the case for Melons, Pickle Cucumbers, Italian Squash, Green Beans, Green Peas, Sweet Corn and others. Ice is supplied by third parties at the growing area and during transit to the border, when distance takes more than 12 hours for arrival. So, the grower doesn't have control of the hygienic quality of the ice provided and can not invest in ice stations at re-icing places during transit.

In order to comply with the Guides, much of the actual practices of packing on the field have to be changed for hauling the products to a packing plant, where they can be washed properly and the grower can have a better control of the packing process. Not all growers in Mexico have the capacity to make this re-conversion of the packing practices. This involves big amount of investments and probably will not be ready for the time the Guidelines will be released and the importation enforced. Other problem is that many of the fresh commodities grown in Mexico are sold for domestic consumption to wholesalers in terminal markets. Some of them are re-packed, mixed or re-conditioned and then exported to USA. This practice, that usually involves the mixing of same product coming from different regions, lots and growers, will not allow an adequate control of the sanitary process. Such type of operations could put on risk the Mexican exports if an appropriate system for standarization and certification is not developed soon. This process could take about two years since it doesn't depend exclusively on the growers.



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Regarding Health and Hygiene of the workers, much of the effort to be done is in education, training and new or increased facilities. Again this will require investment. In the growing areas in Mexico, the growers provide health care to the workers through the Mexican Institute of Social Security (IMSS), the major problem would be the building of increased sanitary facilities in the field where the biggest concentration of migrant workers is located. Facilities must be of the mobile type because the land use for growing is not the same every season due to rotation needs; in addition waste need to be properly disposed. One of the critical aspects of the Guidelines is the amount of investment needed for every grower to develop his own sanitary system and disposal, since there is not private companies to provide said service. This goal would not be accomplished by the time the Guide be released and the imports enforced.

The most critical of all the aspects related to food safety is the water used for washing the products. Most of the possible contamination problems of the fruit coming from the field, could be eliminated if water properly treated is used to wash the fruit plus added disinfectants. No doubt the major investment needed is the construction of purified water plants for every packingshed since most of them are located in rural areas. Again the major difficulty to implement the Guidelines is the wide spread of the growers, the size of their operations and the location of the growing in rural areas, where municipal services barely exist.

Because of the above, CNPH believes that the implementation of the Guidelines to all the export operations in Mexico are not feasible in the short run and of course into the datelines established by the governmental agencies involved. Our opinion is that these agencies should have the authority to enter into agreements with foreign governments or organized group of growers in order to identify and agree which of general practices can be implemented immediately; which others can be established in the short term and which of them need longer term and commitments. In order to do so, it would be helpful to establish compliance programs by regions according to the level of infrastructure, technology and rural development.

Best Regards,

  
Basilio Gatzons Torres  
President.

