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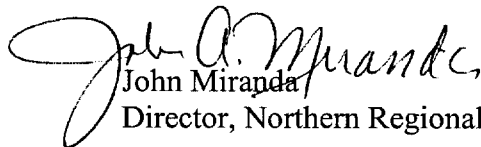
Dockets Management Branch (HFA-305)  
Food and Drug Administration  
12420 Parklawn Dr., rm. 1-23  
Rockville, MD 20857

Dear Sir or Madam:

Within the time given for this purpose, I am submitting the comments from our specialists in the Caribbean Region to the draft of the "Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables".

We appreciate the opportunity of allowing us to contribute in this process and hope that the concerns of the Caribbean Countries are taken into consideration.

Cordially,

  
John A. Miranda  
Director, Northern Regional Center

97N-0451

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**COMMENTS TO THE DRAFT OF THE GUIDE TO MINIMIZE MICROBIAL FOOD SAFETY  
HAZARDS FOR FRESH FRUITS AND VEGETABLES**

The Inter-American Institute for Cooperation on Agriculture (IICA) would like to present the following comments on the draft guidelines proposed by the Food and Drug Administration and the U.S. Department of Agriculture on the above topic.

The comments represent the opinion of our specialists in the Caribbean Region.

**General Comment**

The guide is comprehensive and should be useful in minimizing any potential risk of microbial contamination of fresh produce. However, there is a concern that these guidelines could disrupt trade if they ever become mandatory.

**Water Quality**

World Health Organization's Standard for potable water should be taken into consideration and more reference made to them so duplicity is avoided and compatibility or harmonization of norms are facilitated when implementing the guidelines by other countries.

**Traceability**

The ability to identify the source of the product should include the planting material, taking in consideration that the illnesses associated with sprouts have been attributed to contaminated seeds.

**The need for Equivalence and Coordination**

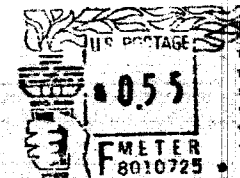
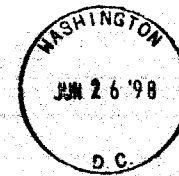
Exporters of Caribbean produce and food products to Europe and the United States should not be required to implement dual systems. It must be emphasized that exporters of Caribbean produce and food products to Europe would need to conform to the Codex Alimentarius HACCP regulations and eventually the wider issue of developing and implementing quality management systems.

We all should be working on one system that folds in multilateral recognized authorities like the Codex Alimentarius Commission.

**Implications for the Caribbean**

These Guidelines will be very difficult to implement, particularly by small producers. Taking as an example, the recommendations for water quality requires adequate infrastructure and support services for monitoring and testing which may not be available to small producers. Additionally, an adequate supply of potable water may not be available to small-scale producers for irrigation purposes.

In response to previous comments on international implications and the need for a "level playing field" to encourage fair trade between foreign and domestic producers, FDA noted that "agencies of DHHS, USDA and EPA work directly with many foreign countries to better ensure... that foreign exports meet US standards, and to enhance the food production system and regulatory oversight infrastructure. As resources permit, these agencies also provide technical assistance to help correct deficiencies in production practices and foreign monitoring and enforcement programs" (Addendum B. 5.). The Caribbean would appreciate any technical and or financial assistance the United States has to offer to producers in implementing these guidelines to ensure the microbial safety of fresh produce exported to the U.S.



Technical Cooperation Agency  
in the United States

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