



International Fresh-cut Produce Association

June 29, 1998

Dockets Management Branch
Food & Drug Administration
12420 Parklawn Drive, Room 1-2356 '96 JUN 30 P1:55
Rockville, MD 20857

SUBJECT: {Docket No. 97N-0451}
Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables, Federal Register, April 13, 1998

Dear Sir or Madam:

This letter is sent to you on behalf of the International Fresh-cut Produce Association (IFPA) which is the trade association that represents and provides technical assistance to commercial suppliers of fresh-cut produce, as well as companies affiliated with the fresh-cut industry, including equipment manufacturers, service providers and retail purchasers of fresh-cut produce. The association submits the following comments on the document noted above:

The IFPA has worked over the past six years to identify practices that could enhance the safety of fresh-cut produce as it is cut and packaged in processing facilities around the country. The Association has published the "Food Safety Guidelines for the Fresh-cut Produce Industry," currently in its 3rd edition, and has worked hard to disseminate this information to the industry. In the past year, we have also worked in partnership with the Western Growers Association (WGA) in Newport Beach, California to compile "The Voluntary Food Safety Guidelines for Fresh Produce" to minimize microbial contamination of the produce during the growing and harvesting operations.

Thank you for providing the opportunity to comment on the contents of the "Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables" recently submitted for public comment. We agree with the comprehensive federal guidance document as it includes many of the recommendations found in the IFPA/WGA guidelines but we would like to point out a few things that need further clarification by the agencies responsible for the document.

In general, the guidance is the first step to address the President's Food Safety Initiative for produce and it is hoped that the guidance would not evolve into regulations for the produce industry. As guidance, the information can be applied, tested and studied so that the best practices may be identified and the guidance updated accordingly. Regulations for best agricultural practices would be difficult to update in a timely fashion and burdensome to an industry that is so diversified and has only recently been identified as needing further examination for the risk and incidence of illness-causing microorganisms associated with fresh produce.

This industry has also shown a concerted effort to address its agricultural

97N-0451

CHAIRMAN OF THE BOARD
LEONARD BATTI
TANIMURA & ANTLE, INC.

VICE CHAIRMAN
WALTER STRICKLAND
STRICKLAND PRODUCE, INC.

SECRETARY/TREASURER
LORRI KOSTER
MANN PACKING COMPANY, INC.

PAST CHAIRMAN
GREG FLOOD
GRIMMWAY FARMS

PRESIDENT
EDITH GARRETT
IFPA

DIRECTORS

GRAHAM ALEXANDER
GEEST-BOURNE SALADS, LTD.

MANNY CASQUILHO
PACIFIC PRE-CUT PRODUCE CO., INC.

MARK DE MICHAELIS
STATE GARDEN COMPANY

KELLY DIETZ
VERDELLI FARMS, INC.

STEVE GILL
GILLS ONIONS

GARRY GRANGER
KMB PRODUCE/FRESH ADVANTAGE

MATTHEW KING
DIXON TOM-A-TOE CO., INC.

NANCY NAGLE
DOLE FRESH VEGETABLES CO.

ROBERT STEELE
INDIANAPOLIS FRUIT COMPANY

LEO ZANONI
ASGROW VEGETABLE SEEDS

C82

1600 Duke Street
Suite 440
Alexandria, VA 22314
703.299.6282
703.299.6288
www.fresh-cuts.org

own guidelines as mentioned earlier. Time is needed to analyze the effectiveness of the measures taken in various operations to reduce the risk of microbial contamination before best practices can be positively identified for a checklist approach to growing safe produce.

As noted in the Guidance, while there are "...health benefits associated with regular consumption of fresh fruits and vegetables...Evidence of the incidence and prevalence of foodborne infection from fresh produce are unavailable" (Page 3). The federal government should continue to help the produce industry encourage consumers to eat more produce. We think the agencies also need to be committed to identifying the real risk associated with the consumption of fresh produce so that the industry and the American public can make appropriate judgements about their food and its preparation.

Definitions: The definition of "fresh fruits and vegetables" also includes fresh-cut produce. Fresh-cut produce operations already fall under the established regulation for Good Manufacturing Practices (GMP) found in the Code of Federal Regulations (CFR) and all other regulations that apply to processed foods. Recent FDA inspections of these facilities around the country has reinforced this regulatory status. Is this definition saying that fresh-cut facilities are more appropriately covered under this guidance document now? We do not think that is the case. Is this definition trying to distinguish the difference between fresh-cut produce packaged in the field or agricultural operation and the fresh-cut produce that is manufactured in state-of-the-art processing facilities? Perhaps this Guidance is directed at packinghouses and other non-processing environments where produce is packaged which should be clarified. Many of the fresh-cut processing operations are found in metropolitan areas far from any growing operations and are not associated with agriculture so this guidance would not be directed at them. This definition is unclear as it stands.

Under "Good Management Practices" the definition includes Good Manufacturing Practices for a processing/packing environment. Since there are established GMPs in federal regulations already, then GMPs should always mean GMPs and they should be referenced here. If this is the case, does this current definition mean that packinghouses should be complying with the GMP regulations found in the CFR?

The definition of "sanitize" includes "food contact surfaces" which is defined to include agricultural equipment, but in the body of the document the term "disinfect" is used under Section IV., C, 2.2 Equipment Maintenance and Section IV., C, 2.2 Equipment Maintenance for agriculture equipment. What is the definition of disinfect? If it means the same thing as sanitize, the agricultural equipment and even some of the packinghouse equipment is not made of materials that could withstand the harsh chemical sanitizers necessary for a 5-log reduction of microorganisms, and most of it doesn't even come into contact with the produce. Some clarification and consistent use would help in the use of these terms.

Specific Recommendations For All Sections:

1) There seem to be several areas that need further research before definite recommendations can be given. For the sections on Irrigation Water, Manure Management and Traceback the federal government needs to make every effort to place necessary funds and manpower to study these subjects to get the necessary answers brought up in the discussion. Perhaps there are ways for

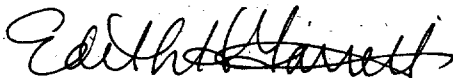
the produce industry to help identify the areas of greatest need.

2) It is always difficult to identify employees that are ill unless they exhibit overt symptoms. In general, employee hygienic practices are difficult to monitor so perhaps more emphasis on training could achieve greater results than relying on management to identify ill employees or unwashed hands. Clearly, more guidance is needed in the area of employee hygiene and the different levels of compliance necessary in the produce industry. What could work well in the processing facility could be burdensome in the field operation.

3) The transportation part of this business is frequently operated by companies not in the produce industry. The transportation section in the guidance seems to assume that the produce companies will be able to address the sanitation of these trucks, but that may not be the case. We hope that this guidance could reach out beyond the produce companies' trucks to include all the trucking companies that may haul produce. Are there other regulations for transporting food that could be cited here? Is there a plan to make this information available to the trucking industry?

We have tried to keep our comments focused on areas that will affect the fresh-cut produce industry and want to thank you for the opportunity to comment on the Guide To Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables. Please do not hesitate to call me at 703-299-6282 if you have any questions or need clarification on any of these comments.

Sincerely,



Edith H. Garrett
President

International Fresh-cut Produce Association
Duke Street, Suite 440
Arlington, Virginia 22314

V/A
H METER 533495

FIRST CLASS MAIL

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