



FLORIDA FARM BUREAU FEDERATION

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June 26, 1998

Documents Management Branch (HFA- 305)
Food and Drug Administration
12420 Parklawn Dr. Rm. Attn.: 1-23
Rockville, MD 20857

1559 '98 JUL -6 A9:56

RE: Comment on *Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables*

The Florida Farm Bureau Federation would like to submit comment on behalf of its 129,000 members regarding the President's new Food Safety Initiative. The State of Florida supplies the United States over half of its summer fruits and vegetables. Our members believe that the implementation of the Food and Drug Administration's "Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables" will serve as *de facto* regulations for the growers of Florida. Although the standards set forth by this guide serve as voluntary guidelines to increase food safety, they may become mandatory as buyers of fresh products require compliance. Florida growers cannot compete in a global market with the expense the current guidelines inflict. We present to you the following policies:

- 1. Any FDA effort should focus on education.** Contamination problems have occurred in the past primarily from improper sanitation and hygiene at the retail and household level. Correcting problems at these levels are best done by educating retailers at both supermarkets and restaurants on management practices that prevent contamination. Educating the general public on food safety is necessary as well. In most of today's school systems, there is no longer an education program in that teaches basic "home economics". In the past, most households contained someone who stayed home and prepared meals in the proper manner by washing food products and cooking foods at the correct temperatures and times. Yet in today's hectic society, that well-prepared meal has been replaced by fast-food restaurants or microwavable products.
- 2. New regulations are unnecessary.** Farmers are already "voluntarily" adopting new practices which prevent and reduce the incidence of microbial contamination.
- 3. Farmers share the concern over microbial contamination.** It is critical that we make every effort to ensure the safety of our food supply. However, FDA seems to be rushing to regulation even before its own advisory committee "National Advisory Committee on Microbiological Criteria on Food" has issued its white paper and recommendations on what should be done. Farm Bureau supports using the best science before making policy decisions affecting every U.S. fruit and vegetable producer. FDA seems to be unwilling to wait for the science.

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4. Florida Farm Bureau is concerned that any proposal that places regulatory requirements on growers in other countries will be interpreted by them as a non-tariff trade barrier. Inspections at the border will be interpreted similarly. If the U.S. imposes requirements on growers in other countries, then expect other countries to place the same type of requirements on U.S. growers.

5. Sanitary and phytosanitary (SPS) requirements or "guidance" should be the same for foreign farmers as what is required of U.S. farmers. Currently, no U.S. agency has the authority to inspect foreign farms for sanitary purposes unless there is believed to be a problem with their products. If a foreign country or farm plans to export their product to the United States, then they should hold a "certificate of sanitation" after being inspected by U.S. authorities should any guides or regulations be implemented on U.S. farmers. Inspections made on foreign farms should hold the same guidelines as what is placed on our own farmers such as, water quality, labor conditions, and product holding and packing facilities.

The FDA proposal has no clear policy goals except to place expensive and impracticable guidelines that will soon become subject to regulation. When all this is implemented, what are the public health benefits? This proposal is no different. Will this proposal eliminate all sources and incidents of contamination? Unfortunately, FDA can not answer that question because, no regulatory scheme or guidance will prevent contamination from willful misconduct, which current law already covers. It doesn't matter what type of regulatory apparatus anyone builds if someone is willing to skirt the law if accidents occur.

The one-size-fits-all approach will not work. The U.S. produce industry raises and handles hundreds of different commodities grown under a variety of conditions. Developing a single regulatory scheme may work for some commodities, but not for others. It is clear from the guidance document that it was prepared by regulators completely unfamiliar with farming practices and the uniqueness of the U.S. fresh produce industry.

Thank you for this opportunity to offer our comments.

Sincerely,

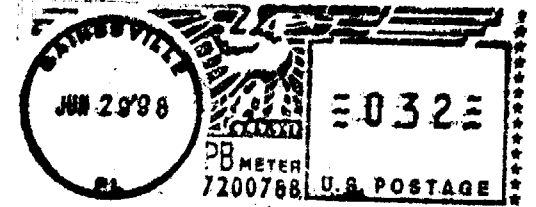


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