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Testimony of

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Congressional Testimony on Produce Food Safety

Chairman Lugar, thank you for this opportunity to testify before the Senate Committee on Agriculture, Nutrition and Forestry. I am here today on behalf of the United Fresh Fruit and Vegetable Association, as their Vice President of Scientific and Technical Affairs. Through my career that has been focused on food safety, I have gained extensive management and technical experience with both the production and handling of fresh fruits and vegetables.

The United Fresh Fruit and Vegetable Association (United) is keenly interested in the topic of food safety. Over 1,100 member companies and organizations make up United, an association that was founded in 1904. United is the national trade association that represents the interests of producers, wholesalers and distributors of commercial quantities of fresh fruits and vegetables. Our members take very seriously their responsibility to provide consumers with safe, high quality, nutritious produce.

I want to emphasize at the outset of my testimony that fresh fruits and vegetables are remarkably safe products. Despite the recent attention that produce safety issues have received, United is convinced that alarming reports by the media and the fears of some public health officials far

exceed the actual risks associated with the consumption of fresh fruits and vegetables. The evidence indicates that in the majority of cases, when the consumption of fresh fruits and vegetables has resulted in an outbreak of illness, the cause is often related to improper handling or cross-contamination with other potentially hazardous foods during food handling and meal preparation. Nonetheless, United is committed to enhancing the safety of produce and we welcomed the publication of Food and Drug Administration (FDA) guidance. We recognize that growers, packers, shippers and other handlers play an important role in assuring the safety of produce and we are presently using FDA's guidance to help prevent or minimize potential microbial hazards.

In the remainder of my testimony, I will turn to the questions specifically posed by the Committee.

Is microbial contamination the most significant threat to our food safety system?

It is the belief of the U.S. food safety agencies that microbial contamination is the most significant threat to our food safety system. United believes that fresh fruits and vegetables are consistently safe to consume, but we do share the belief that microbial contamination is far more a significant threat than chemical or physical contamination to the safety of the produce industry. The regulated and responsible use of agricultural chemicals in the produce industry is well documented year after year in U.S. federal and state governmental surveys of pesticide residues and pesticide use reporting of both domestic and imported fruits and vegetables. However, a risk or hazard-based food safety program should not neglect potential chemical and physical contamination.

What is the value of the Hazard Analysis and Critical Control Points (HACCP) approach to food safety in addressing microbial contamination?

It is widely accepted among food safety professionals that prevention of microbial hazards is far more effective than trying to ascertain and verify the safety of food after its been produced and handled. Prevention is the core element of HACCP.

The HACCP concept is being promoted as an improved procedure for the management of food safety. The HACCP concept is relevant to all stages throughout the food chain from growing, harvesting, processing, manufacturing, distributing, and merchandising to preparing food for consumption. However, certain points in the food chain are better suited to the application of the HACCP principles. We have recognized that certain segments of the produce industry benefit significantly from the development and implementation of HACCP programs, i.e. fresh-cut produce, fresh juice, and sprouts. Unfortunately, in the growing, harvesting and packing of fresh fruits and vegetables an actual HACCP program can most often not be implemented because a critical control point can not be identified or due to the lack of control measures, such as wildlife or climatic environmental conditions. However, the use of certain HACCP principles such as the hazard analysis can be very helpful in identifying potential hazards and/or practices that need improvement.

In general, the produce industry has found more value in the adoption of Good Agricultural Practices (GAPs) and Good Manufacturing Practices (GMPs) in addressing microbial contamination in the growing, harvesting and packing of fresh fruits and vegetables. In October 1998, FDA and United States Department of Agriculture (USDA) published a guidance document which has been used by growers and packers for the identification of potentially significant microbial food safety risks and appropriate measures to prevent or minimize the occurrence of microbial hazards in produce through the use of GAPs. This document has captured the attention of governments worldwide. In fact, there is keen interest in understanding and using, where possible, the recommendations contained in the guidance among all our major trading partners.

What are the barriers to the development and implementation of new technologies and tools to detect, prevent and reduce microbial contamination?

The current federal approval system is slow to adopt new technologies that can improve food safety due to potential for harm if inadequately evaluated. In some cases, there is little economic incentive to develop or adopt new technologies if it appears that regulatory agencies and/or consumers will not accept it, i.e. irradiation.

Basic understanding and research about the epidemiology, ecology, and molecular mechanisms involved in the array of pathogens confronted and the control procedures needed at the farm level require a larger investment than currently exists. There is no nationally coordinated scientific research agenda among all agencies involved in food safety that stems from a unified mission or centrally focused leadership. This indicates a significant lack of adequate integration of research efforts among federal and state agencies. Federal, state, and local authorities must work with varied amounts of resources, skills, and legal authority that are often inadequate to support a science-based system.

Education of food handlers throughout the farm-to-table continuum is an important component or tool in the prevention or reduction of microbial contamination. As in the areas of food safety research, appropriate funding of grassroots food safety education campaigns for food handlers do not currently exist. Education efforts can be enhanced by private sector efforts, but should be primarily funded through federal and state agencies and institutions.

Are changes needed in the food safety system to aid in the detection, prevention and reduction of microbial contamination?

An effective food safety system must be supported by funding adequate to carry out its major functions and mission which is the public's health and safety. Food safety in the United States lacks allocation of funding based on science and sustained political support.

Also, federal, state, and local agencies should dedicate a significant portion of its resources in preventing food safety problems, rather than dealing with them after the fact. In other words, these agencies must develop and initiated food safety programs that are proactive versus reactive.

Conclusion

I hope the Committee will realize that we cannot rely exclusively on federal and state agencies to assure the safety for fresh fruits and vegetables. In the end, those who actually grow, handle and market the produce that we consume are the same people on whom we must rely to assure the safety of these products. The produce marketplace is highly intolerant of unsafe food and will react swiftly and negatively to outbreaks of foodborne illness. Today, grocery retailers and restaurant operators routinely ask their produce suppliers what measures have been implemented to assure safety. The produce industry has made great strides here and abroad to identify potential sources of microbial hazards in fresh fruits and vegetables, and United's members are willing to implement prudent measures to prevent problems.

However, the safety of the food system could be further enhanced by increasing the allocation of funding and resources for research and education based on sound science and demonstrating a more coordinated effort among federal, state, and local agencies.

Thank you for this opportunity to testify. I look forward to answering your questions.