



November 25, 2008

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, MD 20852

Re: Docket No. FDA-2008-N-0455

Dear Sir or Madam:

The United Fresh Produce Association appreciates the opportunity to respond to FDA's request for comments on potential revisions to the 1998 *Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables* (GAPs).

The 1998 GAPs guidance has served the fresh produce industry well. In the decade since its publication by FDA, it has formed the basis of dozens of food safety educational and auditing programs. Its effectiveness is also apparent in the safety of the vast majority of fresh produce commodities that have never been linked to a foodborne illness. While we agree that the guidance can be updated to incorporate learnings from the 10 years since it was written, any changes should not be considered lightly. FDA has asked important questions in the Federal Register notice, and the answers to those questions must be considered across the diversity of commodities, growing regions and growing practices that make up "fresh produce".

United Fresh Produce Association has been actively soliciting input from our member companies and allied associations. However, the industry is still dealing with the impact of the *Salmonella* Saintpaul outbreak linked to fresh produce this summer, as well as the harvest season that much of the U.S. fresh produce industry experiences this time of year.

Therefore, we respectfully request that FDA extend the comment period for 90 days (until March 31, 2009), so that the industry can provide the carefully considered answers and data that FDA has asked for.

United Fresh Produce Association is the pre-eminent trade association for the produce industry in managing critical public policy issues; shaping legislative and regulatory action; providing scientific and technical leadership in food safety, quality assurance, nutrition and health; and developing educational programs and business opportunities for members to better meet consumer needs for increased consumption of fresh produce.

Founded in 1904, United Fresh represents the interests of member companies from small family businesses to the largest international corporations throughout the global fresh produce supply chain, including growers, shippers, fresh-cut processors, wholesalers, distributors, retailers, foodservice operators, industry suppliers and allied associations.

Sincerely,

A handwritten signature in black ink that reads "David E. Gombas". The signature is written in a cursive style with a large, stylized "D" at the beginning.

David E. Gombas, Ph.D.
Senior Vice President Food Safety and Technology

Cc: Dr. Michelle Smith, FDA CFSAN
Dr. Nega Beru, FDA CFSAN
Dr. Stephen Sundlof, FDA CFSAN
Dr. David Acheson, FDA