United Fresh Produce Association
Food Safety & Technology Council Meeting
Hyatt Regency, Washington DC
September 8, 2014

Draft Minutes

Council Members Present:
Bob Elliott, Sunkist Growers, Chair
Roger Becker, Gold Coast Packing
Michael Bentel, J & J Family of Farms
Sally Blackman, CPMA
Daniel Botts, FFVA
Jim Brennan, SmartWash Solutions
Donna Lynn Browne, Naturipe Farms
Willette Crawford, Ruby Robinson
Gray Drohan, Junction Solutions
Thomas Fenimore, GlobalG.A.P North America
John Freed, Syngenta
Scott Grow, G.O. Fresh
Valerie Hannig, The Oppenheimer Group
John Headrick, Monsanto
Peter Hill, Alpine Fresh
Joe Holt, Earthbound Farm
Lance Jungmeyer, FPAA
Karan Khurana, Pulse Instruments
Tom Lovelace, McEntire Produce
Sunny Luo, USDA ARS
Donald Mayfield, Cabbage, Inc.
Drew McDonald, Church Brothers
Bob Mills, The Harbinger Group
Gail Murray, Disney Consumer Products
Beth Oleson, GFVGA
Courtney Parker, Chiquita Brands
Bill Pool, Wegman's Food Markets
Walter Ram, The Giumarra Companies
Sam Schlagetter, Freshway Foods
Aaron Schneider, Dole Fresh Vegetables
Mark Seetin, U.S. Apple Association
Gurjit Shergill, Taylor Farms
Brian Zomorodi, Ready Pac Foods

United Fresh Staff:
David Gombas
Erin Grether
David Durkin, OFW Law

Guests:
Samir Assar, FDA CFSAN
Annemarie Buchholz, FDA CFSAN
Jane DeMarchi, ASTA
Rick Dunkle, ASTA
Jacob Guth, CCOF
Cynthia Klein, Sun World International
Liz Meitus, Meritech
Blane Seley, Dole Fresh
Marshall Sherman, Walter P. Rawl
Steve Warshawer, Wallace Center
Eric Wilhelmsen, ATP

Council Members Absent:
Walt Armijo, Lighthouse FS&Q
Megan Arnold, C.H. Robinson Worldwide
Stanley Bailey, bioMerieux Industry
Tony Banegas, Ready Pac Foods
Geri Barone, Professional Food Safety
Ed Beckman, Certified Greenhouse Farmers
DeAnn Benesh, 3M Food Safety
Rod Bernard, Southern Specialties
Ian Bessell, Birko
Samantha Bierschwale, Lipman
Michael Bledsoe, Village Farms
Abram Bowman, Deerpoint Group
Barbara Braden, organicgirl
Jeffrey Brandenburg, The JSB Group
Amanpreet Brar, Raley's Family of Fine Stores
Hap Carr, Titan Farms
Edward Casey, Ocean Spray Cranberries
Megan Chedwick, Church Brothers
Chris Christian, California Strawberry Comm.
Cliff Coles, California Microbiological Consult.
James Cranney, CA Citrus Quality Council
Will Daniels, Earthbound Farm
Suresh Decosta, McDonald's
Matt Demma, KFC Corporation
Amy Duda-Kinder, A. Duda & Sons
Chris Dzuik, H-E-B
Mario Estrada, Markon
Thea Eubanks, organicgirl
Harold Ewell, N2N Global
Ebrahim Firoozabady, Del Monte Fresh
Daniel Flores, Fresh From Texas
Steve Foster, Wholesale Produce Supply Co.
Lisa Fuentes, The Nunes Company
Micah Fuson, Apio
Tom Gautreaux, Maxwell Chase Technologies
Hank Giclas, Western Growers
Bob Gravani, Cornell University
Mark Greever, Locus Traxx

John Gurrisi, Chiquita Brands
Margaret Hardin, IEH Laboratories
Heidi Hau, Ecolab
Scott Horsfall, California LGMA
William Hurst, University of Georgia
Michael Jantschke, Pro*Act
Beverly Kempf, Club Chef
Justin Kerr, Factor IV Solutions
Andrew Kesler, McDonald's
Jeanna Kilmer, Silliker
Ozgur Koc, Crunch Pak Sliced Apples
John Kolenski, The Kroger Company
Greg Komar, NSF Agriculture
Mahipal Kunduru, McDonald's
Sharan Lanini, Chiquita Brands
Jorge Leyva, MexBest
Jim Llano, Castle Rock Vineyards
Steven Lyon, Chick-fil-A
Bridget Lyons, Taylor Farms
Rex Martin, Syngenta
Amanda May, Paramount Citrus
Michael Menes, True Organic Products
Clarisa Molina, Ser-Ka Solutions
Bob Morrissey, National Watermelon Assoc.
Gurmail Mudahar, Tanimura & Antle
Ernesto Nardone, N2N Global
Jerry Noland, Safeway
Elis Owens, Birko
Heena Patel, SCS Global Services
Sean Picquelle, SP Food Safety Consulting
Chris Polito, Yum! Brands
Joshua Porbeni, Club Chef
Gale Prince, Your Food Safety Coach
Jeanne Raede, Gills Onions
Keith Refsnider, Driscoll's
Matt Rekeweg, Dow AgroSciences
Eric Ritchie, McCain Foods USA
Jim Robbins, Wm. Bolthouse Farms
Michael Roberson, Publix Super Markets
Nikki Rodoni, Measure to Improve
Joan Rosen, JC Rosen Resources
Mansour Samadpour, IEH Laboratories
Kim Snyder, Monterey Mushrooms
Brian Stepien, Growers Express
Stacy Stoltenberg, Dupont Qualicon
Trevor Suslow, University of California, Davis
Lori Tansey, Chiquita Brands
Hilary Thesmar, Food Marketing Institute
Jim Topper, Neogen Corporation
Steve Tripp, Pacific International Marketing
Angela Valadez, Publix Super Markets
Kari Valdes, Taylor Farms
Tony Valenzuela, Naturipe Berry Growers
Richard Varley, KiVar Chemical Technologies
Jon Wall, North Bay Produce
Matt Warren, Walter P. Rawl & Sons
Robert Whitaker, PMA
Tim York, Markon
Thomas Young, Young Appraisal & Consulting
Bob Ziel, McEntire Produce

I. Meeting Called to Order

Council Chair Bob Elliott welcomed the attendees and asked for self-introductions. The Council was reminded of the United Fresh antitrust guidelines. The Council approved the minutes of the June 2014 Council meeting without change. The agenda was approved without change.

II. Safe Food for Canadians Act Regulations

David Durkin, OFW Law and United Fresh counsel, updated the Council on the Safe Food for Canadians Act and pending regulations. The Act received "Royal Assent" in 2012. Unlike the US, Canada published an Overview of Proposed Regulations before published proposed rules; the comment period on the Overview had closed August 29, 2014. Proposed regulatory language was expected to be pre-published in Fall 2014, followed by 75-day formal consultation period. Proposed regulations are expected to be formally published mid-2015, with staged implementation 2015 – 2017.

According to the Overview, regulations are expected to cover:

- License requirements, including for importers. A regulation would extend business licensing beyond the 9 sectors currently under CFIA regulations to all food types. The proposed license would be valid for two years, for a fee of approximately CAN$250. Similar to US facility registration, the license could be suspended, making it illegal to sell food.
- Traceability requirements, which would follow the Codex Alimentarius standard of "one step up, one step back", similar to the US. Traceability information would need to be provided electronically upon CFIA request, in plain French or English text and in a format that can be imported and manipulated by standard commercial software. The information would need to be accessible in Canada; this would also apply to imported foods.
- Food safety requirements. Similar to US GMPs, these would cover seven key areas: 1) products and processes; 2) sanitation, pest control, sanitizers and chemical agents; 3) hygiene and competencies; 4) equipment and conveyances to be used in an establishment; 5) physical structure and maintenance of the establishment; 6) receiving, transportation and storage; and 7) investigation and notification, complaints and recall procedures
- Preventive Control Plan (PCP). Envisioned more like HACCP than the US proposed Preventive Controls, PCPs would include the 7 HACCP principles.
- Grade Standards, Labeling and Standards of Identity. Intended to streamline existing standards, no fundamental changes are expected.
- Dispute Resolution Corporation Membership. Similar to PACA. Membership would be required for buyers and sellers of fresh fruits and vegetables, including importers.

Donna Lynn Browne added that, as proposed, the importer of record must have a visible presence in Canada, and companies will not be allowed to ship directly from a different (non-base) country to Canada. Walter Ram added that there are many similarities to the FSMA rules, but some important differences; e.g. record retention requirements for 3 years versus 2 years by FDA. Sally Blackman shared that CPMA comments to the proposals are available on the CPMA website.

A proposed regulation detailing requirements for Preventive Control Plans for produce is expected in January.

III. FDA 2013 Cantaloupe Assignment

FDA CFSAN Produce Safety Staff Director Dr. Samir Assar and FDA's Dr. Annemarie Buchholz reported on this 2013 inspection and sampling assignment, which is now closed. The assignment was in response to two major outbreaks traced to fresh cantaloupe, where investigations revealed multiple findings of insanitary production, handling conditions, and practices in packinghouses. The industry was notified of the assignment through a "targeted letter" issued by FDA. Fewer than twenty facilities were visited, generally medium and large facilities, and most of those were registered with FDA. Assar noted that FDA did not have a good inventory of operations to visit, including a lack of physical addresses for non-registered facilities. Facilities were visited across the country, but not much in California where cantaloupes are typically field packed. Each facility was given a 48 hr notice before the visit.

Visits focused on packinghouse and equipment sanitation, worker health and hygiene, packinghouse melon dump operations, melon cooling medium, cooling delays and documentation and records.

Buchholz described some of the observations from the assignment that they found concerning. While some firms had no objectionable conditions, with packing equipment clean and in good repair, others had only partially cleanable food contact surfaces, some with residues visible on the packing line. Some handling lines were not washed and sanitized prior to each use. Some operations used sanitizing compounds without first using soap or any other cleaning compound to clean surfaces. Some firms had processing equipment that was not designed to be easily cleaned or sanitized. Some had painted or unpainted exposed wood food contact surfaces that were not cleaned routinely. Some had brushes on conveyor belts that showed signs of dirt and mud build up. Some stored product bins on the floor where employees and visitors walk. At one operation, a worker was observed carrying water from the floor onto the packing line on his/her shoes. While some operations had a pest control program in place, with no signs of pest intrusion, others had numerous flies in the packing areas.

Some operations had made changes to their programs after hearing about the cantaloupe-related outbreaks: some added environmental swabbing as a micro-testing program, some added sanitizing agents to their cleaning program, some replaced brush rollers on the processing line, and some changed their equipment sanitizer from chlorine dioxide to quaternary ammonia.

In regard to worker health and hygiene, Buchholz reported that, at some firms, worker practices seemed appropriate to avoid contamination and no adverse observations were made. However, in others, visibly soiled clothing was observed contacting washed cantaloupes and individuals did not wash their hands prior to entering the packing areas or touching washed cantaloupes.

In regard to dump tanks and melon cooling, Buchholz noted that most of the operations visited did not use dump tanks. When dump tanks were used, water was treated and monitored in various ways, but some firms were unsure as to at what level the sanitizer should be maintained.

Some of the other observations noted included: condensate from condenser units dripping onto cartons of packaged cantaloupes; dump tank water drained where it created a puddle of stagnant water; and culled cantaloupes also in the same area, acting as an animal attractant and could be a source of pathogens.

Finally, in regard to recordkeeping and traceability, FDA found that all firms had some product tracing mechanism in place.

Assar said that FDA may use this targeted letter approach in the future. No Form 483 was issued as a result of the assignment, but some operations were revisited and some 483s were issued. He also noted that multiplication of human pathogens on cantaloupe rind has not been well researched, so it is unknown to what extent such may have contributed to the outbreaks.

In response to a question, Assar noted that this assignment was different from the avocado assignment; for example, there were no facility visits for avocado. Avocado sampling was initiated because of a CDC report of illnesses linked to guacamole, Salmonella detections on avocado imports, and no domestic information.

In response to another question, Assar said that updated GAPs will be issued as draft guidance, as will Produce Safety implementation guidance. Both will be open for public

comment. However, FDA's first focus is getting the rule finalized, followed by guidance as soon afterwards as possible.

IV. Role of Seeds in Fresh Produce Food Safety

John Headrick introduced Jane DeMarchi, Vice President Government and Regulatory Affairs, and Dr. Rick Dunkle, both from the American Seed Trade Association (ASTA). DeMarchi told the Council that ASTA has a Food Safety Pathogen Working Group to address field and greenhouse planted seeds and human pathogens. The group has reviewed the literature on food safety related to seeds, developed ASTA position statements on seed safety and provided comments to FDA, and has a mechanism for rapid response if needed. DeMarchi noted this applies only to seeds for fruits and vegetables, and that seeds for sprouts are addressed separately by the seed industry.

ASTA has compiled an extensive bibliography of over 160 scientific papers that mention seed and which support claims that food safety risk of seed grown under field or greenhouse conditions is extremely low to non-existent. However, in response to some customers requiring seed lots to be tested for human pathogens, ASTA drafted a position paper: *ASTA Statement on Field and Greenhouse Planted Seeds and Human Pathogens*. Some of the key takeaways from that statement are that 1) existing data have not shown that human pathogens are transmitted from seeds to field or greenhouse grown fresh produce; 2) there is no significant value in requiring testing of seed lots for the presence of human pathogens and that such testing would not prevent future food illnesses emanating from produce; and 3) strict quality assurance and quality control procedures are applied to all seed production, and seed must meet product quality standards to be available for sale.

DeMarchi observed that United Fresh does not identify seeds as a food safety risk in either the Microbiological Testing of Fresh Produce White Paper or in the Harmonized Standards. FDA likewise does not include control of agronomic seed in its proposed Produce Safety rule. Because some ASTA members continue to report that customers are requiring seed lots to be tested for human pathogens, ASTA asked the Council to support their position paper with a white paper or letter that concludes that seeds are not a likely source of human pathogens in field or greenhouse production of fresh produce and that lot testing of seed for human pathogens is unnecessary. DeMarchi also asked that United Fresh distribute that white paper or letter to its members and customers, as appropriate.

The Council had some questions for DeMarchi, including the demarcation between sprouts, which are known to uptake pathogens, and field grown fresh produce. For example, what data exist on whether microgreens and baby leaf greens do or do not uptake pathogens from their seeds? Sunny Luo shared that their research indicates that microgreens can uptake pathogens, but the farther from the root, the less the potential for contamination. Gombas noted that the ASTA position paper may be self-weakening, by stressing the strong pathogen control measures in place for seeds; he said it seemed that ASTA was saying that controls were not needed because the seeds were controlled. Instead, he suggested that ASTA concentrate on data demonstrating that seeds are not a food safety risk, regardless of such controls.

The Council ultimately decided to table the ASTA request, concluding that this was not a focus or priority for the Council.

V. Harmonized Standards/ GAPs Survey

Erin Grether reported the results of a draft survey on the use and obstacles to use of the Harmonized Standards. An invitation to the Survey Monkey survey was distributed to members of the Council and committees of the Produce GAPs Harmonization Initiative. Between July 10 and September 2, 82 responses were received; 40 self-identified as buyers that require their fresh produce suppliers to have a 3rd party GAP audit, 31 as suppliers who are 3rd party audited at customers' request/requirement, and 10 as neither. Buyers were automatically directed to four buyer questions; suppliers were directed to five supplier questions; those who responded "neither" were directed to a "final comments" page and thanked for participating.

In response to the question "Does your company require GAP audits of some or all of your fresh produce growers?" 23 of 29 respondents said All, while the other six said Some. In response to the question "Does your company have requirements regarding which 3rd party audits are acceptable?" seven said No, but 22 said "yes, we have some restrictions". Some of the restrictions reported included: GFSI benchmarked audit scheme; government agency; approved reputable auditing company; from an approved Certification Body or an authorized audit list; Tomato Metrics; LGMA; audit using Harmonized GAP Standard; and company-specific requirements.

In response to the question "Does your company accept audits performed to the Harmonized Standards?" 12 responded "yes, with no restrictions or conditions", 11 said "yes, if performed within the restrictions detailed in Question2", three responded No, and three responded "Don't know/Unfamiliar with Harmonized Standards".

The final buyer question was "Do you have separate/different requirements for post-harvest operations (e.g. packinghouse, etc.)?" to which 17 responded No and 12 responded Yes. Some of the separate/different requirements reported included: company-specific for cooling and repacking and GFSI compliant for processing; Tomato Metrics and SQF; separate cooler and repacker assessment required in addition to Harmonized Audit. Grether noted that the survey did not distinguish between a buyer's own requirements or requirements based on subsequent customer requirements.

The first supplier question was "How many 3rd party GAP audits does your company expect to have in 2014 (does not include self-audits, customer-performed audits or visits or non-food safety audits, e.g., organic, worker welfare or sustainability)?", to which two of 20 said One, nine said 2-5, and nine said More than 5, one of which added "More than 100".

Of the 20 respondents, in response to the question "Do some/all of your customers require (check all that apply)", seven said "any GAP audit, no restrictions"; 17 said "any GFSI-benchmarked audit"; six said "a government performed audit"; three said "audit to the Harmonized Standards" and eleven said "additional customer-specific GAP/food safety standards". One respondent added that WalMart, Loblaw, Ahold, others require GFSI. Another added that "All EU countries, Australia, New Zealand, and Canada require a GFSI."

In response to the question "Will your customers accept an audit to the Harmonized Standards?" two said "yes, all will"; eight said "some will, some won't"; two said "none will" and eight responded "don't know/haven't asked". Some of the comments added by respondents included: "We support the harmonized standard - but this is not being required by our customers", "Some require GFSI and others like Costco will not accept USDA audit." and "All growers would prefer Harmonization audit!!!!The buyers request others especially GFSI. YUM is the only buyer not accepting Harmonization."

In response to the fourth supplier question "What is your impression of the Harmonized Standards?" 13 were somewhat (7) or strongly (6) positive, four were neutral/no opinion/unfamiliar with the Harmonized Standards, and three were somewhat (1) or strongly (2) negative. Two of the concerns added by respondents were "It added another audit, confused an already confused retailer and didn't simplify our lives at all" and "Annoyed it does not reduce the number of audits. It just adds another audit. One of our food safety reps says he stays away from it like the plague".

Gombas noted that, by piloting the survey with the Council and participants in the Produce GAPs Harmonization Initiative, responses were likely from the audience most supportive of the Harmonized Standards. Drew McDonald observed that it is important to avoid a perception of a hierarchy of auditors; e.g. that a lone consultant may not be as good as an auditor accredited to a GFSI-benchmarked scheme. He suggested that a subgroup of the Council help with improving the survey before it is sent out to a broader audience. He also suggested that the survey can be a good beginning for educating buyers and the industry on the Harmonized Standards specifically and audits in general.

Other suggestions for improving the survey included: Joe Holt – how many buyers are adding riders or limiting who can do the audit? Steve Warshawer – ensure that the survey questions keep separate the "what" (i.e., opinions about the Harmonized Standard) from the "how" (i.e., the audit process, including who can do the audit). Bob Mills – if a respondent finds fault with the Harmonized Standard, the survey should inquire what is concerning so that the Technical Working Group can consider it.

VI. FDA Proposed Rules – United Fresh Comments

Gombas reminded the Council that FDA had already published seven proposed rules and two additional proposals in compliance with FSMA, and United Fresh had convened working groups to develop comments to FDA for each. The Council had previously been briefed on United Fresh comments submitted to all except Intentional Adulteration, Sanitary Transportation and the Reportable Food Registry Advance Notice of Proposed Rulemaking (ANPR).

The proposed Intentional Adulteration rule states that it only applies to registered facilities (farms are exempt) and, among those, only applies to operations that have bulk liquid receiving and loading, liquid storage and handling, secondary ingredient handling, or mixing and similar activities. As such, it doesn't appear to apply to cooling, warehouse/distribution, packinghouse and repacking operations engaged solely in cooling, holding, handling, packing, repacking, packaging, labeling and shipping of raw, intact fresh produce. It may apply to fresh-cut operations, but fresh-cut working group members did not identify any objections to the proposed requirements other than that mitigation strategies must be left flexible to the operation.

The Sanitary Transportation proposed rule has been in development since 2005. It applies to shippers, receivers, and carriers engaged in transportation operations of food intended for consumption in the U.S. The rule proposes to cover vehicle design and sanitary condition, temperature control when needed for safety or spoilage, and written procedures and records of sanitary control. Primary issues identified by the working group for inclusion in United Fresh comments were: 1) the rule should not apply to intra-company transport of foods, even if using a third party carrier; 2) temperature control requirements should only apply to foods requiring temperature control for safety, not for quality, and so should not apply to transport of raw agricultural commodities; 3) there should be no exclusions for size

because it will exempt too many carriers and will create confusion of who becomes responsible; and 4) responsibilities must be clarified for atypical and local shipments, such as cross docking and less-than-load.

The Reportable Food Registry ANPR was published October 29, 2013; the comment period closed August 18. An ANPR is not a proposed rule; rather it is FDA's approach to gathering more information before deciding whether to publish a proposed rule. The ANPR was required by section 211 of FSMA, requiring FDA to develop consumer-oriented messaging on Reportable Foods, for posting at retail. In comments submitted to FDA, the working group agreed that consumer-oriented messaging should be available wherever recalled food is sold, including when the recalled food is a raw agricultural commodity, but only when it will help consumers identify if they have a recalled food (so, not at restaurants). The working group disagreed with Congress, saying that messages should be based on Class I recalled foods, not on Reportable Food Registry reports. Messaging should be kept brief and include the same information as a press release, and retail operations should have flexibility to post messaging where and how they think it will be most useful to consumers.

Based on an agreed to schedule set in federal court, FDA must publish final rules on the two Preventive Controls rules by August 2015, on Produce Safety, Foreign Supplier Verification Programs and Accredited Third Party Certification by October 2015, on Sanitary Transportation by March 2016, and on Intentional Adulteration by May 2016. After final rules are published, there will be a one year implementation period (two for Produce Safety and additional years for small and very small operations and for the Produce Safety water testing requirements) before the rules are enforceable, except for the Accredited Third Party Certification, which FDA can begin using immediately. The court deadlines did not include the High Risk Designation proposal or the Reportable Food Registry ANPR, and FDA has not published any next steps for either.

Gombas reminded the Council that all of the FDA proposals related to FSMA and the corresponding United Fresh comments are openly accessible on the United Fresh website's FSMA webpage.

VII. Council Priorities

Gombas reviewed some of the major accomplishments of the Council since 2007: initiation of the Harmonized Standards; the Audits Benchmarking Matrix; Food Safety Course Index; comments to the FDA proposals; and publication of the Best Practices for Garment Use in Fresh-cut Produce Plants, Microbiological Testing of Fresh Produce white paper, Guidance on Environmental Monitoring and Control of Listeria for the Fresh Produce Industry, and (soon) the updated Fresh-cut Food Safety Guidelines. With the exception of the Fresh-cut Food Safety Guidelines, all of these objectives have been completed.

Elliot asked the Council members to break into three groups and brainstorm what challenges face the fresh and fresh-cut produce industry and what objectives the Council should take on next.

When the groups reported back, there were several common themes:

- Develop a scientific rationale to support a non-zero tolerance for Listeria monocytogenes on raw agricultural commodities that do not support growth.
- Development of tools to support industry under FSMA regulations, e.g.:
    - Sanitation and sanitary design education for in-field, packinghouse, etc.

    - Process validation procedures for produce
    - Risk mitigations for water use in field
    - Transportation risks from field to Packhouse
- Follow and develop recommendations, as appropriate, on emerging issues; e.g., biotechnology and GMOs.

Other potential objectives arising from the brainstorming session included:

- Addressing inconsistencies in microbiological testing procedures and responses.
- Better working relationship CDC/FDA during an outbreak investigation; e.g., better information sharing with the industry during the investigation; providing industry resources to FDA/CDC on supply chain and distribution education, "safe" procedures for sharing data with FDA.
- Create a mechanism for sharing best practices; e.g., survey of current question/concerns of "what troubles you?"; review of current and new research that may have direct application; seed testing.
- Create a mechanism for communicating emerging issues (in some issues our trade groups seem to be the last to know; e.g. Cd in the soil; parasites; biotechnology).
- Building the future; i.e., the next generation of QA/Food Safety professionals – education, outreach, and program design.
- Consumer education: produce handling education for end users – what is out there, is it effective; assign resource teams for particular areas of FSMA; other areas of expertise testing; audits, SOPS customer questions.
- Monitoring and assessing the regulations resulting from the Safe Foods for Canadians Act
- Explore ways to get the Harmonized Standards palatable to customers, with or without GFSI
- Assist in harmonization of MRLs
- Without duplicating the Center for Produce Safety, Identify and communicate knowledge gaps for fresh produce research
- Foot bath guidance for coming from the field to the packhouse
- Updating Guidance: What to do when FDA knocks on the door
- Educating/communicating true risk to consumers
- Clarification on "zone" definitions for environmental monitoring, e.g., high care areas
- Guidance on equipment design for fresh produce use; identify current issues; build on existing books/commodities (it was noted that this objective is underway by PMA)
- Dry cleaning procedures for produce (learnings from baking)
- Equipment upgrading
- CPMA Consumer Fact Sheets, e.g., Fact Sheet on GMO
- Survey of the issues
- The Produce Safety Alliance is developing a course index; should United's Food Safety Course Index be replaced with a link to the PSA course index?

VIII. What Have You Heard?

A regular agenda item, Council members shared information that may be of general interest:

- Gale Prince informed the Council of a paper written by IFT on code dating of products; fighting food waste in the home, retail and foodservice. Blackman added that this is on CCFL agenda in October.

- Jim Brennan reported that an FDA teleconference was scheduled on the Cyclospora outbreak investigation in Texas.
- Brian Zomorodi informed the Council that a small *E. coli* O157:H7 outbreak linked to leafy greens was underway, and that CDC was involved in the investigation.
- Browne reported a news story of an antibiotic allergic reaction on blueberries. She noted that Naturipe does not use antibiotics on blueberries, but that some operations may use streptomycin and/or oxytetracyline.
- Gombas provided a brief update on the AOAC-United Fresh project on field sampling. He also said that FDA has reported that the only fresh produce item in this coming year's contracted testing by IEH Laboratories will be tree nuts. Finally, he notified the Council that the National Advisory Committee on Microbiological Criteria for Foods (NACMCF), on which he serves, was about to release papers on norovirus and on product testing recommendation for the Department of Defense.
- McDonald has observed that FDA was performing extensive sampling and testing of leafy greens from distribution centers. He was unaware whether this was being directed by CFSAN or a separate District effort. Gombas shared that CFSAN Deputy Director Roberta Wagner had told him that she was unaware of such an assignment.

Finally, Elliott noted that the Council now had over 120 members on the roster, but that some Council members have not participated in any way for at least the past 3 years. There are no procedures for removing members for nonparticipation, so he asked for Council opinion. The Council agreed that United Fresh should remove from the Council roster members who had not participated in some way (e.g., meeting attendance, participation in a Council project), but allow them to rejoin if they ask to and participate.

IX. Next Meeting

The next scheduled meeting of the Council will be Wednesday, January 14, 2015 during the Midwinter Leadership Forum at the La Quinta Resort in La Quinta CA.

Having reached the end of the agenda, the meeting was adjourned.