

December 7, 2018

TO: Dr. Stephen Ostroff, Dr. Stic Harris, CDR Kari Irvin, Dr. Jim Gorny
U.S. Food and Drug Administration

Cc: Dr. Ian Williams, Dr. Matt Wise
Centers for Disease Control and Prevention

We are writing to follow up on our letter to you of November 22, and repeat our plea to work with the agency on identifying the source of the recent outbreak.

We specifically refer to FDA's announcement yesterday:

Traceback information from four restaurants in three different states so far has implicated 10 different distributors, 12 different growers, and 11 different farms as potential sources of the contaminated lettuce. The information indicates that the outbreak cannot be explained by a single farm, grower, harvester, or distributor.

We highlight below the key question we asked in our November 22 letter for you to address:

- It is critical that industry understand the point of sale reported for verified illnesses so that we can use our business process sales channels to narrow the scope of potentially affected product. Given FDA's newly announced policy to list retail sales establishments that may have received affected product in recalls, we believe it is appropriate to share the point of sale establishments linked to illnesses. We do not need access to private records in order to be helpful using our knowledge of supplier/customer relationships to protect public health.

Given FDA's comments on the many potential paths through the supply chain, we urge you to allow us to help combine the business intelligence we can bring to understanding distribution patterns, buyer-seller relationships, etc. to assist in identifying a source. In this case, the same basic geographic pattern of illnesses – and the absence of illnesses in other areas – over three years is an important clue that can be married with business intelligence. With the tight geographic pattern of illness, there are likely business clues that can be gained from understanding where people consumed contaminated product.

We thank you for your consideration and respectfully ask for a formal response to this request. Thank you.

Sincerely,

Arizona Leafy Greens Marketing Agreement
California Leafy Greens Marketing Agreement
Florida Fruit and Vegetable Association
Grower-Shipper Association of Central California
Produce Marketing Association
United Fresh Produce Association
Western Growers
Yuma Fresh Vegetable Association
Yuma Safe Produce Council