

**Food and Drug Administration**

**Docket No. FDA-2008-N-0455**

**Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables; Requests for Comments and for Scientific Data and Information**

On behalf of the Northeast Organic Farming Association Interstate Council (NOFA-IC), comprised of the seven NOFA state chapter organizations (NOFA-NY; NOFA-VT; NOFA-NH; NOFA-MASS; NOFA-CT; NOFA-RI and NOFA-NJ) thank you for the opportunity to comment on the above-cited docket.

NOFA is one of the oldest organic farming associations in the nation with over 5800 members, along with 1,400 organic operations certified by USDA's National Organic Program. NOFA's small-scale family farms market a large portion of their products directly to consumers and to community retail establishments. Here in the East, organic food production is a rapidly growing and increasingly important component of our region's agricultural economy. NOFA has recently organized a "Leafy Greens Working Group" with regional farming organizations from Maine to Florida and we are further aligned with national organic and sustainable farming groups to address these questions.

NOFA welcomes the opportunity to provide comments regarding this food safety issue. However, due to the depth of the FDA questions as well as complexity of the issue as it specifically affects small-scale and organic farmers **we hereby request an extension of the comment period for an additional 90 days, to March 31<sup>st</sup> 2009.**

Food safety is a major concern of the NOFA organizations. However, along with other grassroots family farm and consumer farm-support organizations across the nation we are deeply concerned about the impacts of one-size-fits-all federal policies on small-scale farmers. We feel that a revised Guide should have several versions that take into account the relative risk of regional and local small scale marketing practices, as opposed to the inherent dangers of nationally distributed "fresh cut" bagged leafy greens production. We are also concerned that potential rulings may not take into account the proven environmental and health attributes of biodiverse organic farming practices that serve to protect against the microbial contamination of food.

NOFA is currently in the process of engaging its membership on appropriate-scale food safety practices; reviewing third-party audit verified HACCP farmer training models that are keyed to USDA organic certification standards and identifying regional researchers with the expertise to assess how organic protocols address these issues. All these important initiatives will take time - and therefore NOFA requests a 90 day extension.

Thank you,

Sincerely,

  
Steve Gilman  
NOFA-IC Policy Coordinator

Ruckytucks farm  
130 Ruckytucks Road  
Stillwater, NY 12170  
518-583-4613

12/30/08

FDA-2008-N-0455

01018 9 JAN -6 AM 1:41

C

12/30/08

I was unable to send this  
on Regulations.gov -

it kept coming up with  
a blank page  
on my mac/safari

Thank you,

Steve Cohen  
NOFA

NO. FA  
130 Archway Rd  
Stillwater  
NY 12170

ALBANY NY 122



Food + Drug Administration  
Division of Dockets Management HFA-305  
5630 Fishers Lane rm 1061  
Rockville,

Docket No.  
FDA-2008-N-0455-0001

MD

20852

