



December 15, 2014

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

RE: FDA-2011-N-0143- Revised “Foreign Supplier Verification Program (FSVP) for Importers of Food for Humans and Animals.”

To Whom It May Concern:

New York Farm Bureau (NYFB), the State’s largest general farm organization, appreciates this opportunity to provide comments regarding the revised “Foreign Supplier Verification Program (FSVP) for Importers of Food for Humans and Animals.” NYFB commends the FDA for issuing this Supplemental Notice of Proposed Rulemaking and are pleased to present our perspective from the farm level on the modifications to the initial foreign supplier verification rule.

Our farmers have a vital interest in how food safety is practiced, perceived and regulated. We believe that, while the U.S. food production system is among the best in the world, science-based, collaborative, improvement is always an important principle.

Food systems, by their nature, are biological and are not failsafe nor ever “zero risk.” However, recent improvements in reducing foodborne illness have occurred despite new challenges for food safety; such as changes in the typical American diet that include more imported foods and more food consumed away from home. The United States imports food from more than 150 different countries through more than 300 ports of entry. About half of the fresh fruits eaten in America are grown outside of the country, and these imports allow us to enjoy our favorite produce year-round. This exchange in food products permits a more varied and customized diet suited to today’s consumer preferences and permits our farmers and other food producers to sell their goods abroad. It also means that food safety requires enhanced attention to the global food supply, and **FDA must apply and enforce any new produce safety standards on imports in a manner similar to that for domestic producers.**

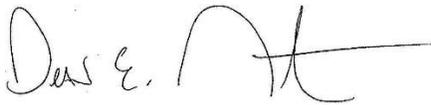
If not applied equally, our producers will be put at a competitive disadvantage. It is crucial that this rule is enforced internationally so our growers—already at an economic disadvantage due to labor costs, environmental regulations, higher tax and other business costs—don’t have another inequity added that makes them less competitive compared to imported products. With only 1 percent of imported food inspected when it enters the country now, it is difficult for us to understand how FDA will have the resources to ensure equal compliance in the U.S. and abroad. It is critical that FDA does not disadvantage domestic growers in favor of foreign growers where compliance is much more difficult to monitor.

It is a necessity that FDA have adequate human and financial resources to implement this rule. FDA must have sufficient personnel and systems in place to inspect importers and ensure that those importers

have and implement strong supplier verification programs and adequate resources ensure that these standards are being met on foreign farms.

Once again, thank you for the opportunity to submit these comments. New York farmers are committed to improving food and feed safety in a targeted, scientific, and risk-based manner; while ensuring that New York and U.S. farms are not put at a competitive disadvantage due to the inability to enforce rules on our foreign counterparts. We look forward to continuing our working partnership with FDA to promote the safety of the food and feed provided and utilized by our family farms.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean Norton". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Dean Norton
President