What’s up in the USA!
6 Points of Interest

10:15 – 11:15 Wednesday – 4/10/19
1.) US FDA published a **125-page** draft Guidance for Sprout growers:

- Right there you already know they’re in trouble. **US Growers are in trouble.**
- Then, there’s the title:
Compliance with and Recommendations for Implementation of the Standards for the Growing, Harvesting, Packing, and Holding of Produce for Human Consumption for Sprout Operations: Guidance for Industry

This is the title
• During last summer’s comment period, many comments were submitted.

• Bob and I alone submitted over 18 comments

• Many come under the categories of:

  – **The minutely prescriptive guidance.**
    • FDA defining a "grow unit"
    • and "a batch of typical size"
      – For sampling of SIW....
      – an impossible task;
      – trying to make guidance fair against human ingenuity
      – They were doing their best
Other Troublesome US Government Rules & Guidance

• **Time/Temperature Rule**

• **Corrective Actions for SIW Positives**
  – Discarding the entire lot of seeds after a single positive.

• **Seed Treatment.**
  – guidance still talking about 20,000ppm calcium hypochlorite soaks
2.) Time/Temperature Rule

  - (1) "Time/temperature control for safety food" means a FOOD that requires time/temperature control for safety (TCS) to limit pathogenic microorganism growth or toxin formation.
  - (2) "Time/temperature control for safety food" includes:
    - An animal FOOD that is raw or heat-treated;
    - a plant FOOD that is heat- treated or consists of raw seed sprouts, cut melons, cut leafy greens, cut tomatoes or mixtures of cut tomatoes that are not modified in a way so that they are unable to support pathogenic microorganism growth or toxin formation,
• 3.) Caudill Seed Co. has hired a lobbyist to help address the SIW corrective action:

  – “Discarding the entire lot of seeds after a single positive.”

  – This includes seed of the same lot being used by any other grower. A problem for both growers and seed suppliers.
• 4.) ISS has been investing in an organically approved seed treatment sanitizer from Neo-Pure

  – that will sanitize seed before shipping so that according to the US law

  – the growers who buy the seed will not have to perform a sanitizing step before sprouting
• 5.) Bob Sanderson continues to work to promote research on Competitive exclusion
  – with a mixture of organisms found in healthy sprouts
  – Inoculated onto clean seeds to out-compete any organisms that might recover on seed after treatment
  – Trials inoculating seeds naturally contaminated with generic ecoli show promising results in reduction of ecoli
6.) US SPROUT SAFETY TASK FORCE recently published the Document:

**US SPROUT INDUSTRY PRODUCTION BEST PRACTICES**

- Only 40 pages
- Written in sprout language
- Has all the information for growing safe sprouts
- Includes FSMA regulations for US growers
- There are links to the document on the ISGA web site
- There are links to the document on the IFSH web site
- IFSH recently sent out a press release announcing it to their industry database