

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 US FDA published a **125-page** draft Guidance for Sprout growers: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

- **2013 FOOD CODE: U.S. Public Health Service, FDA, 2013**
 - (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