

Food Safety Statement

ASTA

Phytosanitary Committee

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San Antonio, Texas

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Should Seed Be Tested?

- **Timeline of Industry**
- **ASTA Food Safety Statement**
- **What About Sprouts?**
- **Current Research**

Seed Industry Events 2006

- CSA Policy on seed testing (Oct. 12, 2006)
 - Focus on GAPs and GMPs
 - Testing unwarranted at this time
- S. Koike/T. Suslow letter against seed testing (Nov. 3, 2006)
 - Cited lack of seed association in spinach outbreak
 - High cost of testing and low benefit
 - Potential for false positives
 - Absence of standardize methods of analysis
 - Absence of valid sampling protocol

Seed Industry Events 2007

- ASTA Food Safety Workgroup formed (Jan. 24, 2007)
 - Address issues stemming from customer concerns
 - Dissemination of information and communication
 - Develop further knowledge of the issues
 - Continued monitoring of the issues
- ASTA-Veg. Tech Subcommittee letter of support for CSA (May 7, 2007)
 - Supported the CSA policy statement
 - Urged science-based regulatory decisions
 - Seed testing unwarranted at this time

Additional Seed Industry Events 2007

- ASTA-Veg. Tech Subcommittee literature search and database (Feb. 2007)
 - Initiated literature search and database development
 - After reviewing over 50 scientific articles no solid evidence that seed plays significant role.
 - Low levels of seed contamination
 - Sampling issues
 - Treated seed lowers level of detection

Seed Industry Events 2008

- ASTA Statement on Field and Greenhouse Planted Seeds and Human Pathogens (July 31, 2008)
 - Emphasized the low risk associated with seed
 - Science based research focused on greatest exposure to enteric pathogens entering the produce supply chain
 - Continued monitoring and reviewing seed production procedures
- CA Health Official Tours Seed Facility

Seed Industry Events 2010

- Commented on FDA Standards
- Updated ASTA Statement
- Monitor
 - Continue review and monitoring of the situation
 - Add new information to database
 - Quickly react if warranted to new techniques or developments
 - Communicate updates & pertinent insight to CSA , ASTA, or ASTA Working Group Members
 - As appropriate new information distributed to CSA members

Produce Research Symposium

June 23, 2010

- Center for Produce Safety Research Reports
- 11 Research reports, 3 Sessions
 - Survivability of *E. coli* in Field Conditions
 - Enhanced testing methods for pathogens in produce
 - Potential vectors for pathogen transfer during field production

Conclusions;

Pre Harvest assessment critical (7-10 days)

ID bacteria present on produce

Environmental conditions play a role

LGMA “no harvest metrics work”

Sprouts A Special Case

- Sprouts – a different story
 - Seed implicated as significant source of inoculum
 - Bacterial amplification step
 - CDHS/FDA Video available “Safer Processing of Sprouts”
(<http://www.dhs.ca.gov/fdb/PDF/FreshCutOrderform4.PDF>)
 - FDA (Oct. 27, 1999) releases Guidance for Industry: Reducing Microbial Food Safety Hazards for Sprouted Seeds

Supportive Information

- 1998 Guide to Minimize Food Safety Hazards for Fresh Fruits and Vegetables
(<http://www.fda.gov/downloads/Food/GuidanceComplianceRegulatoryInformation/GuidanceDocuments/ProduceandPlanProducts/UCM169112.pdf>)
- 1999 Reducing Microbial Food Safety Hazards for Sprouted Seed
(<http://www.fda.gov/Food/GuidanceComplianceRegulatoryInformation/GuidanceDocuments/ProduceandPlanProducts/ucm120244.htm#foot1>)
- 1999 FDA "Guidance for Industry: Sampling and Microbial Testing of Spent Irrigation Water During Sprout Production"
(<http://www.cfsan.fda.gov/~dms/sprougd2.html>)

Additional Supportive Information

- April, 2006 Commodity Specific Food Safety Guidelines for the Lettuce and Leafy Greens Supply Chain 1st Edition
(<http://www.fda.gov/downloads/Food/FoodSafety/Product-SpecificInformation/FruitsVegetablesJuices/GuidanceComplianceRegulatoryInformation/UCM169008.pdf>)
- 2008 Guide to Minimize Food Safety Hazards for Fresh Cut Fruits and Vegetables
(<http://www.fda.gov/Food/GuidanceComplianceRegulatoryInformation/GuidanceDocuments/ProduceandPlantProducts/ucm064458.htm>)
- 2009 AFDO Model Code for Produce Safety
(<http://www.afdo.org/Resources/ProduceSafety.cfm>)
- FoodSafety website (<http://www.foodSafety.gov>)
- Joint Institute for Food Safety and Applied Nutrition site
(<http://www.foodrisk.org>)

Recommendations

- **Adopt Statement**

*ASTA Statement on
Field and Greenhouse Planted Seeds and Human Pathogens
June 30, 2010*

- **Continue Monitoring**