



August 19, 2011

Division of Dockets Management  
Office of Budget and Program Analysis (HFA-305)  
U.S. Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Re: Food and Drug Administration, HHS  
Request for Comments - Preventive Controls for Registered  
Human Food and Animal Food/Feed Facilities  
Docket No. FDA-2011-N-0238  
*76 Federal Register 29767 (May 23, 2011)*

To Whom It May Concern:

We appreciate the opportunity to submit comments under the "Request for Comments – Preventive Controls for Registered Human Food and Animal Food and Animal Food/Feed Facilities", *76 Fed. Reg. 29767 (May 23, 2011)*. The Request for Comments was issued to assist the FDA in developing guidance on hazard identification and control measures with respect to human food or animal food/feed.

#### American Spice Trade Association

The American Spice Trade Association (ASTA) was established in 1907 to provide representation for the American spice trade. Its members include companies involved in all aspects of the spice trade – importing, growing, processing, and marketing at the wholesale and retail levels. On behalf of its members, ASTA works with federal and state regulators and legislators and assists its members in addressing a variety of technical issues to help members provide an adequate supply of safe and wholesome spices for their industrial, food service and consumer customers.

#### ASTA's Priority: Clean Safe Spices

The highest priority of ASTA and its members is providing safe spices to our customers, food manufacturers and consumers. This year, ASTA published *Clean Safe Spices, Guidance from the American Spice Trade Association* to empower the industry with information and tools to combat filth, microbial contamination and food borne illness. This document provides our members and the entire spice industry with comprehensive information so that they are better able to ensure that spices consumed in the U.S. are clean and safe. ASTA continues to dialogue with FDA to increase outreach and education through the supply chain and urges FDA to incorporate these methodologies.

ASTA and its members are committed to ensuring the safety of food ingredients and continue to support efforts to appropriately implement the Food Safety Modernization Act (FSMA) to strengthen and modernize our nation's food safety system. In crafting guidance relative to hazard identification and control measures for spices, ASTA urges FDA to insure flexibility and reminds the Agency that one size does not fit all. ASTA urges FDA to focus on setting appropriate goals and identifying desired outcomes while allowing the spice industry to apply the extensive, spice-specific expertise evident in its *Clean, Safe Spices* guidance report.

#### ASTA Requests the Adoption of its Guidance by FDA

In its request for comments, FDA states that it "is interested in making appropriate best practices relating to identified hazards and control measures for specific industry segments publicly available."<sup>1</sup> The attached *Clean Safe Spices, Guidance from the American Spice Trade Association* is submitted in response to FDA's call

<sup>1</sup> *76 Federal Register 29767 (May 23, 2011), pg 29768*

for information and provides the Agency with current best practices guidance that is specific to the spice industry. The Guidance incorporates expertise unique to spice industry manufacturing and production to ensure the safety of the spice supply chain and our membership strongly encourages FDA to adopt this document as a resource available in the public domain.

ASTA HACCP Guide for Spices and Seasonings

Another resource that will soon be revised to assist companies with compliance related to food safety is the ASTA HACCP Guide that is currently under review. ASTA first published the *HACCP Guide for Spices and Seasonings* in June 2003 to provide an analytical tool to the industry that “enables management to introduce and maintain a cost-effective ongoing food safety program.”<sup>2</sup> The Guide was updated in February 2006 and is about to undergo a new review to ensure it stays current with best practices and technologies and data available to identify and mitigate contamination risk throughout the supply chain. When the newly revised document is completed this fall it will be submitted to FDA. We welcome FDA's adoption and placement of the HACCP Guide for Spices in the public domain as another resource to assist in implementing food safety measures.

As noted previously, the *Clean Safe Spices, Guidance from the American Spice Trade Association* elaborates on five key recommendations including:

- Minimize risk for introduction of filth throughout the supply chain;
- Prevent environmental contamination, cross-contamination, and post-processing contamination during processing and storage;
- Use validated microbial reduction techniques;
- Perform post-treatment testing to verify a safe product;
- Test to verify a clean and wholesome manufacturing environment.

ASTA welcomes the adoption of these industry guidance materials to further assist in providing resources that may assist companies as they develop food safety plans.

ASTA appreciates the opportunity to assist FDA with FSMA implementation, including the provisions relating to preventive controls and hazard analysis. Thank you in advance for the opportunity to submit comments. We urge your consideration and are available to answer any questions that may arise during the deliberative process.

Sincerely,



Cheryl Deem  
Executive Director

Attachment: *Clean Safe Spices, Guidance from the American Spice Trade Association*

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<sup>2</sup> *HACCP Guide for Spices and Seasonings*, February 2006