



AMERICAN SPICE TRADE ASSOCIATION, INC.

1101 17th Street, N.W. • Suite 700
Washington, DC 20036 USA
Tel: 202-331-2460 • Fax: 202-463-8998
E-mail: info@astaspice.org
Web: www.astaspice.org

February 26, 2024

Jim Jones
Deputy Commissioner for Human Foods
U.S. Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

Dear Deputy Commissioner Jones,

The American Spice Trade Association (ASTA) congratulates you on your appointment as Deputy Commissioner for Human Foods at the Food and Drug Administration (FDA). We look forward to working with you in the years to come to enhance food safety and protect public health.

ASTA was founded in 1907 and is the voice of the U.S. spice industry in the global market. Our members include companies involved in all aspects of the spice trade – importing, growing, processing, and marketing at the wholesale and retail levels. Approximately 200 companies are members of ASTA, and these companies manufacture and market the majority of spices sold in the U.S. for commercial food manufacturing, food service, and consumer use. The highest priority of ASTA and our members is ensuring the supply of clean, safe spices to American consumers.

ASTA has been a steadfast proponent of the FDA since its formation and has been members of Alliance for a Stronger FDA since its inception. On behalf of the spice industry, ASTA has historically collaborated with FDA on a variety of issues, such as food safety, including in particular microbiological safety; spice standards; food fraud; chemical safety; and the definition of spices for labeling purposes. We look forward to continuing ASTA's positive and constructive relationship with the agency on issues related to spice safety, authenticity, and trade.

In recent years, ASTA's dialogue with FDA has focused on lead's presence as an unavoidable contaminant in the spice supply chain, as well as the importance of agency enforcement action to address instances of economically motivated adulteration. In connection with that dialogue, ASTA has requested that FDA 1) establish action levels for lead in spices, and 2) increase inspection and enforcement activities that focus on the risk of economically motivated adulteration in spices.

In the wake of the recent cinnamon applesauce incident, ASTA would once again like to initiate a dialogue with FDA on establishing action levels for lead in spices. Given the global nature of the spice supply chain and the ubiquity of lead in the agricultural environment, federal guidance on what constitutes reasonably achievable levels of lead in spices and herbs would promote public health and safety, create a uniform federal benchmark, and bolster consumer confidence in the safety of spices in the U.S. market. This is especially relevant as specific states are proposing their own action levels related

to lead in spices, in the absence of federal guidance. Specifically, ASTA supports federal action levels that take into account international guidance on the topic, which would facilitate trade and promote global harmonization.

The American spice industry is committed to ensuring spices imported into the United States remain safe and that any presence of lead is as low as reasonably achievable. This is accomplished through good agricultural practices, strong supplier programs, and rigorous screening and testing for heavy metals to achieve the safest supply of spices for consumers.

A number of recent incidents involving excessively high lead levels have been linked with fraudulent practices, especially the addition of lead chromate to enhance the color of cinnamon and other spices. ASTA has zero tolerance for economic adulteration and has developed a number of resources to raise awareness within the spice industry of the potential for such adulteration, the steps that can be taken to mitigate it, as well as tools for detecting it.

Additionally, ASTA has taken proactive steps to reduce further the trace amounts of heavy metals that may be present in spices as a result of their ubiquitous presence in the agricultural environment. For instance, ASTA has published industry [guidance levels](#)¹ for lead in spices and herbs and [Good Agricultural Practices](#)², to educate spice producers on how to best grow crops, manage irrigation, monitor soils, and safely transport product to minimize uptake of heavy metals from the environment. Furthermore, the spice industry works with producers and other partners, such as the Sustainable Spice Initiative, worldwide to provide training on these practices while investing in ongoing research on the best ways to mitigate the presence of heavy metals in the spice supply chain.

ASTA welcomes continued dialogue with FDA on the issue of lead in spices and would like to request a brief meeting at your convenience to further introduce the association and to discuss the potential establishment of federal action levels for lead in spices and herbs. We believe that federal guidance would support our joint goal of creating a safer food supply, while also providing clarity to the trade.

We are grateful to you and the Administration for your commitment to ensure the success of FDA's Human Foods Program and continued safety of American consumers. ASTA stands ready to partner with you on these goals.

Sincerely,



Laura Shumow
Executive Director
American Spice Trade Association

¹ <https://www.astaspice.org/download/42858/?tmstv=1673033849>

² <https://www.astaspice.org/food-safety-technical-guidance/best-practices-and-guidance/good-agricultural-practices-guide-gap-guide/>