



INTERNATIONAL SPECIALTY SUPPLY

July 22, 2004

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Food and Drug Administration [Docket No. 2004N-0258]

Produce Safety From Production to Consumption: An Action Plan to Minimize
Foodborne Illness Associated With Fresh Produce; Public Meeting
Objectives of the Proposed Action Plan
Objective 1: Prevent Contamination of Fresh Produce With Pathogens

This letter is a supplement to the letter I sent July 8, 2004.

As you know, we supply commercial sprout growers as well as grow sprouts commercially ourselves. We manufacture equipment for sprout growers, sell them seed and supplies, including lab supplies, and help them with their HACCP plans, etc. This gives us the opportunity to be on the phone listening to sprout growers all day long. In the other ear, we are listening too and supplying the needs of grocery store chains and produce buyers. This puts us in the unique position of hearing the needs of seed suppliers, researchers, sprout growers, wholesale grocers, and consumers.

I would like to make a couple more suggestions that may make more “street sense” than pure science.

In the previous letter I mentioned that *some* lots of mung seed would not handle the 20,000-ppm calcium hypochlorite. When this happens, sprout growers either have rot problems or shelf life problems. The growers can't stand the rot problems, and the grocers can't handle the short shelf life problems. As a result, sprout growers who are not in compliance increase their business and those who are, loose business. This somewhat forces non-compliance

Mung is not the only seed that 20,000 ppm seriously effects. These levels of chlorine seriously affect onion, wheat, sunflower, soybean, and some other sprouts. It does not have much, if any negative affect on alfalfa, radish, clover, or broccoli sprouts. But, there are growers who, because they loose some of their sprouts, are shy about using it on any of their sprouts. Some growers just reduce their chlorine levels on everything. Another concern I hear is that the 20,000-ppm is so caustic it rusts stainless steel, plumbing, etc, and some cities complain about it going down the drain.

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Please consider reducing the levels of all sprouts to between 200 and 2000-ppm calcium hypochlorite. The higher the ppm, the more effective sanitization will be. The lower the ppm required, the more compliance there will be.

Second Suggestion:

The most effective risk reduction step is post testing of the run-off water. The more compliance we can get with this, the more the risk of eating sprouts is reduced. Testing the run-off water at 48 hours is extremely effective. However, the hold and release part of this program makes it difficult for some growers to comply with. This is what is supposed to happen:

- ?? Sample water at 48 hours
- ?? Test the run-off water either in house or send to a lab.
- ?? Hold the product in the building until the results come back
- ?? Release the product for sale.

I am not condoning this, but pointing out what I believe happens often. That is, growers pull from their “hold” sprouts because they don’t have enough “released” sprouts. They are tempted to do this when:

- ?? Their orders are larger than expected.
- ?? They under planted
- ?? Their yields are low
- ?? They have rot problems
- ?? The carrier was late picking up or delivering their water sample to the lab
- ?? The lab was late getting the results back to them
- ?? Their customers are complaining that their sprouts are not as fresh as some other grower (who may not have a hold and release program).

So the question may be “How do we get growers to quit pulling from their hold sprouts?”

If they have not gone out, the grower is very likely to take action and not send them out. If a defective or contaminated product is on the market, no matter what industry, the odds of a voluntary recall decrease substantially. Words like “loosing you business”, and “million dollar law suit” come to mind. So the best program for the industry is one that actually works, and not just on paper.

Although the 48-hour period for testing the runoff water may be ideal, 24 hours would allow more growers to have a workable hold and release program. It would also allow a grower:

- ?? One day longer shelf life (Considering that bean sprouts may have a 7 to 8 day shelf life, and 4 days may be spent in the distribution chain, one day can be critical. And it is the freshest day of the sprouts life that is sitting in the cooler.)
- ?? Free up precious cooler space (some growers don't have enough room to store an extra day.)
- ?? One day longer to find sprouts from another grower in order to meet their orders, or to notify customers that they will not have sprouts.

Reducing the period from 48 to 24 hours may make it so the results of the tests can be back before the sprouts are even harvested. If the results of tests get back to growers one day earlier, I believe compliance would be higher and the program would be more effective.

Thanks for your consideration,

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