

**Fullei Foods, Inc.**  
D/B/A Fullei Fresh  
400 ne 67<sup>th</sup> Street  
Miami, Florida 33138  
305-758-3880

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**Dockets Management Branch (HFA-305)**  
**Food & Drug Administration**  
5630 Fisher Lane  
Room 1061  
Rockville, MD 20852

**Re: Guidances & Testing**  
**Docket No: 99D-4488 and 99D-4489**

**December 15, 1999**

**Dear Sir/Madam:**

Fullei Fresh, a grower with 2 sprouting facilities in the state of Florida and one of 13 sprout growers selected by Brassica Protection Products (BPP), hereby acknowledges the need to set standards for our industry.

We have written GMPs, follow HACCP programs, and have a third party audit by American Institute of Baking (AIB).

In reviewing the guidelines for industry testing, I have to look at this issue from both sides of the fence. Testing of the products before shipping is good to insure the public good safe products. The economics of testing I feel should be changed to batch testing rather than what is recommended to minimize cost. This has an advantage and disadvantage.

**Advantage:**

If a grower follows all procedures from A to Z, he/she would not have a problem and can defer some of the cost.

**Disadvantage:**

If a facility comes back with a positive result through testing, then it would affect the whole batch. Your loss would be greater.

**Cost:**

Testing certainly will add a cost to the products, but if all growers play by the same rules in the same playing field, then this is not an issue.

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99D-4489

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**Summary:**

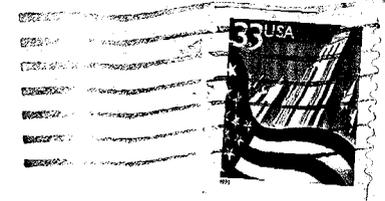
**I feel a grower that tests in large batches will do a better job in sanitizing the seeds and will follow GMP, because he/she has a greater loss if a test comes back positive.**

**Sincerely,**

*Wong, Kwok-Cheng*

**Kwok-Cheng Wong  
President**

FULLEI FOODS, INC  
400 N.E. 67 ST  
MIAMI, FL 33138



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