

0216 95 DEC 21 P217

Dockets Management Branch (HFA-305)  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852  
RE: Dockets 99D-4488, 99D-4489

To Whom It May Concern:

As a member of the sprouting industry, I am concerned that the recommendations in the recently released "Guidance for Industry" pertaining to sprout production involve risks and hardships to the industry which might be alleviated with an alternative method of assuring the production of safe sprouts.

This alternative is the development of a thorough pre-production sampling and testing protocol, of all seed lots intended for sprouting. I ask that the FDA give its serious consideration to this approach, including a statistically valid assessment of this approach as compared with other recommended interventions.

It is my strong feeling that such a method of pre-production seed sampling and testing, in conjunction with the testing recommended in the "Guidance" document, would allow for the survival of the sprouting industry as a diverse community of entrepreneurs, and would provide the highest assurance of safety for the public.

Yours truly,

 Jim Mumm

President

Mumm's Sprouting Seeds Ltd.

99D-4488  
99D-4489

C58