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Certify: N
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Dear Dr. Smith,

I am a food inspector with the Michigan Department of Agriculture and after getting a panic call from a sprout grower that I inspect and then going through the FDA recommendation in the Backgrounder, it appears that there are several questions to be answered. First, is this guidance for sprout growing going to be a requirement or just recommendations as is stated a number of times. There are also statements to the effect that if recommendations are not followed then FDA inspectors may be able to prosecute establishments as insanitary. Next, after talking with some laboratory personnel, it seems to them that there are some flaws in the testing procedure outlined and that most processors will not be able to comply with the testing protocol. It also seems that since most processors are small they will not be able to afford the testing of irrigation water and if they don't go out of business they will do the best they can and take the chance that they won't have a problem and ignore the testing. Can you shed some light on this guideline? It doesn't seem well thought out and practical to implement.

99D-4488

EMC4

CROSS FILE SHEET

File Number: 99D 4488/EMC4

See File Number: 99D-4489/EMC4