

**Butler, Jennie C**

**From:** Chirper [songbird@best.com]  
**Sent:** Monday, December 27, 1999 2:59 AM  
**To:** fdadockets@oc.fda.gov

Dear Sir/Madam

As it Reads Now The Proposed Guidelines Will:

- 1) Put all Certified Organic Sprout Growers out of business.
- 2) Force all sprout growers to have in-house laboratories.
- 3) Not make sprouts safer.
- 4) Make the annual dumping of over 26 Million Gallons of Bleach OK.
- 5) Make it even harder to get good bacteria into your diet.

he New Guidelines Must:

- 1) Create a safe source of seed - intended specifically for human consumption.
- 2) State that "Certified Organic Seed is considered an acceptable alternative approach to prevention of microbial hazards in sprouted seeds".
- 3) Create a government certification that labels seed grown for human consumption as such (i.e. Grade A Beef) and make it mandatory that sprout growers use that government certified seed and/or certified organic seed.

Remember:

1. Certified Organic Seed is safe - No illness has ever been blamed on sprouts grown from Certified Organic Seed!
2. New guidelines must focus on creating a safe source of seed for non-organic (conventional) sprout growers.
3. FDA should use Certified Organic Seed Farmers to help develop guidelines for the conventional (non-organic) farming of seed for human consumption.
4. Even in the worst year(s) for sprouts (1995-96), they were only responsible for a fraction of a one percent of the annual foodborne illness in the US.

This

whole thing is way out of proportion. 93% of the annual foodborne illnesses in the US are traced to Meat, Poultry and Dairy (wealthy industries with plenty of lobbyists).

Here is the gist of the Guidance:

NO illness has ever been traced to Certified Organic seed.

"Certified Organic seed is the best starting point for sprout safety" says

Jeff

Davis, Chief Medical Officer of Wisconsin HFS (the Health Department)  
The FDA must create a source of clean seed - seed intended for human consumption - to be used for sprouting.

FDA should hire Certified Organic seed farmers and processors to aid them in establishing guidelines which they can use to certify that seed produced for human consumption is safe. Conventional (non-organic) farmers will need to follow these guidelines in order to have their seed certified for human consumption before they can sell it to the lucrative sprout industry.

It is outrageous that the FDA is continuing to demand that sprout growers solve

the problem of seed safety instead of putting that responsibility on the seed producers.

Human Beings (as well as other animals) need bacteria. Bacteria lives in our guts. Without it we are more susceptible to ailments. FDA has been making bacteria more rare in our food for years - unpasteurized juice is now hard to find, they want sprouts bleached which kills all the bacteria and next on the list is irradiation of produce. As Jeff Davis, Chief Medical Officer at Wisconsin HFS says "We are dependent on commensal bacteria." Without healthy bacteria in our diets we will be sick!

It is hoped that sterilizing sprouting seeds with bleach kills all the bacteria. We now know - from the recent Wisconsin outbreak of salmonella, that that is not true. By shifting the population of bacteria so dramatically pathogens can grow unabated. It is a very dangerous way of achieving safety,

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Sincerely,  
Masha Lee