



ASTA is a trade association that represents the U.S. spice industry. It was founded in 1907 and represents the interests of approximately 185 member companies, including companies that grow, dehydrate, and process spices. ASTA's members include U.S.-based agents, brokers, and importers, and other companies associated with the U.S. spice industry. ASTA members manufacture and market the majority of spices sold in the U.S. at retail and to food processors.

Food safety is our number one priority and we support reforming the food safety system. However, there are several provisions that have been included in food safety bills that would be problematic for the spice industry.

1. **Traceability:** The House bill would require FDA to establish a tracing system for all food. The tracing system would enable FDA to identify within two business days, each person who grows, produces, manufactures, processes, packs, transports, holds, or sells food

Tracing any co-mingled raw agricultural product, such as coffee beans, cocoa beans, wheat, or spices, back to a specific farm plot is currently extremely difficult, if not impossible. ASTA supports requiring the traceability of these types of products back to the collector instead of the farm.

2. **Country of origin labeling:** The bill would require a product's label to list the country of origin where final processing took place. Similarly, the country of origin for non-processed food would be required to appear on labeling for the food.

ASTA does not support this provision because it would not improve the safety of the food supply and would be financially burdensome and time consuming, especially for small businesses.

3. **Positive lab results to FDA:** After a feasibility study and two or more pilot projects are completed, the bill would require high risk facilities (category 1) to send the FDA positive lab results from finished products.

ASTA opposes this provision because test results should be treated as an opportunity for a facility to correct an undesirable condition. Under current law companies are already required to report to FDA whenever a product may cause serious adverse health consequences. Requiring the agency to set up another system to record and evaluate reported test results is not an effective use of the agency's limited resources.

4. **Administrative Detention Authority Expansion:** The bill expands FDA's power to administratively detain food by changing the requirement that the FDA must have "credible evidence or information" that an article of food "presents a threat of serious adverse health consequences or death to humans or animals" to a "reason to believe" that the article is adulterated, misbranded or otherwise in violation of the FD&C Act. It also expands the maximum length of detention from 30 to 60 days and extends the time for an informal hearing from 5 to 15 days.

ASTA opposes this provision because "reason to believe" that an article of food is adulterated, misbranded or in violation of the FD&C Act is too broad a standard for detaining food products. ASTA also opposes expanding the maximum length of detention and the time for an informal hearing.