



American Spice Trade Association  
2011 Annual Meeting & Exhibits  
Scottsdale, Arizona



# Pre Conference Workshop

## Guidance Document on Pathogens in Spices





American Spice Trade Association  
2011 Annual Meeting & Exhibits  
Scottsdale, Arizona



# An Introduction to ASTA's Guidance on Clean, Safe Spices

John Hallagan  
ASTA General Counsel  
ASTA Annual Meeting  
3 April 2011  
Scottsdale, Arizona





American Spice Trade Association  
2011 Annual Meeting & Exhibits  
Scottsdale, Arizona



## Clean, Safe Spices

### Key Events

- Heightened focus on microbial contamination of foods - recalls
- FDA meetings, discussions with ASTA on safe spices during 2009, 2010
- FDA April 2010 request for comments on development of FDA risk profile for pathogens and filth in spices.

ASTA Board decision in July 2010 to develop guidance on clean, safe spice

- Urgent need recognized by the Board





American Spice Trade Association  
2011 Annual Meeting & Exhibits  
Scottsdale, Arizona



## Clean, Safe Spices

Goal of the report is to provide the spice industry with guidance on how to best provide clean, safe spices to food manufacturing customers and to consumers

Clean, Safe Spices is guidance and not an industry standard

- Individual companies must make their own decisions on how to best provide clean, safe spices
- Recognition that there are variations among spices and among facilities





American Spice Trade Association  
2011 Annual Meeting & Exhibits  
Scottsdale, Arizona



## Clean, Safe Spices

### Clean, Safe Spices Report

- Major accomplishment by ASTA in short period of time

Guidance developed using the most recent information available

### Development included:

- Review of summary by FDA
- Peer review of report by experts in the spice industry
- Peer review by GMA experts and staff





American Spice Trade Association  
2011 Annual Meeting & Exhibits  
Scottsdale, Arizona



## Clean, Safe Spices

Clean, Safe Spices contains

- Background information on the spice industry and its regulation
- Information on filth and pathogens that may be present in spices
- Strategies for reducing filth and pathogens
- Information on testing strategies and techniques





American Spice Trade Association  
2011 Annual Meeting & Exhibits  
Scottsdale, Arizona



## Clean, Safe Spices

### Key Principles

1. Minimize risk from introduction of filth throughout the supply chain
  - GMPs, GAPs, and HAACP
2. Prevent environmental contamination, cross-contamination, and post-processing contamination during processing and storage
  - GMPs are key
3. Use validated microbial reduction techniques
  - EtO, PPO, irradiation, steam, heat





American Spice Trade Association  
2011 Annual Meeting & Exhibits  
Scottsdale, Arizona



## Clean, Safe Spices

4. Perform post-treatment testing to verify a safe product
  - Remember – “safe” means a “reasonable certainty of no harm”
  - Don’t test your way to safety
  
5. Test to verify a clean and wholesome manufacturing environment
  - Environmental monitoring







American Spice Trade Association  
2011 Annual Meeting & Exhibits  
Scottsdale, Arizona



## Clean, Safe Spices

### Final thoughts

- ASTA is in a leadership position on clean, safe spices
- Food safety is a high priority for the public, Congress and FDA, and ASTA can lead on spices

ASTA's Clean, Safe Spices is a valuable resource, but not the only resource

- Use all resources available to do your best to assure that your spices are clean and safe





**American Spice Trade Association  
2011 Annual Meeting & Exhibits  
Scottsdale, Arizona**



**Clean, Safe Spices**

Questions, comments?

Please contact me with any issues that you'd like to discuss.

John Hallagan

202.331.2333

Hondobear@aol.com

