

# **Roger Lawrence**

## **ASTA President**

**2010 ASTA Regulatory/Legislative Meeting**



# ASTA/FDA Shared Goal

## Clean Safe Spice

- Risk of pathogen contamination
- Responsible companies mitigate risk
- Entire industry is impacted by outbreaks
- ASTA takes responsibility for moving entire industry forward



# ASTA Philosophy

- Work cooperatively with FDA
- Represent industry views
- Provide constructive input
- Achieve shared goal of clean safe spice with minimal disruption and cost to industry



# ASTA Actions

- Ongoing dialogue with FDA
- Federal Register Notice
  - Working Group & Ed Ruckert evaluated request
  - Members submitted data on 58,000 lots
  - Informed FDA we cannot provide requested data on:
    - Consumption patterns
    - Manufacturing practices with intended use



# ASTA Actions

- Work underway on second submission
  - Filth data
  - Overview of supply chain and control steps
  - Overview of paths spices take to consumers

# Additional ASTA Initiatives

- ASTA organized educational visits to member companies
  - Tours and presentations on sourcing
- Key questions
  - How well do companies know suppliers?
  - Where and when is treatment done?
  - When is pathogen testing done?
  - How is decision made to treat?
  - Have processes been validated?



# ASTA Role

- Provide industry knowledge
- Work cooperatively to identify problems and implement solutions
- Ensure industry concerns are addressed
- Achieve shared goal of clean safe spice



# Guidance Document

- Special Board of Directors meeting on food safety concerns
- Take more proactive role
- Guidance Document on Pathogens in Spices

Pathogen control under the principle of a reasonable certainty of no harm



# Guidance Document

- Being developed by:
  - Working group from industry
  - ASTA General Counsel John Hallagan
  - Ed Ruckert
  - Scientific writer
  
- First draft in review



# Guidance Document

- Distribution and Education are key
  - Available through ASTA Web site
  - Pre-conference workshop in April
  - Distribute through IOSTA and other spice associations



# ASTA Goal

Restore FDA confidence in safety of industry products



Thank You

Questions

