

ASTA ANNUAL MEETING
APRIL 17-20, 2005



Adulteration

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Spice Industry Self- Regulation

ASTA Annual Meeting



20 April 2005

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ASTA Industry Self-Regulation Program

- Program based on FFDCFA and FDA regulations
- Adulteration
- Misbranding (Labeling)

Why is a self-regulatory program important?

- ❑ Industry reputation and ethics
- ❑ Customer and consumer expectations
- ❑ May avoid formal action by regulatory agencies

It's better for us to regulate ourselves rather than face enforcement action from regulatory agencies.

Recent developments

Changes in the spice and customer industries

- ❑ Consolidation in spice industry and among customers
- ❑ Increasing competition related to pricing pressure
- ❑ Changes in supplier relations

Economic factors can lead to adulteration

- Vanilla
- Paprika

Recent incidents mean more customer vigilance

- More independent analyses

How does the ASTA self-regulation program work?

- Clear written protocol
- Confidential program administration by General Counsel (GC)
- Products that may be adulterated or misbranded are identified in the marketplace by members and reported to GC in confidence

GC investigates

- Has independent analyses done to verify allegations
- Labeling compliance issues researched
- Confidential report prepared

GC contacts alleged violator if investigation yields substantial evidence of non-compliance

- Alleged violator asked to take corrective action

If GC receives notice that corrective action has not been taken within a reasonable time

- GC verifies non-compliance
- GC contacts alleged violator
- If non-compliance continues, then after a reasonable time (third strike), GC contacts FDA

How to submit a report

Program report is available on the ASTA website

- ❑ Forms for submission of report of alleged adulteration and/or misbranding
- ❑ Report must contain appropriate documentation and samples
- ❑ Fees are \$1,000 per allegation
- ❑ Confidentiality to be maintained by submitter

You can discuss the submission of a report with me before submitting it.

- This is encouraged to allow for proper focus and accuracy.



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THANK YOU!

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QUESTIONS

