

ASTA Update

November 24, 2016



ASTA Update

- Lead in Turmeric
- Food Safety Modernization Act
- New ASTA Guidance
- CODEX Update



Lead in Turmeric

- ⦿ Several recalls this summer for excessive lead levels (40-50ppm)
 - FDA says has seen 100+ ppm
- ⦿ Gross contamination
- ⦿ Believed to be lead chromate – economically motivated adulteration
- ⦿ Customers asking about lead levels and what is acceptable

Lead in Turmeric

- ASTA meeting with FDA – FDA position:
- Research shows there is no safe exposure level
- Lead is commonly found in agricultural products because of air/soil contamination
- They are not looking for zero
- FDA will not issue guidance to spice industry
- However.... FDA will share their “thinking” on a level that will not likely prompt enforcement action

Lead in Turmeric

- FDA wants to see spice industry data on lead in turmeric
- Compare levels from companies with good GAP/GMP practices to FDA monitoring data
- Will determine level based on that comparison
 - FDA wants the level to be something industry can meet
- Expect it will be between 10ppm and 0.1ppm



Lead in Turmeric

- ASTA is collecting data from members
- Will submit to FDA as soon as sufficient data points available
- Expect FDA to agree fairly quickly on level that will be acceptable (not result in enforcement action)



Food Safety Modernization Act

- ⦿ September 19th – large firms begin compliance with Preventive Controls
- ⦿ Requires implementation of food safety system including
 - Analysis of hazards
 - Risk-based preventive controls
 - Verification of those controls

FSMA Compliance

- ⦿ Compliance dates staggered by rule, company size
- ⦿ And then there are extensions for certain provisions, for example preventive controls:
 - Two year extension to comply with requirements for customer assurance that it will follow all applicable food safety requirements or sell only to someone who agree to do so
 - FDA will also look at feasibility during the extension period

Compliance – FDA

- ⦿ Deputy Commissioner for Foods and Veterinary Medicine Dr. Stephen Ostroff spoke at ASTA meeting last month
- ⦿ Primary focus of compliance:
 - Education
 - Training
 - Technical assistance

Dr. Ostroff: Compliance

- “Focus will be on working with you to create the culture of food safety that is embodied in FSMA”
- However, FDA will act quickly if significant food safety hazards are identified

FSMA Resources

- FDA began issuing draft guidance in August
- Preventive Controls – issued first five chapters of at least 14 chapters.
- Accessible on line
- ASTA Decision Tree
 - On line document with questions to guide through what provisions each company must comply with (Members – free, Non-members \$250)



New ASTA Guidance

- ① Risk Assessment Considerations for FSMA
 - Target January 2017
- ① Allergens
 - Target January 2017
 - Pre-Conference Workshop April 2017
- ① Adulteration
 - Target January 2017



Codex Update

- ⦿ Next meeting: February 2017
- ⦿ Will continue work on 4 draft standards
 - Pepper, cumin, oregano, thyme
- ⦿ Big focus: scope
 - Current scope designed to cover only ready-to-eat imports
 - US and Canada opposed that as it would cover very little in trade
 - A lot of time, expense for little return
 - TBD

Cheryl looks forward to seeing everyone in May!

