



*Where the subject may be perishable
but the insight isn't.*

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Testing Sprout Seed Before It Ships

Jim Prevor's Perishable Pundit, May 20, 2009

When we published our piece, [Alfalfa Seed Company, FDA, USDA And Supporting Cast Comment On Seed Withdrawal](#), which highlighted an interview with Lyle Orwig, a PR professional who was functioning as a spokesperson for Caudill Seed Company, we expressed some skepticism regarding some of the claims being made in the interview. Later we ran another [piece](#) that demonstrated the company's claim to not have been "conclusively tied" to the outbreak was, at best, questionable.

The Quality Assurance Manager for the North American Division of one of the largest food buyers on the planet also was skeptical and sent us this note:

I read your articles about the sprout seed supplier and I could not agree more with your point regarding Mr. Orwig's story being full of gaps and illogical statements. With all due respect, he forgot to mention that they are selling Australian seed grown in [paddocks](#), [scarified](#) seed for better germination, mixed lots etc.

Coincidentally, while this latest alfalfa recall was going on, I was visiting sprout growers while learning about that industry and trying to figure out if our company will be able to release raw sprouts that we stopped serving back in 1999.

After weighing all facts, I don't see any chance of releasing alfalfa sprouts while I feel differently about mung bean sprouts. Major sprout growers such as [Fuji Natural Foods](#), [Salad Cosmo](#), LA Calco etc., abandoned alfalfa and are concentrating on mung bean only. I was told that Dr. Devon Zagory will be new food safety director for Salad Cosmo — that shows how serious they are about food safety.

It is very interesting and worth mentioning the efforts that Bob Rust from [International Specialty Supply](#) (ISS) has implemented.

He is screening and sometimes even pre-screening seed (before he buys them from farmers) that he sells.

Screening includes sampling every lot of seed until it gives him 99.9999 % certainty (at 4 cfu/kg — which is extremely light contamination) that the pathogen will be discovered.

He is implementing [mastication](#), testing for [Shigella](#) and some other interesting steps that definitely add to sprout safety.

The problem is that not all sprout growers are buying seed from ISS; most of them are buying it from both major suppliers (Caudill and ISS) and the worst part is that many sprout growers don't follow FDA recommendations for growing and testing.

To add to this mess, sprout growers are buying sprouts from each other and selling them under their own label. The [recall that LA Calco](#) had recently was caused by Arizona Hydroponic Farming LLC product sold by LA Calco.

Interestingly enough, it seems that out of 2 major seed suppliers, one was responsible for all outbreaks that occurred in last 10 years. Something for you to check out?!

*— Dan Lasic, MS, MPH, REHS
Quality Assurance Manager
[Compass Group, North American Division](#)
Charlotte, North Carolina*

We appreciate Dan's comprehensive and enlightening letter. Much of the FDA's focus has been on what sprouters can do in the way of testing. We raised the [issue](#) of ensuring the seed is grown under conditions that assume it will be used for human consumption. Dan points to an innovative and comprehensive program one seed company has for testing seed before it ships to sprouters.

We are most intrigued by the [ISS process](#), and it certainly provides another barrier against a food safety problem. If seed companies follow the ISS procedure and sprouters follow FDA recommendations, that would be enormous progress, although, we reiterate our position that seed should be planted with the knowledge that the seed is being raised for human consumption and that appropriate GAPs should thus be followed.

We found news that Dr. Devon Zagory would be lending his expertise to a sprout company significant. Dr. Zagory had been interim head of the Center for Produce Safety and has contributed to the Pundit, including this [letter](#). We asked Dr. Zagory for a confirmation:

Well yes, I think it is true. My contract with NSF Davis Fresh was up at the end of 2008. We have agreed that I will continue as a strategic advisor to NSF Davis Fresh on a limited basis. This leaves me free to pursue other opportunities.

I have been working with a sprout company, Salad Cosmo, in Dixon California, just a few miles from my home in Davis. They have had some problems with contaminated sprouts in the past and have asked me to help them revamp their food safety programs. We are currently waiting for approval from the CA State Dept. of Public Health that my associate Gwain Evans and I serve as Directors of Quality and Safety for Salad Cosmo. This would be a part time job for both Gwain and for me. In essence we would tag team to maintain a presence at Salad Cosmo. Our goal is for Salad Cosmo to become a model for food safety assurance in the sprout industry, no mean task.

Assuming the State of CA approves our written plan, we will assume those duties shortly. In the mean time we are already instituting a program that includes adherence to FDA test-and-hold procedures and goes well beyond FDA guidelines in terms of seed testing, water testing, environmental sampling, hazard analysis, development of detailed SOPs and validation of food safety programs and processes. Of course we are investigating seed sources to try to find seed produced following GAPs. It is a challenge that we relish. I don't eat sprouts unless I know where and how they were produced. I eat sprouts from Salad Cosmo.

*— Devon Zagory, Ph.D.
Devon Zagory & Associates LLC*

So some progress is being made on many fronts. Two key questions: How can we make sure sprouters use seeds grown under GAPs, and who are the buyers of all the sprouts from facilities not following FDA regulations?
