

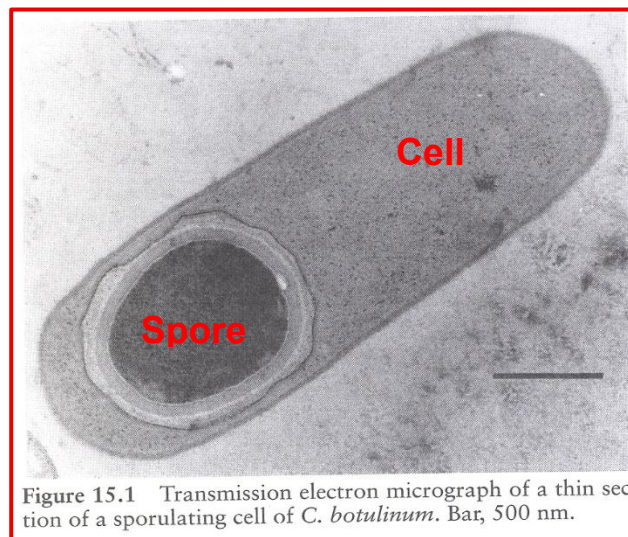
P.O. Box 1866
Kodiak, AK 99615
March 16, 2026

Senate Labor and Commerce Committee (SLCC)
Alaska State Legislature
Via senate.labor.and.commerce@akleg.gov

Re: This afternoon's hearing on SB226 "Homemade Food: Reduced Oxygen Packaging"

Dear SLCC Members,

Since its discovery 130 years ago as a potent foodborne pathogen, *Clostridium botulinum* <https://www.cdc.gov/botulism/about/index.html> continues to cast a pall over food processing worldwide and specifically Alaska <https://pmc.ncbi.nlm.nih.gov/articles/PMC3320287/pdf/03-0745.pdf> Please note that the recent recall of <https://www.cdc.gov/botulism/outbreaks-investigations/infant-formula-nov-2025/index.html> occurred in a commercially produced product and the company should have had significant safeguards to protect our littlest consumers! Refer to https://health.alaska.gov/media/q23g3urs/akphan_20251113_infant-botulism.pdf



[Note: The measuring "bar" of nm is short for nanometer which is one-billionth of a meter. Reference: Austin, J.W. 2001. *Clostridium botulinum*. In: *Food Microbiology, Fundamentals and Frontiers*, 2nd ed., Doyle, M.P. et al. (ed.), pp. 329-350. American Society for Microbiology Press, Washington, DC.]

In this letter of recommendation, I concur with the sponsor's opening statement in Senate Bill 226 which "would amend Alaska's Homemade Food regulations by separating high-botulism-risk foods from those that qualify for sale under the State of Alaska's Homemade Food

exemption and requires that these higher-risk foods be subject to appropriate food safety oversight”.

Although Alaska’s home processors are well-intentioned and mean no harm, it is unfortunate that there may be those who are not familiar with this sporeforming, strictly anaerobic, bacterial pathogen <https://www.cdc.gov/botulism/prevention/home-canned-foods.html> which is ubiquitous and may be lurking in raw and organic ingredients. Under anaerobic conditions, the heat-resistant spores can germinate into viable cells and coincidentally produce a deadly neurotoxin from at least eight toxin biotypes to cause paralysis and death, if not provided with prompt medical attention, specifically the administration of antitoxin and artificial respiration.

Since this particular pathogen is stealthy, meaning there is no off-odor nor off-flavor that can be produced in reduced oxygen packaged food, the best protection for home processors and consumers is “Do not use plastic, glass or sealed plastic bags to age foods as these create a low-oxygen environment that encourages the growth of the [*Clostridium botulinum*] bacteria.” [\[https://health.alaska.gov/media/j5gmye2g/botulismfactsheet.pdf\]](https://health.alaska.gov/media/j5gmye2g/botulismfactsheet.pdf) Additionally, a nationally-known milk and value-added producer in Northwest U.S. offers this practical guidance, in line with SB226, regarding the pertinent topic “reduced oxygen packaging” https://tillamookchc.org/wp-content/uploads/2016/06/ROP_Guidelines.pdf

Furthermore, this classic bacterial pathogen will never be eradicated from the natural environment. The following is a short list of recent occurrences involving homemade foods:

- https://stacks.cdc.gov/view/cdc/7002/cdc_7002_DS1.pdf
- <https://www.foodsafetynews.com/2025/10/studies-highlight-botulism-danger-from-homemade-food/>
- <https://www.mdpi.com/2304-8158/14/15/2584>
- <https://www.sciencedirect.com/science/article/pii/S1876034125000516>
- <https://pubmed.ncbi.nlm.nih.gov/38144879/>
- <https://www.mdpi.com/2076-2607/13/7/1662>

Sincerely yours,

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