

Response to Proposal p1004 Primary production & processing Standard for seed sprouts

Individual response made by Tom Johnson.

Key Concerns

1. Prescriptive V Outcome Driven regulation.

Prefer Outcome driven regulation

- a. Alfalfa c/w Mung Bean/ Lentil, Snow Peas. Different seeds require different treatments. Even if different chemicals with different rates are identified and prescribed what about evolution of other exotic seeds ?
- b. Any prescriptive treatment may well result in extremely low seed viability, immediately encouraging non compliance.

2. Water use

- a. Not unusual to use over tens of thousands litres of water per day to grow Sprouts.
- b. But appears no available support to research methods or how to make water used for growing recyclable/potable. This is a high cost to producers and therefore an inherent significant risk if shortcuts are taken either inadvertently or knowingly.

3. Compliance

- a. Currently there is no active policing/auditing of smaller producers. Other than NSW .
- b. In states other than NSW relies largely on EHO's following up in response to consumer complaints.
- c. Without a National approach, Interstate Trade may well continue to result in Wholesalers who exploit State differences.

4. Asian market

- a. Largely Mung Beans; - "Bean Sprouts".
- b. Typically Operators lack fundamental knowledge of Food Safety.
- c. Operates on a minimalist and super price sensitive. Example Cold Chain compliance is seen as a cost, often Largely unpoliced by Council
- d. Asian market appears to dominate the Pricing. Sprouts are seen as a commodity & no real opportunity to differentiate by branding with Quality or Safety.

Option 1 SELF REGULATION

Concern is that with an Industry Code of Practice, the code is only ever as good as the next Board. The owners of the Code.

Examples exist of current Industry Codes having been watered down over time by Boards as they react to Industry pressures, example the drought / financial hardship resulting in reduced surveillance requirements for some codes.

OPTION 2 STATUS QUO

Concern is continuing lack of uniformity of regulatory requirement, both between States as well as within States.

Example Suppliers to major Retailers are required to produce to proprietary Food Standards whilst other small producers can have minimalist systems.

OPTION 3 FOOD REGULATION

Preferred option

Industry/FSANZ developed regulatory measures that have specific outcome based requirements.

Underpinned by existing Food Standards Code.

- Sprout Producers required to maintain a license issued by State authority.
- License issue dependant on both a
 - documented Food Safety Plan compliant to needs of FSANZ Code
 - 6 monthly Site Audit demonstrating compliance to the Food Safety Plan.
 - Audits conducted at expense of Producer using a State registered Food Safety Auditor. (As per current Vic system.)

Benefits of regulation

- Can not be diluted
- Would allow Producers to invest in plant equipment and processes to meet regulation knowing that their Competitors have no inherent advantage.
- Sprout producers Brands will be underpinned by scientific knowledge/best practice.
- Industry can move from backyard cottage industry and grow.
- Allows for Innovation with new types of Seeds and "Micro Greens".