



Australian Government

Department of Agriculture, Fisheries and Forestry

**Food Standards Australia New Zealand
PO Box 7186
CANBERRA ACT 2610**

**SUBMISSION TO THE
PRIMARY PRODUCTION AND PROCESSING STANDARD FOR SEED SPROUTS
SECOND ASSESSMENT REPORT (PROPOSAL P1004)**

The Australian Government Department of Agriculture, Fisheries and Forestry (DAFF) is pleased to provide comments on the FSANZ Primary Production and Processing Standard for Seed Sprouts Second Assessment Report (Proposal P1004).

DAFF supports the development of primary production and processing standards (PPPS) within the appropriate *Australia New Zealand Food Regulation Ministerial Council - Overarching Policy Guidelines on Primary Production and Processing Standards*. DAFF has a specific interest in reducing the regulatory burden on the Australian food sector. DAFF supports the development of a PPPS for seed sprouts as it will facilitate a nationally consistent approach to the food safety management of seed sprouts in Australia.

Specific comments on the proposed drafting for Standard 4.2.6 – Production and Processing Standard for Seed Sprouts are attached.

Thank you for providing DAFF the opportunity to comment on this report.

Yours sincerely

Richard Souness
General Manager
Food Branch

18 October 2010

**Specific comments on proposed drafting for Standard 4.2.6 – Production and Processing
Standard for Seed Sprouts**

Page	Clause	Comment
33 & 35	Clauses 1 (2) & 7 “decontamination”	<p>DAFF supports outcome based standards, however, the critical control measure “decontamination” for which the standard primarily relies upon to ensure safe sprouts does not specify an outcome.</p> <p>In the absence of prescribing a process for decontamination, DAFF strongly suggests that an outcome is stated.</p> <p>This can either be achieved by specifying an outcome in the definition of “decontamination” in clause 1 (2), e.g. “decontamination means a process using a controlled environment to reduce <i>that reduces</i> the level of pathogenic organisms that may be present in seed sprouts <i>to a level that does not present a food safety risk.”</i></p> <p>Or</p> <p>Clause 7 be rephrased in terms of the desired outcome.</p>
34	Clause 1 (2) Definition of “unacceptable”	<p>DAFF notes that the proposed definition for “unacceptable” is inconsistent with definitions in existing (and proposed) PPPS.</p> <p>The definition for “unacceptable” in the proposed PPPS for seed sprouts refers to clause (2) of Standard 3.1.1; however, the proposed PPPS for eggs and egg products does not refer to clause (2) of Standard 3.1.1. The PPPS for poultry meat does not have a definition for “unacceptable”, however, it has a definition for “unsuitable” which refers to Standard 3.1.1. The PPPS for seafood, meat (RTE meat), and dairy products have no definitions for “unacceptable” or “unsuitable”.</p> <p>DAFF suggests that the terminology used between PPPS be consistent and suggests that a definition for “unacceptable” is not required in the PPPS for seed sprouts and instead this standard should reference the definitions for “unsuitable” and “unsafe” as defined in Standard 3.1.1.</p> <p>The Office of Legislative Drafting and Publishing (OLDP) also noted in its audit report of the Food Standards Code that defined terms are not used consistently in the Code. The OLDP recommended that terms have a single meaning in the Code unless this is unavoidable. It also recommended listing all defined terms in a single place.</p>

34	Clause 1 (2) Definition of “validate”	<p>DAFF does not support the proposed definition for “validate” as it is not consistent with existing PPPS. Further, the proposed definition does not require the business to provide evidence that the control measure has been effective as defined by Codex*.</p> <p>DAFF suggests that a single definition for “validate/validation” be included in Standard 4.1.1 (consistent with OLDP recommendations) with existing definitions removed from all other PPPS.</p> <p>DAFF supports the definition for “validation” in Standard 4.2.3 (RTE meat) as this is consistent with Codex and is already specified within the Code.</p> <p><i>*Recommended International Code of Practice - General Principles of Food Hygiene (CAC/RCP 1-1969): “Validation: Obtaining evidence that the elements of the HACCP plan are effective.”</i> and <i>Guidelines for the Validation of Food Safety Control Measures (CAC/GL 69-2008): “Validation: Obtaining evidence that a control measure or combination of control measures, if properly implemented, is capable of controlling the hazard to a specified outcome.”</i></p>
34	Clause 1 (2) Definition of “verify”	<p>DAFF does not support the proposed definition for “verify” as it is not consistent with existing PPPS and because it does not include the concept of monitoring as defined by Codex*.</p> <p>DAFF suggests that a single definition for “verify” be included in Standard 4.1.1 (consistent with OLDP recommendations) with existing definitions removed from all other PPPS.</p> <p>DAFF supports the definition for “verification” in Standard 4.2.3 (RTE meat) as this is consistent with Codex and is already specified within the Code.</p> <p><i>*Recommended International Code of Practice - General Principles of Food Hygiene (CAC/RCP 1-1969): “Verification: The application of methods, procedures, tests and other evaluations, in addition to monitoring to determine compliance with the HACCP plan.”</i> and <i>Guidelines for the Validation of Food Safety Control Measures (CAC/GL 69-2008): “Verification: The application of methods, procedures, tests and other evaluations, in addition to monitoring, to determine whether a control measure is or has been operating as intended.”</i></p>
35	Clause 8 Traceability	<p>DAFF notes that, while the intent is the same, the wording in clause 8 for traceability is different to the traceability provisions in existing PPPS.</p> <p>To ensure consistency, DAFF suggests that a general traceability requirement be developed and included in Standard 4.1.1.</p>