

24 September 2010

Standards Management Officer
Primary Production Standard for Sprouts
Food Standards Australia New Zealand
PO Box 7186,
Canberra BC
ACT 2610

Dear Sir or Madam

RE: P1004 - PRIMARY PRODUCTION AND PROCESSING STANDARD FOR SEED SPROUTS

Thank you for the opportunity to provide comment on the 2nd Assessment Report regarding the development of a Primary Production and Processing Standard for Seed Sprouts ("the draft Standard") currently being considered by Food Standards Australia New Zealand.

As a national retailer that sells a range of seed sprout products, Coles has provided expert advice to the Standards Development Committee on the risks to production/processing of seed sprouts and is very supportive of the initiative to develop a Standard for seed sprouts that is based on the principles of Hazard Analysis Critical Control Points (HACCP) and gives guidance on hygiene, seed sanitation standards and other good manufacturing practices.

Coles is pleased that the draft Standard is based on outcomes which will provide opportunities to demonstrate that different processes will not adversely affect the microbiological safety of the sprouts. This is important because Coles is concerned that more prescribed standards would be too restrictive. For example, high levels of free chlorine (20000ppm) to decontaminate sprout seeds is subjective and would restrict alternative methods such as other sanitisers or heat treatment. High levels of free chlorine could also cause OH&S issues as well as potential damage to production equipment which may impose an unnecessary burden and cost to the industry.

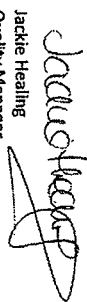
Coles also supports the model implementation plan for the draft Standard. However, Coles believes it is important that the implementation plan also include a communication strategy to ensure all producers of sprouts are covered. This will ensure small producers who supply local food premises (such as restaurants or local markets) will be informed of the Standard. It is especially important that these producers have access to food safety management statement templates and any reference material to allow them to develop food safety systems for their business.

Any food safety systems should identify potential hazards therefore any reference material should include all potential hazards such as *Listeria monocytogenes*. This approach will help protect individual businesses as well as the entire sprout industry.

In summary, Coles supports option 2b and believes the development of a primary production and processing standard for seed sprouts based on the principles of HACCP is necessary. We believe the draft Standard will go a long way to improving the food safety of sprouts and establishing a safe production process of these products in Australia.

Should you wish to discuss our views or require assistance during the implementation of the Standard, please contact Andreas Klieber on (03) 982 96158 or Paul Goldsmith on 03 9829 6227.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jackie Heeling', written in a cursive style.

Jackie Heeling
Quality Manager
Coles Supermarkets – Quality Team