

# SUBMISSION

## P1004 – Primary Production & Processing Standard for Sprouts

### Second Assessment Report

Joint Agency Submission from SA Health and Primary Industries and  
Resources SA (PIRSA)

SA strongly supports Option 2 (b) – *Regulatory food safety measures for sprout producers only.*

South Australia offers the following comments in relation to proposal P1004:

#### Definitions

SA recommends amendment to the draft variation of Standard 4.2.6 of the following section 2,:

A **sprout producer** means a business, enterprise or activity that involves any or all of the following –

- (a) receipt or storage of seed;
- (b) decontamination of seed or seed sprouts;
- (c) soaking of seed;
- (d) germination or growth of seed;
- (e) harvest of seed sprouts;
- (f) washing, drying or packing of seed sprouts;
- (g) chilling or storage of seed sprouts; or
- (h) transport of seed sprouts.

This must be amended as there is concern that it captures seed processors and merchants and (g) & (h) captures retailers, wholesalers and transporters that are not sprouters as they would be involved in these activities. It appears the wording of “involves any or all” captures businesses that are not a sprout producer.

Thank you for the opportunity to comment.

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