

18 October 2010

Project Officer Proposal P1004
Food Standards Australia New Zealand
PO Box 10559
The Terrace
WELLINGTON 6036

FS350-118-1004

Dear Sir/Madam

Proposal P1004 – Primary Production and Processing Standard for Seed Sprouts – Second Assessment Report

Thank you for the opportunity to comment on this proposal. The New Zealand Food Safety Authority (NZFSA) has the following comments to make.

NZFSA supports the objective of the Australian government to minimise adverse health effects associated with seed sprouts in Australia and internationally through production and processing control measures.

NZFSA notes that FSANZ has undertaken preliminary scoping activities in relation to developing a broader *plant and plant products standard*. However, following discussions with the Implementation Sub Committee (ISC) it was decided to progress the sprouted seeds proposal ahead of a plant and plant products proposal based on the identified food safety problem and priority for intervention.

The “Standard for Seed Sprouts Technical Paper” (January 2010) was prepared to support the development of the Proposal and provides a through-chain analysis of the food safety hazards and control measures for the production and supply of seed sprouts, shoots and micro greens. This paper supports the approach agreed by the Australian government in that control options throughout all parts of the primary production and processing chain for seed sprouts are considered.

It should be noted that “Option 1(b), Self-regulation”, was not considered to be feasible due to a range of industry factors, and that these factors will also make implementation of any proposed standard in this sector challenging.

FSANZ preferred “Option 2(b), Regulatory food safety measures for sprout producers” recognises that the full through-chain option is unlikely to be practical or cost-effective for regulating the sprout industry at this time. NZFSA agrees this is a reasonable compromise. However, given the existing questions about the evaluation and validation of appropriate control measures and compliance and enforcement activities, NZFSA questions whether there is sufficient scientific data available to support development of a standard at this time, and whether the acknowledged lack of information has been considered with respect to likely time lines for implementation of the new standard.

Therefore, NZFSA suggests consideration be given to the option of making no change to the Code at this time, in favour of developing a broader *plants and plant products standard*. A generic outcomes based standard would permit different implementation approaches for specific types of plants and plant products, including sprouted seeds. Despite the inherent delay involved, this approach would allow for the conclusion of the work by the South Australian Research & Development Institute (SARDI), which is due for completion during 2012. In any case the SARDI work would be helpful; when considering this or other options as it includes work on cultural practices in growing seeds for sprouting, post harvest treatments, handling, storage and transportation of seed, seed sanitation regimes and seed growing practices.

As a further specific comment, NZFSA agrees with the revised definition of seed sprouts (*seed sprouts means sprouted seeds or beans for human consumption that include all or part of the seed*). We note that the scope needs to be wide enough to cover seed sprouts that are eaten as ready to eat and those that are eaten cooked or lightly cooked.

Yours sincerely

Jenny Reid
Deputy Director
Science