

## SUBMISSION

### P1004 PRIMARY PRODUCTION & PROCESSING STANDARD FOR SEED SPROUTS

#### First Assessment Report

From the South Australian Department of Health  
and Department of Primary Industries and Resources, SA

FSANZ prepared the first assessment report for the above proposal and is seeking comment. The assessment comments on the problem, how it may be addressed and possible options.

FSANZ is considering the following risk management options:

1. Self Regulation
2. Status Quo
3. Food Regulatory Measures

### COMMENTS

The South Australian Department of Health (SA Health) and the Department of Primary Industries and Resources, SA would like to offer the following comments in relation to P1004.

#### *Recommendation:*

SA strongly support Option 3. The development of food regulatory measures in the Code for sectors involved in the production of seed sprouts.

#### *Discussion*

SA agrees that sprouts are a high risk product that requires regulation.

SA is currently proposing a food safety scheme for seed sprouters to be included in regulations under the Primary Production (Food Safety Schemes) Act.

It is SA's preference to adopt a national standard through these regulations and thus strongly support the development of a production and processing standard for seed sprouts.

SA supports 'in principle' the 3 areas of control identified in the initial assessment being:

- the testing of seed lots for microbial pathogens,
- seed sanitisation prior to use, and
- pathogen testing of the spent irrigation water.

However SA supports the further examination of the detail of these controls prior to adoption.

Thank you for the opportunity to comment.

31 August 2009

Comments by

Dianna Alder  
Senior Policy Officer  
Regulatory Policy & Legislation  
Food Policy & Programs Branch  
Public Health  
SA Health  
08 8226 7128

Cleared by

Elena Anear  
Principal Advisor  
Regulatory Policy & Legislation  
Food Policy & Programs Branch  
Public Health  
SA Health  
08 8226 7473