

## Seamons, Colleen

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**From:** Vic Cherikoff [vic@cherikoff.net]  
**Sent:** Friday, 7 August 2009 7:37 PM  
**To:** submissions  
**Subject:** Comment on Proposal P1004

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Dear Sir,

Re:

**PROPOSAL P1004  
PRIMARY PRODUCTION & PROCESSING  
STANDARD FOR SEED SPROUTS  
(FIRST ASSESSMENT REPORT)**

Seed sprouts are seen as a natural wholefood which consumers choose to eat for their nutritional betterment. Furthermore, the use of chemicals, ozone, irradiation or other non-natural antimicrobials is inappropriate for commercial production of sprouts in the light of the perception of sprouts as natural and often organic.

The Proposal should recommend natural means to reduce the microbial load potential including the use of natural antimicrobials such as Herbal-Active as a solution. At 1%, this product can kill food pathogens including Salmonella spp. with an instantaneous immersion. There is no need to rinse as the product is made from natural flavour extracts from common culinary herbs. Additionally, unlike the use of antibiotics, there can be no selection for resistant strains with a broad spectrum product such as Herbal-Active as it acts on the cell walls and mitochondrial walls of all micro-organisms generally, making them leaky to intracellular pressure and effectively lysing the cells and organelles.

While Herbal-Active is a proprietary product, while there are no competitors in the natural antimicrobial spectrum which can be rated as effective, the food safety benefits are impressive along with the water minimization in their being no need to rinse the dipped sprouts.

Kindest regards,  
Vic Cherikoff

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