

25 August 2009

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

FS350-118-1004

Dear Sir/Madam

Proposal P1004 – Primary Production and Processing Standard for Seed Sprouts – First 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 there are existing guidelines available to Australian and New Zealand sprout producers including the guidelines for Australian and New Zealand Sprout Producers, prepared by the Australian and New Zealand Sprouters Association. These guidelines have been adopted by some Australian and New Zealand sprout producers. These guidelines will be of assistance in developing the primary production and processing standard for seed sprouts. If the future uptake and implementation of any guidance is considered to be limited (Options 1 and 2) then Option 3, the development of food regulatory measures may be more appropriate. We ask that the guidelines for Australia and New Zealand sprout producers are considered during the development of any seed sprout standard or guideline to ensure a consistent approach and maintain equivalency. We suggest that these guidelines are provided as an attachment to the Second Assessment Report.

NZFSA asks whether the scope of the products included in the First Assessment Report is broad enough to allow the future inclusion of other varieties of sprouts and shoots. The current scope on page 4, section 2.1 applies to primary production and processing of green sprouts (e.g. alfalfa sprouts, onion sprouts, radish sprouts etc.), bean sprouts (which are primarily

produced from mung beans) and snow pea shoots. NZFSA notes that not all sprouts are green and the current definition excludes any non-green sprout, e.g. red cabbage, sango or pop-corn sprouts, etc. NZFSA suggests that the scope is broadened to 'sprouted seeds'. Similarly limiting the scope to snow-pea shoots may exclude other forms of shoots from any guideline or standard developed. The scope provided in the guidelines for Australian and New Zealand Sprout Producers should be initially considered as this has a broader scope and potential to include other sprout varieties.

Attachment 1 (The Seed Sprout Industry), Section 2.2.1 (Seed disinfection) of the First Assessment Report states that seed disinfection treatment of 20,000 ppm calcium hypochlorite has been suggested for alfalfa seed. NZFSA notes other Australian and international guidelines and standards provide either an outcome statement for any microbial treatment, to achieve at least a 3 log reduction, or a combination of chemical concentration (1,000 to 5000ppm) and application time. NZFSA suggests for seed disinfection that the chemical concentration and application times are validated and further scientific evidence is also provided to develop a similar outcome statement for the microbial treatment.

Thank you for the opportunity to comment on the Proposal P1004 Primary Production & Processing for Seed Sprouts (First Assessment Report). NZFSA looks forward to further progress on this standard and assisting where possible.

Yours sincerely

Jenny Reid
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Science