

Seamons, Colleen

From: Heggie, Stuart M [Stuart.Heggie@dhhs.tas.gov.au]
Sent: Monday, 18 October 2010 6:20 PM
To: standards management
Cc: McQuestin, Olivia J
Subject: FW: Submission - Proposal P1004 - TAS Department of Health & Human Services
Importance: High

Dear Standards Liaison Officer,

Submission – Proposal P1104 – Primary Production & Processing Standard for Seed Sprouts

Thank you for the opportunity to provide a submission on the Second Assessment Report (SAR) for Proposal P1004.

Through DHHS' membership on the FSANZ Standard Development Committee for Seed Sprouts, we appreciate the particular public health challenges that seed sprout production poses given that the sprouting process is ideal for microbial growth and product tends to be consumed raw. We also note, 'through-chain' regulatory food safety measures appear onerous given that the seed for sprout production comprises a very small proportion of total seed production.

DHHS supports Option 2(b) – regulatory food safety measure for sprout producers. DHHS is satisfied that the proposed standard addresses the food safety risks associated with seed sprouts and will contribute to public health and safety *via* a nationally consistent approach. We note that this approach may result in a net cost to the community and suggests that other risk management strategies, such as consumer education, should also be considered in addition to new regulation.

During our review of the draft standard, the following points were raised and are provided for further consideration.

Food safety management statement

In the past, DHHS has been concerned with the lack of consistency between standards in Chapter 4 of the code and in particular the terminology used for documented food safety programs. We support the use of the term "food safety management statement" in the draft standard as it is consistent with other recent PPP standards (e.g. Standard 4.2.2 and the drafted egg standard) and is clearly defined. Alternatively, we would also support reference to food safety programs in accordance with Standard 3.2.1.

Interpretation

Query the need to define "verify" in the draft standard when the same definition is included (albeit for "verification") in Standard 4.1.1, which is referred to at Clause 1(1) of the draft standard.

Meaning of sprout producer

DHHS suggests that a business that solely transports seed sprouts and does not engage in any other activity listed in Clause 2 of the draft standard (i.e. parts A-G) should not be defined as a sprout producer, as the requirements of this standard for such a business would be onerous. However, we do believe that a business that engages in any other of the listed activities as well as transport of seed sprouts, should include the transport stage in its food safety management statement.

Thanks
Stuart

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