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Food Standards Australia New Zealand
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AUSTRALIA

SARDI



SOUTH AUSTRALIAN
RESEARCH AND
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INSTITUTE

To whom it may concern

**Submission - Proposal P1004 Primary Production & Processing
Standard for Seed Sprouts 2nd Assessment Report**

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I would like to submit some comments in response to the second assessment for Proposal P1004.

Comments in relation to the RIS:

- The cost of decontamination of sprout seed has not been explicitly mentioned in the RIS (page 12-13) as an ongoing cost for sprout producers. Has this cost been included in the calculations?

Comments in relation to the draft standard:

- The definition of "sprout producer" (page 34) appears too broad. Under the proposed definition, someone storing seed only would be classed as a sprout producer (point a). Similarly, a farmer growing seed in a field would be classed a sprout producer (point c), as would be a transport company delivering sprouts to a retail outlet.
It is suggested that item (d) be reworded to "germination or growth of seed sprouts;" and that this item is a necessary requirement to the definition of a sprout producer. That is, a sprout producer must undertake (d) plus any, all or none of the other items.
- Should a requirement for the storage of sprouts at a certain temperature be included or is this already covered in a different standard?

Yours sincerely

Dr Andreas Kiermeier
Food Safety Program Leader
SARDI

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of South Australia