

George Seymour
PO Box 5632
Hervey Bay QLD 4655

17 October 2010

Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186
Canberra ACT 2610

Dear Sir/Madam,

RE: SUBMISSION ON PROPOSAL P1004 – SEED SPROUTS

I wish to provide comment on the second assessment report of the abovementioned Proposal.

Whilst a through-chain response including seed producers and seed processors would provide a greater level of protection, the preferred option of 2(b), Regulatory Measures for Sprout Producers Only, will achieve the objective of the Proposal in reducing the incidence of food-borne illness from the consumption of seed sprouts.

The risk of food borne illness is too significant to continue with the status quo of no specific regulation and the nature of the industry has been shown to be insufficiently cohesive to allow self regulation to be effective. This risk to public health necessitates regulation of the industry despite the analysis in the Report that such measures could impose a net cost on the community.

The Draft Standard adequately covers the potential risks involved at the sprout production phase. Whilst there are a number of operators producing seeds in a very professional manner, the inclusion of identification and responses to hazards, including suspect seed and inputs, into a mandatory and verified food safety management statement will place an onus of responsibility on some operators that they have perhaps not previously adhered to.

To be effective in the event of a food safety problem any traceability mechanism must identify suspect products in a timely manner. Thus, it may be of some improvement were clause 8 to read "A sprout producer must have a system to *immediately* identify-".

Yours sincerely,



George Seymour
Consumer Representative on Seed Sprouts SDC