

21 August 2009

Project Manager  
Primary Production Standard for Sprouts  
Food Standards Australia New Zealand  
**PO Box 7186**

Canberra BC  
ACT 2610

**Dear FSANZ – Project Manager,**

**P1004 PRIMARY PRODUCTION AND PROCESSING STANDARD FOR SEED SPROUTS**

Thank you for the opportunity to provide comments on the first assessment report concerning the development of a Primary Production and Processing Standard for seed sprouts (P1004).

Coles Supermarkets (Coles) is very supportive of the initiative to develop a Primary Production and Processing Standard for sprouts that is based on Hazard Analysis Critical Control Points (HACCP) and gives guidance on hygiene, seed sanitation standards and other good manufacturing practices.

Coles has observed that the current voluntary arrangements have not been adopted by many parties and believes there is potential for a significant food safety risk with these products. This is proven by the two Salmonella Oranienburg food poisoning outbreaks attributed to sprouts that occurred in Australia from November 2005 to May 2006. In addition, Coles also believes that the industry may not have taken all risks into account when developing their current guidelines. For example, *Listeria monocytogenes* is a significant risk for sprouts and has caused outbreaks in the United States of America. The industry has so far not acknowledged this risk in their guidelines.

In summary, Coles supports the development of Standards for the primary production and processing for seed sprouts that includes HACCP systems and believes that it will go a long way to improving the food safety of sprouts and establishing a level playing field for the safe production of these products in Australia.

We look forward to providing further input on the next assessment stage of this Proposal. Should you wish to discuss our views, please contact Andreas Klieber on (03) 982 96158.

Yours sincerely

**Neil McSkimming**  
Policy & Brand Standards Officer  
Coles Supermarkets – Quality Team