

A perspective on the European Sprouted Seeds sector

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Background of myself:

- Involved in sprouting business for over 20 years
- My company is specialized in the production of mungbean sprouts. Annual production of 25.000 tonnes distributed in the Netherlands, Germany, Belgium, Poland, Denmark, France and UK
- Representing European Sprouting sector at EU level as a boardmember of ESSA

What has happened in Europe?

- 6-6-11 : BREAKING NEWS: Sprouts are publicly declared to be the cause of the EHEC crisis by Mrs. Ilse Aigner German Minister of Public Health
- 2011 -2013: 4 new EU Regulations are designed, adopted and come into force immediately per july 2013
 - EFSA Scientific Opinion on the risk posed by Shiga toxin-producing *Escherichia coli* (STEC) and other pathogenic bacteria in seeds and sprouted seeds
 - Many drafts are reviewed with input from ESSA until a final version is adopted by the EU Commission



What has happened in Europe?

- 2013 till now: FVO-audits in third countries and in Europe itself take place in order to ensure enforcement of the new regulations
- ESSA organizes training missions in China and Myanmar in cooperation with the European Union

Results so far:

- Sprouting industry in Europe gets organized quickly through ESSA and an efficient and effective communication with the EU authorities has developed
- The sprouting industry in Europe can be nominated as the industry which developed most of all food sectors regarding food safety control



Any problems?

- Yes, certainly there were huge problems for the individual sprouters because of the rush with which it was all implemented
- No, I do not want to talk about that, it is behind us

Relevant question: was it worth it?

- Yes, I think at present every responsible pro-active sprouter has again a perspective
- Yes, In Europe sprouts are considered “hot” again in new Product Development for their benefits as a healthy and tasty food. Previously Quality Assurance was blocking most of this because of food safety concern. Things unquestionably have been moving in our sector. QA professionals appreciate this and they review their risk perception of sprouts in comparison to other fresh vegetables like freshly cut leafy greens WHEN THEY LEARN ABOUT THE NEW SITUATION IN OUR SECTOR
 - See also another EFSA scientific report:
 - EFSA Scientific Opinion on the risk posed by pathogens in food of non-animal origin

Summary of the key issues that changed:

- Every sprouter in Europe needs approval from its Competent Authority (CA) and will be audited regularly (EU 210/2013)
- Sprouts and seeds for sprouting need full traceability (EU 208/2013)
- Seeds for sprouting from third countries need a certificate from the CA in the third country (EU 211/2013):
 - Result: seeds for sprouting from third countries will be produced dedicated to that purpose from the beginning with full traceability, GAP and GHP
- Positive release for every batch of seed through a very intensive sampling and testing procedure is part of the EU sprouters legal responsibility (EU 209/2013)
- Microbiological criteria for seeds for sprouting and for sprouts are clearly defined (EU 209/2013)

ESSA hygiene guideline for the production of sprouts and seeds for sprouting

April 2015

Why hygiene guidelines?

Obligation to comply with hygiene rules in Annex I of regulation 852/2004

For EU sprout producers (regulation 210/2013):

Article 2

Food business operators shall ensure that establishments producing sprouts are approved by the competent authority in accordance with Article 6 of Regulation (EC) No 852/2004. The competent authority shall approve those establishments only provided that they comply with the requirements set out in Annex I to Regulation (EC) No 852/2004 and in the Annex to this Regulation.

For seeds suppliers in third countries (regulation 211/2013):

Article 3

Certification requirement

1. Consignments of sprouts or seeds intended for the production of sprouts imported into the Union and originating in or dispatched from third countries shall be accompanied by a certificate in accordance with the model set out in the Annex, attesting that the sprouts or seeds were produced under conditions which comply with the general hygiene provisions for primary production and associated operations set out in Part A of Annex I to Regulation (EC) No 852/2004 and the sprouts were produced under conditions which comply with the tracea-

But Annex I of regulation 852/2004 is very general – no specific rules on seeds or sprout production – insecurity for operators and competent authorities

5. Food business operators producing or harvesting plant products are to take adequate measures, as appropriate:
 - (a) to keep clean and, where necessary after cleaning, to disinfect, in an appropriate manner, facilities, equipment, containers, crates, vehicles and vessels;
 - (b) to ensure, where necessary, hygienic production, transport and storage conditions for, and the cleanliness of, plant products;
 - (c) to use potable water, or clean water, whenever necessary to prevent contamination;
 - (d) to ensure that staff handling foodstuffs are in good health and undergo training on health risks;
 - (e) as far as possible to prevent animals and pests from causing contamination;
 - (f) to store and handle wastes and hazardous substances so as to prevent contamination;
 - (g) to take account of the results of any relevant analyses carried out on samples taken from plants or other samples that have importance to human health;



What is the benefit of the guidelines?

- EU regulation 852/2004 specifically welcomes voluntary hygiene guidelines developed by the concerned sector
 - European Commission and member states will review and endorse guidelines (but they remain voluntary for operators)
 - European Commission will translate guidelines into all official EU languages
 - Competent authorities will be able to use guidelines during official controls
- ➔ better clarity and security for all operators and authorities across Europe, and better safety guarantees given by our sector

Content of the guidelines

Sprout production

- Establishment of the sprout producer (layout, sanitation, worker hygiene)
- Water use
- Control and storage of incoming seeds
- Microbiological testing of seeds
- Sprouting process
- Processing, Packaging, Storage and Transport
- Traceability, documentation and records
- Action in case of contamination

Seed production

- General
- Soil/Land Treatment
- Worker Hygiene
- Irrigation
- Seed
- Drying of plants/pods
- Threshing
- Storage after harvesting

Special reference where legal obligations are included

Timeline

- March-June 2015: consultations within ESSA and the sector
- July or September 2015: Possible endorsement of the guide by the EU Commission and member states
- In following: translation and publication

What should be the focus of sprouters in Europe?

- to strive for harmonization of enforcement of the new rules in Europe
 - By establishing hygiene guidelines endorsed by the EU Commission
 - By continuously demanding for transparency of all national authorities

RULES WITHOUT ENFORCEMENT ARE COUNTERPRODUCTIVE

- to continue to evaluate and improve the food safety control system in cooperation with authorities

KEEP THE CHANNEL OPEN

- jointly inform European consumers and foodoperators about the benefits and tastyness that sprouts can bring to them

SAY THE WORD

- Exchange views and try to learn from sprouters from other continents

THAT'S WHAT WE DO NOW IN ROTTERDAM



Thank you for your attention!

Any Questions?

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