



Submission

FSANZ Review of food safety management standards

14 June 2019

About

The Australian Fresh Produce Alliance (AFPA) is made up of Australia's key fresh produce growers and suppliers. The members include:

- Costa Group,
- Perfection Fresh,
- Montague,
- One Harvest,
- Pinata Farms,
- Fresh Select,
- Mitolo Group,
- Mackay's Banana Marketing,
- Driscoll's,
- 2PH Farms,
- LaManna Premier,
- Rugby Farming,
- Freshmax, and
- Fresh Produce Group.

These businesses represent:

- half the industry turnover of the Australian fresh produce (fruit and vegetables) sector - \$4.5 billion of the \$9.1 billion total,
- a quarter of the volume of fresh produce grown in Australia - 1 million of the 3.9 million tonne total,
- more than a third of fresh produce exports - \$410 million of the \$1.2 billion export total,
- more than 1,000 growers through commercial arrangements, and
- more than 15,000 direct employees through peak harvest, and
- up to 25,000 employees in the grower network.

The key issues the AFPA is focusing on include:

- packaging and the role it plays in product shelf life and reducing food waste landfill,
- labour and the need for both a permanent and temporary supply of workers,
- market access to key export markets for Australian produce,
- product integrity both within and outside of the supply chain,
- pollination and research into alternative sources, and
- water security, including clear direction as to the allocation and trading of water rights.

The AFPA's aim therefore is to become the first-choice fresh produce group that retailers and government go to for discussion and outcomes on issues involving the growing and supply of fresh produce.

Products grown by AFPA Member companies include:

Apples	Broccoli	Fioretto	Oranges	Strawberries
Apricots	Broccolini	Green Beans	Peaches	Sweet Corn
Asparagus	Brussel	Herbs	Pears	Table grapes
Avocado	Sprouts	Lemons	Pineapples	Tomatoes
Baby Broccoli	Butternut	Lettuce	Plums	Water Cress
Baby Corn	Pumpkin	Mandarins	Potatoes	Wombok
Bananas	Cabbage	Mango	Cucumber	
Beetroot	Cauliflower	Mushrooms	Raspberries	
Blackberries	Celery	Nectarines	Salad leaf	
Blueberries	Cherries	Onions	Spinach	



Executive Summary

Food safety is a critical priority for the fresh produce industry. The fresh produce industry provides nutritious food essential to the diets of all Australians and to compromise food safety undermines the whole industry. The Australian Fresh Produce Alliance has identified product integrity as one of the six key priority issues affecting the industry and requiring concerted focus and attention.

The FSANZ information paper identifies a range of ‘high risk horticulture’ products to be considered as part of the review. On the basis of the information presented, the problem identified relates to very few horticulture products – imported frozen fruit, rockmelons, and specific vegetables. If FSANZ is drawing a wider body of evidence and investigations (such as Codex Code of Hygiene Practice for Fresh Fruits and Vegetables) it will be imperative to identify that information, and the relevance to Australia, as part of the review and proposed *‘Primary Production and Processing Standard for high-risk horticulture’*.

These comments should not be misinterpreted as opposition to horticulture wide food safety standards - industry’s success is dependent on effective food safety systems, culture and regulation. The effective design and application of policy and regulation is critical to achieving the FSANZ objective of *‘the protection of public health and safety’*.

Understanding the operation of the current fresh produce supply chains is vital to ensure that the risks are identified and addressed. The current application of food safety standards, auditing, processes and culture is important to understand the current gaps in the system. Formalising existing requirements, recognising current practices and working with industry to identify solutions will ensure that the review is fully informed and FSANZ has the opportunity to build support in industry.

While out of scope of this review, the strawberry tampering incidents have had a significant impact on consumer confidence and industry sentiment. Each food safety or tampering incident reinforces the importance of product integrity for the entire industry – the fallout from issues are not isolated to individual products. While industry education and information may not be a formal objective of FSANZ, there is a significant opportunity for the Australian Government to identify gaps in understanding and provide targeted education to growers in different supply chains.

The information paper identifies the importance of traceability in the supply chain, particularly in relation to incident management. Any FSANZ consideration of traceability should include conversations with industry to ensure that regulation development is informed by the latest evidence available. Improved traceability will have a multitude of benefits from a commercial and regulatory perspective.

The food safety requirements of production and sale interact with other requirements including for traceability, export and labour. The FSANZ review and proposed standard cannot be developed in isolation from other business requirements both regulatory and other standards. Any opportunity for integration of food safety with other business requirements should be sought to reduce administrative burden and cost, and improve outcomes.

Lastly, collectively we need to acknowledge that simply increasing the administrative burden through increased regulation is unlikely to improve public policy outcomes.



Introduction

Food safety is a critical priority for the fresh produce industry. The fresh produce industry provides nutritious food essential to the diets of all Australians and to compromise food safety undermines the whole industry. The public policy and regulation of food safety is important to all consumers and businesses in fresh produce.

The Australian Fresh Produce Alliance has identified product integrity as one of the six key priority issues affecting the industry and requiring concerted focus and attention. The comments are provided as input to the information paper provided for the 'Review of food safety management standards' and respond directly to the invitation '*for stakeholders to provide general comment on the proposed scope and approach to the review*'.

Define the Problem

The information paper identifies a range of 'high risk horticulture' products to be considered as part of the review. Specifically, the paper states '*Since 2014, there have been several food incidents involving fresh produce in Australia*':

- *Hepatitis A in frozen berries (2015)*
 - **Comment:** imported frozen berries (not fresh production in Australia)
- *Salmonella in pre-packed lettuce (2016)*
- *Salmonella in mung bean sprouts (2016)*
- *Salmonella in rockmelons (2016)*
 - **Comment:** environmental conditions relating to production or packing?
- *Hepatitis A in frozen berries (2017)*
 - **Comment:** imported frozen berries (not fresh production in Australia)
- *Listeria monocytogenes in rockmelons (2018)*
 - **Comment:** environmental conditions affecting packing facility
- *Hepatitis A in pomegranate arils (2018)*
 - **Comment:** imported frozen pomegranate (not fresh production in Australia)

Recent food safety incidents have had a material impact on the industry, regulators and the general public, and it is important to ensure that we are focussed on the identified issues. On the basis of the issues outlined above and the comments provided, the problems might be considered:

- Food safety testing for imported frozen fruit,
- Specific production issues for rockmelons, and
- Specific risks with particular vegetables.

On the basis of the information presented, the problem identified relates to very few horticulture products – imported frozen fruit, rockmelons, and specific vegetables. If FSANZ is drawing a wider body of evidence and investigations (such as Codex Code of Hygiene Practice for Fresh Fruits and Vegetables) it will be imperative to identify that information, and the relevance to Australia, as part of the review and proposed '*Primary Production and Processing Standard for high-risk horticulture*'.



These comments should not be misinterpreted as opposition to horticulture wide food safety standards - industry's success is dependent on effective food safety systems, culture and regulation. The effective design and application of policy and regulation is critical to achieving the FSANZ objective of *'the protection of public health and safety'*.

FSANZ's review and proposed standard must consider the complexity of horticulture with more than 100 products grown across the length and breadth of Australia, while the specific issues identified are isolated to particular products and supply chains. Industry seeks risk based regulation which establishes and enforces a minimum operating standard, and addresses high risk areas confirmed by clear evidence (consistent with FSANZ's objective *'the need for standards to be based on risk analysis using the best available scientific evidence'*).

Understand current arrangements in supply chain

The Australian fresh produce sector is defined by supply to major retailers – industry structure, production and systems are heavily influenced by consumer requirements reflected through Australia's major retailers. Understanding the operation of the current fresh produce supply chains is vital to ensure that the risks are identified and addressed.

The current application of food safety standards, auditing, processes and culture is important to understand the current gaps in the system. Formalising existing requirements, recognising current practices and working with industry to identify solutions will ensure that the review is fully informed and FSANZ has the opportunity to build support in industry. Acknowledging FSANZ current industry engagement, there is a significant opportunity for FSANZ to work with food safety specialists in businesses and industry to support the continued development of a food safety culture.

Culture

For many of the challenges facing fresh produce sector, such as water, people, packaging and food safety, one of the key factors is the culture within companies, product specific industries and the entire fresh produce industry. While out of scope of this review, the strawberry tampering incidents have had a significant impact on consumer confidence and industry sentiment. Each food safety or tampering incident reinforces the importance of product integrity for the entire industry – the fallout from issues are not isolated to individual products.

Broader industry culture is affected by the external environment through regulation, supply requirements and education. While industry education and information may not be a formal objective of FSANZ, there is a significant opportunity for the Australian Government to identify gaps in understanding and provide targeted education to growers in different supply chains. This is particularly important if FSANZ (or state regulators) plans to enforce new regulation which industry may not fully understand.

Traceability

The information paper identifies the importance of traceability in the supply chain, particularly in relation to incident management. It is important to note the publicly reported commercial initiatives underway focussed on traceability and temperature management through the supply chain.



Different initiatives and activities have engagement from supply chain specialists, fresh produce suppliers and retailers. Any FSANZ consideration of traceability should include conversations with industry to ensure that any regulation development is informed by the latest evidence available. Improved traceability will have a multitude of benefits from a commercial and regulatory perspective.

Interaction with other requirements

The food safety requirements of production and sale interact with other requirements including for traceability, export and labour. From a company and industry perspective, meeting the requirements of food safety, traceability, export and labour are a key part of business and cost of doing business. These requirements do not exist independently and are often mutually reinforcing. The FSANZ review and proposed standard cannot be developed in isolation from other business requirements both regulatory and other standards. Any opportunity for integration of food safety with other business requirements should be sought to reduce administrative burden and cost, and improve outcomes.

Lastly, collectively we need to acknowledge that simply increasing the administrative burden through increased regulation is unlikely to improve public policy outcomes.

