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Good afternoon

Please see below comments from the City of Rockingham's Health Services in response to proposal P1052 – PPP Requirements for Horticulture (Berries, Leafy Vegetables and Melons):

- There are some proposals that would be helpful, such as a notification requirement to LGAs that would assist in traceability issues. Also, would help better capture premises without mains scheme water, in which the City can assess how water is used, treated, etc.
- We feel **option one** and current FFS's address some food safety risks, as outbreaks, recalls, etc. are not as common as other commodities.
- We agree that there are gaps potentially for melon microbial risk that could be improved –leafy vegetables less so and berries even lesser.
- Also, option one may not be adequate for potential pesticide monitoring issues, where self-regulated by industry.
- **Option two** has potential cross overs and conflicts with other legislation, primary industry, etc., and a potential burden for LGA EHO's (where proposed monitoring would be the responsibility of the local jurisdictions).
- A combination of options one and two seems most appropriate. As part of this, we suggest
  - o A requirement for FFS's (especially for higher risk products such as melons), and review FFS requirements (preferably by an external party). The review process could tie in with a notification process to LGAs (similar where vulnerable person food provider audits are supplied to LGAs);
  - o Development of fact sheets/guidance notes for both PPP and retail sectors; and
  - o Requirements for skills and knowledge at PPP level (as with retail) to strengthen food safety culture.