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Submission P1052 Primary Production and Processing Requirements for Horticulture (Berries, Leavy Vegetables and Melons)

Submitter: Horticulture New Zealand Incorporated

Submitted by:

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INTRODUCTION

1. Horticulture New Zealand (HortNZ) advocates for and represents the interests of New Zealand's 6,000 commercial fruit and vegetable growers. The horticulture industry is valued at \$6.73b with \$4.55b in exports annually.
2. The industry employs over 60,000 people, occupies some 80,000 ha of land and provides critical regional development opportunities in Northland, Auckland, Bay of Plenty, Waikato, Hawke's Bay, Gisborne, Manawatu, Marlborough, Nelson, Canterbury and Central Otago.
3. New Zealand growers supply fresh and processed fruit and vegetables to domestic consumers, as well as exporting crops to discerning consumers overseas.
4. As HortNZ is an industry good organisation working in the interests of its members (commercial fruit and vegetable growers), we provide general comments and responses to some of the Food Standards Australia New Zealand (FSANZ) consultations, where relevant to the horticulture industry.
5. HortNZ welcomes the opportunity to submit on the proposed Primary Production and Processing Requirements for Horticulture (Berries, Leavy Vegetables and Melons).

RELEVANCE FOR NEW ZEALAND HORTICULTURE

6. Food safety is critical for the success of the New Zealand horticulture sector now and into the future.
7. The nature of fresh produce, and market expectations means that horticulture businesses are very aware of food safety risks, and are driven by markets and/or regulations to develop and implement best practices to ensure that their produce is safe and suitable for consumers.
8. HortNZ understands that the primary production and processing standards (chapter 4 of the code) do not apply in New Zealand (Food Standards Australia New Zealand, 2021). Therefore, proposal P1052 does not impact on the production or processing of fresh produce in New Zealand. We are supportive of the scope of the proposed changes excluding New Zealand as we have our own food safety schemes and regulation in operation.
9. However, the proposal signals a more prescriptive regulatory approach to risk management in future, which HortNZ is opposed to if there are other effective ways for the desired outcomes to be achieved.

GENERAL COMMENTS ON THE PROPOSED APPROACH

10. HortNZ agrees with the need for robust food safety practices during horticultural production and processing.
11. HortNZ has no objection to an approach that uses a combination of regulatory and non-regulatory measures where necessary. We support an approach that uses the fewest interventions to achieve the desired outcome (safe food).
12. As such, we suggest that existing robust private food safety schemes that achieve the same outcomes are recognised and considered equivalent to proposed regulations. Prescriptive regulations may then apply to producers who are not part of a recognised food safety system. This prevents those businesses who are already operating under an appropriate food safety scheme from incurring additional costs and managing an increased and unnecessary regulatory burden.
13. In order to avoid duplication and confusion for auditors and regulators, HortNZ suggests that the proposed Primary Production and Processing Standards are made available for adoption via existing Food Safety assurance systems operating at producer and processing levels.

CONCLUSION

14. It is important for businesses to be able to demonstrate that required practices are in place to produce fresh fruit and vegetables that meet local and international regulatory and market requirements – so customers can buy with confidence. We believe achieving the desired outcomes while minimising the regulatory burden is best achieved by industry and regulators working in partnership and making use of (or integrating with) existing food safety schemes, where appropriate.
15. HortNZ welcomes the opportunity to discuss the points raised in this submission.

REFERENCES

Food Standards Australia New Zealand (2021) 2nd Call for submissions – Proposal P1052 Primary Production and Processing Requirements for Horticulture (Berries, Leafy Vegetables and Melons).