



## **AUSVEG Submission for Proposal P1052**

Primary Production and Processing Requirements for high-risk  
horticulture

**March 18, 2020**

**Submitted on Behalf of AUSVEG by**



## About AUSVEG

AUSVEG is the national peak industry body representing the interests of Australian vegetable and potato growers and is committed to securing the industry's future.

We advocate for growers to all levels of government and ensure that the industry has a strong, active voice in the public sphere. We also communicate industry issues and perspectives to government, media and the public.

AUSVEG is also a service provider for a number of levy-funded research projects that are funded by Horticulture Innovation Australia using levy and government funds.

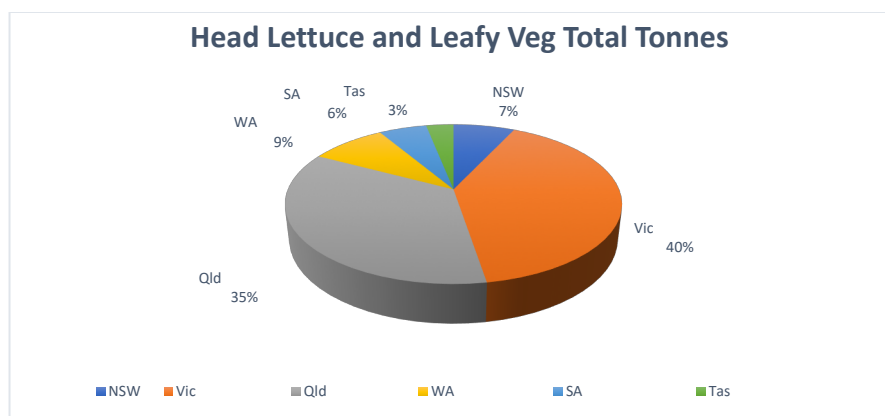
Ensuring the results from these research projects are made available to Australian vegetable and potato growers is vital for the vegetable and potato industries to remain on the forefront of global horticulture production and for local growers to be able to operate an efficient, productive and profitable growing operation.

For us, as the peak body for the vegetable industry, food safety for the Australian consumer is of utmost concern, and as an industry, we are committed to provide safe and nutritious foods for consumers while supporting the AUD 4.3 billion vegetable industry. In 2017-18, there were around 2,300 Australian farm businesses growing vegetables. This represents a little over six per cent of the total value of Australian agricultural production.

In response to the call for submission for proposal 1052, primary production and processing requirements for high risk agriculture, AUSVEG would like to raise some key points to the content of the document and look forward to making further comments as the process proceeds.

## The industry

The leafy veg industry produced over 192 thousand tonnes in 2017/2018 from almost 8,000 hectares and over 350 growers. While production occurs across the country, hence catering to consumer needs through the seasons, Victoria and Queensland make up the bulk of the production, producing over 75% of the countrys' leafy green vegetables. Together, leafy vegetables, head lettuce and fresh herbs value at \$614.3 million, contributing 14.1% to the overall value of vegetable production in 2017/2018.



*Source: Australian Horticulture Statistics Handbook Vegetables 2017/18*

### Current standards and a culture of food safety

Overall, it is critical to recognize that the growers and businesses producing leafy vegetables currently undertake a range of quality assurance practices as mandated by either the market or their large retail customers. These are detailed in SD2 by FSANZ, but broadly, Harmonised Australian Retailer Produce Scheme (HARPs) and Global Food Safety Initiative (GFSI) and GFSI benchmarked standards including BRC global standard for food, global G.A.P. integrated farm assurance standard, SQF food safety program, Freshcare food safety and quality and supply chain standards, SGS HACCP.

The discussion paper and supporting documents refer to the non-regulatory food safety schemes as voluntary. However, wholesale markets and all retailers require proof of a GFSI benchmarked system being operated on farm. Hence all levels of suppliers need supply a certificate that a GFSI benchmarked food safety system is currently operating. Where a grower is supplying indirectly to retail (i.e. via a wholesaler, agent or another growing business) this grower is still required to provide proof of an independently audited GFSI benchmarked food safety system in place.

Where a grower is supplying to a wholesaler in one of Australia's central market locations, changes to the Horticulture Code of Conduct in 2017 have seen the introduction of mandatory Horticulture Produce Agreements (HPAs). The standard HPA template provided by Fresh Markets Australia (FMA) includes a requirement for growers providing produce against these agreements to be operating a GFSI benchmarked food safety program.

Between 80-90% of growers are adhering to one of the above mentioned schemes. Hence AUSVEG believes that the industry has significant standards in place to produce safe food, and that regulation will potentially not add any further safeguards, instead increase further administrative and cost burdens.

If regulation is, however, deemed necessary after consultation, it is critical that regulation connect to the current existing schemes being adhered to by the industry, and not create an additional scheme or administrative cost requirements. Current schemes are detailed and thorough and cover every aspect of food safety.

Food incidences that the FSANZ proposal have highlighted since 2011 have been a result of a lapse in food safety processes. This alludes to a need to drive and inculcate a culture of food safety. To ensure that all staff, keep food safety at the forefront of their roles and that businesses introduce and push food safety as their culture and way of doing business.



Training is critical as is a mechanism of continued checks and balances, with increased vigilance at key extraordinary events within the business, for e.g. weather events.

To further the food safety culture, we recommend that unannounced audits are introduced. The current auditing system are a check at a single point in time, and often indicate the businesses' best behavior at the time an auditor is expected. To drive business to do the right thing every single time, auditing can potentially be unannounced. This will ensure that staff are always vigilant with their food safety. This is practiced by Work Safe, and is a process the food industry can potentially adopt. Recently, a representative of Red Tractor, a UK based food assurance scheme visited Australia and spoke of introducing a similar practice within their auditing to build a culture of food safety.

#### Smaller business

While most larger businesses adhere to food safety schemes, the smaller growers and business often find it too onerous, complicated, arduous and cost prohibitive to undertake any schemes. These are businesses that often supply to local markets and then, are a potential risk segment within the industry.

In order to have a complete value chain protection across all levels of growers, it is important to bring the smaller growers under quality assurance schemes. However, in order to make that happen, a simpler program with focus on covering key processes and critical risk points need to be introduced into the system. This leads to our initial recommendations of identifying high risk processes instead of identifying some crops as high risk and regulating those.

#### High risk process vs high risk crops

AUSVEG notes that pinpointing specific crops as high risk is counter-productive to the intent and a recommended approach is to identify processes (or lack of them) as high risk. Identifying leafy vegetables, melons and berries as high risk based on minimal processing before consumption is an arbitrary mechanism of identification. Additionally, it sends an incorrect messaging to consumers about consumption of these products, highlighting them as high risk and dangerous products to consume. This goes against the advice given by Nutrition Australia and health professionals to eat a diet that is 70% plant based, incorporating fruits and vegetables as the largest part of the food pyramid.

An analysis of the leafy and melons incidents reveal, businesses had a robust approach to food safety, and the incidents were a result of a lapse in a quality process and human error. This points to a need for training and extension within the food safety spectrum to ensure that business and staff are remain up to date with their skills and that new incumbents are trained up for their roles. As well as identifying processes as critical or high risk rather than specific crops. Hence, any recommendations for regulation should encompass all horticulture vs only a part of the industry or specific crops.

#### Uniform implementation

AUSVEG would advise that in the event that regulation is deemed necessary, it is critical that all states implement it uniformly. Any differences in implementation of regulation, will inhibit movement of produce within states or increase complexity and administrative requirements and burdens for growers.



## Recommendations

AUSVEG recommends and supports Option 1 – Status Quo.

However, in the event that Option 2 regulation is considered, critical elements to consider, as discussed above are:

- Will regulation result in mitigation of risk of food borne illnesses?
- Any regulation must tie into the current benchmarked schemes that exists within the industry and not introduce any additional schemes that would add on increased costs and administration
- Regulation should be implemented across states uniformly to ensure continued movement of produce.
- Support to focus on improving training, process improvement and improved food safety culture and mindset within the industry.