



## OH Submission:

# Food Standards Australia New Zealand (FSANZ) Proposal P1052 - Primary Production and Processing Requirements for high-risk horticulture

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## OH Representative

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## **Executive Summary:**

One Harvest (OH) is a multi-generational business owned by the Robson family. For over 80 years, OH has been supplying Australian families with fresh produce, and for over 25 years, we have been processing and supplying Australian retailers with fresh cut salads. OH have a national footprint incorporating four factories and a Tasmanian farming operation. OH is guided by our purpose of “helping people live better lives”.

OH supplies all the major retailers in Australia, employing over 1000 personnel and operates 24/7 processing and packaging operations. OH sales revenue is approximately 300 million. In the retail ready to eat fresh cut salads category OH maintain 50% of the market share. OH converts 120 tonnes of produce into 620,000 packaged units per day across 120 SKUs using more than 160 ingredients.

The food safety of Australian produce is vital to consumer confidence and the profitability and viability of OH and the Industry as a whole. OH considers food safety to be a fundamental principle at the heart of all we do. To this end we have developed grower partnerships, applied best agronomic practices and invested in people, processing, food safety culture and third party accredited GFSI food safety systems to assure the integrity of our product food safety across the supply chain. While these systems are not mandatory government regulatory requirements for OH to maintain retail supplier approval and supply these food safety systems are mandatory.

## **OH support Option 1 – Status Quo**

Whilst there is no nationally consistent set of food safety requirements for horticultural produce, a range of industry schemes do exist that are non-regulatory. OH supports growers being certified to the GFSI benchmarked standards SQF, Freshcare and GlobalGAP which are all HACCP based and are third-party audited. OH believes that these schemes, when correctly applied, are effective at managing food safety risks.

OH supports the adequacy of current Food Code Standards as relevant and applicable to leafy green vegetable food safety. Focus on better certification schemes and good agricultural practice standard application, particularly early in the supply chain (during growing, harvesting and post-harvest handling of leafy green vegetables) will have the greatest impact on food safety, as contamination of produce at this early stage creates additional risks that cannot be adequately mitigated at subsequent processing stages in the supply chain. Supporting and encouraging effective food safety culture across the supply chain instead of regulation would reduce the risk of future food safety recalls.

OH is nervous that any new government regulations will not be implemented uniformly and consistently across all states and territories. Many industries, as does OH, struggle to ensure national standards and ways of working are consistently applied across the different states. Horticultural businesses regularly highlight the unnecessary additional compliance costs attributed to differing requirements across jurisdictions. A national approach is essential. Amending the Food Acts will add an additional audit to each grower, which will add duplication and cost to the current audit process.



**Detail:**

**Supplier Approval**

OH sites are certified to the BRC Global Standard Food Safety, Version 8.

OH approved growers are split between FreshCare v4.1 (70%), SQF v8 (15%), GlobalGAP v5.3 (2%) which are GFSI recognised standards. GFSI accreditation: SQF version 8, 2004; Freshcare Food Safety and Quality Standard Edition 4.1, 18/2/2020 and GlobalGAP General Regulations Version 5.3, 24/3/2020.

As members of the Fresh Salad Producers Group, OH has assisted in the development of the new Fertiliser and Soil Additive Standard which sets limits on the number of days between the application of compost and the presence of livestock, and harvest.

Internally OH have developed a GAP (Good Agricultural Practices) Standard to strengthen the food safety practices for growers supplying ready to eat salads. These systems are based on good agricultural practices (pre-planting and pre-harvest inspections, water and crop microbiological quality testing) to mitigate risks. OH grower roadshows provide support and training for emerging concerns. Training videos and posters are used to cover recurring or emerging concerns such as allergens, hand washing, foreign bodies, personal items in the fields and pests (frogs, rats/mice). All staff are encouraged to ask questions and understand what they are doing and why it is important. The posters are left on site at the growers so they can be reinforced and allows the staff to discuss further.

The OH Supplier Integration team visit growers on a regular basis to drive continuous improvement strategies and to encourage open communication and a “working together” relationship. OH has long-term relationships with our growers. Open communication from the growers allows us to modify processing controls at our processing facilities in advance of actual detection.

**Processes:**

Fresh produce is harvested daily and delivered into OH factories later the same day. All incoming fresh produce is evaluated for suitability before accepting into the facility.

Fresh produce is sampled annually by OH and sent to an external NATA certified laboratory and tested for a suite of microbiological contaminants. These include *Listeria monocytogenes*, *Salmonella* spp, *E.coli* and *Staphylococcus aureus*. OH also test for Pesticide Residues and Heavy Metals to comply with the FSANZ Food Standards Code MPC's (Maximum Permitted Concentrations) and MRL's (Maximum Residue Limits). These are tested annually. The growers are required under OH agreement to provide random test results for microbiological (*E.coli* and *Salmonella*), MRL and Heavy Metals annually.



Fresh produce is tested for temperature and an assessment is made to determine the quality and foreign bodies in the produce. If deemed acceptable the stock is labelled and moved into chilled storage for processing. The stock is further inspected during all stages of processing including during tipping, trimming, sorting, crating off, mixing, and during packing.

All removed foreign bodies are logged and trended. Non Conformances reports are created and sent to the supplier for investigation and corrective actions. Within the OH procedures all growers are rated black, red and green dependent on their performance for quality and foreign bodies. Black require 4 additional staff on the line sorting the produce, red requires 2 additional staff and green requires nothing additional.

The leafy vegetables are trimmed, washed, mixed and packed into bags of salads, salad mixes and vegetables in convenient plastic packaging (bags, bowls or trays). The salad range is extended by assembling salad/vegetable mixes with addition of value adding components such as sachets of dressing and condiments or/and cooked meats (Chicken or Bacon), grated cheese, packed into sealed plastic packaging. Potatoes and beetroot are delivered for grading, peeling, trimming, vacuum packing and retorting for shelf stable ready to eat vegetables.

Both Chlorine (Smartwash) and Peracetic Acid (PAA) are effective at providing appropriate log reduction if correct concentration and contact time (dwell time) are completed consistently across a continuous wash system. Also taking into consideration initial loads (microbiological) and effect of adverse weather conditions i.e. increased organic matter (soil/mud/dust) on incoming produce. Validation of the correct concentration/time and triggers to increase sanitation due changes of incoming produce are as important as verification checks to maintain levels above critical control point limit. Facilities are segregated into Low, Medium and High care zones to prevent cross contamination.

HACCP Plans include key CCP and QCP steps to ensure food safety and quality hazards are mitigated. Facility and Equipment are designed to reduce risks, and cleaning and sanitation is verified by pre-operational inspection, including environmental pathogen testing programs.

#### **Traceability:**

Traceability processes are often highlighted as a weakness in the ability of a business to carry out a trade or consumer level recall with 100% of product to be accounted for within 4 hours. OH believes traceability and product identification are key processes in a strong food safety system and its compliance. The requirement for validated traceability systems is driving continuous improvement in technology (software) to enable these processes to be completed with greater speed and accuracy.

#### **Food safety culture:**

Embedding a food safety culture around our people, processes and procedures has helped OH improve against our benchmarked performance for food safety. We invest in our people, standardise our systems, nurture strong external relationships with our growers and government agencies and align with our customers' expectations. We actively search and implement new science and technology to ensure our high standards are maintained. We are dedicated to continued consumer protection while providing innovative, healthy and convenient salad options.



At OH, food safety culture starts with our leaders, and is embedded through processes and routines designed to support communication and quality control. The challenges of introducing, instilling and establishing a food safety culture include overcoming the barriers to change and skill gaps for essential leadership positions.

Embedding a food safety culture around our people, processes and procedures has helped OH improve against our benchmarked performance for food safety. At the heart of all we do, and guiding our actions is our commitment to our purpose 'We help people live better lives'

Culture Connections Newsletter - 5th Edition (Autumn 2020) FSANZ:

<https://www.foodstandards.gov.au/foodsafety/Pages/Food-Safety-Culture-Connections.aspx>

### **Retailer and Export requirements**

Australian retailers require that all growers supplying OH are certified to SQF, GlobalGAP or Freshcare. OH are required to be certified to BRC and adhere to retailer additional requirements. Coles completes second party audits for own brand products.

Strict testing requirements are required by retailers to verify the food safety of Ready-To-Eat products for consumers. Monthly microbiological finished product testing include Yeast and Mould, Thermotolerant Coliform, E. Coli, Listeria monocytogenes, Salmonella spp, Bacillus cereus, Staphylococcus aureus, Anaerobic Count, Total Plate Count.

OH exports to customers in the Asia-Pacific region. Our export customers accept BRC accreditations and the equivalence of FSANZ Food Standards Code, and compliance with Codex as acceptable to enable export to the region. There are specific export microbiological and chemical requirements which OH include in the testing regime to ensure compliance to these regional requirements.

### **Consumer feedback**

Customer complaints are measured in Complaints per Million Units (CPMU). OH has a CPMU target of <2.5, and achieved a CPMU of 2.24 in FY 2018/19. The majority of complaints registered are foreign body and insect contamination (77%). In FY2018/2019 there were no confirmed food poisoning incidents register with OH finished goods.