



Berries Australia response to the discussion paper on amending the Food Standards Code (the Code) to enact a primary production and processing standard to manage food safety for high-risk horticulture.

About Berries Australia

Berries Australia was established in November 2018 as a joint venture between the Australian Blueberry Growers' Association Inc. (ABGA), Raspberries and Blackberries Australia Inc. (RABA) and Strawberries Australia Inc. (SAI) to represent the interests of the Australian berry industry as a whole. Valued at \$1.4 billion/annum, the berry industry now represents the single largest fresh produce category in Australian supermarkets. Berries Australia represents more than 1000 individual growers nationally ranging from significant corporate holdings to small family farms.

This submission was prepared with input from key food safety technical specialists within the berry sector as well as growers across the category.

About the industry

Berries sit somewhere between an annual and perennial cropping system in that the infrastructure required means a level of permanence and commitment to the crop and they tend not to be grown opportunistically. Strawberries are mostly grown as an annual crop whereas blueberries and raspberries grow on the same bushes for several years.

The majority of blueberry and raspberry production is undertaken by a relatively small number of growers but there are quite large numbers of very small producers. Strawberries are less concentrated, but the supply chain is more complex with many points of consolidation. In Queensland and Western Australia, there are also some strawberry farms which are leased and change operators from season to season. The majority of berry farms do have a food safety system in place and growers are more aware of the need to be diligent since the needle tampering crisis. That said, as for all of horticulture, the smaller operators can be risk creators when it comes to food safety and biosecurity issues as they do not have systems in place or the staff to maintain them.

In reference to the question posed by the discussion paper, it is difficult to know the exact percentage of producers who are covered by an existing third-party audited scheme, but we can say with some confidence that the majority of Australian *production* is covered by an existing scheme.

For more detail on the berry industries, please refer to Appendix 1.

Submission

Fundamentally, Berries Australia does not support the approach of singling out individual commodities and categorising them as high risk. Risk is a very loaded term and should be used with great care as it can create a perception in the mind of the consumer that those commodities not defined as high risk are inherently risk free or that Australian grown berries are less safe than other fresh produce. In the particular case of the berry industry, we also contend that the evidence base presented in the discussion paper to categorise Australian grown berries as high risk is extremely weak as there were *no examples* of locally grown fresh berries causing a food safety issue¹. We do agree that imported frozen product has caused issues in the past.

As described in the discussion paper, most producers are participating in third party audited schemes such as Freshcare and/or HARPs. Whilst no scheme is perfect, in relation to Australian grown berries, these programs have successfully (based on incidents) managed risk within the supply chain from a food safety perspective. The strawberry needle tampering incident was a deliberate malicious act and should not be considered part of this discussion.

We consider there is no evidence that the current schemes do not manage the risk in the berry category and for that reason we support Option 1 – Status quo unless a different approach is taken. We also are concerned by the implication in the paper that the current systems are inadequate as they do not manage risk in atypical conditions. This may well be the case, but we cannot see how a regulatory approach could manage such circumstances any better so it cannot be used as a justification for regulation. No system can eliminate risk entirely, but a focus on cultural change and education can assist growers to better identify when conditions are atypical and enable them to respond accordingly.

We do appreciate that berries have been identified in CODEX as high risk but would like to point to the Canadian example² whereby microbiological testing was done for four years and found that current systems were adequate. We suggest that this should be the next step rather than singling berries out with no evidence to support the classification as high risk in the Australian context.

If the regulatory approach moved away from so-called high-risk categories, we would be more supportive of option 2. It is our view if a regulatory *Standard* was to be developed then it should:

- apply across all of horticulture
- recognise the existing third-party accredited programs and not place an additional administrative or cost burden on those growers who are already certified
- capture those growers, regardless of commodity who do not have any scheme or system in place. A regulatory “back-stop” if you will.

We accept that some horticulture commodities present less risk due to how they are consumed (i.e. always cooked or non-edible peel) and any *Standard* should recognise this, but it should be contingent on all growers to demonstrate how their product is safe. Fundamentally a berry grown on a farm with an effective food safety system in place is less ‘risky’ than a cherry tomato (for the sake of argument) consumed raw which has been produced on a farm with no processes in place.

¹ Please refer to the Driscoll's submission which analyses the data in more detail

² <https://www.inspection.gc.ca/food-safety-for-industry/chemical-residues-microbiology/microbiology/fresh-berries/eng/1430919163515/1430919164640>

Should a regulatory Standard be developed, enforcement of should be consistent across all jurisdictions. Any differences in implementation of regulation, will inhibit movement of produce within states or increase complexity and administrative requirements and burdens for growers.

Light touch regulation applied across all of horticulture would enable the Australia government to place the same requirements on imported product (frozen and fresh) which, based on the evidence presented in the FSANZ discussion paper, may have an actual impact on reducing risk to the Australian consumer.

Finally, we acknowledge that berry industry does not have full paddock to plate traceability at the moment. That said, many producers (of all sizes) are moving swiftly toward comprehensive traceability systems with commercial imperatives and new technologies driving implementation. It is our view that these approaches will rapidly become the industry norm negating the need for a regulatory intervention.

Appendix one – Industry information

Strawberries - There are approximately 200 commercial strawberry growers nationally and about 60 opportunistic growers. National production is trending towards the consolidation of fewer, larger businesses supplying the market.

Error! Reference source not found. illustrates the proportion of national production of strawberries by state.³

Production is concentrated in several regions, including:

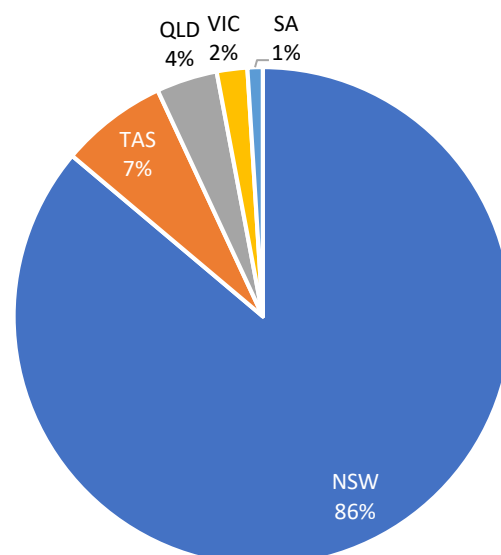
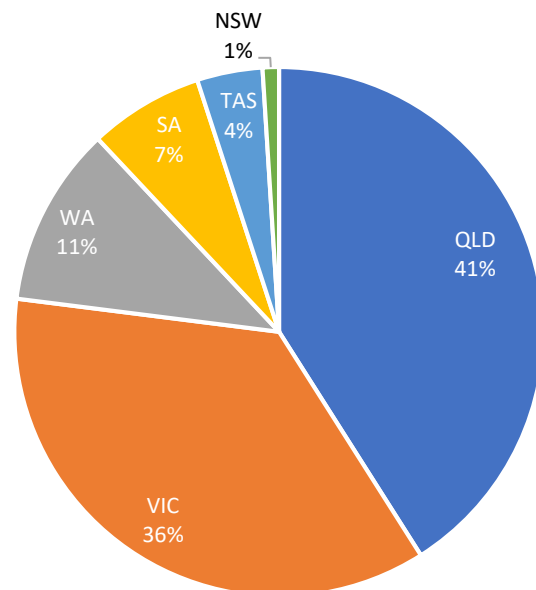
- Adelaide Hills region in South Australia
- Caboolture, Granite Belt and Bundaberg regions in Queensland
- Camden region in New South Wales
- Sunshine Coast region of Queensland
- Wanneroo and Albany in Western Australia
- The Yarra Valley in Victoria.

Total national volume of production within the industry is increasing, in large due to improvements in production yields as a result of research into plant health and the selection of improved varieties. There is also increased uptake of table-top and protected cropping approaches.

Blueberries - There are estimated to be up to 300 blueberry growers throughout Australia. These growers' range in size from small scale opportunistic growers (1 to 20 hectares) through to large plantings (100+ hectares).

Australian blueberry production more than quadrupled from just under 4,000 tonnes in the 2012 financial year to about 17,000 tonnes in the 2018 financial year. The significant increase in blueberry production volume over this period was supported by:

- Large corporate plantings in a diversity of locations around Australia
- New and improved varieties
- Improved production systems
- Strong yields that have met the increasing year to year sales growth and per capita consumption.



³ 2017/18 Australian Horticulture Statistics Handbook

This growth is predicted to continue to rise over at least the next four years.

Figure 4-1 illustrates the significant blueberry producing regions in Australia.

Figure 0-1: 2017/2018 Percent of total production volume of fresh Australian blueberry production by state

Rubus - There are around 120 growers producing raspberries and blackberries in all states, except the Northern Territory, with minimal production volumes from Western Australia. Figure 5-1 illustrates the proportion of national production of strawberries by state.⁴

Of the total rubus category, raspberry production accounts for 90% and blackberries comprise 9% of fresh rubus production. Other rubus varieties such as silvanberries, boysenberries and loganberries equate to about 1% of fresh production.

The main growing season is November to May (summer and autumn), with the greatest volume being produced from December to April.

The majority of berries are produced in the southern states of Australia, particularly in:

- The Dandenong Ranges and Yarra Valley regions of Victoria
- Corindi in New South Wales
- The Northern Midland region in Tasmania.

Other production areas in Queensland, South Australia and Western Australia, as well as protected cropping systems, extend seasons for year-round supply.

In recent years production volumes have increased rapidly. In 2013, 2,167 tonnes of rubus berries were produced whereas in 2017/18 6,189 tonnes were produced. This increase has been supported by:

- Establishment of year-round supply
- An increase in farm productivity and production volumes
- Strong year-on-year sales growth and per capita consumption growth.

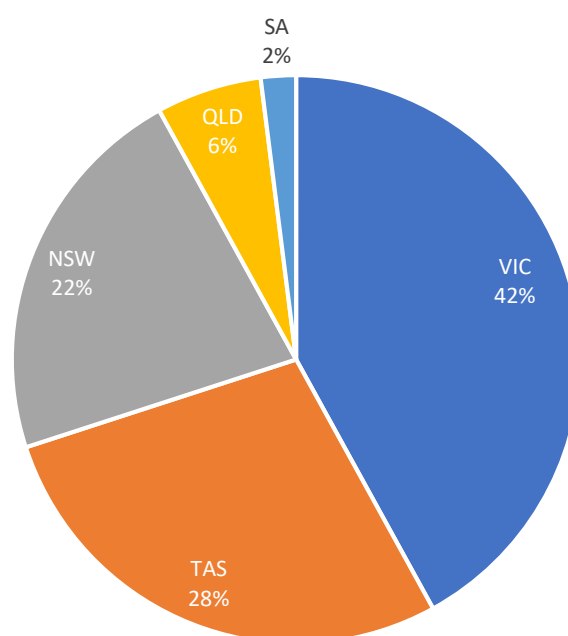


Figure 0-2: 2017/2018 Percent of total production volume of fresh rubus berry production by state

⁴ 2017/18 Australian Horticulture Statistics Handbook