

Submission: International Fresh Produce Association (IFPA)

2nd Call for Submissions

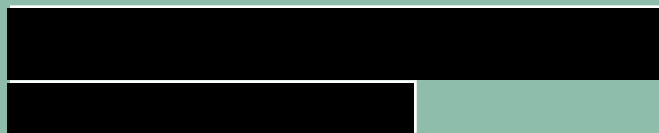
**Proposal P1052: Primary
production and processing
requirements for horticulture**

February 2022



International Fresh Produce Association

www.freshproduce.com



An introduction to the International Fresh Produce Association

The International Fresh Produce Association (IFPA – formerly PMA) is a member-based organisation that serves, connects and informs members throughout every sector of the fresh produce supply chain. Our members are buyers and sellers from every segment of the fresh produce and floral supply chain. Our global community includes growers, packers, processors, importers and exporters, wholesalers and retailers, foodservice, government agencies, associated suppliers to the industry, universities and many more.

By working across the whole supply chain, IFPA strives to assist businesses to increase their sales of fresh and safe produce to domestic and global consumers. It does this by assisting members to develop their business capabilities to increase consumption of fresh produce in Australia and improve food safety along the supply chain.

Importantly, IFPA is actively supporting members and the broader industry to address various challenges to ensure only safe and suitable products enter the marketplace. These challenges include:

- The diverse range of products (ranging from low to high risk) and processes across the fresh produce supply chain
- Increasingly long and complex fresh produce supply chains
- Consumer expectations of year-round availability, greater convenience, and shelf-life
- Businesses not adequately aware of food safety risks and failing to address food safety culture
- Emerging and more virulent pathogens
- Challenges in finding suitably qualified personnel in regional locations (including but not limited to food safety professionals/practitioners)
- Acquiring resources to undertake relevant research and delivering learnings to industry
- Ensuring improved traceability along the supply chain

IFPA members are directly affected by the opportunities and challenges faced by Australia's fresh fruit and vegetable industry, particularly in contributing to the Australian economy and providing healthy nutritious food to the nation. Accordingly, IFPA has been active in assisting our members to meet these challenges by providing the information, connections, training, and resources that support positive outcomes.

IFPA appreciates the opportunity to provide comments on the 2nd Call for submission. In general, IFPA is supportive of the approach taken by FSANZ and the intention to establish three separate standards for the berries, leafy vegetables, and melons.



Observations

The IFPA provides specific comments on the proposal as follows:

1. The scope of the outputs and the resulting draft Standards are consistent with the direction provided to FSANZ by the then Australia and New Zealand Ministerial Forum on Food Regulation
2. Globally we continue to see a wide range of fresh produce continue to be implicated in outbreaks of foodborne illness, and the proposed outcome-based standards for melons and leafy vegetables provide practical guidance across the entire horticulture sector.
3. The risk assessment document (Supporting Document 2) is comprehensive and clearly outlines potential risks that may compromise the safety of the three commodity groups.
4. The benefit cost analysis (Supporting Document 3) would be improved by more accurate and detailed financial data. IFPA recognises that the agrifood sector is often reluctant to share such data, hence the figures published are considered to be on the high side for costs associated with implementing the Standards. For example, businesses meeting the HARPS Standard would be expected to meet requirements, so the main costs would be initial notification (Berries) and annual licencing and periodic auditing costs (Leafy vegetables and melons).
5. The Compliance Plans (Supporting Document 4) shows how regulators have scoped out how they plan to enforce the Standards, and this provides assurances that there will be a strong focus on achieving national consistency. This is a welcome development, not hitherto seen with previous PPP Standards.
6. While many businesses across the fresh produce sector are already covered by GFSI base standards (incorporating Food Safety Schemes, FSS) there are questions about the accreditation of individual businesses and their commitment to achieving food safety outcomes. Note that the requirements of these GFSI base standards don't meet the more rigorous food safety obligations proposed in the retailer's Harmonised Australian Retailer Produce Scheme (HARPS) Standard Version 2.0.
7. The HARPS standard addresses food safety in more detail, covering the use of inputs (manures, water, etc), staff training, and personal hygiene and is closely aligned to the proposed requirements included in the three PPP standards.
8. It is IFPA's understanding that accreditation to a GFSI base standard would mean a business has met the requirements described in the draft Standards, however the integrity of each business's FSS will need to be verified by the regulatory authorities in each State or Territory. This is a responsibility that cannot be delegated at this time to a third party.



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Preferred approach

IFPA supports the FSANZ preferred approach of **Option 3**, which includes both regulatory and non-regulatory approaches to managing food safety.

The challenge will be to adequately support industry with non-regulatory guidance and advice. Guidance material that has previously been developed for earlier PPP standards (e.g. [A guide to Standard 4.2.4 Primary Production and Processing Standard for Dairy Products](#)) and for the Food Safety Standards (Chapter 3 – [Food Safety Programs – A guide to Standard 3.2.1](#)) would go a long way to explaining what is required. The content published in Supporting Document 4 will provide a template on which to develop printed guidance material to support businesses to meet the requirements of the Standards.

It is noted that the funds allocated by FSANZ to this task are quite modest. There is the opportunity for the various peak industry bodies to step up and provide information and advice, which promotes the advantages of advancing food safety, and the attendant benefits of improving customer confidence and market access. IFPA through its member-base will be actively working with the industry to provide guidance on meeting the PPP requirements.

This will include initiatives such as:

- Webinars outlining the requirements of the standards for each of the commodity groups
- Factsheets covering frequently asked questions about the PPP standards
- Links to useful resources and guidance material

IFPA has been constantly updating members of progress with PI052, and has recently briefed members on the status of the 2nd Call for submissions.

It will be incumbent on IFPA and the relevant horticulture industry peak bodies to inform their members about the introduction of the Standards, and to provide leadership in promoting the benefits of rapidly meeting their requirements.

