

***Submission to
Food Standards Australia New Zealand
On
Proposal P1052
Primary Production and Processing Requirements
for Horticulture (Berries, Leafy Vegetables and
Melons)***

Submitted by:



United Fresh
New Zealand Incorporated



Introduction

United Fresh is the only pan-produce industry body in New Zealand. Our membership includes growers, grower organisations, pack-houses, wholesalers, and service & logistics providers, and retailers.

Our vision is to create a sustainable fresh fruit and vegetable industry for New Zealand.

United Fresh and our members form part of an industry that almost every New Zealander interacts with on a daily basis.

United Fresh welcomes the opportunity to comment on the proposal P1052 by way of this submission. Doing so provides us, as the pan-produce industry body, with the opportunity to enhance our membership's understanding of the issues that have led to the food safety focus upon Berries, Leafy Vegetables and Melons production.

On behalf of United Fresh's membership, United Fresh wishes to make a submission on P1052 *Primary Production and Processing requirements for Horticulture (Berries, Leafy Vegetables and Melons)*.

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Applicability for New Zealand

Chapter 4 of the Food Standards Australia New Zealand (FSANZ) code currently does not apply in New Zealand. However, it is the opinion of United Fresh that the proposed standards could be a valuable tool for New Zealand growers. The proposed standards will assist in mitigating potential risk that can be attributed to the three crops identified with higher risk profiles.

The proposal P1052 is broadly in line with a recently completed *Risk Ranking To Prioritise Fresh Produce Safety Research* recently undertaken by United Fresh in conjunction with the New Zealand Food Safety Science Research Centre (NZFSSRC) and New Zealand Food Safety.

The New Zealand Food Act 2014 categorises most unprocessed fresh produce within National Programme level 1 (NP1). The NP1 categorisation has set the bar too low from a foodborne illness risk viewpoint for Berries, Leafy Greens and Melons. The one size fits all approach of NP1 does not differentiate risk by produce type. For certain products, such differentiation is necessary and hence our support for the proposal.

Proposal P1052 summarises risk within the Australian production context. However, the proposed standards and associated guidance documents adapted for the New Zealand context, would be a valuable resource to strengthen food safety risk management in New Zealand.

Such standards would be a valuable adjunct to the Good Agricultural Practice (GAP) programmes that are recognised as equivalent to NP1 in New Zealand.

The challenge irrespective of legislation/regulations and "Voluntary" GAP schemes, is how to manage the heightened foodborne illness risks seen in the three crop categories identified. The proposed P1052 guidelines will go a long way towards this.

Summary

The proposed standards and associated guidance documents will support a reduction in foodborne illness attributable to Berries, Leafy Vegetables, and Melons.

We support FSANZ's preliminary position to recommend introduction of a combination of regulatory and non-regulatory measures to nationally manage food safety in these sectors. We support primary production and processing (PPP) standards for each of Berries, Leafy Vegetables and Melons be introduced into the Australia New Zealand Food Standards Code.