# Submission

# P1052 – Primary Production and Processing requirements for High-risk Horticulture

**1st call for submissions**

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## Costa Group overview

Costa Group is Australia's leading grower, packer and marketer of fresh fruit & vegetables and operates principally in five core categories: berries, mushrooms, glasshouse tomatoes, citrus and avocados.

Across more than 50 sites, Costa's operations include approximately 4,500 planted hectares of farmland, 30 hectares of glasshouse facilities and three mushroom growing facilities. Costa also has strategic foreign interests, with majority owned joint ventures covering six blueberry farms in Morocco and four berry farms in China.

Costa also operates a wholesale fresh produce and logistics business. We specialise in distribution centre operations, particularly temperature-controlled environments for cold storage and ambient storage solutions.

Costa is the country's leading berry producer with multiple sites across Australia growing blueberries, raspberries, strawberries and blackberries. In all that we grow, we are committed to sustainable production and growing, and food safety is paramount. We have more than 725 hectares of farmland in Queensland, New South Wales, Tasmania and Western Australia. An increasing proportion of Costa's berries are grown under protective tunnels and in substrate to mitigate the risk from weather and climate impacts and to improve yield. Our berries are marketed under the Driscoll's brand in Australia.

While Costa's food production, supply chain, and food safety are constantly developing and evolving, Costa draws on international best practice to maintain our position as a market leader. Australia must continue to strive for world leading systems, processes and regulation to maintain our high-quality produce for consumers in Australia and overseas.

## Executive Summary

As the largest grower and marketer of Australian fresh produce, Costa Group is committed to delivering high quality, nutritious and safe food for consumers in Australia and overseas. Costa Group strongly supports the FSANZ objectives of maintaining the food safety of Australian food. However, the application of prescriptive, burdensome and onerous regulation is unlikely to achieve this policy and regulatory outcome. Any new requirements must clearly identify the problem with substantive evidence domestically (as opposed to relying on international evidence) and operate in a manner that recognises commercial systems and the need for the continued development of a strong food safety culture across industry.

To this end, there are existing certifications in place which coupled together with a food safety culture ingrained in our operations, Costa meets in all verifiable ways. The priority for FSANZ should be to concentrate on ensuring all berry and horticultural suppliers meet this standard as a minimum requirement for the supply of product. This will then address the key category and industry risks.

The categorising of fresh Australian grown berries as high risk also raises a threat to the commercial viability of Costa and other industry participants. 'High risk' will be taken literally by consumers, and the purchase and consumption of berries will be seen as less preferable to other fresh produce. There is genuine concern on the part of Costa that the categorisation of berries as high risk will also signal the beginning of a process in which other fresh produce is also categorised in the same way and that it simply becomes a catch all application. This will be comparable to a version of the precautionary principle, in which although there is lack of empirical and scientific evidence to warrant the action, this does not stop it being strictly applied with no exceptions. This would create an untenable commercial situation for Costa and the entire fresh produce industry.

Where horticultural businesses have already adopted and are certified to a GFSI benchmarked Food Safety Scheme which is independently audited, has a focus on the inclusion of elements of food safety culture improvement in the way in which such a scheme is implemented, managed and assessed for compliance, then FSANZ should give due consideration to allow such businesses to achieve and satisfy regulatory compliance through this certification. International initiatives in this space should be explored, including the New Zealand example of Food Act compliance via industry Food Safety Standards.

## Introduction

This submission is in response to FSANZ 1st call for submissions to assist with further consideration of Proposal P1052 *Primary Production and Processing requirements for high risk horticulture*.

Effective food safety management is critical to ensure consumer confidence and the commercial success of the fresh produce industry. Outbreaks of foodborne illness can have a significant impact on the general public and the reputation and profitability of the industry. Appropriate regulatory and non-regulatory measures are therefore important to all consumers, and for businesses operating in the fresh produce industry.

**Scope of the Proposal**

Proposal P1052 - The development of primary production and processing requirements for high risk horticulture has been informed by an earlier assessment undertaken for Proposal P1015 (broad based primary production and processing standard for horticulture), an analysis of relevant Australia and international foodborne illness outbreak data (between 2011 and 2019) and Australian Recall data.

Ministers responsible for food regulation in Australia agreed on a need to reassess food safety measures in five high-risk horticultural sectors (Those with annexes to the Codex Code of Hygienic Practice for Fresh Fruits and Vegetables).

Based on stakeholder submissions, preliminary risk assessment work and existing code requirements the scope of P1052 has been determined as primary production and the primary processing activities of berries, leafy vegetables and melons.

There is no doubting the fact that industry wide effective food safety management is critical to an industry's success and the protection of the public's health and safety.

However, an important distinction needs to be made between the use of international and local data when relying on such data to establish a risk rating. The international data in supporting documents shows that among other produce, raspberries and strawberries have been associated with foodborne illness outbreaks (identified as part of the review of P1015). In contrast those outbreaks which have occurred in Australia have only involved **imported frozen berry products** (2015-2017). The frozen berries product referred to had been grown and processed overseas, with these quite distinct activities (growing and processing) often occurring in separate countries. In contrast there have been no foodborne illness outbreaks associated with fresh Australian grown berries. This is a crucial distinction to highlight and strongly suggests that the classification of fresh Australian grown berries as 'high-risk' is not only unreasonable, but also unwarranted based on the evidence at hand. Caution should be applied when concentrating on products rather than the processes used to produce them.

In addition, careful consideration should be given to the terminology used to classify products to ensure that the language ('high risk') does not reduce consumer confidence and ultimately consumption resulting in deleterious commercial consequences.

This however does not seek to discount or downplay the fact there are food safety risks associated with fresh produce that need to be effectively controlled. It is how this is achieved which is important and it should not be done in a way which simply increases the regulatory burden. The information below describes how this is currently being achieved.

**The Food Safety Compliance system**

Compliance to the requirements contained in Global Food Safety Initiative (GFSI) benchmarked Food Safety Schemes applicable to the primary production of berries (and other horticultural crops) (i.e. Freshcare, Global G.A.P., SQF) is third party audited. The requirements address the need for control in areas most commonly associated with fresh produce related foodborne illness outbreaks. These include:

- Management of pre- and post-harvest water quality
- Management of fertilisers
- Management of animals (wildlife and domestic animals) and pests
- Maintenance of facilities
- Hygiene and sanitation
- Process control

While the effectiveness of the current food safety compliance system has been identified as adequate by the Fresh Produce Safety Centre as part of the Innovation Project, potential opportunities for improvements are also investigated as part of this project. The purpose of the Innovation Project is to achieve a more robust, efficient and cost-effective food safety compliance system that underpins consumer expectations today and into the future. Any changes to the system will not change the existing Food Safety Schemes used in the horticultural industry but will focus on how those standards are implemented, managed and assessed for compliance.

Effective implementation of food safety management systems and ensuring correct decisions and practices in relation to food safety are made and followed, are highly dependent on the food safety culture of an organisation. Elements of food safety culture have been added to the GFSI benchmarking requirements 2020, and it would be expected for these to be included in the requirements of GFSI benchmarked schemes as part of the next revision of the standards.

Important cultural components include leadership, education, communication and hazard and risk awareness. Further education and support to businesses, in the form of basic food safety education, guidance material, tools and communications which are primarily aimed at understanding and more effectively managing food safety risks, in particular where there are changes in risk profile, would help reduce food safety risks.

Where horticultural businesses have already adopted and are certified to a GFSI benchmarked food safety scheme which is independently audited, has a focus on the inclusion of elements of food safety culture improvement in the way in which such a scheme is implemented, managed and assessed for compliance, then FSANZ should give due consideration to allow such businesses to achieve and satisfy regulatory compliance through this certification. International initiatives in this space should be explored, including the New Zealand example of Food Act compliance via industry Food Safety Standards. Demonstration of compliance with Food Safety Schemes or regulatory requirements and risk control by businesses should be effective, accessible and cost effective, with alignment with existing industry systems and future improvements to these systems are a priority.

Where a horticultural business does not have a 3rd party audited GFSI benchmarked Food Safety Scheme in place that addresses the main microbiological contamination risks and minimum requirements for traceability, they should be required to do so.

Once again, this should be supported by (further) education and support to businesses, in the form of basic food safety education, guidance material, tools and communications to effectively manage food safety risks as well as consumer education on safety storing, washing and preparing fruit and vegetables.

**Traceability**

Traceability systems and schemes must be commercially relevant and applicable to ensure effectiveness in delivering traceability in a manner that is sustainable, and least cost for the desired public or regulatory outcome.

Effective traceability is critical to ensure products can be isolated, withdrawn or recalled effectively in case of a food safety incident, limiting the impact of the incident. Currently the minimum standard is for products to be traced from production to its destination (customer).

It is important that initiatives to improve horticulture supply chain traceability, including developing and trialling technologies that digitise information flow, continue to be explored and trialled. Traceability technologies should focus on practical application, cost effectiveness, have the support of the industry and align with retailer requirements.

## Appendix 1. Further information to support the assessment

### 1. Costa Food Safety Scheme certifications and production volumes

All Costa's operational domestic berry sites are certified to a third party audited Food Safety Scheme, either Freshcare (Food Safety & Quality) or the Global G.A.P. Integrated Farm Assurance scheme. Where within scope of the scheme, our sites also hold a Harmonised Australian Retailer Produce Scheme (HARPS) certificate. Table 1. Provides an overview of production volumes by region. Costa domestic berry site Food Safety Scheme certifications are outlined in Table 2.

**Table 1. Costa berry production volumes by region**

| Region | 2019 Production volume by berry type (tonnes) |
|---|---|
| Corindi - NSW | Blueberries: 2,563<br>Raspberries: 1,758<br>Blackberries: 94 |
| Tumbarumba - NSW | Blueberries: 403* |
| Tasmania | Blueberries: 517<br>Raspberries: 1,495<br>Blackberries: 789<br>Strawberries: 1,947 |
| North Queensland | Blueberries: 769<br>Blackberries: 79 |
| Western Australia | Blueberries: 429<br>Raspberries: 72 |

* 2018/2019 season. 2019/2020 season impacted by bushfires

| Table 2. Costa berry site Food Safety Scheme certifications | | | |
|---|---|---|---|
| **Site Location (State)** | **Scope of activities and berry types** | **Food Safety Scheme certifications^** | **HARPS certificate (Y/N)** |
| Corindi (NSW) | Growing, harvesting, packing, storage and dispatch of blueberries, raspberries and blackberries | GLOBALG.A.P. Integrated Farm Assurance scheme | Y |
| Courabyra / Taradale (NSW) | Growing, packing, storage and dispatch of blueberries | Freshcare FS&Q* | Y* |
| Rosewood (NSW) | Growing and dispatch of blueberries to pack shed for packing at Taradale site | Freshcare FS&Q* | |
| East Devonport DC (TAS) | Intake, cooling and distribution of pre-palletised strawberries, raspberries, blackberries and blueberries<br>Packing, storage and dispatch of blueberries and strawberries | Freshcare FS&Q | Y |
| East Devonport (TAS) | Growing, packing and dispatch of blueberries and strawberries to DC for further packing and sorting | Freshcare FS&Q | Y |
| Wesley Vale (TAS) | Growing, packing and dispatch to DC of raspberries | Freshcare FS&Q | Y |
| Wesley Vale (TAS) | Growing, packing and dispatch of strawberries to DC for further packing | Freshcare FS&Q | Y |
| Sulphur Creek (TAS) | Growing, packing and dispatch of blueberries to DC for further packing and sorting. | Freshcare FS&Q | Y |
| Dunorlan (TAS) | Growing, packing and dispatch to DC of blackberries | Freshcare FS&Q | Y |
| Dunorlan (TAS) | Growing, packing and dispatch to DC of blackberries | Freshcare FS&Q | Y |
| Lebrina (TAS) | Growing, packing and dispatch of blueberries to DC for further packing and sorting | Freshcare FS&Q | |
| Tolga (QLD) | Growing and harvesting of blueberries | Freshcare FS&Q | |
| Atherton QLD) | Growing of harvesting of blueberries | Freshcare FS&Q | |
| Walkamin (QLD) | Growing, harvesting, packing, storage and dispatch of blueberries and blackberries | Freshcare FS&Q | Y |
| Neergabby (WA) | Growing, packing, storage and dispatch of blueberries and raspberries | Freshcare FS&Q | Y |

*Certification has expired. Not currently supplying product as a result of 2019 bushfire impact. Audit will take place when site is back in operation

^ FS&Q = Food Safety & Quality Standard

## 2. Costa sites and production systems and practices for fresh berries

**Growing**

An overview of production systems and preharvest water use for each berry type can be found below:

| Region | Production system* | Fruit contacts soil (Y/N) | Fertigation / irrigation method | Water used for spray application |
|---|---|---|---|---|
| **Blueberries** | | | | |
| **Corindi - NSW** | Grown in substrate or in the ground | N | Drip systems– No fruit contact | Critical limits as per guidelines for Fresh produce food safety 2019 |
| **North Queensland** | Grown in substrate | N | | |
| **Tasmania** | Grown in substrate or in the ground | N | | |
| **Western Australia** | Grown in substrate | N | | |
| **Tumbarumba - NSW** | Grown in the ground | N | | N/A – no spray application |
| **Raspberries** | | | | |
| **Corindi** | Grown in substrate | N | Drip systems– No fruit contact | Critical limits as per guidelines for Fresh produce food safety 2019 |
| **Tasmania** | Grown in substrate or in the ground | N | | |
| **Western Australia** | Grown in substrate | N | | |
| **Strawberries** | | | | |
| **Tasmania** | Grown in coir on raised table beds | N | Drip systems– No fruit contact | Critical limits as per guidelines for Fresh produce food safety 2019 |
| **Blackberries** | | | | |
| **Corindi - NSW** | Grown in substrate | N | Drip systems– No fruit contact | Critical limits as per guidelines for Fresh produce food safety 2019 |
| **North Queensland** | Grown in substrate | N | | |
| **Tasmania** | Grown in substrate or in the ground | N | | |

*When grown in the ground plants are in raised mounds with weed matting cover. When grown in substrate pots are raised on pavers or plastic shells on raised mounds with weed matting cover.

Water is tested with a minimum frequency once per annum with multiple sources being tested pre-season, mid-season and when situations give rise to additional testing.

Pest management programs have been implemented and bird deterrents are in use and continually being reviewed. Measures are in place to control wildlife and intrusion is monitored. Domestic animals are excluded from growing, packing and storage areas.

Any product which has been dropped on the floor or any unsanitary surface or in some way been subject to contamination is discarded into a waste bin.

**Harvest and postharvest handling**

| Harvest & postharvest handling | | | |
|---|---|---|---|
| **Berry type** | **Harvest method** | **Packed in facility on packing line** | **Postharvest water used** |
| **Blueberries** | Product is harvested by hand in 3 kg trays which are then stored on chariots for transport to facility for cooling, packing and palletising at facility | Y | N |
| **Raspberries & Blackberries** | Product is harvested by hand and packed into punnets in the field on trolleys. Packed product stored on chariots for transport to facility for cooling and palletising at facility | N | N |
| **Strawberries** | Product is harvested by hand in 3 kg trays which are then stored on chariots for transport to facility for cooling, packing and palletising at facility | Y | N |

Handwashing facilities are available at toilets, chariots and packing facilities with availability of potable water (E. Coli <1 CFU/ 100ml), liquid soap, paper towels and hand sanitiser. Hand washing signage is available in multiple languages. Personal hygiene requirements, including hand washing, are covered in induction training and employee communications.

Handwashing takes place upon commencement of work, toilet breaks, meal breaks, block movement, using a nasal tissue, handling waste material, wash down of equipment and after contact with any potential source of contamination.

Water is tested with a minimum frequency once per annum with multiple sources being tested pre-season and mid-season.

All equipment such as buckets, inspection trays are cleaned at the end of each day and use. All harvest equipment including buckets, trays, trolleys and chariots are sanitised prior to daily use.

Cleaning and sanitation program of facilities is in place with pre-operational inspections and audits.

Environmental swabs to verify picking equipment, hands and packing equipment hygiene is carried out annually.

*Through-chain microbiological data (e.g. level, frequency and type of microbiological contamination at different production and processing stages or critical control points)*

Review of historical data (3 years) does not show breaches of critical limits for water sources or pathogenic contamination of finished fresh berry products produced at our sites.

*FSANZ welcomes the views of submitters on the range of regulatory approaches to be considered under Option 2, including whether existing regulatory requirements (e.g. Chapter 3 requirements) should/could apply*

The requirements in Chapter 3 of the Food Standards Code cover those areas reflected in GFSI benchmarked Food Safety Standards and the Harmonised Australian Retailer Produce Scheme. While most requirements can and should apply some would require changes to be able to apply to primary production. Examples relate to food premises' floors, walls and ceilings where product is packed in the field and the availability of a supply of *warm* running water for hand washing facilities available in the field.

END.