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Submission to FSANZ on Safety of Horticultural Produce in Australia

Introduction

PMA Australia-New Zealand (PMA A-NZ), an affiliate of the global Produce Marketing Association (PMA) and the only organisation that represents most of the major Australasian organisations across the full value chain from seed to retail in fruits, vegetables, nuts and herbs, supports FSANZ's review of the Safety of Horticultural Produce in Australia and is in general agreement with your approach.

PMA A-NZ as an organisation does not involve itself directly in the area of Food Safety, but this is under review, as we have had requests from a number of our members to take a more active role in this area, due to our across-sector representation.

Therefore this submission limits itself to four main comments for your review.

1. Does the review cover imported produce?
2. Does the review cover all segments of the value chain?
3. Does the review take note of food safety practices in other parts of the world?
4. General comments

1. Does the Review cover imported produce?

Currently about 5-7% of fresh produce is imported, but this amount is far higher for processed fruits, vegetables and nuts. As more and more counter-seasonal fresh produce is imported, it is likely that imports of horticultural products will increase over the coming decade.

Therefore it is important that the Review does take note of this, especially if Australian producers are being seriously disadvantaged against offshore producers on food safety standards. The other important issue is the potential for contaminated imported food getting into the Australian food chain and then not being picked up by systems further down the chain.

2. Does the Review cover all segments of the value chain?

Australia has long been considered a world leader in food safety systems and management; the fact that there have been no major health scares (as seen in the USA and Europe) could either be pure luck or more likely because of these systems and management.

All the major companies have rigorous systems in place and there are a number of organisations that play a major part in ensuring these systems are in place and compliant.

However it is the 'outliers' in the value chain where there is the greatest risk of food safety falling down. For instance there are many small growers who cannot afford the cost of expensive food safety systems and at the other end of the chain, there are increasing numbers of farmers' markets that have limited food safety systems applied to them. Direct from farm to consumer is what many consumers want, but it does come at an increased food safety risk.

In the food service sector, there is probably even more risk with a plethora of small operators providing produce to restaurants and other food service outlets.

A food scare (such as an E.coli outbreak in spinach) in these less regulated value chains could have a major impact on the more regulated sector, with consumers likely to turn against a product before turning against the market outlet (such as farmers' markets), as has been the result in countries where there has been a breakdown in food safety.

3. Does the Review take note of food safety practices in other parts of the world?

All major fresh produce safety scares have occurred in Europe and USA; these have all been well-documented.

In the USA, one of the most significant outcomes of this has been the industry response, culminating in the establishment of the Center for Produce Safety (CPS, <https://cps.ucdavis.edu>), which is focused exclusively on providing the US produce industry and government with open access to the actionable information needed to continually enhance the safety of produce. It was established by public and private partnership at the University of California, Davis, with funding provided by the California Department of Food and Agriculture, the University of California, Produce Marketing Association (PMA), and Taylor Farms.

The CPS has invested considerable sums of money into research into the causes of food safety outbreaks in fresh produce, but has also provided industry participants with many tools to better mitigate against the risk of outbreaks. One of the most important factors about the CPS is that it looks at the whole value chain and is not just focussed on horticulture.

It is strongly recommended that the Review by FSANZ does consider the systems being put in place in other parts of the world to better handle food scares in fresh produce, as currently the Australian fresh produce industry does not have a clear, cohesive, integrated risk management plan and food scare response system in place.

4. General Comments

The review appears to be focussed only on Australia and not New Zealand; if this is not the case then this needs to be clarified.

The review would benefit from a matrix approach, for example with food safety risks broken down to product (some are more or less inherently risky than others), production systems (organic versus conventional), supply chain (import versus local-grown), and product preparation (those eaten in the same form as when harvested versus pre-cut). This would enable food safety systems to be better aligned with the risk level, e.g. the chances of a food safety issue with whole citrus fruit are considerably less than packaged leafy vegetables and there needs to be some recognition of this.

As mentioned, PMA A-NZ generally supports the process FSANZ is taking and looks forward to ongoing consultation as the review continues and at the end of the process.

Yours sincerely,

Chief Executive Officer

11th July 2011

About Produce Marketing Association (PMA)

Founded in 1949, Produce Marketing Association is the leading trade association representing nearly 3,000 companies from every segment of the global produce and floral supply chain. Members rely on PMA year round for the business solutions they need to increase sales and consumption, build strong professional relationships, and expand their business opportunities. For more information, visit www.pma.com.

About PMA Australia-New Zealand (PMA Aus-NZ)

Founded in 2009, PMA Australia-New Zealand is the first international affiliate of Produce Marketing Association (PMA), the global produce and floral industry's leading trade association. PMA A-NZ's mission is to serve PMA members from across the Australia and New Zealand industry by providing benefits and services tailored to the needs of the Trans-Tasman market. This includes quality networking events, and education and information designed to deliver practical business-building value. PMA A-NZ is governed by a local Board of Directors whose members hail from across the Australia and New Zealand produce and floral supply chain. For more information, visit www.pma-anz.com.
