

11 July 2011

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**Submission by NSW Farmers' Association Horticulture Committee to Food Standards Australia New Zealand in response to the Improving food safety for fresh horticultural produce consultation paper**

The NSW Farmers' Association (the 'Association') is Australia's largest state farming organisation representing the interests of the majority of commercial farm operations throughout the farming community in NSW. Through its commercial, policy and apolitical lobbying activities it provides a powerful and positive link between farmers, the Government and the general public.

The Association's Horticulture Committee welcomes the opportunity to provide comment to Food Standards Australia New Zealand (FSANZ) on the 'Improving food safety for fresh horticultural produce consultation paper' (the 'paper').

The Horticulture Committee understands that the work currently being undertaken by FSANZ in relation to improving the food safety for fresh horticultural produce is in its early stages and welcomes the intention of FSANZ to consult widely across the whole supply chain as this work progresses. FSANZ representatives will be attending the Horticulture Committee's Conference on 18 July 2011 to discuss the process and we thank FSANZ for accepting our invitation to meet with our Members.

The Horticulture Committee agrees with the statement by FSANZ that Australians are able to access a large variety of high quality, safe fresh produce. We also support processes which ensure that the risk of microbiological or chemicals hazards are managed, which protect the reputation of horticultural industries.

We ask FSANZ to recognise the commitment the majority of horticultural producers have made to food safety through participation in food safety and quality programs such as Freshcare (the on-farm assurance program for the Australian fresh produce industry). For most producers food safety compliance is not voluntary. They must implement a food safety system such as Freshcare in order to meet customer (retailer) requirements.

Whilst a large percentage of fresh produce in the market place is grown under a certified food safety system there is produce that is supplied to the market place that is not. It is a concern to growers with a food safety system in place that if there is a food safety incident all growers (of the offending commodity and possibly all fresh produce) will be impacted by a lack of consumer trust, not just those without a system in place. It also frustrates growers that have gone to the effort and cost of achieving annual food safety certification that markets for which certification is usually a requirement for supply may source produce from uncertified businesses when produce is in short supply.

In NSW there are 865 Freshcare members (Food Safety and Quality Code) with 466 being certified and 64 pending certification. The remaining members are in the training and implementation phase. This Freshcare Code of Practice covers all aspects of production and handling, from initial site selection to postharvest storage and transport. It is based on a master HACCP Plan and requires growers to complete individual risk assessments in areas identified as presenting significant safety risk as well as demonstrating compliance to all the prescriptive elements of the Code of Practice.

The implementation of a food safety system is not an insignificant cost to a farming business. We therefore agree with FSANZ that unnecessary additional financial burdens should not be placed on horticultural producers who are already complying with a food safety scheme.

The focus of any food safety compliance must be based on an assessment of risk, not on commodities or commodity groupings. Specific farming inputs and practices and their management present risk, rather than the actual crop. An example is the use of certified composted manures

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compared with the use of un-composed manures. To assess food safety risk the combination of crop, inputs, in-field and postharvest processes and end use must be considered.

The Horticulture Committee notes that a range of food safety information and guidance material has been produced through research and development projects managed by Horticulture Australia Limited and funded by industry levies and the Australian Government. An example of one project is 'Quality Wash Water for Carrots and Other Vegetables: Insurance for Clean Food and Minimising Environmental Impact'.

The Horticulture Committee would like to thank FSANZ for considering our comments. We are available to provide input and feedback to FSANZ during the process to determine what approaches should be taken to ensure food safety in fresh horticultural produce.

Yours sincerely