



TASMANIAN FARMERS & GRAZIERS ASSOCIATION

Food Standards Australia & New Zealand
PO Box 7186
Canberra BC ACT 2610



Re: *Improving Food Safety for Fresh Horticultural Produce* Consultation Paper

About TFGA

The Tasmanian Farmers and Graziers Association (TFGA) is the leading representative body for Tasmanian primary producers. TFGA members are responsible for generating approximately 80% of the value created by the Tasmanian agricultural sector.

In 2009/10, the farm gate value of agriculture and fishing was \$1,683 billion – which represented approximately 6% of the gross state product. More than seventeen thousand people are directly employed in farm related activities. Taking into account basic multiplier factors, this meant the farm dependent economy contributed c\$5.4 billion dollars (18%) to gross state product and 1 in 6 jobs.

Not only that, the sector is one of very few in the state that have continued to deliver improved performance in the long term. Over the past 25 years, the average annual rate of increase in farm gate GVP has been 4%. Over the five year period from 2003/2004 to 2008/2009, the actual increase was a massive 42% - from \$1.35 billion to \$1.68 billion.

These figures clearly demonstrate the importance of the sector as an economic driver for the state's economy – and also demonstrate that agriculture is a more significant contributor to the Tasmanian economy than it is in any other state. With this in mind, it is clear that Tasmania needs to ensure that the agricultural base of the state remains competitive and profitable.

With our purpose being to promote the sustainable development of Tasmanian primary industries, the TFGA is committed to ensuring that the agriculture sector in Tasmania is profitable and sustainable. We are also committed to promoting the vital contribution the agricultural sector makes to the environmental, social and economic fabric of the Tasmanian community.

Comments to Consultation Paper

We welcome the opportunity to provide comment to Food Standards Australia New Zealand on the *Improving food safety for fresh horticultural produce* consultation paper. We see this as the first step in ensuring improved Food Safety outcomes for the horticulture industry and we look forward to working with FSANZ closely on this issue.

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TFGA endorses the submissions made by Freshcare Ltd and Growcom on this consultation paper.

TFGA places paramount importance on food safety. Growers are particularly concerned by the threat posed to the whole horticultural industry by growers who are not part of a food safety program. The estimated 25% of growers¹ who do not have any food safety program in place pose an unacceptable risk to the industry as a whole. We accept that some of these growers pose a very low risk - but it is impossible to know that for sure. In line with the Freshcare recommendations, we support a risk based model based on full consideration of the product, inputs, processes and end users.

We do not endorse a commodity-based approach to determining risk as there are too many variables. That said, any risk assessment process has to ensure that the cost and level of effort required by the grower to comply is commensurate with the level of risk.

A key outcome of this review should be the development of an appropriate risk framework with a compliance regime based on level of risk. There should be full recognition of existing schemes, provided they deliver the outcomes defined in the risk assessment. Duplication and additional cost imposts should be avoided where possible.

We understand 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 welcome the intention of FSANZ to consult widely across the whole supply chain as this work progresses.

We would of course be happy to discuss further our comments on the issues raised in this paper should that be required.

Yours sincerely

Chief Executive Officer
18th July 2011

¹ As per the Freshcare submission