



Government of **Western Australia**
Department of **Health**
Public Health

Horticultural Produce Consultation Paper
Food Standards Australia New Zealand
PO Box 7186
CANBERRA ACT 2610

SUBMISSION ON THE "IMPROVING FOOD SAFETY FOR FRESH HORTICULTURAL PRODUCE CONSULTATION PAPER"

The Department of Health, Western Australia (DOH) would like the following comments and information taken into consideration in relation to the "improving food safety for fresh horticultural produce consultation paper". In general, the DOH supports regulation of horticulture produce based on specific product and processing risk.

Please consider the following comments on the matters raised in the initial consideration report.

Activities that are covered

The horticulture industry is an extremely varied primary production industry with variation in risk depending on the physical nature of the product, the risk factors in the cultivation and harvesting of the product, any post harvest treatment of the produce and the conditions associated with consumption of the product.

It is considered a comprehensive mapping of the Australian horticulture industry is essential to determine all commodities, their methods of production, any post harvest treatment and processing of the produce, and whether the risks associated with these is mitigated by the activities associated with their consumption.

However, based on previous outbreak cases, the processing of horticultural products should be covered by a food safety management system.

Costs associated with implementing and maintaining

While it is argued that many growers and processors already have food safety schemes in place, the costs of implementing a regulated system should be minimal, principally being regulatory verification. There has not been any evidence to demonstrate these voluntary systems are effective in terms of food safety. Traditionally food safety issues frequently relate to businesses which do not participate in such schemes.

Of more significance will be the ability of regulators to manage any enforcement of any regulated system. Horticulture production occurs in a multitude of varying sized production

levels in rural areas where authorised food safety officers are in short supply, with staffing levels generally linked with the size of the community and town based businesses.

Where you source information/advice regarding food safety risks associated with the production and/or processing of horticultural products

Information regarding horticulture food safety is obtained through food monitoring programs covering both microbiological contamination and chemical residues, through notification of potential food borne enteric illness and international subscriber notifications.

What residual risks may exist that could be managed through a regulatory framework or through other incentive based voluntary adoption mechanisms.

While voluntary schemes are encouraged, they do not provide a regulator with a basis to ensure a food business is managing risks. The majority of recent food borne microbiological outbreaks in Australia have been associated with horticultural, and current sampling of fresh fruit and vegetables is indicating significant levels of chemical residues.

Any existing state regulatory scheme should not be considered as these are outside the regulatory framework and are actually signaling a need for regulatory intervention.

Whether we have identified the commodities that present the highest risk

There is no definitive list of commodities presenting the highest risk. Risk is determined by a number of factors rather than purely commodity. The DoH generally agrees with the basis for determining risk. In determining risk, food recalls due to the presence of allergens (apart from relating to the processing of the product) should not be considered in the assessment of the risk of the commodity.

The evidence that a new approach could work well and that the benefits would outweigh the costs.

It is not possible to respond to this question until a scheme is devised and the scope and processes are determined.

However, recent incidents indicate a strong need for interventions that may reduce the risk of severe food borne disease outbreaks

Thank you for considering the above comments and information. Should you wish to discuss any of these comments please do not hesitate to contact Bill Calder on (08) 9388 4958 or <mailto:bill.calder@health.wa.gov.au>.

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