



11 July, 2011

Food Standards Australia New Zealand (FSANZ)
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Dear Sir/Madam,

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

Thank you for the opportunity to comment on the above consultation paper recently released by FSANZ.

The Australian Nut Industry Council (ANIC) is the federation representing the seven tree nut industries in Australia. Collectively we represent a production base of over \$500 million, a significant portion of which is sold as fresh produce domestically. Food safety is of course a serious concern for our industry.

We have a number of comments to make about the consultation paper:

- ANIC represents seven industries, with many large and small processors who implement a wide variety of food safety guidelines, schemes and programs. This is in addition to the estimated 1,500 producers who range from large corporate businesses to small enterprises with maybe a dozen trees, all selling fresh and /or processed nuts in a wide variety of ways. To answer the questions posed by the consultation paper in any level of detail in the timeframe provided would require an investment in time and resources beyond the capacity of the organisation, which has a part time Executive Officer only. ANICs five smaller members also rely on a voluntary association executive structure. ANIC believes that there is a significant amount of information that already exists on food safety systems and compliance, and that FSANZ needs to do further research work and better refine what it believes the issues are and ask industry to comment on these, rather than asking for a sweep of information as the starting point for consultation with industry.
- ANIC understands that FSANZ had a review of food safety systems completed approximately five years ago. ANIC suggests that this would be an ideal starting point for consultation with industry, rather than coming with a blank page and asking industry to resource the study.
- ANIC understands that TQA have a project looking at the cost of compliance to QA due for completion by the end of July 2011. Again, this work will provide valuable insight into some of the questions posed in the consultation paper.
- ANIC notices that the paper does not address the issue of imported product, and believes that any food safety guidelines/regulatory framework imposed should be applied consistently to all product regardless of source if the risk exists.



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- The paper talks of investigating new systems or the possibility of a regulatory framework for managing food safety. ANIC would encourage FSANZ to use existing frameworks and systems where possible, and address the issue of recognition across or between systems. FSANZ's efforts may be best placed in determining the criteria considered essential for food safety and then developing, in consultation with industry, a framework for recognising those systems that meet these criteria as a minimum.

Whilst we recognise that the consultation paper indicates nuts are a secondary target product, ANIC would like to be kept informed of and engaged with the progress of this review, as it will have implications for our industry. We are happy to provide detailed information if FSANZ can better define its issues.

Regards,

Chaseley Ross
Executive Officer