



**Submission to Food Standards Australia New
Zealand in response to discussion paper:
*Improving food safety for fresh horticultural
produce***

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Introduction

TQA Australia welcomes the opportunity to respond to the discussion paper "Improving food safety for fresh horticultural produce" released by Food Standards Australia New Zealand (FSANZ).

TQA Australia considers the discussion paper raises a number of key questions specifically related to one of our core activities.

About TQA Australia

TQA Australia offers a unique perspective on and range of experience in, agrifood assurance systems, both on-farm and throughout the supply chain. For over 13 years, TQA Australia has been at the forefront of on-farm assurance systems, working across Australia with a broad range of industries including horticulture, grains, eggs, dairy, honey, wool, forestry, aquaculture and wine. The organisation has experience with domestic and export market requirements, including public and proprietary standards.

With more than a decade's experience assisting producers implement systems, we have developed a strong understanding of the most effective ways to engage with producers and of the issues and concerns producers have with regard to quality assurance, food safety and environmental management.

TQA Australia provides consultancy and training services to primary producers across Australia with wine producers in South Australia and Victoria, orchardists in Western Australia, vegetable growers in Tasmania and tropical fruit growers in Queensland and Northern Territory.

Executive summary

TQA Australia believes that there is more work that can be done to improve food safety for fresh horticultural produce.

With our knowledge of the most commonly used on-farm food safety systems, we do not believe that there are any significant risks that aren't already covered under the current systems. However, we do believe that within the horticultural industry there are sectors with low adoption of food safety systems. These sectors include producers supplying local markets like independent retailers, certain processors, farmers markets or restaurants.

While TQA Australia supports Food Standards Australia New Zealand in their endeavors, we believe that any approach must take into account the work already being done by those producers that are certified the 3rd-party audited food safety systems.

Submission

Existing systems and programs currently used by producers

A number of food safety and quality assurance systems exist, covering varying on-farm activities. Some focus purely on food safety, whilst others incorporate additional areas such as occupational health and safety, customer specifications and environmental aspects.

Food safety and quality assurance systems include:

- Freshcare Food Safety and Quality 3rd Edition
- GlobalG.A.P. Integrated Farm Assurance Scheme (GlobalG.A.P)
- Woolworths Quality Assured (WQA)
- SQF 2000
- SQF 1000
- HACCP
- Coles Requirements
- Salad GAP
- ISO 9001

Freshcare Food Safety and Quality, GlobalG.A.P, SQF 1000 and Salad GAP are the most commonly used prescriptive on-farm food safety systems in Australia. Businesses which do not carry out on-farm activities are unable to be certified to these systems i.e. stand alone packhouses, transport companies.

Other principle based systems exist which do not prescribe what a primary producer must do to obtain compliance; rather they offer a series of principles that must be achieved. These systems include:

- ISO 9001:2008 Quality management systems – Requirements
- ISO 22000:2005 Food safety management systems – Requirements for any organization in the food chain
- Hazard Analysis Critical Control Point (HACCP)

Primary producers often have limited choice as to what systems they implement on-farm; this is generally specified by the customer. Whilst Woolworths have written their own system, Coles have chosen to accept a number of different systems and develop an additional set of requirements that producers must meet. In order to meet the requirements of multiple suppliers, producers often have to implement multiple systems.

Whilst the above is not an exhaustive list, the majority of primary producers that hold certification to a third-party audited system would be certified to at least one of these systems.

Activities covered

Whilst their approach and specific elements may be different, the majority of food safety and quality assurance systems share commonality in the on-farm activities they address. Systems generally have a management component and a food safety component. Typical activities include:

Management

- Document control
 - ensuring use of current documents
 - copies of up-to-date codes of practice are maintained
 - records of compliance are kept
- Internal audit
 - completing self-assessments to identify non-conformances
- Corrective action
 - defining process for dealing with potential and actual issues
 - implementing actions to control issues and prevent recurrence of issues
- Training
 - system requirements
 - hygiene
 - job-specific tasks

Food safety

- Equipment and machinery
 - suitability
 - location
 - construction
 - calibration
 - maintenance
- Control of inputs (includes chemicals, fertilisers, water)
 - training and use
 - monitoring frequency, timing and accuracy of application to ensure reduced risk of contamination
- Approved suppliers
 - control and monitoring of suppliers that can have an impact on food safety
- Hygiene
 - hygiene policies
 - training of workers
 - cleaning
- Other Good Manufacturing / Agricultural Practices
 - pest control
 - control of foreign objects
 - site security
 - maintenance
- Product identification and traceability
 - Product recall, including mock recalls
- Allergen management

Costs associated

TQA Australia has recently undertaken a survey, assisted with funds from Horticulture Australia Limited as part of a larger project (HG10024: Quantifying the cost of compliance with Quality Assurance). This survey showed that it is difficult to put a figure on the cost to horticulturalists of compliance with food safety systems.

The cost to each producer is dependent on a variety of factors including the frequency of audits (biannual, annual), the number of systems producers are certified to and the frequency and number of tests that need to be completed (water, produce microbial testing, chemical residue tests, soil / leaf / sap tests).

Producers are also often charged a 'certification' fee by the system owners – a cost to be certified to their system. This can be based on turnover (SQF) or the number of hectares (GlobalG.A.P) or may be a flat fee (Freshcare).

The system that is chosen will also impact on costs. Some systems are complex, leading to an increased time being spent on understanding and complying with the elements. For some producers, increased complexity may lead to them engaging an external consultant to assist.

Resources

There are a number of resources producers can use to improve their knowledge of food safety issues and systems. These sources include peak industry bodies, system owners (i.e. Freshcare Limited), customers (i.e. Coles and Woolworths), websites, certification bodies, trainers and consultants.

A primary concern in having multiple resources is the possibility of mixed messages. There have been cases where producers have been advised to implement a certain system, only to find that their customer does not recognise it.

Residual risks

With our knowledge of the most commonly used on-farm food safety systems, we do not believe that there are any significant risks that aren't already covered under the current systems. We do however believe that within the horticultural industry there are sectors with low adoption of food safety systems. These sectors include producers supplying local markets like independent retailers, certain processors, farmers markets or restaurants.

A new approach?

TQA Australia is excited about the possibility of a new approach to this issue; however the approach must consider the systems that are currently adopted by many producers around Australia. The cost to benefit ratio is largely dependent on what the new approach is.

In our experience, voluntary systems appear to only be adopted if the producer is forced to adopt it in order to supply a specific customer. A recent survey conducted by TQA Australia found that 75% of respondents indicated that the primary reason for implementing a 3rd-party audited system was to meet the requirements of a specific customer. Voluntary systems appear only to be adopted if the producer is

forced to adopt it in order to supply a specific customer. We do not believe that they system can then be considered voluntary.

If there are no market drivers for the producer to adopt a system then we believe, in the majority of cases, producers will choose not to become certified to a system due to the added costs and the time required to maintain the system. In the TQA Australia survey, respondents were asked about overall value of these systems to their business 29% of respondents indicated that the system had little or no value to their business. More disturbingly, 11% of respondents believed the systems had a negative effect on their business.

Some food safety systems are specific to a particular commodity and activities associated with growing that commodity. For example, those growing carrots, onions and potatoes who only supply their onions to Woolworths are not able to have their carrots or potatoes certified to WQA. The only way around this is for the producer to adopt another system like Freshcare Food Safety and Quality that has the ability to cover all produce grown on farm.

TQA Australia believes that a possible way forward would be to develop a recognition framework. The framework would enable Food Standards Australia New Zealand, in conjunction with industry, to identify the key elements that must be in place to address the risks associated with horticultural produce, then analyse the food safety systems currently being used and identify which of these system(s) best meet their needs. The framework would provide a means of assessing the content and verification requirements of systems, thus enabling recognition of "equivalence".

High risk commodities versus high risk activities

We believe the focus should be on the on-farm activities and the market of the commodity rather than the commodity itself. It is the on-farm activity that can increase the food safety risk to the consumer, not the commodity itself. For example a producer supplying broccoli to the fresh market has a higher food safety risk in relation to microbial content that someone supplying the same product to the processing industry.

Activities that affect risk include whether the commodity:

- is grown in or near the ground
- has an edible skin
- is generally eaten uncooked
- has fertiliser of organic origin applied to it and if this is treated or untreated
- is grown on a site that also is also grazed with livestock
- is irrigated with water which complies to a microbial limit
- is washed post harvest
- is harvested by hand or machinery
- is chemically treated according to label, off-label permits, registration or country of sale requirements taking into account MRL testing for residues of chemicals used on the crops, used by neighbours, or built up in the soil over time (persistent chemicals and heavy metals)

Conclusion

TQA Australia welcomes a new approach to dealing with food safety risks, provided it takes into account the good work that has already been done by producers.

We recommend the development and adoption of a framework, rather than the development of another voluntary scheme.

TQA Australia would like to be kept informed of the process, and would welcome the opportunity to be involved.