



11 July 2011

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

Re: Submission on *Improving food safety for fresh horticultural produce* consultation paper

Growcom is the peak representative body for the fruit and vegetable growing industry in Queensland, providing a range of advocacy, research and industry development services. We are the only organisation in Australia to deliver services across the entire horticulture industry to businesses and organisations of all commodities, sizes and regions, as well as to associated industries in the supply chain. We are constantly in contact with growers and other horticultural business operators. As a result, we are well aware of the outlook, expectations and practical needs of our industry.

The organisation was established in 1923 as a statutory body to represent and provide services to the fruit and vegetable growing industry. As a voluntary organisation since 2003, Growcom now has grower members throughout the state and works alongside other industry organisations, local producer associations and corporate members. To provide services and networks to growers, Growcom has about thirty staff located in Brisbane, Bundaberg, Townsville, Toowoomba and Tully. We are a member of a number of state and national industry organisations and use these networks to promote our members' interests and to work on issues of common interest.

Growcom is a founding member of Freshcare Ltd and also provides Freshcare training to Queensland growers.

Comments

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.

Growcom endorses the submission by Freshcare Ltd on this consultation paper and we add our own comments below.

Growcom places paramount importance on food safety. Recent consultation with our grower members has highlighted that a food safety scare is perceived as one of the greatest threats to the industry. Accredited growers are particularly concerned by the threat posed to the whole horticultural industry by growers who are not part of a Food

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Safety program. For example, the recent European E.Coli scare has highlighted the issues around the use of incorrectly prepared organic fertiliser; a practice which does apparently still occur in Australia.

As has been seen in the European outbreak, contamination in a single product line can cause devastation to the horticultural industry and the wider economy through consumers ceasing to purchase fruit or vegetables. It is essential that such contamination in Australian horticulture be prevented and our clean, green image maintained.

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 uses. 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, should be 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. Additional cost imposts should be avoided where possible.

While we do support the existing Food Safety programs, there may be a need to apply more stringent codes in certain situations. Additionally, there has been a concern raised by growers that training and auditing functions are performed by the same organisations, which is potentially a conflict of interest.

At a broader level, Growcom is concerned by the lack of a central organisation or an individual who could speak on behalf of the horticulture industry should there be a widespread contamination event in Australia. This is particularly important in the early stages when the exact source of contamination is unknown. We are keen to work with FSANZ and the rest of the industry to determine an appropriate model for a food safety response.

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 hope that we can meet with members of your organisation in the near future to discuss further some of the issues raised in this paper and ask that you contact Troy Reeves on 07 3620 3815 to arrange a meeting.

Yours sincerely

Chief Executive Officer

¹ As per the Freshcare submission