

7 February 2022

Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT2604

via email: submissions@foodstandards.gov.au

Dear Sir/Madam,

2nd Call for Submissions – Proposal P1052. Primary Production Processing Requirements for Horticulture (Berries, Leafy Vegetables and Melons).

Thank you for the opportunity to comment. This office advocates for small and family business to ensure policy making settings support their growth and business transformation.

Consultation with key stakeholders highlights the considerable work that has already been done by industry to ensure on-farm safe food production. Standards introduction will likely cause duplication of processes, confusion due to inconsistent implementation by states, and is unlikely to solve ongoing issues after produce leaves the farm gate.

We therefore recommend FSANZ collaborate with industry, state and territories to:

1. Ensure any changes in requirements are adopted by jurisdictions uniformly including through implementation, compliance and education processes. For the avoidance of doubt, FSANZ should not introduce standards unless uniform adoption across jurisdictions can be delivered.
2. Educate producers not currently engaged with a Food Safety Standard of their responsibilities to contribute towards a safe food environment, and methods to achieve this.
3. Provide education materials on best practice for specific commodity growing and handling.
4. Educate consumers on appropriate pre-consumption treatment of fruit and vegetables.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact [REDACTED]

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