

**Submission to Proposal P1052 - PPP Requirements for Horticulture (Berries, Leafy Vegetables and Melons)**

Dear FSANZ,

With respect, both the supporting risk information and rationale relied upon in this Proposal P1052 cannot justify the inclusion of Australian berries in its scope.

Australian berries have been included in the scope based only on food safety incidents associated with berries grown and packed in overseas countries.

The overseas berry contaminations relate to the transmission of viruses on berries through worker hygiene and product contact. These incidents occurred because of the high endemic rates of viral diseases (such as Hepatitis A) in the overseas population where the berries were grown, or high-risk factors for contamination caused by the very close proximity between livestock (source of porcine viruses), human habitation and berry production.

These scenarios are not relevant for assessing food safety risk in Australian berry production systems and no equivalent foodborne outbreaks of these types have originated in Australian grown berries.

Categorisation of Australian berries as 'higher risk' based on the argument that 'it has happened overseas' is unsustainable. There have been many food safety outbreaks overseas attributable to many different fresh produce types, yet all these produce types are not included in the Proposal scope.

Furthermore, the identification of potential food safety risk entry pathways for berry contamination in Australia *via* agricultural inputs or poor worker hygiene - as additional risk factors - apply equally to almost all other types of Australian grown fresh produce types.

Leafy vegetables and melons grown in Australia have had historical incidents of food safety outbreaks when inputs have been contaminated and control measures ineffectively managed. There are risk elements associated with these product characteristics that may enhance microbial survival if production and postharvest control measures are not appropriate. However, it may also be argued that actual outbreaks in these products were due to the failure of food safety management practices in place, rather than due to inherently higher product risk factors.

It is my submission that Proposal P1052 should immediately exclude berries from the scope of the Proposal, on the grounds that the justifications relied upon for their inclusion are scientifically and logically unsound.

I would welcome the opportunity to discuss and elaborate further on this submission with your team.

Yours faithfully,

[Redacted Signature]

   
Fresh Produce Group

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