



## **FSANZ Proposal P1052 – PPP Requirements for Horticulture (Berries, Leafy Vegetables and Melons)**

### **Submission from vegetablesWA**

vegetablesWA is the state representative for the vegetable and melon industry in Western Australia. vegetablesWA has more than 750 members located from Broome in the north to Albany in the south of the state. Of vegetablesWA's members approximately 150 grow melons and 100 grow leafy vegetables.

Data captured between 2011 and 2019 has uncovered a sharp increase in foodborne illness in Australia originating from the melon, berry and leafy green categories. FSANZ has been tasked by federal government to plan and implement a range of measures to reduce foodborne illness originating from these primary production categories.

Based on consultation with major melon and leafy vegetable growers vegetablesWA's preference would be for Option 3 (for all three proposed crop types) with the recommendation that legislators and regulators work directly with industry partners to develop support resources to assist businesses to implement the standards prescribed.

Feedback by WA based vegetable growers (melon, leafy and to a lesser extent, berries as some berry growers are vegetablesWA members) and other affected producers (i.e. packhouses, merchants etc.) suggests that in general Option 3 is in principle the most suitable outcome.

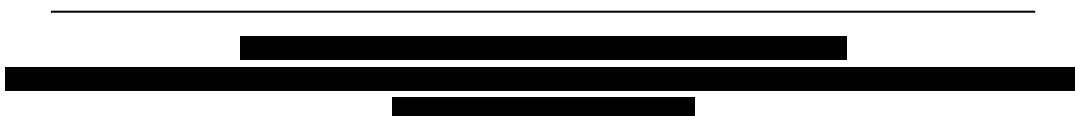
vegetablesWA is broadly supportive of the submissions the national peak industry bodies Melons Australia, AusVeg, Berries Australia who have also conducted consultation of their affected members and have also concluded that Option 3 is the best pathway forward to achieve the desired outcomes in a fair and effective manner.

### **Feedback related to Option 3 (Regulatory and non-regulatory measures)**

*"After examining all available risk management options, FSANZ's preliminary conclusion is that option 3 is our preferred option."* (17 November 2021 179-21 Consultation Regulation Impact Statement P1052 – Primary Production and Processing Requirements for Horticulture (Berries, Leafy Vegetables and Melons))

Discussions conducted with several senior PPP stakeholders (leaf/melon/berry growers operating a GFSI recognised food safety scheme) – this is an acceptable option and should minimally disrupt those growers supplying the major retailers (operating a GFSI base scheme + HARPS). Provided the existing food safety programs are recognised in their entirety and system compliance delivers regulatory compliance.

*"FSANZ considers that, in general, the Australian horticulture industry operates at a high level of food safety. This is supported by horticultural produce agreements and industry initiatives such as FSS. However, based on current levels of illness, outbreaks and incidents, the current system needs strengthening—particularly in the leafy vegetables and melons sectors."* (17 November 2021 179-21 Consultation Regulation Impact Statement P1052 – Primary Production and Processing Requirements for Horticulture (Berries, Leafy Vegetables and Melons))



This statement is accepted and endorsed by WA growers/operators as those operating without any food safety systems are considered to pose a risk to the broader industry. Growers consulted believe that regulatory measures that will encourage/urge operators without a food safety system to adopt a GFSI recognised system (such as Freshcare FSQ4.2, for example) should assist to level the playing field in terms of operating expenses/compliance while helping to reduce the food safety risks associated with these commodities.

Adoption of Option 4 would also be supported to achieve this outcome. However, the WA growing community feels that regulation requires policing to ensure that fairness and equality are maintained (nationally) Option 3 is supported provided that a clear pathway and timeline for adoption is well communicated and fair/reasonable.

*“Existing FSS in Australia for fresh produce cover the requirements of the proposed PPP standards. FSANZ anticipates that there would be minimal impact for those businesses currently signatory to a FSS. However, PPP standards will ensure a consistent and appropriate level of food safety management across all berry, leafy vegetable and melon businesses. Reductions in illnesses and outbreaks also lead to an increase in consumer confidence and business sustainability.” (17 November 2021 179-21 Consultation Regulation Impact Statement P1052 – Primary Production and Processing Requirements for Horticulture (Berries, Leafy Vegetables and Melons)*

Our members surveyed, agree with this statement and they accept that consumer confidence is a driver for changes/improvements to food safety and the systems that support its delivery.

*“PPP standards would result in consistency and transparency for industry and government and demonstrate regulatory requirements to our trading partners.” (17 November 2021 179-21 Consultation Regulation Impact Statement P1052 – Primary Production and Processing Requirements for Horticulture (Berries, Leafy Vegetables and Melons)*

WA based operators affected by the proposal would like to see GFSI recognised food safety schemes encouraged to form the non-regulatory framework recognised by the regulation in their entirety and growers who undertake a GFSI recognised scheme should be considered as compliant without requiring any further administration activities.

Given the current industry state-of-play (February 2022), WA vegetable growers would like to see that the proposed Option 3 implementation across the states is uniform, to ensure that producers across states are not faced with inequitable or additional administrative burden/competition for market access depending upon their business location.

#### **Other thoughts/comments for consideration:**

- The system needs to capture all current participants in the primary production processes to be most impactful. Compliant producers cannot and should not be left to suffer the system while other non-compliant operators avoid and continue to conduct operations without requiring compliance systems. Current activities must be acknowledged and supported. For example: certification against industry recognised food safety systems such as Freshcare, SQF and GlobalG.A.P.; participation and adherence to industry best practice guides such as Safe Melons Program; current produce/input testing in place (such as produce and water testing).
- There is a lack of clarity around which leafy vegetables will be in/out of the current proposal – this is likely to cause confusion unless it is clearly defined what it is in and what is outside the regulation. There needs to be a clear pathway and suitable support for smaller growers to become regulation compliant.

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[REDACTED]

[REDACTED]

[REDACTED]

- There are some questions about whether the current non-regulatory system (food safety programs) cope with a surge in new operators without compromising existing stakeholders if Option 3 is adopted. Given the isolation WA faces which has been exacerbated with Covid-19 border closures there have been issues that growers have faced securing food safety program audits. Mechanisms and resources need to be in place to ensure this does not occur.
- Language Other Than English growers – Approximately a third of vegetablesWA's members are Vietnamese speaking. Appropriate support mechanisms will need to be developed and implemented to assist this significant segment of growers to understand and efficiently adopt suitable measures in their businesses to achieve regulatory and non-regulatory compliance.
- vegetablesWA has a suitable mechanism to support the adoption of Freshcare via the Quality Assurance Coordinator project that is currently funded by the state-based APC-VPC. This service assists operators that do not currently have any non-regulatory food safety measures in place to work towards regulatory compliance.
- vegetablesWA supports the submissions made by AusVeg, Melons Australia and Freshcare particularly the sentiments that the broader horticulture industry supports the adoption of a food safety culture and a general increase in food safety activities in primary production businesses.

Should you require more information or examples vegetablesWA would be please to do so. Thank you for the opportunity to provide feedback on this proposal

Yours sincerely,

