

16 February 2022

DRAFT Proposal P1052 Primary Production and Processing Requirements for Horticulture (Berries, Leafy Vegetables and Melons)

Submission from the **Fresh Produce Safety Centre Australia & New Zealand**

The Fresh Produce Safety Centre Australia & New Zealand (FPSC) is an industry-led, not-for-profit company established to enhance fresh produce safety across Australia and New Zealand. Its mission is to empower the Australian and New Zealand fresh produce industry with novel and innovative systems and processes that leads to safer fresh produce for consumers. FPSC was established in 2014 with support from PMA A-NZ, and The University of Sydney under a Horticulture Innovation Australia funded-project. Our supporters represent stakeholders across the fresh produce value chain – growers and packing houses, input services, storage and transport, wholesale, retailers and exporters along with industry bodies and research organisations. Our networks exist across government and regulatory bodies, food safety standards and auditing, research and education, equipment and packaging. Further information on our supporters is at: <https://fpsc-anz.com/our-supporters/>.

FPSC welcomes the opportunity to respond to the Proposal P1052 Primary Production and Processing Requirements for Horticulture (Berries, Leafy Vegetables and Melons). In this submission, the FPSC offers the following comments on the proposal:

Recognition of accreditation through existing Food Safety Schemes (FSS)

A proportion of businesses across the three commodity sectors are already covered by a GFSI-benchmarked FSS. This should automatically qualify the business as having met the requirements of the standard and no further action should be required by the business, as far as meeting the requirements of the standard is concerned. (The businesses may of course undertake other actions above and beyond the FSS and standard requirements, and many do so on a regular basis). It is very important for businesses to not be subject to multiple hurdles to demonstrate the efficacy of their food safety systems. This cost of multiple requirements, standards and audits has been recognised in several reports, including the FPSC's 2025 Innovation Agenda Review of the Audit Process report, pp 14-15 (2020) and the Australian Food and Grocery Council's Food Safety Auditing Project Report (2015), p4.

Underdeveloped proposal and cost-assessment for non-regulatory measures

FSANZ has stated that its preference is for option 3, a combination of regulatory and nonregulatory measures. However, there is very little discussion in the proposal P1052 on the form of the nonregulatory measures throughout the documentation.

The FPSC is of the view that for option 3 to be viable, the nonregulatory side needs considerable investment. At the moment, FSANZ is proposing that it invest \$42,007 (in total, over 18 months) and that industry peak bodies invest \$9,240 (again over 18 months) to implement the nonregulatory measures proposed.



From a review of supporting document 3 (SD3) Cost-benefit analysis, FSANZ proposes the following activities to support the nonregulatory component of option 3, or option 4 (nonregulatory measures alone):

- Factsheets (6 fact sheets in total, 2 per commodity): No distribution, translation, printing or training costs included. Total cost assumed \$9,631.
- Animations (3 animations in total, 1 per commodity): No distribution, translation, industry input costs included. Total cost assumed \$5,586.
- Links to useful resources: Total cost assumed \$353.
- Webinars (2-4 x 1.5 hour webinars): Total cost assumed \$9,703.
- Face-to-face meetings (3-6 face to face meetings over an 18-month period): Total cost assumed: \$9,534.
- Flights and travel: \$7,200.
- Industry costs of preparing factsheets, attending meetings and participating in webinars: 20 hours x 6 representative (2 per commodity): \$9,240.

Total: \$42,007 plus industry costs of \$9,240.

Assuming that the nonregulatory component of option 3 (or the entirety of option 4) is designed to reinforce the requirements of the relevant standard (for option 3) or the benefits of having an effective FSS (for option 4), this budget and activity is inadequate, and makes it hard for FPSC to see much difference between option 2 and option 3. We note:

- It does not adequately budget industry time/expenses in engaging with these activities. For example, there is no cost for industry representatives to have input into the animations, to translate the material to meet the needs of NESB growers, to print and distribute the material. FPSC is aware (from our own activities) of the high costs associated with translation, printing and distributing materials to reach growers in formats that they will use, understand and read/watch/listen to.
- The underlying assumption is that the growers that most need to be reached with this information – those not already covered by a FSS – are already accessing information through traditional routes (the FSANZ website or through peak industry body e-newsletters or magazines). We do not believe that this is the case. FPSC argues that a nuanced and differentiated communications program is required to reach these traditionally hard-to-reach growers, and that for this to be effective, investigations need to be undertaken to determine the routes, channels and formats which are most suitable to each grower group.
- It assumes that these growers understand and receive information in English, visit the FSANZ website, read email communications and do not require printed material. We are aware that relying solely on emails and websites may not reach/resonate with different grower groups (i.e. those not in a FSS, smaller growers, NESB growers, market gardeners), and printed, translated material with a nuanced distribution strategy, and supported by training, is likely to have better communications reach.

This investment is inadequate. FPSC proposes that if option 3 is to be initiated, a comprehensive change management and communications approach should be adopted and fully funded. We propose that this should include realistic and comprehensive activities such as those activities proposed by FPSC to Hort Innovation under our Food Safety Culture Proposal (valued at

approximately \$800K over 3 years, not yet funded). Such activities to be performed under the FPSC proposal include:

- Conduct research including an engagement survey/research to identify where producers gain food safety information, to identify every organisation in Australia that provides food safety services to the industry (Fresh Produce Safety Centre, researchers, scheme owners, audit and compliance companies, training providers etc), plus an estimate of scheme coverage.
- Identify ways to build on existing platforms for food safety knowledge-sharing and leverage existing resources invested into produce safety (such as HIA-funded VegPro <https://vegpro.talentlms.com/index>);
- Employing a resource person to conduct testing with food businesses of one-on-one produce safety health checks via Zoom, smartglass, tablet/smart phone or similar technology: a 30-minute produce safety check to check the farm or facility with the grower/packer and identify immediate areas for improvement or corrective action.
- Design training programs (online self-paced, Zoom and face-to-face) and outreach materials in produce food safety based on the *Guidelines for Fresh Produce Food Safety*, world's best practice and learnings gained through FPSC's food safety forum discussions; and leverage other initiatives to expand the reach. Translation and distribution plans as guided by research.

Additionally, we propose that an industry funded organization such as FPSC is best placed to deliver this communications program in concert with other industry bodies such as Freshcare, other GFSI-benchmarked schemes, the International Fresh Produce Association, Australian Organic Limited and peak industry bodies such as AUS-VEG, Growcom, the Australian Melon Association etc. This will ensure greatest reach and credibility among growers.

A national approach

Of great concern to industry is the possibility that any new standard will not be implemented uniformly and consistently across all states and territories. Horticultural businesses, particularly those businesses that operate in multiple states and territories, regularly highlight the unnecessary additional compliance costs attributed to differing requirements across jurisdictions. A national approach is essential.

Differing standards sending mixed messages to industry

The call for submissions document states "There are currently no national or consistent regulatory requirements for food safety that apply to the primary production and processing of horticultural products, except for seed sprouts." (p. 10). However, the proposal, as prepared under option 3, has a differentiated approach for berries, compared to leafy vegetables and melons. FPSC is of the view that a single standard would be more appropriate.

This submission has been approved by the Board of the FPSC A&NZ.

