
From:


Thursday, 12 March 2020 10:08 AM

To:

standards management

Subject:

FSANZ Submission Form Received (Internet) - Ray Coffey

	
Application/Proposal Number:	P1052
Organisation Name:	
Organisation Type:	Other
Representing:	Industry in general
Street Address:	
Postal Address:	As above
Contact Person:	
Contact Number:	
Email Address:	
Submission Text:	<p>This submission has listed areas of the proposal that need further review. As with all of these issues a risk based approach is used. Rather than waste time trying to find all growers (which will prove impossible even PIC numbers will fail due to lease and sub lease arrangements) start with the largest and use those to develop bench marks for levels and types of contamination and the method it occurred. Current testing (micro on water and product is not statistically valid nor is the submission independent). WGS should be used to</p>

pin point organisms of concern Forget third party auditing as it may give a false positive as to what is really happening out in industry. There is a clear lack of skills and knowledge both in the industry and in the auditing sector (one day I can do meat the next I will do strawberries even though I may not have any horticultural background. Food Safety culture is the buzz phrase at present but is virtually non existent. Farms are forced to utilize workers from other cultures and hand washing is not part of that The proposal overlooks fluming, dipping, sanitising and fertigation all major vectors in spreading water borne bacteria. A graduated response with sanctions will not work as for years people have been used to getting Non Conformances and closing them out without penalty rather than finding the issue themselves or at least doing a root cause on the initial finding Use of cheap chlorine by staff who know nothing about chlorine demand combined with auditors who chase cracks and cobwebs is a recipe for disaster Auditors seem to think they are there to find non conformance but it is the exact opposite and auditors need to take the blame for repeated non conformances. CB assessments of auditors and audit reports is seen as an imposition and treated accordingly. We cant get the auditor off side as we have no others. HARPS is massively underfunded and cannot perform enough auditor and report reviews. Freshcare only requires a micro test on like products

so if I grow water melons and rock melons I only have to test water melons or if I grow six types of berries I can just test my blueberries. I am happy to discuss any of this at any time. My background is 50 years in the food industry (half in government) with the last 30 as an auditor well before SQF etc I am currently a level 4 high risk audit assessor and have recently undertaken a review of all CBs in Australia on behalf of a GFSI system owner. I wish this to remain confidential.