



Submission to

Food Standards Australia New Zealand

in response to

1st Call for submissions – Proposal P1052

Primary Production and Processing
Requirements for high-risk horticulture

Australian Melon Association Inc

18th March 2020

SUBMITTER'S DETAILS

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Authorised by:

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Size and location of producers in the melon industry

The Australian Melon Association (AMA) is the peak industry organisation for melon growers. The functions are to provide leadership for the industry, facilitate communication of information and to represent members on issues that affect the viability of businesses and the industry as a whole.

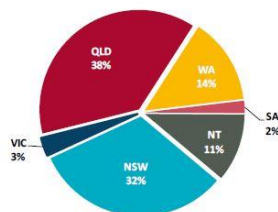
The melon industry consists of 220 melon growers who annually produce \$130 million of melons on 8,500 hectares. Fruit is produced in all states and territories except Tasmania, with Queensland and New South Wales being the largest growing areas.

Fresh seedless watermelons, rockmelons and honeydew melons are the major fruit types. For the purpose of this document, 'melons' refers to rockmelon.



Melons—Muskmelons

2017/18 Fresh Muskmelons Production by State



Sources: AMA

Fresh Muskmelons Seasonality by State

State	17/18 Tonnes	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
New South Wales	14,554												
Victoria	1,364												
Queensland	17,282												
Western Australia	6,367												
South Australia	910												
Northern Territory	5,003												
Availability legend		<div style="display: flex; justify-content: space-around;"> High Medium Low None </div>											

Source: AMA

Main Muskmelon Varieties

Production is dominated by two main varieties, as indicated below:

Rockmelons, a round melon with netted greyish-green skin and an orange flesh. Rockmelons accounted for **85%** of fresh production for the year ending June 2018.

Honeydew melons, a round melon with a light green flesh. Honeydew melons accounted for **14%** of fresh production.

Other muskmelon varieties include the newly introduced **Piel de Sapo** variety.

Melons—Muskmelons

Seasonality by Muskmelon Variety

The seasonal availability of some major varieties is profiled in the table below.

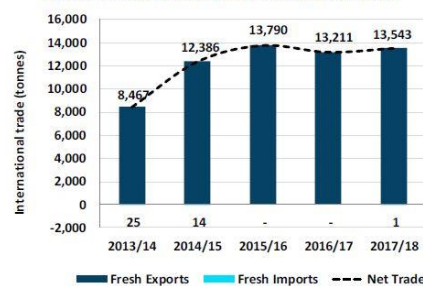
Variety	17/18 Tonnes	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
Rockmelons	38,658												
Honeydew	6,367												
Piel de Sapo	455												
Availability legend		<div style="display: flex; justify-content: space-around;"> High Medium Low None </div>											

Source: AMA

Fresh Muskmelons International Trade

Australia is a net exporter of fresh muskmelons, typically exporting between 8,000-14,000 tonnes per year. For the year ending June 2018, Australia exported **13,543 tonnes**. The exports and imports over the last 5 financial years is profiled in the graph below, where imports are counted as negative tonnes.

Net Fresh Muskmelons International Trade

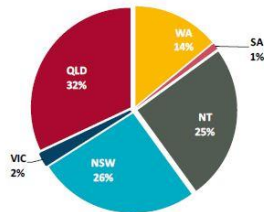


Source: GTA



Melons—Watermelons

2017/18 Fresh Watermelons Production by State



Source: AMA

Fresh Watermelons Seasonality by State

State	17/18 Tonnes	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
New South Wales	44,210												
Victoria	3,401												
Queensland	54,412												
Western Australia	23,805												
South Australia	1,700												
Northern Territory	42,510												
Availability Legend		High	Medium	Low	None								

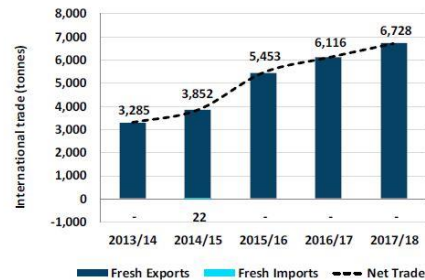
Source: AMA

Fresh Watermelons International Trade

Australia is a net exporter of fresh watermelons, with exports growing in recent years. For the year ending June 2018, Australia exported 6,728 tonnes. The exports and imports over the last 5 financial years is profiled in the graph to the right, where imports are counted as negative tonnes.

Melons—Watermelons

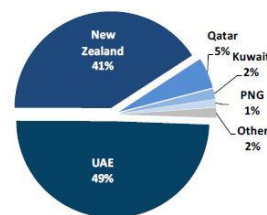
Net Fresh Watermelons International Trade



Source: GTA

For the year ending June 2018, 49% of exported fresh watermelons were sent to United Arab Emirates, as profiled in the chart below.

2017/18 Fresh Watermelons Exports by Country



Source: GTA

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Hort Innovation

freshlogic

2017/18 Australian Horticulture Statistics Handbook 04/03/2019

04/03/2019

2017/18 Australian Horticulture Statistics Handbook

freshlogic

Hort Innovation

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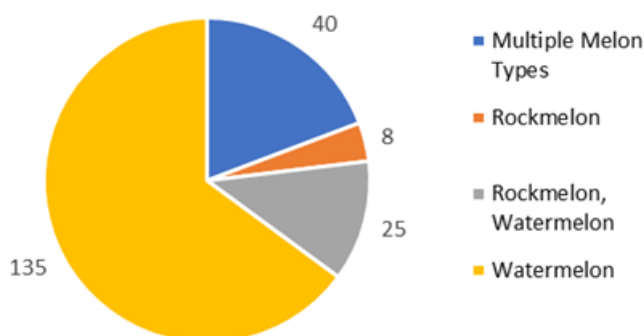
Uptake and efficacy of industry schemes across the high-risk horticulture sectors.

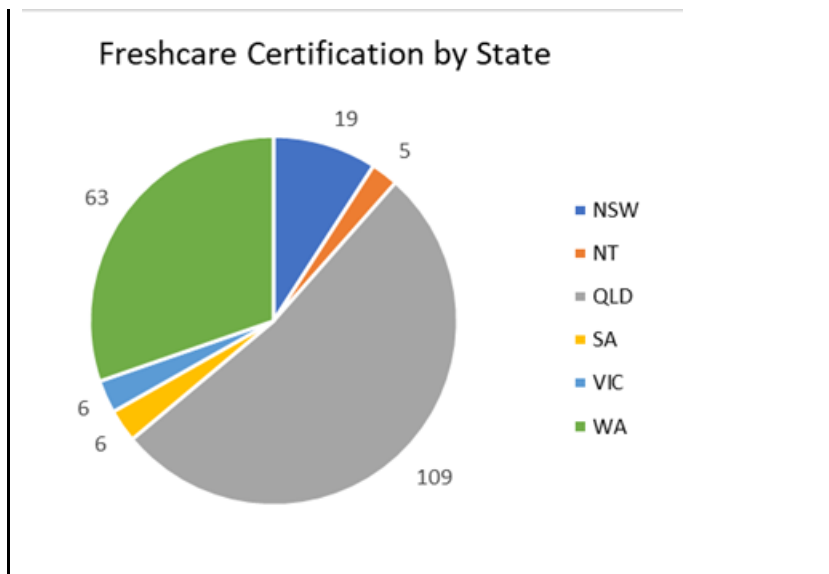
Food safety in the Australian melon industry

The Australian melon industry has food safety systems in place on farms. The most common is Freshcare, however SQF and GlobalGAP are also implemented. The programs are based on Hazard Analysis Critical Control Point (HACCP) principles and supported by Good Agricultural Practice (GAP).

MELONS

Total Freshcare Certifications
01 Mar 2019 to 29 Feb 2020





Freshcare 2020

Previously, the Australian Melon Association felt that melon growers were lacking in knowledge about food safety and were unable to work proactively to prevent food safety incidences. Food safety systems are often installed by commercial entities and calibrated to work at a set level, without due regard to change in environmental conditions. It was also observed that growers did not always understand the meaning of hygienic cleaning.

As a result, and in the wake of the 2018 Listeriosis outbreak, the melon industry and Hort Innovation worked with growers to launch a six-pronged initiative to combat foodborne illness risks.

Lead by the NSW Department of Primary Industries, the project has delivered strengthened food safety measures and training support for the industry. This included:

1. Visits to all Australian rockmelon growers and packing sheds to review and audit current practice and critical control points and provide one-on-one food safety consultations with growers, managers and key farm staff.
2. The development of a melon food safety Best-Practice Guide, informed by the findings from the above consultations, feedback from retailers and other key stakeholder groups.
3. The ongoing monitoring of current practice by growers and in packing sheds and training of staff in line with the Best Practice Guide.
4. The development of a 'toolbox' for grower use including risk assessment templates, training guides, food safety posters and record sheets to support food safety programs – this will be housed on the Australian Melon Association website.
5. Regional roadshows in key growing regions that highlight the availability and contents of the toolbox and Best Practice Guide.
6. A helpdesk to provide technical support to growers, packers and other stakeholders.

This project is continuing to work individually with melon growers and has been extended to include larger watermelon growers. The success of the project is indicated by no detections of any food-borne illness in melons to date despite extensive on-farm and in-market testing by the project team and jurisdictions Australia-wide.

The result of the project has been a change in food safety culture of melon growers. Sanitation and hygiene are now top of mind. Growers understand their food safety systems, how they work and how they can adapt to changes in food safety risk on their farms. This change has been embraced by all commercial melon growers in Australia. Very small growers who opportunistically produce very small amounts of fruit and sell locally were not included in the project as it was felt that they were not a large risk to overall food safety.

Australian melon industry position on food safety and regulation

The Australian melon industry regards high food safety standards as central to production of melons to ensure the health of consumers and sustain the financial viability of melon businesses. The impact of listeria on one farm had a far-ranging and negative effect on all melon businesses and continues to do so. Consumers immediately stopped buying all melons, regardless of the available fruit not being linked or involved with the affected farm.

To prevent this impact occurring again, the melon industry has been working to increase on-farm food safety standards as outlined above. However, the industry is well aware that new businesses can enter the market or business change hands. It is important to ensure that any proposed regulation is based on current food safety systems, such as the current on-farm systems. These systems are based on global standards and world best practice. The system itself is not all fault in a food safety outbreak but it must be implemented and operated correctly.

Knowledgeable training and expert focussed auditing is the key as a check on food safety systems. The AMA has noted that training had become, in some instances, a 'tick and flick' exercise and auditing did not always concentrate on key food safety issues. Auditors must be very well educated in food safety practice.

The melon industry is supportive of exploring options to increase the standard of fresh produce food safety in Australia. This could be undertaken by a range of measures. These include education, auditing, and random checks on food safety systems.

While the industry thinks that there may be some benefits to regulation, regulation could create an administrative and financial burden on growers who could be asked to implement new or added food safety systems. The AMA would request that any proposed regulation does not add this burden, as it is likely to impact negatively on food safety culture.

Option 1 – Status quo

The status quo should be maintained for the watermelon industry.

The Australian watermelon industry has not had any food safety incidents and should not be considered as part of this review.

Of the ninety-nine Corrective Action Records (CARs) for all melon and watermelons under Freshcare for the previous three years, watermelons only accounted for 11%. These were for:

1. Lack of a chemical residue test is conducted before initial Freshcare certification and then annually, or more frequently, if required by a customer specification.
2. A food fraud vulnerability assessment is completed
3. All chemicals purchased are recorded in a chemical inventory.
4. Evidence of compliance for suppliers of materials and services is kept.
5. All workers must receive basic food safety training before starting work.
6. An internal audit of all activities and records relevant to the Freshcare Code of Practice Food Safety & Quality is conducted at least annually.
7. Monitoring and measuring equipment are identified, checked for operational efficiency and accuracy, and calibrated.
8. Suppliers of materials and services must comply with the applicable requirements of the Freshcare Code of Practice Food Safety & Quality.
9. Stored chemicals are checked at least annually to identify and segregate chemicals for disposal.
10. Records of all preharvest chemical applications are kept.
11. All other water used postharvest must meet, or is treated to achieve, *E. coli* <1 cfu/100mL. Evidence is kept. (See Appendix A-F6).

Of these CARs, the issue of water is directly related to food safety. The other ten CARs are important as part of an overall food safety scheme, but they are unlikely to impact directly on specific food safety of a packed product.

On this basis, regulation for the watermelon industry is not an option that effectively manages a low level risk.

Option 2 – Regulation

Food safety regulation will be the responsibility of state and territory governments through various means. The food Acts in the jurisdictions are variable and can be different between jurisdiction.

It has been the melon industry experience that there can be a lack of communication between state health departments and food authorities; and local councils that have regulatory powers.

This is of concern to the melon industry as unclear messages lead to poor outcomes for food safety. An example is the removal from sale of rockmelons in a Melbourne fruit shop in March 2018 in response to the listeria outbreak. The fruit was grown on an unrelated farm and had tested negative for any food safety pathogens.

Some jurisdictions have food safety instruments in their food Acts to address specific issues, such as the requirement for a mandatory food safety supervisor. This has led to national inconsistency in the food safety regulatory requirements placed on food businesses in Australia.

State and local government regulation divergence is an issue for melon growers who have been impacted by conflicting advice and rulings between food authorities and health departments of state and local jurisdictions.

The nature of the risk for particular commodities or production activities

This review has asked for comment on “the nature of the risk for particular commodities or production activities”.

However, the review focuses on particular commodities and not production activities.

The melon industry contends that while some produce is a higher risk than others; all produce can be high risk if it is not managed correctly.

Creating a category of “high risk” could well encourage other commodities to be considered “low risk” by producers and therefore not as important for stringent food safety practices.

FSANZ may well find that outbreaks of food-borne illness start to occur in commodities that they have considered ‘low risk’.

The Codex Committee for Food Hygiene (CCFH) is or has reviewed the General Principles for Food Hygiene (CAC/RCP1) to consider the concept of additional measures that are not critical control points (as defined within the Hazard Analysis and Critical Control Point (HACCP) system) but are more than Good Hygienic Practice (GHP). These ‘enhanced food safety control measures may include practices and processes (e.g. cleaning) identified as needed to manage a specific hazard/s.

The melon industry supports food businesses having operating procedures and monitoring activities that demonstrate that a business understands the food safety risks associated with its food handling operations and that the risks are being managed. It must be noted that this review should not preclude the potential that other commodities may be implicated in future horticultural-associated foodborne illness outbreaks.

The melon industry would support the above approach of managing “processes” rather than specifically identified high risk commodities.

Production chain intervention

The current definition of primary food production applies based on where activities occur i.e. off-farm or on farm and therefore subject to different requirements. Some of these activities may include food handling activities such as packing or washing which would normally be undertaken by food businesses and covered by chapter 3 requirements which are regulated

The problem with this definition is that it is based on location and not activity. Melon semi-processing should continue be regulated.

One of the concerns to the melon industry is handling in the supply chain, more specifically cool chain maintenance. Producers are at risk if the fruit that has left their farm and control is then handled poorly, along the cool chain to the consumer.

We have evidence of poor quality fruit in retail stores that have been left on the shelf for a long period of time.

Another serious area of concern is the sale of cut and wrapped fruit not held in refrigeration.

The so-called 2/4 rule should be abolished in those jurisdictions where it is allowed. Leaving cut and wrapped fruit out of refrigeration with no recording of cut times and length of display is no cavalier in maintaining strong food safety practices.

Producers are not able to control these practices and should not, therefore, be held responsible for practices down the cool chain and in retail stores.

The melon industry is supportive of changes to the regulation for the supply chain to ensure that the cool chain is monitored and documented and that all cut and wrapped produce is kept in appropriate refrigeration.

Good traceability in horticultural production systems is fundamental to maintaining strong food safety. This requires all parts of the supply chain to be actively involved and apply a traceability system adequately. At the moment, the melon industry does not believe that supply chain members have addressed the need for participation in such systems.

As an industry, we have trialled a digital traceability system that can track produce from paddock to consumer. We are concerned that support from links in the supply chain after the farmgate will not willingly participate in a traceability system to monitor the produce right through to the consumer. This includes retailers who are only supportive of traceability to the package level. Mixing produce on a retail shelf without identification removes the majority of its traceability.

The melon industry supports complete through-chain traceability from paddock to plate and not the current system of tracing by one step forward and one step back as this process has failed on two occasions for the melon industry.

The melon industry believes that traceability should be part of the entire supply chain from the paddock to the consumer.

Options to apply a tiered regulatory approach

A tiered approach to regulation may seem to be an attractive proposition, however it does not address the following issues.

Establishing the risk of a commodity is difficult. A product that is deemed high risk may be handled satisfactorily in a food safety system, while a product deemed to be 'less risk' handled poorly could pose a threat to consumers.

Any process can have potential to create food safety issues if it is not implemented properly. For example, regulating the standard of water in post-harvest application does not address the ability of pre-harvest water to impact on the pathogen load for some products. Producers who are not implementing a cleaning protocol in a packing shed effectively may be better to be packing clean produce straight from the plant to box in the field.

The costs that would arise from a food regulatory measure developed or varied as a result of the proposal should not be greater than the gained benefits.

Any regulatory measures that are implemented must be cost-effective and not impose a financial burden on producers

Food safety systems and auditing

The Australian melon industry has good implementation of food safety systems, particularly Freshcare and to a lesser extent SQF Global and Global Gap. Many growers also have the retailer add-on of HARPS.

Assurance that all growers had to comply with food safety standards is a form of insurance for all in the industry. In 2018, one melon grower caused a listeria incident, but all rockmelon growers were impacted through loss of sales, both domestically and export.

Although a food safety schemes was in place, their effectiveness can depend on the operators' understanding of food safety principles and practices. Therefore, food safety system should be supported by good knowledge of basic principles and consistent focussed auditing.

When reviewing standard 3.2.2, FSANZ should consider the skills and knowledge requirement for food safety supervisors and mandatory training for all food handlers.

The melon industry believes that effective auditor training and examining is crucial to ensure that food systems are implemented correctly. This along with compulsory education for all food safety system supervisors will do more to ensure safe food than periodic audits.

The issue is not with the food safety systems but the competent, informed management of the food safety systems and the checks and balances of efficient and knowledge auditing.

Enforcement of regulatory requirements for horticulture would be challenging due to the horticulture industry consisting of a large proportion of small businesses, the diversity and changeability of commodities and the large geographical spread involved.

Therefore, the melon industry would propose that this is a reason for implementing education for businesses involved in food safety for horticultural produce.

Benefits of enhanced food safety regulation in terms of protecting or accessing overseas markets

The Australian melon industry suffered losses in the export markets from a food safety event in both 2016 and 2018. There are lingering concerns for the brand that had the problem in 2018.

The Australian Melon Association undertook trade missions to key export markets in 2019 to restore confidence and assure importers that improvements were being made in the melon food safety standards.

As Australia has promoted the clean, green image as one of our significant trademarks, the standards set for Australian produce is higher than for other countries. It was observed in a number of markets that produce from some countries was obviously not expected to be at the same level of food safety practice as Australian produce.

Notwithstanding, it is important that our produce is of the highest standard, supported by consistent food safety programs.

One of the advantages of a regulated food safety system is that some markets, particularly Japan would be very supportive of such regulation. It may give Australian produce a competitive advantage over other country imports.

Regulation would also allow the Commonwealth to regulate the food safety standards of similar imported produce.

The Australian melon industry supports the requirement for imported produce to meet the same standards expected of Australian produce, however this advantage needs to be weighed against the possible cost to individual businesses of meeting further regulation.