



Submission

P1052 – Primary Production and Processing requirements for High-risk Horticulture

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Driscoll's Australia

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Victoria, 3023

Driscoll's Australia overview

Driscoll's Australia is a joint venture formed between the Costa Group and Driscoll's Strawberries Associates, Inc (US). The Costa Group is Australia's leading grower, packer and marketer of fresh fruit & vegetables and operates principally in five core categories: berries, mushrooms, glasshouse tomatoes, citrus and avocados. Driscoll's has been growing berries in the USA for more than 100 years, and the brand is well known in many countries around the world.

Driscoll's Australia has a turnover of circa \$500 million and it is the largest berry company in Australia. Driscoll's specialises in berry crops, including fresh blackberries, blueberries, raspberries, and strawberries. The company focus is on variety development and marketing. Driscoll's Australia provides the genetic material to contracted growers who produce the fruit which is later handled and distributed by Driscoll's Australia. The company specialises in R&D, genetics, nursery production of plants needed by our growers, supply chain and marketing.

Our grower network includes a large number of farms in TAS, NSW, QLD, WA, SA, and VIC. Through this valued partnership with the Costa Group and independent growers all over the country, the Australian public can enjoy some of the best berry varieties in the world.

Executive Summary

FSANZ has called for submissions to assist with further consideration of Proposal P1052 Primary Production and Processing requirements for high risk horticulture. Currently in Australia, there are no national regulatory food safety requirement applying to the primary production and processing of horticultural products with the exception of seed sprouts.

In previous reviews, FSANZ had decided that amendment of the code was not warranted, with the preferred strategy being the development by industry and state governments of a strategy for maximising food safety in horticultural produce. However, due to recent increases in foodborne illness outbreaks in Australia due to imported products and some locally grown produce, FSANZ was asked to carry out a review of the regulatory and non-regulatory measures for Australia to manage food safety risks on specific sectors of the horticulture industry.

A thorough analysis of the review carried out by FSANZ showed that the conclusions presented in that review were not fully supported by the data available. This was particularly so for fresh berry crops. The Australian outbreaks identified had been caused by imported frozen products, and not by fresh Australian berries. Driscoll's argues that cases of imported processed produce should not be used to assess the ability of the berry industry to manage food safety risks. The proposal presented by FSANZ does not provide sufficient evidence that regulations would make a significant difference to improve the food safety performance of the horticulture industry.

Most berry growers in Australia have already adopted and implemented industry accepted food safety programs. Those farms are periodically audited by independent accredited organisations. Furthermore, those farms are part of larger commercial networks which include companies such as Driscoll's and also retailers. These commercial networks monitor compliance as well, and raise corrective action requests whenever necessary. As part of the verification process, micro tests are carried out periodically. After testing for about 10 years, Driscoll's has not found any major issues regarding microbial contamination.

The implementation of food safety programs has transformed the Australian horticulture industry. The adoption of cleaning programs, field toilets, handwashing facilities, and personal hygiene practices have had a significant role in preventing food safety outbreaks.

Based on the evidence reviewed, Driscoll's Australia supports Option 1 – Status Quo as current food safety systems have been able to minimise the number of foodborne outbreaks in Australia. We are of the opinion that those businesses that have already implemented recognised food safety programs which are independently audited should be exempt from further regulation. At the same time, our position is that those program could be enhanced through education and food safety culture initiatives, but those initiatives do not need to be regulated.

Driscoll's Australia also proposes that all horticulture products should be treated equally, and that no crops should be classified as low or high risk. The risk is actually a combination of many factors and classifying some crops as low or high risk can actually be detrimental when trying to minimise food safety risks.

There is a need for a reputable government organisation to disseminate important recommendations and guidelines that address specific potential food safety hazards that can be difficult to identify and control by growers with no background in food safety. Publishing that type of information would greatly assist in reducing the risk of foodborne illness outbreaks.

Retailers in Australia are likely to enforce product traceability requirements, so regulation in this area is unnecessary. The only area where regulation may need to be considered relates to horticulture producers which have not yet adopted any formal food safety programs in their farms. But, even in those cases care should be exercised to ensure regulation does not add excessive cost to small producers.

Introduction

Currently in Australia, there are no national regulatory food safety requirements applying to the primary production and processing of horticultural products with the exception of seed sprouts. The Code does not include specific food safety requirements for what has been classified as high-risk horticulture. The only primary production standards in place apart from seed sprouts include seafood, poultry meat, meat and meat products, dairy products, eggs and egg products.

Even though previous reviews of foodborne illness associated with fresh horticultural produce found that international outbreaks included leafy vegetables, melons, berries and minimally processed produce, in 2014, FSANZ decided that amendment of the code was not warranted at that time, with the preferred strategy being the development by industry and state governments of a strategy for maximising food safety in horticultural produce.

However, in 2017, the Australia and New Zealand Ministerial Forum on Food Regulation noted the recent increase of foodborne illness outbreaks in Australia and agreed there was a need to reassess the food safety risk management of five high risk horticulture sectors. The Forum then requested FSANZ to carry out a review of the regulatory and non-regulatory measures for Australia to manage food safety risks in these sectors.

The preliminary analysis of the Australian and international data shows ongoing occurrence of serious illness (an even deaths) associated with horticultural produce. FSANZ found that foodborne illness continues to be associated with fresh horticultural produce in Australia and internationally. FSANZ assessment reaffirmed the assumption that fresh leafy vegetables, fresh herbs, rockmelons, fresh and

semi-dried tomatoes and raspberries were commonly associated with illness. According to FSANZ, the data on Australian outbreaks indicate that the commodity sectors most often associated with outbreaks were leafy vegetables, melons and berries. Also, FSANZ concluded industry food safety schemes had not been effective in avoiding some of the outbreaks in Australia. According to FSANZ, the ongoing issues and lack of regulatory measures for horticultural products suggested the current environment, which relies on non-regulatory measures, is not adequate to protect public health and safety and that regulatory measures are required.

FSANZ proposes to develop, or vary, food safety requirements for high-risk horticulture products in the Code. Those requirements may be supported by non-regulatory measures such as industry guidance, promotion of food safety culture or consumer education. As part of this process, FSANZ called for submissions to assist with further consideration of Proposal P1052 *Primary Production and Processing requirements for high risk horticulture*. This submission is in response to the FSANZ call.

Review of Proposal P1052

Driscoll's Australia carried out a thorough analysis of the FSANZ review and it was clear that the conclusions presented by FSANZ were not supported by the data available. This was particularly so for fresh berry crops. When the Australian outbreaks were analysed, it was found that those outbreaks were caused by imported processed (frozen) products. There were no cases of Australian fresh berries implicated in any of the cases presented by FSANZ. And even though Driscoll's Australia acknowledges that imported products can be taken into account to identify potential issues, we are of the opinion that those examples should not be used to assess the ability of the berry industry to manage food safety risks.

FSANZ prefers the development of regulatory measures and the assumption is that those regulatory measures would further reduce any risks that could be presented due to the consumption of certain products including berries. The proposal presented by FSANZ does not provide evidence that regulations would make a significant difference to what is already implemented by the berry industry. It would be useful to see examples where regulations have totally eliminated foodborne outbreaks in Australia as it appears based on the evidence provided, the berry industry is already managing microbial food safety risks well.

Existing Control Measures

Most berry growers around the country are already required to adopt and implement requirements contained in Global Food Safety Initiative (GFSI) benchmarked Food safety Schemes. Individual sites are independently audited at least once every season to ensure the implementation is acceptable, and that hazards are properly identified and kept under control.

On top of the audits carried out by independent accredited organisations, companies such as Driscoll's are regularly monitoring farms that are part of their supply chains, and retailers also raise corrective action requests whenever non-conformances are identified, or when consumers highlight any potential food safety issues.

As part of the verification process, each farm that joins a food safety scheme must test all products for potential microbiological contamination. Over the last 10 years, Driscoll's has carried out about 400 micro tests on samples that have been randomly selected and none of those samples have ever shown any microbial contamination. Other companies, including retailers, also carry out this type of sampling and testing periodically, and no significant issues have been identified in fresh berry products.

There have certainly been a few very serious cases in the Australian horticulture industry when implemented systems have failed to prevent foodborne outbreaks. In those cases, individual companies have been unable to correctly identify potential hazards under different conditions. This type of shortcomings can also be found in other industries that are already regulated. The cases where individual companies have failed to properly control hazards are the exception rather than the rule. Over the last twenty years, the implementation of food safety programs has transformed the Australian horticulture industry. The adoption of cleaning programs, field toilets, hand washing facilities, and personal hygiene practices have had a very significant role in preventing food safety outbreaks and providing Australian consumers with a level of safety which is much better than many other countries around the world. The success in preventing the spread of foodborne diseases due to the implementation of food safety programs in Australia needs to be properly acknowledged and efforts have to be made to promote the further adoption of these programs by all growers in the country.

Recommendation

Driscoll's supports Option 1 – Status Quo as the evidence reviewed shows that current food safety systems have been able to minimise the number of foodborne outbreaks in Australia when compared to many other countries around the world. Those businesses that have already implemented recognised food safety programs (i.e. SFSI benchmarked) which are independently audited should be exempt from further regulation. The certification to a GFSI benchmarked food safety scheme should be recognised as compliance to proposed regulation. Clearly there is a case to enhance the current programs by supporting further education and promoting food safety culture within the industry, but this does not need to be regulated as consumer and customer expectations are sufficient to drive this type of improvement.

Classifying some products in the horticulture industry as high risk should be discouraged. Each combination of product, location, environmental conditions, production methods, etc. produces a specific level of risk which needs to be properly assessed and controlled. Describing some products as high risk potentially help in creating a negative perception about that particular product, and gives a false sense of security to growers of so called 'low risk' products.

Identifying potential hazards, and designing better control measures is a never ending process. Implemented systems can certainly be enhanced by incorporating better control measures as they are identified and developed. The Australian horticulture industry is becoming even better at disseminating this type of information among growers and produce handlers. Having a central organisation with credibility such as FSANZ publishing recommendations and guidelines to assist in preventing known hazards would greatly assist in reducing the risk of foodborne disease outbreaks even further.

Product traceability is a key component of all food safety systems, and developing suitable technologies to achieve full traceability in the supply chain must be explored. However, retailers in Australia are likely to enforce compliance in this area in the short term, so regulation would likely be unnecessary.

The only area where regulation may need to be considered relates to the small proportion of horticulture producers which have not yet adopted any formal food safety program in their farms. But, even in those cases care should be exercised to ensure regulatory costs would discourage small producers from continuing production activities.