

Questions for stakeholders resulting from FSANZ's P1052 team for second round of consultations.

Q1 No comment as I have no way of verifying your information.

Q2 From my work as a registered Freshcare trainer, and consultant to growers for HARPS

Q3 From my work with growers who are FSS compliant, non-compliant growers would be from as low as 10% through to perhaps 50%. Something that I was not aware of until I started getting Organic growers attend Freshcare training as Organic certifications are for method of farming, not safe food with verifiable traceability. This was from the growers themselves. The big chains stopped taking their produce until they had achieved certification.

Q4 This would depend entirely on what made up their 50% compliance, so it is very hard to verify.

Q5 I would query the number of working days for harvest and packing for berries. There are some businesses who pick for a longer period of time.

Q6 As none of my growers have had any issues, I could not comment.

Q7 No comment

Q8 This depends entirely if you have a small packing machine for packaging berries, or a large automated one. From discussions with growers cleaning small machines, they allow an hour, and growers with large machines say with a few cleaners can be 2 hours per day.

Q9 For those who are already FSS certified, then it can vary from 1 hour for very small businesses to 3 hours for larger businesses. Tax records don't contribute to application records, nor do they help with other record keeping for fertilizer applications, water testing, chemical applications, and the list goes on. I think you are way off the mark here.

Q10 No comment

Q11 From my personal experience and from working with farmers for the past 27 years teaching them how to do their compliance books, budgets, business planning, I have found any two businesses, even those who do the same "things", produce a marked variation in the figures. Consequently, I would not be guided by your figures.

Q12 As my growers are already FSS compliant, then they already have these benefits. It would be of great assistance in helping non FSS compliant growers be traceable in tracing food safety incidents.

Q13 For anyone who is not FSS compliant, it will be costly at first for their business. For small "Mum and Dad" businesses and small family businesses it will be another time issue as they are probably already working very long hours, and you have to remember many growers are not well educated, nor are they comfortable with compliance issues. As a life time farmer myself, I have found ways to train them how to do their compliance records in a manner that appears less onerous and scary. I fully understand their side of the issue and have had to cope with the same issues. The other issue is in small businesses the wife holds down either part time or full-time job as well. That is what I always did too, until I started my own business after we "retired" from farming. Growers are increasingly telling me that the compliance is going to be the straw that breaks the camel's back, and they will move out of the industry. This greatly concerns me as I don't want to eat imported fresh produce.

Q14 See Q13. I might add, that until you work with the growers on a regular basis, not just at audit time etc, you really have no idea just how stretched they are for time. Let alone raise a family, educate them etc.

Q15 Many transport businesses that growers talk about already have their own compliance. This helps growers a great deal. Other suppliers, eg fertiliser, chemicals, etc are also certified.

Q16 The further you are from any major centre is always a penalty for farmers, irrespective of what you produce. Travel / freight costs are a huge impediment. This is embedded in everything you buy. It also effects costs of compliance audits, as there is travel and accommodation costs. Also, poor or no internet connections that are reliable. To conduct business now you are expected to be computer savvy and also have good internet connections. This really is common in the bush. Some days you only need heavy cloud, storms, rain, etc. Until you experienced this you have no idea how frustrating this is. Then if your internet breaks down, they can't log in to fix it as it is not working, you have to wait for a techo to come visit. This can be days and in some instances weeks, and it is very, very expensive. Then when they get there they don't have the correct parts!!

Q17 Rule of thumb, farms are the end of the chain and they are expected to bear the cost of all compliance. Compliance often only provides access to market, not better price.

Q18 This is all part of Freshcare compliance and other codes!!

Q19 I was asked to put this together by some of my grower clients as they just don't have the time as it is busy picking time. I Have been a Freshcare registered trainer since 1 Jan 2010, and from 2001 to about 2013 I was a SQF registered Trainer working with grains, animals and stock feeds. I gave SWF away as it became hugely onerous and very expensive and went back to HACCP schemes.

My husband and I farmed crops and sheep in our own right for 40 years, then sold out to semi-retire on a small holding.

If you would like to talk to me about any of my comments, I am more than happy to talk to you.

Thank you

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