



Food Standards Australia New Zealand (FSANZ) Proposal P1052 – Primary Production and Processing (PPP) Requirements for Horticulture (Berries, Leafy Vegetables and Melons): Second Submission, 16th February 2022

One Harvest (OH) is a multi-generational business owned by the Robson family. For over 80 years, OH has been supplying Australian families with fresh produce, and for over 25 years, we have been processing and supplying Australian retailers with fresh cut salads. OH have a national footprint incorporating four factories and a Tasmanian farming operation. OH is guided by our purpose of “helping people live better lives”.

OH supplies all the major retailers in Australia, employing over 1000 personnel and operates 24/7 processing and packaging operations. OH sales revenue is approximately 300 million. In the retail ready to eat fresh cut salads category OH maintain 50% of the market share. OH converts 120 tonnes of produce into 620,000 packaged units per day across 120 SKUs using more than 160 ingredients.

The food safety of Australian produce is vital to consumer confidence and the profitability and viability of OH and the Industry as a whole. OH considers food safety to be a fundamental principle at the heart of all we do. To this end we have developed grower partnerships, applied best agronomic practices and invested in people, processing, food safety culture and third party accredited GFSI food safety systems to assure the integrity of our product food safety across the supply chain. While these systems are not mandatory government regulatory requirements for OH to maintain retail supplier approval and supply these food safety systems are mandatory.



OH support Option 3 – A combination of regulation and non-regulatory measures

During FSNZ and Jurisdictions consultation with Industry at the Horticulture Standards Development Advisory Group (SDAG) Webinar it was announced February 2nd, 2022 that a system to recognise GFSI Food Safety Schemes (FSS) is being actively explored as a way of demonstrating compliance with the draft standards. The recognition model also sought to explore an alternative approach to standard audit and inspection, so that existing systems used by businesses on GFSI FSS could be used to generate ongoing compliance data. Jurisdictions will, through the Horticulture Implementation Working Group (HIWG) engage with FSS owners and peak Industry bodies to progress work on a recognition model for businesses operating GFSI FSS. Jurisdiction asked Industry to consider the proposed transition period (18 months) to provide this outcome.

In consideration of the Jurisdictions announcement (outlined above), OH supports Option 3, with the approach of national jurisdiction recognition of GFSI FSS which will avoid duplication and additional cost for leafy vegetable growers within OH supply chain that required GFSI FSS to comply to our supplier approval program accredited to GFSI BRC Global standard Food Standard, version 8, 2018 (clause 3.5.1.2 supplier approval to ensure raw material have a valid certificate applicable BRC global standard or GFSI bench marked standard) & Coles Food Manufacturing Supplier Requirements (CFMSR) version 3, June 21 (clause 8.5 Supplier Approval – raw material suppliers must have evidence of a certified GFSI food safety program).

It is essential that implementation of proposed option 3, is implemented consistently nationally across the jurisdictions. OH would recommend and support the establishment of a national data base (Industry access) for leafy growers. This would ensure a register of national leafy green growers and outline compliance via either GFSI FSS certificate or Food Standard Code, Leafy Vegetable draft standard 4.2.8. This platform could also be utilised as a communication channel for non-regulatory measures which are essential to assist smaller leafy green growers comply to draft standard 4.2.8 or GFSI FSS. OH wishes to support leafy green growers outside GFSI FSS offering technical support to the HIWG to generate fact sheet, webinars, multilingual training resources and encouraging effective food safety culture across the supply chain.

OH as a national business is nervous that new government regulations will not be implemented uniformly and consistently across all states and territories. Many industries, as does OH, struggle to ensure national standards and ways of working are consistently applied across the different states. Horticultural businesses regularly highlight the unnecessary additional compliance costs attributed to differing requirements across jurisdictions. A national approach for implementation of P1052, option 3 is essential.