
From:
Sent: Monday, 16 March 2020 11:35 AM
To: submissions
Cc:
Subject: PROPOSAL P1052



FOOD STANDARDS
PROPOSAL P1052

I would like to submit that fresh food should have a labelling system that specifies the food additives, in a similar way that the food processing industry.

Plants are FOOD from germination, not from harvest!

Perhaps due to the complexity of the food production sector, I believe there is some ambiguity about what is considered food, and what is considered plant, and at what point does a plant become food. In the absence of clarity, I support the notion that the plant is food from the point of germination. Therefore all chemical contact should be considered as having been absorbed to varying levels and therefore considered ingredients of the plant (food).

The system should be regulated in a similar way to the food processing industry and food producers should comply to food practices under national standards. I believe the declaration of all chemical use in contact with the plant should be declared as an ingredient.

Protect the investment of producers in compliance

There is also a competitive issue in that unsophisticated producers, are able to ignore standards, and sell their produce in an un-regulated environment, thereby avoiding the substantial cost of food compliance and management. I suggest any introduction of standards should include a regime to extinguish rogue operators (black market) from undermining the economic viability of compliant businesses.

Organic standards in Australia

The Proposal P1052 an supporting materials has ignored the organic food sector which represents the fastest growing sector of the produce industry. There are significant implications for food safety in certified organic food production including :

1. Prohibited use of some chemicals approved by the APVMA
2. Use of non-chemical methods of pathogen control

I note that a study in the USA on melons & listeria outbreaks concluded that despite the absence of chemical sanitation in certified organic melon production, these farms were NOT the source of contamination. Instead the source was from conventional farms mis-using chemical sanitation.

Please consult with experts in organic production to ensure that standards that are adopted provide for compliance to national certified organic food production standards including AS6000.

Sincerely,

PALOTUS Fresh

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