

# Australian Food and Grocery Council SUBMISSION

18 OCTOBER 2010

**TO:**

FOOD STANDARDS AUSTRALIA NEW ZEALAND

**IN RESPONSE TO:**

P1004 – PPP FOR SEED SPROUTS, 2<sup>ND</sup> ASSESSMENT



The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors. (A list of members is included as Appendix A.)

With an annual turnover of \$100 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector<sup>1</sup> is Australia's largest and most important manufacturing industry. Representing 28 per cent of total manufacturing turnover, the sector is comparable in size to the Australian mining sector and is more than four times larger than the automotive sector.

The growing and sustainable industry is made up of 38,000 businesses and accounts for \$49 billion of the nation's international trade. The industry's total sales and service income in 2007-08 was \$100 billion and value added increased to nearly \$27 billion<sup>2</sup>. The industry spends about \$3.8 billion a year on capital investment and over \$500 million a year on research and development.

The food and grocery manufacturing sector employs more than 315,000 representing about 3 per cent of all employed people in Australia paying around \$14 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia<sup>3</sup>. It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies

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<sup>1</sup> Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc..

<sup>2</sup> AFGC and KMPG. State of the Industry 2009. Essential information: facts and figures. Australian Food and Grocery Council. Oct 2009.

<sup>3</sup> About Australia: [www.dfat.gov.au](http://www.dfat.gov.au)

## 1. INTRODUCTION

AFGC welcomes the opportunity to make this submission to the Food Standards Australia New Zealand in response to the 2<sup>nd</sup> Assessment Report on Proposal P1004 – Primary Production & Processing Standard for Seed Sprouts.

The AFGC supports the need for regulatory intervention in the protection of public health and safety, and notes that there is evidence of market failure at both an Australian domestic level<sup>4</sup> and at an international level<sup>5</sup>. In the last decade, multiple outbreaks linked to raw seed sprouts have occurred in countries throughout the world, consistent with the increasing popularity of eating fresh salads and produce. One of the largest outbreaks associated with sprouts in the United States occurred May 2009 and affected 235 persons with *Salmonella* Saintpaul across 14 States<sup>6</sup>.

The AFGC notes that the recent outbreaks of foodborne illness associated with eating fresh produce have heightened concerns that these foods are becoming an increasing source of illness in the community and that there is an need to address food safety of horticultural produce more generally. The AFGC therefore supports the development of the Primary Production and Processing Standard for Sprouts as the first of future standards to address this emerging issue. With the the increasingly complex supply chain and the consumer demands for fresh and chilled produce there is also a need for product traceability, and the development of a horizontal traceability standard.

Seed sprouts have been associated with outbreaks caused predominantly by *Salmonella* and enteropathogenic *E.coli*, and that there are special circumstances related to the mechanism of contamination, transmission and infection that warrants the development of a specific Standard for sprouts rather than inclusion in a generic standard for horticultural produce.

The AFGC is concerned that reliance on the development of the regulatory standard alone will be insufficient to ensure the improved safety of sprouts, and recommends that FSANZ in conjunction with jurisdictions, developing an education initiative for consumers and industry as an accompanying risk management measure in the implementation of the Standard.

### Recommendation:

**That FSANZ proceed to develop a food regulatory measure to amend the Food Standards Code to address the food safety requirements of sprouts under the primary production and processing standard.**

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<sup>4</sup> <http://www.ozfoodnet.gov.au/internet/ozfoodnet/publishing.nsf/Content/publications-1>

<sup>5</sup> <http://www.cdc.gov/ncidod/eid/vol5no5/taormina.htm>

<sup>6</sup> <http://www.cdc.gov/salmonella/saintpaul/alfalfa/>

## Membership as at 08 October 2010

Arnett's Biscuits Limited  
Asia-Pacific Blending Corporation P/L  
Barilla Australia Pty Ltd  
Beak & Johnston Pty Ltd  
BOC Gases Australia Limited  
Bronte Industries Pty Ltd  
Bulla Dairy Foods  
Bundaberg Brewed Drinks Pty Ltd  
Bundaberg Sugar Limited  
Byford Flour Mills T/a Millers Foods  
Cadbury Pty Ltd  
Campbell's Soup Australia  
Cantarella Bros Pty Ltd  
Cerebos (Australia) Limited  
Cheetham Salt Ltd  
Christie Tea Pty Ltd  
Church & Dwight (Australia) Pty Ltd  
Clorox Australia Pty Ltd  
Coca-Cola Amatil (Aust) Limited  
Coca-Cola South Pacific Pty Ltd  
Colgate-Palmolive Pty Ltd  
Coopers Brewery Limited  
Danisco Australia Pty Ltd  
Devro Pty Ltd  
DSM Food Specialties Australia Pty Ltd  
Earlee Products  
FPM Cereal Milling Systems Pty Ltd  
Ferrero Australia  
Fibrisol Services Australia Pty Ltd  
Fonterra Brands (Australia) Pty Ltd  
Food Spectrum Group  
Foster's Group Limited  
Fruco Beverages (Australia)  
General Mills Australia Pty Ltd  
George Weston Foods Limited  
GlaxoSmithKline Consumer Healthcare  
Go Natural  
Goodman Fielder Limited  
H J Heinz Company Australia Limited  
Harvest FreshCuts Pty Ltd  
Hela Schwarz  
Hoyt Food Manufacturing Industries P/L  
Hungry Jack's Australia  
Johnson & Johnson Pacific Pty Ltd  
Kellogg (Australia) Pty Ltd  
Kerry Ingredients Australia Pty Ltd  
Kimberly-Clark Australia Pty Ltd  
Kraft Foods Asia Pacific  
Laucke Flour Mills  
Lion Nathan Limited  
Madura Tea Estates  
Manildra Harwood Sugars  
Mars Australia  
McCain Foods (Aust) Pty Ltd  
McCormick Foods Aust. Pty Ltd  
McDonald's Australia  
Merisant Manufacturing Aust. Pty Ltd

National Foods Limited  
Nerada Tea Pty Ltd  
Nestlé Australia Limited  
Nutricia Australia Pty Ltd  
Ocean Spray International Inc  
Parmalat Australia Limited  
Patties Foods Pty Ltd  
Procter & Gamble Australia Pty Ltd  
PZ Cussons Australia Pty Ltd  
Queen Fine Foods Pty Ltd  
QSR Holdings  
Reckitt Benckiser (Aust) Pty Ltd  
Sanitarium Health Food Company  
Sara Lee Australia  
SCA Hygiene Australasia  
Schweppes Australia  
Sensient Technologies  
Simplot Australia Pty Ltd  
Spicemasters of Australia Pty Ltd  
Stuart Alexander & Co Pty Ltd  
Sugar Australia Pty Ltd  
SunRice  
Swift Australia Pty Ltd  
Tasmanian Flour Mills Pty Ltd  
Tate & Lyle ANZ  
The Smith's Snackfood Co.  
The Wrigley Company  
Tixana Pty Ltd  
Unilever Australasia  
Wyeth Australia Pty Ltd  
Yakult Australia Pty Ltd  
Yum Restaurants International

GS1  
Harris Smith  
IBM Business Cons Svcs  
innovations & solutions  
KN3W Ideas Pty Ltd  
KPMG  
Leadership Solutions  
Legal Finesse  
Linfox Australia Pty Ltd  
Meat and Livestock Australia Limited  
Monsanto Australia Limited  
New Zealand Trade and Enterprise  
StayinFront Group Australia  
Swisslog Australia Pty Ltd  
The Food Group Australia  
The Nielsen Company  
Touchstone Cons. Australia Pty Ltd  
Valesco Consulting FZE  
Visy Pak  
Wiley & Co Pty Ltd

### PSF Members

Amcor Fibre Packaging  
Bundaberg Brewed Drinks Pty Ltd  
Cadbury Schweppes Asia Pacific  
Coca-Cola Amatil (Aust) Limited  
Foster's Group Limited  
Golden Circle Limited  
Lion Nathan Limited  
Owens Illinois  
Visy Pak

### Associate & \*Affiliate Members

Accenture  
Australian Pork Limited  
Australian Dietetic Services  
ACI Operations Pty Ltd  
Amcor Fibre Packaging  
\*ASMI  
AT Kearney  
BRI Australia Pty Ltd  
\*Baking Association Australia  
CAS Systems of Australia  
CHEP Asia-Pacific  
CSIRO Food and Nutritional Sciences  
CoreProcess (Australia) Pty Ltd  
Dairy Australia  
Exel (Aust) Logistics Pty Ltd  
Food Liaison Pty Ltd  
FoodLegal  
\*Foodservice Suppliers Ass. Aust.  
\*Food Industry Association WA  
Foodbank Australia Limited  
\*Go Grains Health & Nutrition Ltd

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