

Submission by Freshcare Ltd to Food Standards Australia New Zealand (FSANZ)

Improving Food Safety for Fresh Horticultural Produce – Consultation Paper

The following submission from Freshcare Ltd is made in consideration of feedback from our stakeholders, including industry owner groups, trainers, certification bodies and members.

Background

Freshcare is the on-farm assurance program for the Australian fresh produce industry. The Freshcare Food Safety Code of Practice was first released in July 2000, revised in 2004 and further updated in 2009.

Freshcare has been designed for growers and grower-packers of all fresh horticultural produce, and that produced for processing. The Freshcare Code of Practice covers all aspects of production and handling, from initial site selection to postharvest storage and transport.

The Freshcare Food Safety and Quality Code is based on a master HACCP Plan. The code requires growers to complete individual risk assessments in areas identified as presenting significant food safety risk (areas of critical control) as well as demonstrating compliance to all the prescriptive elements of the Code of Practice.

Freshcare training is mandatory for all members, ensuring both ownership and understanding of the system being implemented on farm.

All the training resources and materials utilised by Freshcare trainers have been developed and approved by Freshcare Ltd, ensuring a consistency of delivery and implementation.

Copies of all Freshcare documents relating to the Food Safety and Quality Code of Practice have been provided to FSANZ. Freshcare also has an Environmental Code of Practice – 2nd Edition 2011 and Farm Safety and Welfare and Biosecurity Codes are currently in draft format.

Freshcare is owned by 21 peak industry bodies (commodity and regionally based). The Freshcare Board of Directors represent the Owner Members and set the strategic direction of the organisation. The day to operation of the Freshcare Program is undertaken by the Freshcare Office in Sydney.

A Freshcare Technical Committee (FTC) has been appointed for each of the Freshcare Codes. The current members of the FTC – Food Safety and Quality are:

- Scott Ledger – Queensland Dept Primary Industry – Food Safety Expert/Postharvest Horticulturalist
- Robert Premier – Global FS Pty Ltd - Food Safety Expert /Microbiologist
- Tundra Howe – TQA Australia – Food Safety Consultant and Trainer
- Damien Alexander – Advancing Food Safety – Food Safety Consultant and Trainer
- Clare Hamilton-Bate – Food Safety Consultant /Freshcare National Program Manager
- Belinda Hazell – Food Safety Consultant /Freshcare Board Representative

The FTC review and address all technical queries raised by Freshcare members /other industry stakeholders; the FTC is responsible for ensuring that the technical content of the Freshcare Code remains current and addresses all food safety risks relating to fresh horticultural produce.

Freshcare Membership

At the 30th June 2011 Freshcare has a total membership of 5,300 growers and grower-packers.

Of the total membership, 4,597 individual businesses have a Food Safety and Quality Membership, 2,601 (57%) of those members hold current certification, 336 are in certification pending (issues identified at audit need to be addressed prior to certification being granted) , 1,055 are in the training and implementation phase and 394 are suspended due to crop loss.

Market Acceptance of Freshcare

The **Freshcare Code of Practice – Food Safety & Quality – 3rd Edition** is an approved on-farm Certification for supply to wide range of customer groups

Coles: - Freshcare can be used for direct (including pre-packs and black crates) and indirect supply to Coles – visit www.coles.com.au for detailed supplier compliance information

Woolworths: - Freshcare can be used for indirect supply to Woolworths via Woolworths approved trade partners who all have WQA

Other Retailers: - Freshcare is widely accepted for direct and indirect supply.

Processing: - Freshcare is widely accepted for the processing supply sector.

Costs Associated with Freshcare Implementation and Certification

As stated previously, Freshcare requires that all members attend a Freshcare Training Workshop prior to system implementation and certification.

The cost of training varies between training providers, but is generally in the \$650.00 - \$900.00 range. Currently, this cost is subsidised for eligible primary producers

The cost of implementation on farm will vary, depending on the infrastructure changes necessary to comply with the Freshcare Code.

Once training and implementation are complete, the Freshcare member business will go to audit; the cost of annual audit varies between Certification Bodies / geographical regions, but is generally in the range \$400.00 - \$550.00. Auditor travel expenses may be an additional cost.

Freshcare charges an annual certification fee to all members at certification (successful completion of their annual audit). Members who are in training or are suspended due to crop loss are not charged any Freshcare fees.

The only additional annual cost is the cost of testing (product residue test, product microbial testing, water tests, etc) that may be required to demonstrate compliance with the requirements of the Freshcare Code of Practice.

Issues for Consideration by FSANZ

Equitable management of risk

One of the biggest issues for Freshcare is the anomaly stated on Page 2 of the FSANZ Consultation Paper:

“Growers who are doing the right thing in ensuring the safety of their fresh produce have higher costs than growers who do not have a comprehensive food safety scheme in place”.

One might assume that after over 10 years of market driven compliance, there would be limited opportunity for growers to place product into the market that is not produced under a certified food safety system. However this appears not to be the case and we are regularly provided with examples of growers without food safety systems supplying through the wholesale market to major retail customers.

We estimate that 75% of market supply (by volume) is grown under a certified food safety system, thus 25% of supply is from growers with no externally certified system in place. We suspect that the majority of these growers are smaller-volume producers and hence they represent greater than 25% of the grower population.

This apparent ability to avoid compliance with stated customer requirements is a source of major frustration to growers who have implemented systems and maintain their compliance through annual certification.

Not only is the frustration driven by the effort and cost of maintaining compliance and achieving annual certification, but also the concern that should a food safety incident occur due to lack of system implementation / poor compliance, the impact will not just be on the non-conforming grower, but on all growers within that commodity sector and potentially on the fresh produce industry as a whole.

We believe it is critically important that growers are given adequate recognition for the food safety systems they have implemented and that those without formal systems should be strongly encouraged to implement, thus providing a stronger foundation through which the industries' food safety risk can be managed.

It may be that regulation is an option to force the late adopters to comply and implement on-farm food safety systems, thus moving towards 100% of supply from certified production. However, this regulation would only be supported if it imposed no additional cost on those growers who already demonstrate compliance through the market driven food safety systems they have in place on farm.

Growers / Grower-Packers with established food safety systems should not be further penalised nor incur any additional costs, in order to enforce the compliance of others.

Concerns re commodity based risk management

In 2008/09 Freshcare undertook a major review of the Freshcare Food Safety and Quality Code.

During the review, the master HACCP Plan was completely re-written and updated, a greater focus was placed on individual risk assessments, the prescriptive elements of the code were strengthened and clear critical limits were set.

In undertaking this work, the project consultant, guided by an expert industry steering committee, reviewed all available information relating to on-farm food safety both in Australia and overseas.

During the review, it became very clear to the project team, that commodity based risk management was not the most effective mechanism to manage on-farm risk. Consideration must always be given to the combination of crop, inputs, process and market/end use, in order to effectively assess food safety risk.

In the past, lists were often created of 'high, medium and low' risk crops based on factors such as proximity to the ground, eaten raw, edible skin, etc. Whilst the risk factors must be considered, this is now not considered a very effective approach as it does not consider all the potential risk factors impacting on the product.

For example:

1.0 Field grown herbs – historically placed in high risk product group, due to proximity to the ground and the fact they may be eaten whole and uncooked.

- Bed preparation using fertilisers of organic origin may introduce a risk that must be managed, whereas the use of inorganic fertilisers does not present the same risk to the product.
- Herbs irrigated with dam water through sub-bed irrigation have a much lower food safety risk than the same herbs irrigated with dam water via overhead sprinkler systems.
- If town water is used for irrigation the risk with both application techniques is minimal.

Under Freshcare, both fertiliser and water inputs are managed through a risk assessment process.

2.0 Apples – historically placed in a medium risk product group as not grown close to the ground, but do have an edible skin / generally eaten uncooked.

- Postharvest sprays applied using river water may introduce risk to a ready to eat crop, particularly if marketed from the orchard.
- However, subsequent steps postharvest (dip tank, wash and brush) may reduce the risk and also need to be considered to determine the final risk status.

Again, under Freshcare, both inputs and process are considered in the risk assessment process.

3.0 Carrots for processing (canning / freezing) v Carrots for fresh market.

For fresh market carrots, as a product grown in the soil, with edible skin and often eaten uncooked, inputs such as fertilisers of organic origin and water may present a significant risk, requiring additional risk management activities under Freshcare.

Carrots destined for canning / freezing are subject to additional processing steps and are not eaten uncooked, thus their risk profile changes. Steps in the processing operation (washing, blanching etc) address a number of the potential risk factors, thereby modifying the required risk management activities on-farm.

Likely food safety risk and appropriate risk management strategies can only be identified / developed if product, inputs, process and end use are all considered. There is no 'one size fits all'.

Recognition of existing food safety systems

It is essential that any legislation introduced builds on the compliance provided through existing HACCP based food safety programs.

Thus, avoiding duplication and cost, in both system implementation and compliance.

Frequency of audit to demonstrate compliance

Freshcare requires members to undertake an annual on-farm audit to maintain food safety certification. Freshcare certificates are issued following an audit, with an expiry date 13 months from date of audit, with next audit due 12 months from audit.

The requirement for an annual audit has historically been driven by customer requirements.

Similar on-farm programs overseas have variable audit frequencies. Some are based on risk; others are group audit scenarios with a second party component.

Freshcare will be seeking funding to undertake a review of alternate audit frequencies, in the hope that frequency and therefore cost may be reduced for some growers.

If FSANZ were to introduce the requirement for compliance to food safety standards to be monitored through an external audit process, consideration would have to be given to audit frequency and the impact of audit costs, particularly on small, seasonal producers.

Industry Resources

The On Farm Food Safety Guidelines (the Guidelines) were first published in 2000 and then reviewed in 2004. This document provided a valuable resource to industry and formed the basis of the resource section of the Freshcare Manual.

When the Freshcare Code was reviewed in 2009, no funding was available to update the Guidelines, so whilst significant changes were made to the resource section of the Freshcare Manual, these same elements have not been updated in the Guidelines. Thus, the Guidelines are now out of date.

To ensure an industry wide understanding of food safety issues to underpin any requirement for regulatory compliance, it will be very important to provide an updated resource to industry.

Scope

Is there any reason that nut crops have not been included in the scope of this work?

The critical inputs are the same for nut production and there are a number of documented cases internationally of food safety incidents attributed to poor agronomic / handling practices in nut production.

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The submission is made on behalf of Freshcare Ltd, with the approval of the Board of Directors of Freshcare Ltd.