



## **AUSVEG Submission Response to the FSANZ Consultation Paper:**

### **FSANZ Improving Food Safety for Fresh Horticultural Produce Consultation Paper**

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As the peak industry body representing vegetable and potato growers in Australia, AUSVEG has a number of recommendations to make to FSANZ in regards to their consultation paper. These recommendations cover relate to issues of regulation, risk identification and clarification.

#### **➤ Regulatory intervention versus self-regulation measures**

AUSVEG does not support the introduction of further regulatory intervention to be imposed upon Australian vegetable and potato growers. Self-regulation has proven to be a far more effective and widely accepted measure to which growers can adhere. Programs such as Freshcare help growers achieve food safety requirements without having to cope with interpreting complex regulations. Understandably there is a desire to create an across the board level of food safety but the focus needs to move away from increasing government or industry regulation and concentrate on grower education. Growers will respond far better if FSANZ is trying to teach better on-farm and pack house practices, rather than implementing protocols that could possibly see them financially worse off. Such protocols can often restrict or interfere with the efficiency of on-farm practices, ultimately cutting into their bottom line.

#### **➤ FSANZ needs to do onsite visits to all areas of the supply-chain**

FSANZ need to determine where the high risk area of food production is and focus attention on that section of the supply chain. The data will be best obtained from independent research by FSANZ, as AUSVEG does not have extensive access to such information. Independent examination by a body such as FSANZ ensures that supply chain examinations are taken seriously by all parties in the supply chain. From speaking with growers on farm to visiting retailers, these types of visits will prove to be the most effect way of determining where the risks lie for a range of different horticultural commodities. Different commodities will have different risk factors.

➤ **Foodborne illness origin statement needs clarification**

*“Internationally, certain horticultural commodities have been associated with outbreaks of foodborne illness. Data from the European Union indicated that five food categories accounted for over 80% of all food incidents<sup>4</sup>. These were fresh leafy vegetables (36.4%), spices (19.7%), nuts and seeds (16.7%) and frozen berries (7.6%). Similarly to the Australian OzFoodNet data, the agents responsible for the food safety issues were most commonly Salmonella and noroviruses.” (FSANZ Improving Food Safety for Fresh Horticultural Produce Consultation Paper)*

This statement seems to indicate that horticultural commodities make up 80.4% of all food incidents. However, this seems incorrect as the figure does not include any: meat, seafood or dairy.

These recommendations should be considered by FSANZ regarding the Food Safety for Fresh Horticultural Produce consultation paper, as they will affect how efficiently and safely growers can provide produce. Special consideration should be considered when addressing regulations for the industry, as self-regulation allows growers to efficiently deliver safe produce. It is also important to consider how risk analysis is conducted, and the different risk factors involved with different commodities. FSANZ should ensure that these recommendations are considered when moving forward with the paper.

AUSVEG strives to uphold the interests of Australian vegetable and potato growers and is willing to work with FSANZ in any area of concern to find the best methods and ideas to benefit the horticulture industry.