



July 2011 Submission to FSANZ Discussion Paper Improving food safety for fresh horticultural produce

Introduction

The Victorian Farmers' Market Association Inc represents some 500 members and the broader industry as a whole. Members comprise market managers and food producing businesses, including farm based producers and specialty food makers. There are approximately xxx fruit and vegetable growers listed on the VFMA database, and many of these are small producers, while all of them sell at least part of their produce directly to the public at farmers' markets. The farmers' market movement started in Victoria around 1992, with the beginning of several farmers' markets around that time. Presently, there are around 90 farmers' markets in Victoria and this number will continue to continue to grow.

Factors in Business Variety

Within the horticultural sector of the farmers' market industry, there are substantial variations in businesses, and it would be difficult to develop any standard approach to suit so many variations.

Organic and conventional

There is a wide variety of business approaches when it comes to organic and conventional systems. Some businesses operate under one of several organic (and biodynamic) certification schemes – each of which has their own food safety control mechanisms and reporting requirements. Several conventional growers operate using similar principles and organic methods, but have chosen not to become certified due to the regulatory burden of doing so. Further, there are also conventional growers, including hydroponic growers that operate using their own common sense approaches to managing food safety risks.

Business size

Farmers' markets tend to attract many smaller growers that want to be involved in every stage of their product, while others are also fulfilling large contracts with retail chains and food processors as part of their business strategy. It is generally the smaller growers that would be severely affected by additional regulation.

Product range

Farmers' markets also often attract producers that offer a variety of different products and who enjoy trying new lines, unusual varieties and testing specialty products made with their own ingredients. For horticultural business opportunities to develop, it is crucial for these innovative growers to retain such flexibility to test new varieties at suitable farmers' markets without regulatory hindrance. There are also plenty of growers who grow one product or all of their product is harvested within a short season, such as raspberries, garlic or tomatoes.

Full time vs part time

Time commitments vary between growers – some see their horticultural pursuits as a part time operation that is balanced with off farm work, family commitments, or with retirement. Others have a larger scale operation involving full time proprietors as well as staff. All of these contributions to Victoria's food production are valuable, and additional regulation will see the demise of some smaller operations.



All of these variations have an impact on the systems and controls that businesses have in place for bringing fresh fruit and vegetables safely to farmers' markets. Any additional level of regulation would overburden at least some of these growers and would ultimately cause business losses. Government funding and initiatives have supported small producers to participate in farmers' markets and it is important to continue this support by limiting the regulatory burden on establishing businesses.

Current food safety measures

When asked about food safety protection measures currently in place, several of our horticultural producers discussed the following measures:

- Following and recording organic certification procedures, including composting times and temperatures of manures, washing procedures and washing water quality testing.
- Strictly following Material Safety Data Sheets provided with every product applied to soil and plants.
- Hand washing and using gloves when handling produce for packing and display at markets
- Using consistent and trusted suppliers of fertilizers and soil conditioners to help ensure product safety in the relevant application.
- Washing produce before packing for farmers' markets. Farmers' market producers take great pride in their product and are fully aware of the impact on sales if it is not presented to a very high standard. These producers are very customer focussed and know that if short cuts are taken, their sales will be affected. They also actively encourage their customers to wash produce before consuming.

The VFMA accreditation program

The Victorian Farmers' Market Association has developed a voluntary accreditation program which verifies that the person selling at a farmers' market is directly involved in producing the goods. As part of this accreditation program, stallholders are asked to verify compliance with any relevant local government food safety requirements relevant to their business and that any claims of free range or organic are backed up by relevant certifications. Details of the accreditation program, its regulations and application forms are available on www.vicfarmersmarkets.org.au

When producers have direct contact with their customers, they take pride in their produce and are more likely to ensure the safety and quality of their product is superior. The quality, flavour and appearance of their produce directly relate to their sales on market day and stallholders generally ensure this goes well beyond providing safe food. Many stallholders provide additional information on freshness, seed provenance, preparation techniques and environmental credentials of packaging and farm practices.

Additional regulation?

Producers are strongly united in the view that additional regulation placed on their businesses would not prevent food borne illness. Rather, it would simply add to their administrative workload and would change little if any of their current practices. Producers would be happy to receive guidelines



and information that would help them identify and further manage risks, but they do not have the resources to meet additional regulatory requirements.

Suggested alternatives

There were further suggestions of approaches that could help support the FSANZ effort to improve food safety for fresh horticultural produce:

- Consumer education – farmers' market producers are constantly discussing their produce with customers and are astounded at the number of people buying produce and not washing it before eating. Consumers are often unaware of the need to wash produce, and this is particularly important for products that are not able to be effectively cleaned before sale – such as leeks, heading lettuce varieties, and some brassicas.
- Providing guidelines for producers including treatment of manure fertilizers, washing procedures and water quality. This needs to be guided, not regulated.

The VFMA can play a significant role by providing information to producers, market managers as well as to farmers' market shoppers about their respective role in ensuring food safety.

The VFMA is also a vital reference point for any issues affecting the horticultural industry – and particularly where small growers are potentially impacted.

Conclusion

A regulatory approach to improving food safety for fresh horticultural produce would be detrimental to many businesses in the farmers' market sector. Strategies including consumer information and guidelines for producers are suggested. The VFMA should be kept involved as an industry reference and communication point throughout the development of this initiative.

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