

# **IMPROVING FOOD SAFETY FOR FRESH HORTICULTURAL PRODUCE**

## **Comments by Victorian Department of Primary Industries (food-borne illness information provided by the Victorian Department of Health)**

### **1. KEY POINTS**

- The horticulture industry in Victoria is diverse, extensive and highly productive. Due to commercial incentives, more than 50 per cent of Victoria's fresh horticultural produce is covered by assurance schemes with comprehensive food safety risk management requirements.
- Where actions to manage food safety risks are required, they should be targeted at those points in the supply chain where they will be most effective and efficient.
- Any proposed regulation should be the minimum level required to effectively manage an identified risk.
- Food safety is enhanced by a number of well established "good agricultural practices" that may initially have been adopted for other purposes. For example, high quality water helps to ensure that herbicides work effectively, as well as limiting potential microbial contamination during production and postharvest.
- DPI will continue to engage with the Victorian horticulture industry and provide advice and information to assist FSANZ, with a particular focus on any knowledge gaps that may emerge as the review proceeds.

### **2. HORTICULTURE IN VICTORIA**

Victoria's horticulture industry includes fruit, nuts, vegetables and the amenity horticulture sector (nursery plants, cut flowers and turf production).

In 2009-10, the gross value of Victorian horticulture commodity production was approximately \$2.4 billion. Nationally, Victoria is the largest producer of all stone fruit (except cherries), pome fruit (apples and pears), table and dried vine grapes, almonds and some vegetables (namely tomato, asparagus, broccoli, lettuce, cabbage and celery). In addition, Victoria contributes a significant proportion of the national orange, wine grape, strawberry, potato, cauliflower and carrot harvest.

There are approximately 3,500 fruit and vegetable growing businesses in Victoria. The main production areas are the Goulburn Valley, Swan Hill, Sunraysia and peri-urban Melbourne, where water is available for irrigation. Fruit production is primarily located in northern and central Victoria, whereas vegetables are grown in many parts of the state, including peri-urban areas west and south-east of Melbourne.

The industry is highly diverse. Each commodity group has a different history, culture, location, export focus, leadership capability and outlook. Some are highly advanced, with regard to aspects such as business structure, technology use and marketing, while others are relatively new and still developing. In addition, there is strong competition between individual producers of many horticulture commodities for a share of the available markets, which puts particular pressure on overall industry unity and propensity to share information.

### **3. FOOD SAFETY RISK MANAGEMENT CONSIDERATIONS**

- Actions should be targeted at those points in the supply chain where there are identified problems in need of attention and where effective and efficient food safety outcomes can be achieved. This may not necessarily be on-farm.
- Any proposed regulation should be the minimum level required to effectively manage an identified risk. It should be practical, proportional and consistent with COAG's principles for best-practice regulation.
- A nationally consistent approach across the whole sector is relevant in terms of outcomes and regulatory impact, but not necessarily in terms of appropriate risk management practices.
- It is important to avoid unnecessary duplication where existing assurance, regulation or other arrangements can provide effective management of food safety risks.
- Any proposed options should focus specifically on improving food safety, not assurance for its own sake.
- Regulation should address demonstrated, systemic risks that are not adequately managed by existing systems. One-off incidents are more appropriately addressed in other ways.
- The horticulture industry in Victoria is not homogeneous. There is considerable variation between different commodity groups in terms of specific risk, maturity and drivers to adopt food safety management systems.

### **4. VICTORIAN ARRANGEMENTS**

Consultation with growers, advisors and industry leaders has affirmed that more than 50 per cent of fresh horticultural production in Victoria is covered by assurance schemes or programs that address potential food safety risks. For many producers, such as those selling to supermarkets, this is a mandatory requirement.

In addition, producers appear to be well aware of risks associated with local management practices. For example, vegetable growers in south-east Melbourne using chicken manure sourced from broiler or egg farms have a good understanding of the importance of monitoring and management of microbial pathogens. In the Yarra Valley, strawberry growers are working with consultants to ensure that the safety of their produce is maintained through the use of integrated pest management rather than repeated chemical use.

While there is general agreement that some growers, especially those supplying small or non-traditional markets, may not be currently participating in formal risk management programs, it is less certain whether this cohort presents a significant food safety risk.

It is difficult to identify exact costs associated with implementing and maintaining food safety risk management systems, as many producers include other risk management activities, such as OH&S, in their monitoring and compliance activities. The owner of one large vegetable production enterprise in south-east Melbourne estimated that he spends around three hours each week on mandatory reporting. His external audit costs are in the order of \$1,000 - \$1,200 per annum.

## **5. ON-FARM FOOD SAFETY MANAGEMENT SYSTEMS IN CANADA, THE UNITED STATES AND THE UK**

In Canada, the United States and the United Kingdom<sup>1</sup>, retailers are increasingly looking for assurance (certification of practices) from suppliers and Governments are seeking more efficient and effective traceback systems. Achieving standardisation of these aspects of business practice is a shared key objective of all stakeholders, including primary producers, in each of these countries.

The drivers for uptake of food safety management schemes vary. In Canada, industry commodity organisations have led the development of comprehensive systems, in partnership with Federal and Provincial Governments. In the UK, arrangements have been strongly influenced by retailer demands and European Union legislation. In the United States, recent foodborne illness incidents have prompted a shift in the overall focus from crisis management to prevention and enforcement.

While there are documented and audited programs in place in these countries, there is minimal regulation. In Canada and the United Kingdom, on-farm food safety schemes for fresh produce are advanced, collaborative and comprehensive. Arrangements in the United States are still in the early development phase, with details such as appropriate systems for small producers still to be resolved.

Government supported information and extension is a key enabling feature in all three countries. In the United States, for example, the Cornell University based Produce Safety Alliance is developing a nationwide curriculum to facilitate the implementation of food safety practices on farms and in packinghouses.

## **6. FOODBORNE ILLNESS OUTBREAKS**

OzFoodNet data on outbreaks of foodborne illness in Australia that have been attributed to the consumption of fresh or processed produce indicates that some incidents cannot be attributed solely to horticultural produce.

The data shows that semi-dried tomatoes, papayas, melons, baby corn, alfalfa and other bean sprouts, some of which were imported, have been linked by relatively good evidence to a handful of outbreaks over the last decade in Australia. We note that risks arising from imported fresh produce would not be able to be managed by Australian Primary Production and Processing Standards.

Overall, the small number of recorded incidents, and other relevant information such as food recall data, suggests that food safety risks in fresh horticultural produce are currently well managed.

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<sup>1</sup> On-farm food safety arrangements for fresh horticultural produce in Canada, the United States and the United Kingdom (available from [tony.fay@dpi.vic.gov.au](mailto:tony.fay@dpi.vic.gov.au)).

## **7. NEXT STEPS**

It is important to distinguish between local management practices and food safety risks that are common to other countries and those that are not considerations for Australia. This will affect the prospective merits of assurance systems in other nations. For example, much of our fresh produce has relatively short supply chains, making traceability faster and easier.

Significant input from across the horticulture industry is required to ensure that the review process is as informed and effective as possible. DPI will continue to actively engage with industry in Victoria to support FSANZ, with a particular focus on any knowledge gaps that may emerge as the work proceeds.

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