

Submission to Proposal P1052 - Primary Production and Processing Requirements for Horticulture (Berries, Leafy Vegetables and Melons)

Comments from the Department of Health Western Australia

Due date of submission – 16 February 2022

The Department of Health Western Australia (WA Health) welcomes the opportunity to comment on Proposal P1052 - Primary Production and Processing Requirements for Horticulture (Berries, Leafy Vegetables and Melons).

Summary

- **WA Health supports Option 3 - Introducing a combination of regulatory and non-regulatory measures.**
- **WA Health supports the proposal for the three separate primary production standards (berries, melons, and leafy vegetables that are ready to eat).**
- **WA Health is committed to explore into the recognition of GFSI benchmarked food safety schemes to demonstrate compliance with the proposed standards.**
- **WA Health supports the inclusion of non-regulatory measures in addition to the proposed regulatory measures.**

WA Health has reviewed Food Standards Australia New Zealand's (FSANZ) proposal with the supporting documents and is in support of Option 3 - Introducing a combination of regulatory and non-regulatory measures.

The summary of Australian (Section 4.1) and International (Appendix 2) outbreaks associated with fresh horticultural produce presented in the Microbiological assessment report (SD2) highlighted the impact of a breakdown in food safety controls in the production of horticulture produce, which have caused foodborne illness and in some cases deaths. The most effective stage to control food safety risks is at the primary production stage. The minimisation and/or prevention of hazards at the primary production stage will greatly reduce the reliance on food safety controls further down the food supply chain by food businesses and consumers to make food safe. This will ultimately result in a reduction in foodborne illness in the community. In WA, there is currently no regulatory oversight on food safety in the primary production of fresh horticultural produce due to the absence of primary production standards. Under our current legislation, enforcement agencies can only investigate further into food safety risks in the primary production of fresh horticulture produce when a serious danger to public health is suspected. The proposed introduction of regulatory measures that enable proactive oversight of food safety risk in the primary production of fresh horticultural produce will be a positive step forward in protecting the health of the community.

The comprehensive microbiological assessment report has presented findings from the review of scientific literature which investigated the pathways of contamination, persistence, survival and amplification of food safety risks throughout the primary production of chain for berries, melons and leafy vegetables. The assessment has

also characterised the microbiological risk profile for each of the three commodities. As the review of the scientific literature has shown that the food safety risk profile for each commodity is different, WA Health supports the proposal to have three separate primary production standards which address the food safety risks relevant to each commodity. The proposed outcomes-based standards will also provide fresh horticulture producers the flexibility on how food safety risks are managed in their operations.

Supporting Document 1 - Current food safety measures for horticultural produce, has provided a summary of major food safety schemes in Australia and those benchmarked against the Global Food Safety Initiative (GFSI), namely: BRC Global Standard for Food Safety, Freshcare Food Safety and Quality Standard, Global GAP Integrated Farm Assurance Standard, and SQF Food Safety Program. WA Health acknowledges that the food safety outcomes in the proposed FSANZ standards can be achieved to various extents via the food safety controls prescribed in benchmarked food safety schemes used in Australia. As such, we are committed to explore into the recognition of GFSI benchmarked food safety schemes to demonstrate compliance with the proposed standards. Not only will this minimise duplication in the assessments of food safety components already covered in the GFSI scheme, but also allows food safety regulators to focus on components not adequately covered in the GFSI scheme.

The introduction of the proposed FSANZ Standards will establish the much-needed oversight to ensure fresh horticulture producers that are not operating under a GFSI scheme have the necessary food safety controls to ensure safe food is supplied to the WA community. It is also equally important to ensure any proposed regulatory requirements imposed on growers are commensurate with the food safety risk for the grower. The overall improvement of food safety across the industry will benefit the industry by reducing/preventing food safety outbreaks that will negatively impact the industry's reputation and consumer confidence in the commodity.

WA Health supports the inclusion of non-regulatory measures in addition to the proposed regulatory measures. The proposal for FSANZ to create industry resources in consultation with jurisdictions and peak industry bodies will greatly benefit small growers and those not currently operating under a GFSI scheme.

WA Health would like to thank FSANZ for their work on Proposal P1052 and the development of primary production and processing requirements for horticulture (berries, leafy vegetables and melons). Should there be any questions about the information in WA Health's submission, please contact [REDACTED]
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