

Food Standards Australia New Zealand
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Re Proposal P1052

16th February 2022

The Victorian Farmers Federation represents horticulture growers throughout Victoria. In particular members producing Melons, Berries and Leafy Green Vegetables. We have consulted with our members as well as Berries Australia, AUSVEG, Melons Australia, Ag Vic and Fresh Care.

We support the following positions of these organisations and in summary we submit the following for consideration by FSANZ.

1. That all regulatory bodies and jurisdictions work together to create a nationally consistent framework including costs, registration, access and intervention in an issue.
2. That all regulations be inclusive of support, training and direct consultation with industry.
3. That current third party food safety schemes will be included for industry to show compliance.
4. The implementation timeline be extended.

We note the industry has moved forward since the instigation of the enquiry and Food Safety measures in particular in Melons and Berries are best practice and equivalent to any jurisdiction in the world. We believe simple registration of producers including the FSS would be a solution for these industries. Leafy Green Vegetables however is both opportunistic and has many small participants and hence the low rate of FSS outside those who supply the major retailers. The projected cost in the proposal may have the effect of having farmers leave the industry or driving the production and distribution underground. To this end we suggest an extended timeframe for compliance as well as support and training as a way to alleviate a cost burden.

In summary our discussions with the previously mentioned groups have found a strong support for Food Safety but with reservations as a number of issues in the proposal and we support the need for detailed inclusion and consultation with industry as part of any implementation of proposal P1052.

We thank you for the opportunity to present our thoughts.

Regards,

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