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Proposal P1052

Primary Production and Processing Requirements for high-risk Horticulture

2nd Call for Submissions Consultation Paper

Summary

The Primary Produce Safety Program (PPSP) of the Tasmanian Department of Natural Resources and Environment (formerly DPIWPE) welcomes the opportunity to comment on the 2nd Call for Submissions (CFS) for Proposal P1052 – Primary Production and Processing Requirements for high-risk horticulture.

The information presented by FSANZ in the 2nd call for submissions documents demonstrates through the Microbiological assessment of berries, leafy vegetables and melons (SD 2), a link between food safety outbreaks associated with fresh and minimally processed horticultural products in the period 2011-2019 and impacting a range of jurisdictions across Australia.

Tasmania supports the development of national regulatory measures for the high risk horticulture sectors identified by FSANZ in the 1st call for submissions of berries, leafy vegetables and melons and is supportive of FSANZ's preferred policy option 3 of regulatory plus non-regulatory measures.

Option 3 presents the most suitable option for Tasmania as the high risk horticulture sector is characterised by a high proportion of small and micro sized producers that would be presented with a range of compliance tools and options under this model. This option provides for minimal outcomes-based food regulatory measures supported by non-regulatory measures developed by industry and government.

Background

The Horticulture Implementation Working Group (HIWG) has been established by the Implementation Sub-Committee for Food Regulation (ISFR) to ensure consistent implementation of amendments to the Australia New Zealand Food Standards Code nationally.

The HIWG members include government officers from individual states and territories responsible for food safety in the horticulture sector. The HIWG utilises the Integrated Model for Standards Development and Consistent Implementation of Primary Production and Processing Standards (the Integrated Model) to develop a draft compliance and implementation package for the proposed standards, should the proposed standards be approved.

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Through Tasmania's membership of the HIWG we have committed, along with the other members, to exploring recognition of existing Global Food Safety Initiative (GFSI) food safety systems, as a means of demonstrating compliance with the proposed FSANZ standards and to support the FSANZ policy option 3 of regulatory and non-regulatory measures to reduce the incidence of food borne illness associated with high risk horticultural products.

GFSI benchmarked Food Safety Schemes in this sector currently include:

- BRC Global Standard for Food Safety – Issue 8
- SQF Food Safety Program – Edition 9
- Global G.A.P. Integrated Farm Assurance Standard – Version 5.3
- Freshcare Food Safety and Quality Standard – Edition 4.2

This concept of exploring recognition is being considered by **all** jurisdictions as a means of recognising existing industry efforts in meeting the proposed **food safety outcomes** of the FSANZ standards.

The Food Regulations System/Regulators aim to work with scheme owners, and exploring means to recognise these schemes, as meeting the **food safety components** of FSANZ standards, to prevent duplication for businesses already operating GFSI scheme, as well as reduce the potential resource burden for regulators.

Questions for Stakeholders

1. *We estimate the following number of businesses in each sector. Is there alternative information you would like us to consider?*

The estimated number of primary production and primary processing businesses in Australia are:

- 750 for berries,
- 1,500 for leafy vegetables
- 225 for melons.

PPSP has nothing to add

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- 2. *We estimate that the following percentages of businesses are currently participating in a FSS. Is there alternative information you would like us to consider?***

The estimated proportions are:

- 75% for berries
- 25% for leafy vegetables
- 95% for melons.

PPSP has nothing to add

- 3. *We have assumed that, on average, businesses not on a FSS are already 50% compliant with the measures proposed by option 3 (regulation and non-regulation). Is there alternative information you would like us to consider?***

PPSP has nothing to add

- 4. *We have estimated that if business are already 50% compliant, costs of regulation can be reduced by 50%. Is there alternative information you would like us to consider?***

Note: Notification, licencing and audit costs have not been deflated by 50% in our existing calculations, because they would likely need to be paid by all businesses not yet on an FSS, regardless of current compliance levels.

PPSP has nothing to add

- 5. *We have estimated the average length of the harvest and packing seasons. Is there alternative information you would like us to consider?***

The estimated seasons:

- 60 working days for berries
- 60 working days for melons
- 310 working days for leafy vegetables.

PPSP have nothing to add

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6. We have estimated the following efficacy (and ranges) of reducing illness by implementing option 3. Is there alternative information you would like us to consider?

Efficacy describes the level of reduction of illness. The estimated efficacy:

- 15% for berries – with a range of 5-50%
- 20% for melons – with a range of 10-50%
- 40% for leafy vegetables – with a range of 10-70%.

PPSP have nothing to add

7. Do you agree with the proposed washing and sanitisation cost estimates?

In practice, this requirement may only involve the removal of extraneous material from the produce. Washing is not mandatory; however, any washing should not make crops unacceptable. FSANZ estimates that the requirement will have a relatively large cost for leafy vegetables and melons. It is estimated to take 20 minutes a day (beyond business as usual) to ensure visible extraneous material is removed from harvested horticultural products. This is only required on harvest days (i.e. 60 days p.a. for berries and melons and 310 days p.a. for leafy vegetables). There are minimal costs of materials involved beyond the one-off cost of modifying general farm and processing equipment.

PPSP have nothing to add

8. We estimate that washing and sanitisation of equipment would take 10 minutes a day. Is there alternative information you would like us to consider?

This is only required on harvest days (i.e. 60 days p.a. for berries and melons and 310 days p.a. for leafy vegetables).

PPSP have nothing to add

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9. Do you agree with the proposed traceability cost estimates?

FSANZ has estimated that there will be a low additional costs as a result of the requirement for minimal traceability. Record keeping is already required for tax purposes (i.e. documenting sales and purchases). We have assumed an additional \$100 per business for minimal traceability resulting from the implementation of option 3.

10. Are there any categories of costs or benefits that we have not accounted for?

See appendix 1 of the consideration of costs and benefits for details of cost categories.

PPSP have nothing to add

11. Do the detailed assumptions for each crop group in appendix 1 of the consideration of costs and benefits sound reasonable?

PPSP have nothing to add

12. Do you agree with the following benefits of implementing option 3 (or can provide additional information about these benefits)?

- Health related benefits
- Improved capacity to effectively and efficiently manage a food safety incident, reducing costs
- Improved inventory and business management
- Potential additional export sales
- Government's improved capacity to effectively and efficiently manage a food safety incident
- A reduction in illness costs

13. How might implementing option 3 affect business viability?

PPSP supports the FSANZ view that generally, the Australian horticulture sector produces produce with a high level of food safety and that the strengthening of the current system will result in improved identification and management of food safety risks that will result in a reduction in food borne illness, increased consumer confidence in the sector and a net benefit to the community as outlined in the CBA (SD 3).

14. How might implementing option 3 specifically affect small businesses?

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There will potentially be an impact for those small businesses not currently participating in a GFSI scheme, however, the commitment from the HIWG to develop, in consultation with industry, a tiered approach to compliance with tools to assist small business in the form of templates and guides, will lessen the burden for small business and assist them to improve their current food safety systems.

15. Do you think that implementing option 3 will have any flow-on impacts for business in the supply chain e.g. transport

As business develops and implements food safety systems, there may be flow on impacts in terms of strengthening of approved supplier systems, instigated by producers. Given the widespread acceptance and adoption of approved supplier programs across a wide range of food commodities already in Australia, any flow on impacts would be minimal and most likely to result in positive benefits across the supply chain.

16. Do you think certain locations might be effected more than others from implementing option 3?

For instance, might businesses in remote areas experience notably different effects than businesses nearer cities; might businesses based in certain climatic regions experience more difficulties?

Based on existing primary production standards and regulatory frameworks, the effects will be very site specific and potentially those producers in remote areas may be faced with a higher compliance cost in terms of audit costs, if applicable for their commodity.

17. How might implementing option 3 affect the price of each commodity or quantities bought or sold?

Based on the information provided, Tasmania is not able to provide comment on the potential impact of commodity price or quantity moved through the market.

18. Berries: Do you think that the berries standard should also include the regulation of soils and fertilisers?

If soil and fertiliser were included, the input clause in the proposed standard would be updated as follows:

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Inputs – soil, fertiliser and water

A primary horticulture producer and a primary horticulture processor must take all reasonable measures to ensure that any of the following inputs do not make the berries unacceptable:

- (a) soil;
- (b) soil amendments (including manure, human biosolids, compost, and plant bio-waste);
- (c) fertiliser; and
- (d) water.

The inclusion of soil fertiliser and water as inputs to the berry standard is appropriate given the potential direct contact between product and inputs. This may however vary between types of berries and provision will need to be made for the varying production methods in the development of implementation tools.

19. Is there any other information you would like to provide?

PPSP has nothing further to add.