



NT Farmers Response to FSANZ P1052

The Northern Territory melon industry makes a significant contribution to Australia's melon sector. It is responsible for approximately 20% of Australia's melon production and it generates roughly \$60.4 million to the Territory economy per annum.

The local industry enjoys a prime market window supplying to Australia and New Zealand when production around Australia pauses for winter. The local industry is expected to continue to grow with investors attracted to the Territory's unique market window and growing conditions.

NT Farmers is committed to enhancing the safety and quality of produce, for the benefit of consumers and the industry as a whole. NT Farmers actively supports producers to improve their food safety processes and achieve commercial food safety accreditation. Our extension officers work with farmers to adopt the latest research in respect to food safety and environmental standards.

It is essential that consumers have confidence in their food, particularly melons in light of the devastating 2018 Listeria outbreak. The industry suffered significant losses as a result of the outbreak and it has taken years to restore consumer's trust in the melon industry. High food production safety standards and a traceable supply chain are vital for the long term growth of the melon industry.

Given the enormous economic and health impacts of microbial outbreaks in the melon sector, reviews of food safety protocols are welcomed and needed. However, Food Standards Australia New Zealand's report (P1052) recommendations simply creates additional red tape and does little to genuinely improve food safety outcomes.

NT Farmers firmly believe that the proposal imposes an unnecessary layer of cost and complexity on farmers without enhancing melon safety. Furthermore FSANZ's report fails to acknowledge the significant work industry has undertaken since the 2018 Listeria outbreak to strengthen melon quality and safety.

The industry is concerned that FSANZ's regulatory and non regulatory compliance measures will simply copy existing voluntary FSS requirements. Given that nearly 95% of the industry is already FSS compliant, there is little justification to regulate industry. NT Farmers questions why FSANZ expects melon farmers to pay an estimated \$1,540 per annum for an audit regime that mirrors FSS standards.

FSS standards are underpinned by the latest scientific research and are highly regarded internationally. Farms are assessed by strict independent auditors and are extremely





effective in ensuring farms meet the highest food safety standards. The standards work well however, recreating them for the sake of addressing a regulatory gap and imposing a charge is extraordinarily burdensome for farmers. It is difficult to understand how the proposed measures will improve or enhance existing melon production and quality standards.

It is disappointing that FSANZ's report has neglected to consider the significant work the melon industry has undertaken to enhance melon food safety. Since the 2018 outbreak, the industry has spent over \$1 million in developing and improving its safety practices and has developed the Melon Food Safety Toolbox.

The Toolbox is a comprehensive set of guides for producers on how to safely grow and handle melons. The guides are grounded in scientific, evidenced based research and has considerably assisted to enhance industry standards. The toolbox and other food safety initiatives have particularly helped industry to adopt the following practice changes:

- Elimination in the use of raw animal manure
- Compost must not contain raw animal manure
- Implementation of plastic mulching for melons has enhanced food safety
- Melon lines must be separated by wind brakes
- Implementation of a monitoring and sampling food safety surveillance program that identifies potential food safety issues prior to the sale of melon products.
- The development and adoption of best practice traceability pilot programs.

It is important to note that the industry developed and implemented food sampling safety surveillance program exceeds standards proposed under the FSANZ. Furthermore the above mentioned food safety practices go above and beyond the existing FSS standards that producers must meet in order to sell to large commercial retailers.

FSANZ's P1052 proposal makes minimal mention of industry's own efforts to enhance its safety practices as a response to past microbial outbreaks. P1052 should have made greater reference to industry's advancements in food safety when formulating its recommendations.

NT Farmers is committed to working with policy makers to ensure that Territory farmers meet the highest food safety and quality standards. NT Farmers cannot support the recommendations provided in P1052. Imposing new regulatory requirements and licensing costs onto producers that are already following existing/established standards cannot be justified.

NT Farmers will support non regulatory approaches to further enhance food safety standards that do not impose costs on producers. As indicated by food safety improvements in the melon industry, voluntary measures can be extremely effective in generating long term change in the industry. To enhance the non regulatory approach, NT Farmers will





closely work with industry to communicate FSANZ's newly developed melon safety standards.

NT Farmers looks forward to working with FSANZ to strengthen the melon industry's food safety capabilities. A melon industry supported by a strong food safety frame work will benefit melon producers, the Australian industry and the Territory economy.

