

23 March 2020

## **Freshcare Submission to FSANZ Proposal - P1052.**

### **About Freshcare**

Freshcare is the largest Australian assurance program for fresh produce; proudly providing certification services to over 4,000 businesses nationally. Specialising in food safety, quality and environmental compliance, Freshcare is developed to meet the needs of Australian horticulture in fulfilling both domestic and global market requirements.

Freshcare provides a practical approach that is underpinned by science and supported by training to help producers and the supply chain assure customers that their produce is safe to eat and sustainably grown.

Freshcare works closely across industry to ensure we provide Standards and resources that continue to meet the demands of multiple customers both locally and globally with one certification program. Freshcare's food safety and quality standard, as it applies to growing and packing operations, has recently received recognition by the Global Food Safety Initiative to reinforce this commitment.

### **Scoping and Incidents**

While the current proposal appears detailed, it fails to provide a clear outline in a number of key areas, that the industry and other stakeholders have been asked to consider, namely that option 1 - existing non regulatory measures continue (status quo) and option 2 - the development of regulatory measures.

These key areas include:

- 1 - The missing components fail to address the topic of the exact definition of leafy vegetables, however, the supporting document 3 (chapter 4) does provide some limited scoping, albeit it is unclear.
- 2 - The incidents referred to in supporting document 1 and used as the case for regulatory measures (tables 3 and 4), includes the production of sprouts, but as this commodity is already covered under chapter 4 (and by extension chapter 3) it is excluded from P1052, therefore the data related to these incidents is not relevant. This could also be said for pre-packaged salad leaves, which has undergone extensive interventions in a processing facility that falls under chapter 3 standards.
- 3- The case for the incidents of imported product (tables 4 and 3) is not relevant to P1052. These products are processed (frozen) and subject to additional processing parameters and can be considered to be at a greater risk of microbiological contamination; they have unknown controls from a food safety perspective that would, should it have been produced locally, have already been covered under existing regulations (Chapter 3). It can therefore be established that fresh berries have not been associated with recent microbiological food safety issues (disregarding the malicious tampering incident) which is the scope of the proposal. Additionally, we note that there is an increased import requirement in place since

these incidents (as outlined in supporting document 3) to show that additional controls are now in place.

Incidents such as the ‘needles in strawberries’ recall as the result of malicious contamination of product are rare, and GFSI recognised food safety systems already address this through food defence measures over and above existing regulations, which have no such measures nor can be effectively managed through regulated government inspection and surveillance.

In considering the above and removing these incidents from the profile, this leaves rockmelons (specifically), and loose leafy salad greens and baby spinach, and possibly raw material input used for further processing in the case of leafy salad vegetables. This is a very limited scope to what is currently being proposed by FSANZ.

Freshcare supports the broader industry concerns around the singling out of individual commodities and categorising them as high risk. The proposal’s current representation for high risk refers to three specific sectors (berries, melons and leafy vegetables) and Freshcare argues that these do not pose any greater risk than a broader range of crops, that have been excluded from this proposal. Examples sighted in the Guidelines for Fresh Produce Food Safety (2019) (3.1 page 6-7) include reference to produce with edible skin such as apples and tomatoes; carrots, broccoli, asparagus and eggplant as examples of vegetables that can be consumed uncooked, yet none of these are considered or discussed by this proposal.

Furthermore, the evidence provided in the FSANZ published food recall data (FSANZ website 2010-2019) shows that products such as salad leaves and fresh fruit make up a relatively small proportion of the total number of product recalls - while processed products such as processed fruit products have a significantly greater proportion of recalls and more likely to be due to factors other than microbiological risk.

There is limited evidence to support the assertion that the “high risk” horticulture sector is at significantly greater risk of product contamination or consumer harm than other products in the horticulture sector. The report does acknowledge that there are a multitude of factors involved in identification and management of the risks associated with agricultural production through its supply chain.

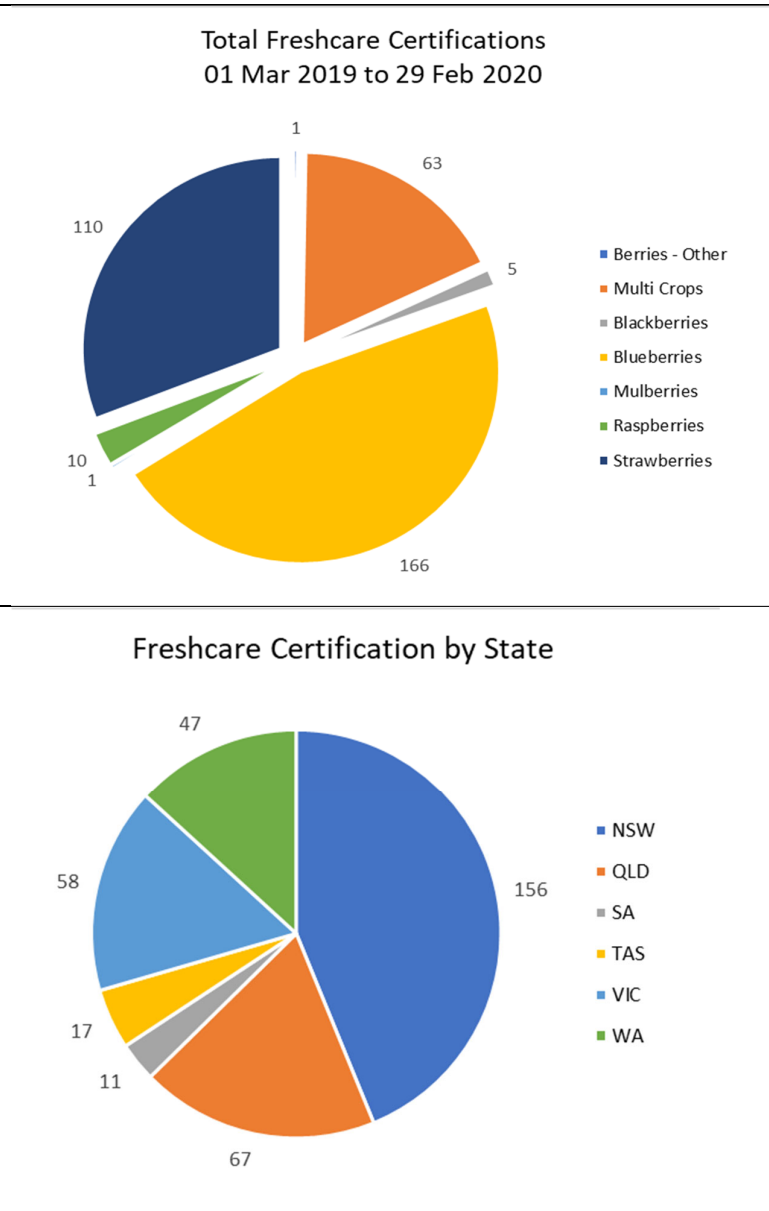
At the end of the day, we are debating regulating a sector of the Australian food production that, in most cases has no inbuilt microbiological safety step, is minimally processed and is eaten/ consumed raw. Failures to implement the food safety systems effectively by individual businesses in the sector is still an issue and will continue to be an issue regardless of regulatory intervention.

There is a known lack of awareness and consumer education on proper handling and preparation of raw food products, food hygiene and storage of these types of items in the home. This can also be seen in similar primary production category – eggs. Although eggs is regulated as a primary production and processing standard under Chapter 4 , we are still seeing outbreaks of microbiological based cases in this sector, therefore it could be debated that regulatory approaches do not work in all situations, and that the focus should remain sector specific focussing on broader education and promoting a food safety culture right through the supply chain to the consumer from paddock to plate.

## Industry Overview

Below is an industry overview as requested by FSANZ (3.3 page 12). Freshcare data provided in tables 1 -3 shows the number of Freshcare certified businesses\* for each of the “scoped” sectors (1 Mar 2019 to 29 Feb 2020), and a breakdown by state. As the leafy vegetables sector is so broad, and businesses in this sector (in most cases) produce multiple crop types, the data is difficult to break down to individual crop types. However, the total number of certifications issues against the Freshcare standard for this sector is indicated.

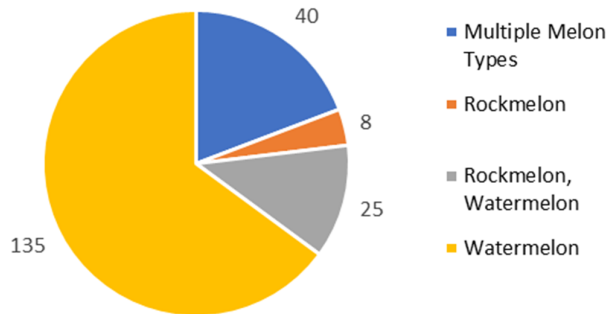
**Table 1 - BERRIES**



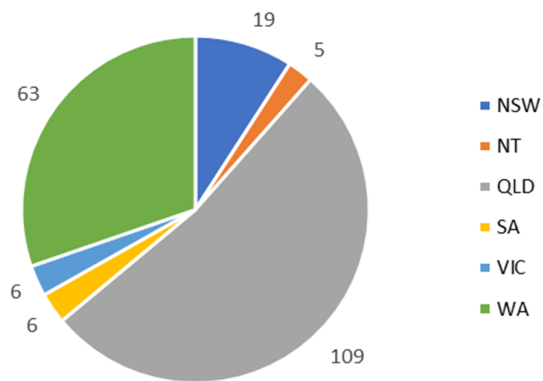
\* Freshcare certified businesses – have successfully completed an audit and had a certificate issued under the rules of the program.

**Table 2 - MELONS**

**Total Freshcare Certifications  
01 Mar 2019 to 29 Feb 2020**



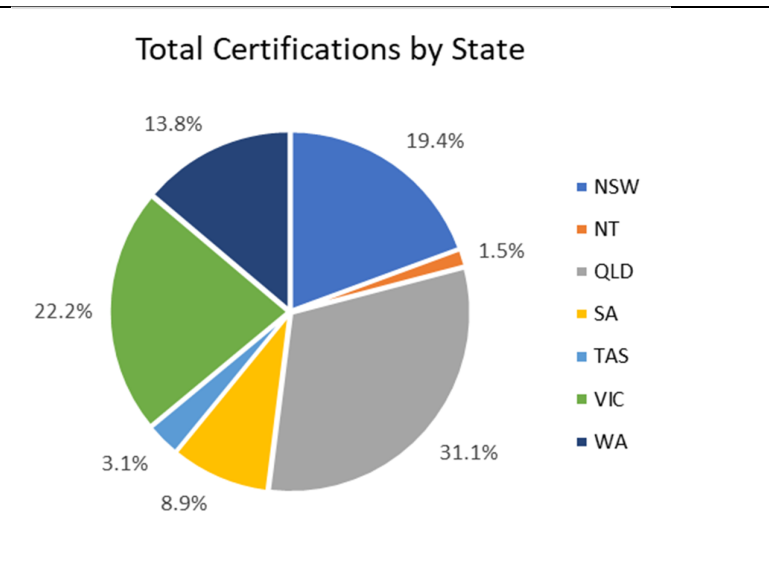
**Freshcare Certification by State**



**Table 3 - VEGETABLES – Leafy and Herbs, Excl Asian**

Too hard to quantify directly due to the multiple crop types that are commonly grown, but there appears to be **approx. 350** certificates for the same time period as indicated for berries and melons. A breakdown by state is based on this estimate below.

Refer to **Appendix 1** for Freshcare Crop List to show what crop types are currently certified against what categories.



Data for GLOBALG.A.P. can be found: <https://database.globalgap.org/globalgap/indexJSF.faces>

Data for SQF can be found: <https://www.sqfi.com/assessment-database/sqf-certified-site-directory/>

### Food safety systems

The current preferred option of FSANZ (option 2) appears to be a duplication of the current systems that are in place and working well, where food safety programs across the whole supply chain are implemented effectively, underpinned by science and respond to emerging and changing risks.

The Freshcare standard specifically includes the requirement for certified businesses to adapt to changing risks, and this is also included in other equivalent food safety programs. We are concerned by the implication in the FSANZ proposal that current systems are inadequate as they do not manage risk in atypical conditions. In the incidents referred to from 2011-2016 (table 3 supporting document 1), particularly for Australia, it could be determined by the supply chain failure commentary provided that the business did not adequately maintain such systems at a level to prevent the outbreaks. However, it is a stretch to question the efficacy of food safety schemes across the board, as it could also be determined that there would be significantly more outbreaks seen had the industry not had such food safety systems in place. This could be equally said for any food businesses currently covered under existing regulatory measures in the current structure of the Food Standards Code, as regulatory oversight is failing to address incidents leading to recalls in several sectors, such as dairy, mixed foods and bakery for microbiological, foreign object and more

importantly allergens, which can lead to severe illness and fatality in the community, as highlighted by FSANZ's own recall statistics data.

As a preventative measure for the whole of industry, the key question is how do we bring those businesses that do not have food safety measures or controls in place, up to the same level as those that do, as well as encouraging continuous improvement in practices across the board.

There is an additional burden where a lack of education and culture occurs within industry – crops may not be recognised as a food item that people will consume. It can be perceived as only a tradeable commodity within agricultural operations (i.e. I am just a grower/ farmer). This is where Freshcare plays an important role using our mandatory training for certification to occur. This training does not only focus on microbiological risks, but also risks associated with chemicals, foreign objects, allergens; the handling of product and managing people and training in businesses; food defence and food fraud and incident management.

The training and awareness component of a food safety management system, works to ensure that the development and implementation of an effective food safety management system for horticulture products by the grower and the processor requires that the individual sites are risk assessed, supporting programs such as those detailed above are implemented to effectively minimise hazards and the critical control points are applied where appropriate. This is not a simple process and requires understanding of the science of food safety risks and agricultural practices and the level of detail provided in food safety schemes by Freshcare and equivalent globally benchmarked schemes such as SQF and GLOBALG.A.P. These variables demonstrate the high level of detail that is required to be considered and understood.

The Global Food Safety Initiative (GFSI) has benchmarked Freshcare, GLOBALG.A.P and SQF and recognised these programs as industry 'best practice' food safety schemes which are independently audited and accredited. Furthermore, the work involved in relation to the ongoing development and changes to such schemes is extensive and resource heavy. This effort is also underpinned by the work from accreditation bodies and certification bodies in ensuring competency of the auditors tasked to audit such schemes, calibration of these experts across the board and ongoing monitoring of the systems and processes by both the food safety scheme and the accreditation body.

Freshcare argues that the model proposed by FSANZ is overly simplistic and fails to take into account other significant sources of contamination in a horticulture environment such as ineffective cleaning of product equipment, personal hygiene, waste handling and disposal, chemical storage and control, controls of raw material inputs, controls of packaging, temperature control of harvest product that our standard, and those of our equivalent cover in detail.

It is therefore important that FSANZ does not propose an overly simplistic model that is limited in focus but instead looks to support the frameworks of recognised schemes, and the basic principles of HACCP and good agricultural practices (GAP) combined with good manufacturing practices (GMP) and provide the agencies responsible for enforcement and action, the mechanism to recognise industry that has been certified to an appropriate standard without the additional cost and imposition of government inspection.

**Options Presented:****Option 1:**

Freshcare believes that the current option of status quo, works for the majority of the sector that have taken the step to implement robust food safety systems into their businesses. However, this option does not consider the need to go one step further to ensure that all horticulture businesses, regardless of risk who produce food for Australian consumers, are working to the same criteria which would create a level playing field in the market. The option of a status quo also does not necessarily address the outcomes-based focus, that addresses food safety across the entire supply chain from paddock to plate.

**Option 2:**

Freshcare believes that regulatory measures, although not the popular option, would address the shortfall, where there is inconstancy across the whole industry. However, this is contingent on the removal of the high-risk classification, and the limited current scoping. It would also need to address additional education, training and cultural change in the sector and in consumer behaviours.

It would also need to ensure agreements across all state and territory Food Acts have one consistent and simplified definition and scoping, so that a business operating in one state is not disadvantaged over another, and that those that operate across state borders, or nationally are not negatively impacted.

As suggested in the proposal (4.3 page 16) variations to the Food Standards Code to extend the definition of what constitutes a food business to the whole of the horticulture supply chain, could achieve an increase in regulatory oversight, without necessarily impacting the status quo for existing businesses that have implemented some form of independently assessed (third party) food safety management system. Additionally, this will then provide a mechanism for those that currently operate “under the radar” and do not have measures or controls in place for food safety, to be brought up to the same level playing field as those that do. Additionally, we need to achieve a point where the adoption of continuous improvement in practices across the board forms part of the outcomes-based focus.

As noted above, the same could be said for ensuring all horticulture goods imported into Australia in this sector is also required to maintain the same level of systems as locally produced goods, therefore not causing an imbalance between imports and domestic supply, as has been recognised in the proposal (5.14 page 19). This could also go the other way in that it opens further opportunities to the global market for Australian horticulture in maintaining our reputation for a safe food supply, along the lines of the work being done by schemes, and the Global Food Safety Initiative.

**Summary of concerns to be addressed:**

Freshcare recommends that if FSANZ does not take a whole of horticulture approach, that FSANZ clearly defines included and excluded crops quickly, so that any subsequent work, should it need to occur, is focussed on appropriately.

Freshcare recommends that FSANZ remove the reference to “high-risk” and consider, as part of the clear scoping above, a wider whole of horticulture approach, where it is the science that determines the risk of a product (eaten as cooked vs raw; intended for further treatment or processing), rather than an arbitrary allocation of commodity based on previous events. There is limited evidence to support the assertion that the “high risk” horticulture sector is at significantly greater risk of product contamination or consumer harm than other products in the horticulture sector.

FSANZ need to ensure agreements across all state and territories food acts for one simplified definition and scoping, so that a business operating in one state is not disadvantaged over another and that those that operate across state borders or nationally are not negatively impacted.

As a prevention measure for the whole of industry, the key question is: how do we bring those that do not have food safety measures or controls in place, up to the same level as those that do, as well as encouraging continuous improvement in practices across the board.

The measures identified need to be supported across the whole supply chain and should address additional education, training and cultural change in the sector and in consumer behaviours.

There is still an issue in determining the overall number of horticulture businesses in Australia. Freshcare suggests that FSANZ may be able to utilise Census data to obtain a more accurate estimate.

#### Appendix 1: Freshcare Crop List as at January 2020.

For brevity, crops not related directly to fruit and vegetables have been removed from this copy, but a full listing can be accessed here - <https://www.freshcare.com.au/resources/freshcare-crop-list/>

## Freshcare Crop List

The Freshcare Crop List outlines the scope of certification for the Freshcare Standards, including crops/produce and business activities. The Freshcare Crop List provides a reference guide for participating Freshcare businesses, stakeholders and customers to verify the scope of certification on Freshcare Certificates.

This list is managed by Freshcare with updates communicated to stakeholders and made available on the Freshcare website [www.freshcare.com.au/resources/freshcare-crop-list](http://www.freshcare.com.au/resources/freshcare-crop-list).

Any questions related to the Freshcare Crop List should be directed to Freshcare [info@freshcare.com.au](mailto:info@freshcare.com.au).

## Freshcare Certification

Freshcare certification covers businesses involved in primary production activities. This includes the growing, handling, packing, storage, ripening, wholesaling, brokerage, transport and distribution of fresh produce.

### Freshcare Standards

Freshcare Standard	Code	Scope	Notes
Food Safety & Quality	FSQ	Grower Packer	
Food Safety & Quality – Supply Chain	FSQ-SC	Packer Storage Ripener Transporter Wholesaler Broker Provedore Marketing Group	Packer includes packing, pre-pack and re-pack activities.
Environmental	ENV	Grower Packer Wild Harvest	Wild Harvest is applicable to the Flowers and Foliage scope category only.
Environmental – Viticulture	ENV-VIT	Grower	Applicable to wine grape production only.
Environmental – Winery	ENV-WIN	Winery	Applicable to wine production only.

### Scope: Activities

Scope Activity	Notes
Broker	Includes businesses involved in facilitating trade of fresh produce between a supplier and a customer that do not take physical ownership or physically handle the produce. Freshcare defines 'brokers' to also include agents and virtual brokers.

<b>Grower</b>	Includes businesses involved in production and harvest of a crop, pre-farm gate.
<b>Marketing Group</b>	Includes businesses involved in facilitating the marketing and trade of fresh produce between a supplier and a customer.
<b>Packer</b>	Includes businesses involved in receiving, handling, packing and re-packing of fresh produce (does not include further processing of whole products).
<b>Provedore</b>	Includes businesses involved in the procurement of fresh produce for distribution or resale to the food service industry.
<b>Ripener</b>	Includes businesses involved in controlled atmosphere ripening of fresh produce.
<b>Storage</b>	Includes businesses involved in the retention, storage (including controlled atmosphere storage) and warehousing of fresh produce.
<b>Transporter</b>	Includes businesses involved in the collection, transport and distribution of fresh produce. Transportation and distribution includes the direct transfer of products from one business, vehicle or container to another; undertaken via road, rail, air or ship.
<b>Wholesaler</b>	Includes businesses involved in the procurement, handling and wholesale sale of fresh produce.
<b>Wild Harvest</b>	Includes businesses that undertake sustainable wild harvesting of flowers and foliage not intended for consumption as food.
<b>Winery</b>	Includes businesses involved in the production of wine.

#### Scope: Categories

Category	Notes
<b>Fresh Produce</b>	Fresh produce supplied to the fresh market.
<b>Fresh Produce for Processing</b>	Fresh produce supplied to the processing sector. Does not include further processes such as freezing, drying, pickling, canning, cook-chill, juicing, slicing/shredding/coring, etc.
<b>Coffee</b>	Coffee crop only. Does not include further processes such as drying, roasting, etc.
<b>Flowers and Foliage</b>	Flowers and foliage destined for the fresh market. Includes edible flowers.
<b>Fodder Crops</b>	Fodder crops destined for use as animal feed.
<b>Nut In Shell</b>	Nuts supplied as nut in shell. Does not include further processes such as shelling, cracking, etc.
<b>Olives</b>	Olive crop only. Does not include further processes such as brining or the production of olive oil.
<b>Seedlings</b>	For the production of seedlings.
<b>Spices</b>	Spice crop (fresh plant material) only. Does not include further processes such as drying, crushing, etc.
<b>Tea</b>	Tea crop only. Does not include further processes such as drying.
<b>Wine Grapes</b>	Wine grapes category is applicable to Freshcare Environmental – Viticulture and Freshcare Environmental – Winery Standards only.

The corresponding scope 'Category' on Freshcare Certificates must be selected in accordance with the Freshcare Crop List, e.g. if Saffron is added, then Spices is also selected as a Category.

## Dried Fruit

The scope of Freshcare certification covers the production of fresh produce and does not include further activities involved in the production of dried fruit.

Businesses that produce Currants, Raisins and Sultanas may list Table Grapes; those producing Prunes may list Plums.

## Sprouts

Freshcare does not cover the production of Sprouts with the exception of Snow Pea Sprouts grown in soil/growing medium and supplied to market as young pea shoots. Snow Pea Sprouts are covered under Microgreens.

See *Category: Fresh Produce, Fresh Produce for Processing > Other > Microgreens*.

## Scope: Crop/Produce

Crop/Produce	Notes
Crop/Produce Group	Crop/Produce as they appear on Freshcare FSQ-SC Certificates.
Crop/Produce	Crop/Produce as they appear on Freshcare FSQ, ENV, ENV-VIT, ENV-WIN Certificates.

## Crop Groups

Please note that individual crops should still be recorded in the documents and records used to demonstrate compliance to the Freshcare Standards. Audit reports should also list individual crops against the scope of the business.

### Crop Groups on Freshcare FSQ and ENV Certificates

Where a Freshcare certified business has many produce lines within these groups, they may choose to have an over-arching crop group on their certificate rather than listing each individual crop. For instance, herb growers who produce many produce lines may choose to have Herbs - Hard Leaf and Herbs - Soft Leaf listed on their Freshcare Certificate rather than each produce line.

There are four Crop Groups in the 'Crop/Produce' column. This includes Asian Vegetables - Leafy, Asian Vegetables - Melons, Herbs - Hard Leaf and Herbs - Soft Leaf.

### 'Other' Crop Labels

There are a number of crops listed as 'Other' e.g. Berries - Other. This includes Berries, Citrus, Exotic Fruit, Melons and Stone Fruit. This label is for crops that are not already listed individually in the corresponding Crop/Produce Group. These crops will appear on Freshcare Certificates as *Crop - Other*. Examples of what these may include have been added to the Notes column.

### 'Baby' Lines

Baby lines are not listed individually in the Crop List unless the crop poses a different food safety risk to its full-sized equivalent. 'Baby' crops should be listed as its full-sized equivalent.

## Microgreens

Microgreens refer to young plants grown in a soil/growing medium. This includes those harvested after sprouting as shoots as well as live plants in a soil/growing medium.

See *Category: Fresh Produce, Fresh Produce for Processing > Other > Microgreens*.

## Adding scope to current Freshcare Certification

Between recertification audits, changes to the scope of Freshcare certification including categories, crops and sites will be reviewed by the Certification Body using a risk-based approach to determine if there is a need for a scope extension audit.

Please refer to the Freshcare Rules for further information.

## Freshcare Crop List

Crops are set out under the following tables as:

<i>Crop/Produce Group</i>	<i>Crop/Produce</i>	<i>Notes</i>
<b><i>Crop/Produce as they appear on Freshcare FSQ-SC Certificates.</i></b>	Crop/Produce as they appear on Freshcare FSQ, ENV, ENV-VIT and ENV-WIN Certificates.	Notes relating to the Crop/Produce. May offer alternative names for crops or provide guidance for its use.

## Category: Fresh Produce, Fresh Produce for Processing

**Fresh Produce** - Fresh produce supplied to the fresh market.

**Fresh Produce for Processing** - Fresh produce supplied to the processing sector. Does not include further processes such as freezing, drying, pickling, canning, cook-chill, juicing, slicing/shredding/coring, etc.

## FRUIT

<i>Crop/Produce Group</i>	<i>Crop/Produce</i>	<i>Notes</i>
<b><i>Avocados</i></b>	Avocados	
<b><i>Bananas</i></b>	Bananas Plantain	
<b><i>Berries</i></b>	Blackberries Blackcurrants Blueberries Boysenberries Cranberries Gooseberries Mulberries	<b>Berries - Other</b> includes, but is not limited to: Goji Berries Youngberries

<i>Crop/Produce Group</i>	<i>Crop/Produce</i>	<i>Notes</i>
<b>Citrus</b>	Raspberries Redcurrants Strawberries Berries - Other	
	Cumquat Finger Limes Grapefruit Lemons Limes Mandarins Oranges Pomelos Tangelos Citrus - Other	<b>Citrus - Other</b> includes, but is not limited to: Buddha's Hand Tangor
<b>Exotic Fruit</b>	Achacha Coconut Custard Apple Dates Dragon Fruit Durian Feijoa Figs Guava Jackfruit Jujube Kiwiberry Kiwifruit Longan Lychee Mangoes Mangosteen Papaya Passionfruit Persimmon Pineapple Pomegranate Prickly Pear Rambutan Sapote Soursop Star Fruit	<b>Papaya</b> refers to both Red Papaya and Yellow Papaw  <b>Exotic Fruit - Other</b> includes, but is not limited to: Abiu Babaco Breadfruit Cempedak Loquat Monstera (from Fruit Salad Plant) Pepino Rosella Sapodilla Star Apple

<i>Crop/Produce Group</i>	<i>Crop/Produce</i>	<i>Notes</i>
	Tamarillo	
	Tamarind	
	Exotic Fruit - Other	
<b>Grapes</b>	Table Grapes	
	Wine Grapes	
<b>Melons</b>	Honeydew	<b>Melons - Other</b> includes, but is not limited to: Piel de Sapo (also known as Christmas Melon) Kiwano (also known as Horned Melon)  For Asian Melons see <i>Vegetables &gt; Asian Vegetables - Melons</i>
	Rockmelon	
	Watermelon	
	Melons - Other	
<b>Pome Fruit</b>	Apples	
	Nashi Pear	
	Pears	
	Quince	
<b>Stone Fruit</b>	Apricots	<b>Stone Fruit - Other</b> includes, but is not limited to Plumcot Pluots
	Cherries	
	Nectarines	
	Peaches	
	Plums	
	Stone Fruit - Other	

## VEGETABLES

<i>Crop/Produce Group</i>	<i>Crop/Produce</i>	<i>Notes</i>
<b>Asian Vegetables - Leafy</b>	Asian Vegetables - Leafy	<i>Businesses with multiple produce lines in this group may choose to list crop group <b>Asian Vegetables - Leafy</b>, or each crop individually for the scope of their Freshcare Certification.</i>  <b>En Choy</b> is also known as Amaranthus or Chinese Spinach <b>Gai Choy</b> is also known as Chinese Mustard <b>Gai Lan</b> is also known as Chinese Broccoli  For Chinese Cabbage (also known as Wombok) see <i>Brassica Vegetables</i>
	Bok Choy	
	Choy Sum	
	En Choy	
	Gai Choy	
	Gai Lan	
	Kang Kong	
	Kun Choy	
	Pak Choy	
<b>Asian Vegetables - Melons</b>	Asian Vegetables - Melons	<i>Businesses with multiple produce lines in this group may choose to list crop group <b>Asian Vegetables - Melons</b>, or each crop individually for the scope of their Freshcare Certification.</i>
	Chi Qua	
	Dong Qua	

<i>Crop/Produce Group</i>	<i>Crop/Produce</i>	<i>Notes</i>
<b>Brassica Vegetables</b>	Fu Qua Seng Qua Shui Qua Sin Qua	<b>Chi Qua</b> is also known as Hairy Melon <b>Dong Qua</b> is also known as Winter Melon <b>Fu Qua</b> is also known as Bitter Melon <b>Seng Qua</b> is also known as Long Melon <b>Shui Qua</b> is also known as Sponge Luffa <b>Sin Qua</b> is also known as Chinese Okra or Silk Gourd
	Broccoli Broccoli – Sprouting Brussell Sprouts Cabbage Cabbage - Chinese Cauliflower Cauliflower - Sprouting Collards Kale Sprouts Kohlrabi	<b>Broccoli – Sprouting</b> also refers to Baby Broccoli and Broccolini <b>Cauliflower</b> also refers to Broccoflower <b>Chinese Cabbage</b> is also known as Wombok
<b>Bulb Vegetables</b>	Eschallots Fennel Garlic Leek Onions Shallots Spring Onion	
<b>Fruiting Vegetables</b>	Cape Gooseberry Capsicum Chillies Chokos Corn Corn - Baby Cucamelons Cucumber Eggplant Gem Squash Gherkin Okra Pumpkins Squash Tomatillo Tomatoes	<b>Cape Gooseberry</b> is also known as the Peruvian Groundcherry <b>Tomatillo</b> is also known as the Mexican Husk Tomato  For Melons see <i>Fruit &gt; Melons</i>

<i>Crop/Produce Group</i>	<i>Crop/Produce</i>	<i>Notes</i>
<b>Leafy Vegetables</b>	Zucchini	
	Zucchini Flowers	
	Amaranthus	<b>Beet Leaves</b> also refers to Beetroot Leaves <b>Broccoli Rabe</b> is also known as Rapini <b>Silverbeet</b> also refers to Chard
	Beet Leaves	
	Broccoli Rabe	
	Chicory Leaves	
	Cress	
	Endive	
	Kale	
	Lettuce - Cos	
	Lettuce - Fancy	
	Lettuce - Iceberg	
	Mache	
	Mizuna	
	Mustard Greens	
	Radicchio	
	Rocket	
	Silverbeet	
	Spinach	
	Spinach - Baby	
	Tatsoi	
	Watercress	
<b>Legumes</b>	Beans	<b>Beans</b> includes, but is not limited to: Berlotti Beans, Broad Beans, Butter Beans, Runner Beans, Winged Bean (also known as Goa Bean) <b>Peas</b> encompass edible-podded peas and peas for shelling. This includes, but is not limited to: Green Peas, Snow Peas, Sugar Snap Peas
	Peanuts	
	Peas	
	Soybeans	
<b>Root and Tuber Vegetables</b>	Beetroot	<b>Beetroot</b> is also known as Beets <b>White Radish</b> is also known as Chinese Radish or Daikon
	Carrots	
	Cassava	
	Celeriac	
	Chicory Root	
	Galangal	
	Ginger	
	Horseradish	
	Jerusalem Artichoke	
	Lotus Root	
	Parsnip	
	Potatoes	

<i>Crop/Produce Group</i>	<b>Crop/Produce</b>	<b>Notes</b>
<b>Stalk and Stem Vegetables</b>	Radish Radish - White Salsify Sugarbeet Swedes Sweet Potatoes Taro Turnip Water Chestnut Yam	
	Artichoke Asparagus Bamboo Shoots Celery Rhubarb	

## HERBS

<i>Crop/Produce Group</i>	<b>Crop/Produce</b>	<b>Notes</b>
<b>Herbs - Hard Leaf</b>	Herbs - Hard Leaf Bay Leaf Curry Leaves Kaffir Lime Leaves Lemon Grass Rosemary Sage Savory Thyme	<i>Businesses with multiple produce lines in this group may choose to list crop group <b>Herbs - Hard Leaf</b>, or each crop individually for the scope of their Freshcare Certification.</i>
<b>Herbs - Soft Leaf</b>	Herbs - Soft Leaf Basil Chervil Chives Chives - Garlic Coriander Dill Fenugreek Marjoram Mint Mint - Vietnamese Oregano Parsley	<i>Businesses with multiple produce lines in this group may choose to list crop group <b>Herbs - Soft Leaf</b>, or each crop individually for the scope of their Freshcare Certification.</i>

<i>Crop/Produce Group</i>	<i>Crop/Produce</i>	<i>Notes</i>
<b>Herbs - Potted</b>	Parsley - Continental Sorrel Tarragon	
	Herbs - Potted	Herbs - Potted refers to live plants in a soil/growing medium.

## MUSHROOMS

<i>Crop/Produce Group</i>	<i>Crop/Produce</i>	<i>Notes</i>
<b>Mushrooms</b>	Mushrooms	
	Mushrooms - Exotic	
<b>Microgreens</b>	Microgreens Microgreens - Potted	<p>Microgreens refer to young plants grown in a soil/growing medium and harvested after sprouting as shoots.</p> <p>This includes, but is not limited to: Wheatgrass, Snow Pea Sprouts, Alfalfa Sprouts, Vegetables</p> <p>Microgreens - Potted refer to live plants in a soil/growing medium.</p>

**Appendix 2:** Corrections to be made specifically to Freshcare information that is incorrect in this proposal

Supporting Document 2

Page 14 3.2.1.3	<p>Freshcare FSQ4.1 achieved GFSI benchmarking in Jan 2020, with public notification to industry by GFSI on 18/2/2020. Please correct.</p> <p>The publication of an FSQ5 has not yet been determined by Freshcare – please correct.</p>
Page 16 3.1.2.3.4	<p>Freshcare is a not for profit company limited by guarantee and is supported by 28 horticulture peak industry bodies in Australia.</p> <p>Freshcare FSQ4.1 achieved GFSI benchmarking in Jan 2020, with public notification to industry by GFSI on 18/2/2020. Please correct.</p> <p>Supply chain may be GFSI benchmarked during 2020, pending on timeframes published by GFSI.</p> <p>As a GFSI Certification Program Owner (Benchmarked scheme), we are now able to meet international requirements.</p> <p>We are working with GLOBALG.A.P. to benchmark against their standard for specific sector needs. – Please correct</p> <p>The Freshcare food safety and quality standards are developed based on Codex HACCP principles and Good Agricultural Practice and Good Hygiene Practices.</p> <p>Freshcare at 31/12/19 holds approx. 4000 certificates for their food safety and quality standards.</p>
Page 19 3.2.1	<p>Note that Freshcare use the Guidelines for Fresh Produce Safety (2019) as a reference resource that supports the implementation of our standards on farm and in the supply chain. We have been proactive in supporting the development of resources such as this to promote consistent application of food safety principles and good agricultural methods, supported by science for horticulture businesses.</p> <p>It is referenced through our standard as an external resource material.</p>