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Food Standards Australia New Zealand (FSANZ)
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By Email: standards.management@foodstandards.gov.au

Submission on: Proposal P1052 – Primary Production and Processing Requirements for High-risk Horticulture

Submitter: Horticulture New Zealand Incorporated
Submitted by:
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1. Horticulture New Zealand (HortNZ) advocates for and represents the interests of New Zealand's 5,000 commercial fruit and vegetable growers. The horticulture industry is valued at over \$5.5b with over \$3.6b in exports annually (FreshFacts, 2018).
2. The industry employs over 60,000 people, occupies some 130,000 ha of land and provides critical regional development opportunities in Northland, Auckland, Bay of Plenty, Hawke's Bay, Gisborne, Manawatu, Marlborough, Nelson, Canterbury and Central Otago.
3. New Zealand growers supply fresh and processed fruit and vegetables to domestic consumers, as well as exporting fresh products to discerning consumers in over 120 countries.
4. The horticulture industry in New Zealand is undergoing a period of significant growth through increased production of premium varieties for export and through exploration of opportunities to grow new fresh fruit and vegetables in the future. The protection of growers' rights will help facilitate this continued growth.
5. As HortNZ is an industry good organisation working in the interests of its members (commercial fruit and vegetable growers), we provide general comments and responses to some of the Food Standards Australia New Zealand (FSANZ) questions, where relevant to the horticulture industry.

6. HortNZ welcomes this opportunity to submit on the proposed Primary Production and Processing Requirements for High-risk Horticulture

Consideration for New Zealand Horticulture

7. This proposal does not impact on the production or processing of fresh produce in New Zealand, however it signals a more prescriptive regulatory approach to risk management in future, which HortNZ is opposed to.

Scope of High-Risk Horticulture:

8. This proposal includes primary production and primary processing activities in three sectors: leafy vegetables, melons, and berries. HortNZ recommends that consideration is given to international definitions and standards for high risk horticulture including the Global Food Safety Initiative:
 - fresh herbs
 - leafy greens (lettuce, romaine, spinach, arugula/rocket)
 - berries
 - cantaloupe melons
 - and any other product associated with known foodborne disease outbreaks

Option 1:

9. HortNZ is not in support of the status quo (Option 1), as we understand that there currently are inconsistent state regulatory requirements and implementing food safety measures is currently voluntary for businesses. There currently is no reference to internationally recognised, independently audited food safety assurance systems. There also is no requirement for producers to operate in a recognised Food Safety system.

Option 2:

10. HortNZ is not in support of the development of proposed prescriptive regulatory measures (Option 2). Instead HortNZ recommends a co-regulatory approach between industry and regulators with a focus on Food Safety outcomes (see paragraphs 14-22, *NZ example: partnership between industry assurance schemes and regulation*)
11. HortNZ is concerned that prescriptive standards and regulation will lead to duplication, confusion, and contradictions at the producer level for auditors and regulators.
12. HortNZ instead recommends recognition of the existing assurance framework and schemes, including the standards, independent audits, accreditation, and international recognition. Prescriptive regulations may then apply to producers who are not part of a recognised food safety system
13. HortNZ recommends the development of guidelines for high risk horticulture (e.g. via the Fresh Produce Food Safety Centre), which can then be adopted via existing Food Safety assurance systems operating at producer and processing levels.

NZ example: partnership between industry assurance schemes and regulation

14. The New Zealand horticulture industry have developed and implemented comprehensive Food Safety systems over the last 20 years via Good Agriculture Practice (GAP) schemes. These schemes are prescriptive, aligned with international best practice, based on scientific research, and are supported by nationally and internationally developed Food Safety guidelines.

15. Food Safety risks in NZ horticulture are managed in partnership by industry (GAP schemes) and regulators (Ministry for Primary Industries - Food Safety).
16. The GAP schemes operating in NZ are GLOBALG.A.P., NZGAP, and British Retail Consortium (BRC), all of whom have Ministry for Primary Industries approved Section 40 approved Template Food Control plans under the Food Act 2014 for the growing, packing and distribution of horticulture produce (minimally processed fruit and vegetables)
17. MPI have also recognised the Independent Verification Agencies (IVAs) and GAP auditors (verifiers) under the Food Act 2014, so GAP audits can double as Food Act verifications.
18. Horticulture businesses are greatly supported with adoption and implementation of good food safety practices with help from GAP schemes, HortNZ, 22 horticultural product groups, district associations, the Fresh Produce Food Safety Centre, research organisations, service providers, and advisers.
19. The nature of fresh produce, and closeness to market expectations means that horticulture businesses are very aware of food safety risks, and are driven by markets and regulations to develop and implement best practices to ensure that their produce is safe and suitable for consumers.
20. GAP schemes are independently audited self-management assurance schemes which provide a pathway for members to demonstrate compliance with regulatory and market requirements via independent (3rd party) audit of internationally recognised standards.
21. All certified businesses operate in an assurance system which requires independent audits by JAS-ANZ (Joint Accreditation System of Australia and New Zealand) accredited certification bodies, and they must continuously meet requirements of GAP standards to maintain certification.
22. Growers who meet GAP standards are able to demonstrate that required practices are in place for the production of New Zealand fresh produce to meet local and international regulatory and market requirements – so customers can buy with confidence.

REFERENCES

Fresh Facts (2018) Fresh Facts, New Zealand Horticulture 2018. Accessed online:
<https://www.freshfacts.co.nz/files/freshfacts-2018.pdf>

Food Standards Australia New Zealand (FSANZ) Proposals to change the Code: Proposal P1052 – Primary Production and Processing Requirements for High-risk Horticulture
https://www.foodstandards.gov.au/code/proposals/Pages/P1052.aspx?mc_cid=15a2de27a7&mc_eid=769fc48008