



AUSTRALIA + NEW ZEALAND

PMA A-NZ Submission

Proposal P1052: Primary production and processing
requirements for high-risk horticulture

PMA Australia-New Zealand: www.pma-anz.com

Primary production and processing requirements for high-risk horticulture

Introduction to PMA A-NZ

PMA Australia New Zealand Limited (PMA A-NZ) is a member-based organisation that serves, connects and informs members throughout every sector of the fresh produce supply chain. Our members are based in Australia and New Zealand and are also part of a global network of leading businesses in the fresh produce industry.

PMA members are buyers and sellers from every segment of the fresh produce and floral supply chain. Our global community includes growers, packers, processors, importers and exporters, wholesalers and retailers, foodservice, government agencies, associated suppliers to the industry, universities and many more.

By working across the whole supply chain, PMA A-NZ strives to assist businesses to increase their sales of fresh and safe produce to domestic and global consumers. It does this by assisting members to develop their business capabilities to increase consumption of fresh produce in Australia and improve food safety along the supply chain.

Importantly, PMA A-NZ is actively supporting members and the broader industry to address various challenges to ensure only safe and suitable products enter the marketplace. These challenges include:

- The diverse range of products (ranging from low to high risk) and processes across the fresh produce supply chain
- Increasingly long and complex fresh produce supply chains
- Consumer expectations of year-round availability, greater convenience, and shelf-life
- Businesses not adequately aware of food safety risks and failing to address food safety culture
- Emerging and more virulent pathogens
- Challenges in finding suitably qualified personnel in regional locations (including but not limited to food safety professionals/practitioners)
- Acquiring resources to undertake relevant research and delivering learnings to industry
- Ensuring improved traceability along the supply chain

PMA A-NZ members are directly affected by the opportunities and challenges faced by Australia's fresh fruit and vegetable industry, particularly in contributing to the Australian economy and providing healthy nutritious food to the nation. Accordingly, PMA A-NZ has been active in assisting our members to meet these challenges by providing the information, connections, training, and resources that support positive outcomes.

Industry overview

The Australian horticultural industry is one of the Australia's largest industries and possesses significant opportunity for growth and development. PMA Australia-New Zealand Limited (PMA A-NZ) supports the industry and believes that to truly harness these opportunities we must continue to ensure that the whole supply chain for fresh fruit and vegetables meets community expectations for the safety and suitability of its products.

PMA A-NZ acknowledges that there have been instances where fresh fruit and vegetables have impacted public health – some domestic, others imported. However, the overwhelming bulk of fresh produce is low risk and presents few concerns for consumers. Where there

have been domestic incidents impacting public health, the prevailing view is that best practice has been adhered to, and subsequent research and development has led to improvements in industry practices to further reduce the risk.

The Australian horticultural industry had a turnover of \$45.9 billion in FY2018, which was a 13.7% increase on the previous financial year. Industry performance year on year shows continual growth within the sector, with the opportunity for further growth into the future.

The Government's target is to grow Australian agriculture to \$100 billion by 2030, but this will be impeded if sectors of the industry are subjected to unnecessary regulation and oversight. Any proposed regulation of higher-risk horticulture must be based on a scientific examination of the risks, and where regulatory measures are proposed they must achieve a net benefit to cost.

Background documents

The documents published by FSANZ outline the current situation with regards to the risk presented by horticultural products in Australia. Importantly they reaffirm the view that the vast majority of horticultural produce in Australia is safe and healthy.

While the decision to just focus on three higher-risk categories (melons, berries, and leafy vegetables) is understood, there are some significant gaps in knowledge. These products have been implicated in outbreaks of foodborne illness in Australia, however the challenges of undertaking adequate source attribution and elucidating the exact pathway of contamination makes further progress with outlining preventative measures quite difficult. This is even more complex when the product is imported, as was the case with frozen mixed berries implicated in the outbreaks of foodborne illness in 2015 and 2017. There have been no foodborne illness outbreaks associated with fresh Australian grown berries.

There is also a strong industry view that any consideration of a PPP standard should focus on processes, and not just commodities. While intrinsic factors are known to impact produce safety, production practices, handling, and packing house operations also play a role in produce safety across a broad range of fresh produce.

The range of risk factors includes water quality (both pre- and post-harvest) and hygienic conditions and practices during production and along the supply chain. It is important to note management of these factors is implicit in existing procedures and strategies typically outlined under good agricultural practice (GAP), good hygiene practices (GHP), and various industry codes of practice (COP).

Nevertheless, FSANZ has indicated that their preferred approach is the development of regulatory measures, although the exact nature of these measures has not been described.

PMA A-NZ observations

The request by the Ministers responsible for food regulation to FSANZ to reassess the need to amend the Australia New Zealand Food Standards Code to manage higher-risk horticulture needs to ensure that any regulatory measures are supported by science and appropriate regulatory impact studies which include comprehensive benefit to cost analyses.

At this stage there remains a lack of scientific and technical data on production and processing practices for higher-risk commodities. This includes information on the nature of environmental contamination during production and studies on the efficiency of current risk mitigation approaches adopted within these sectors.

For example, recent research undertaken by Bartlett *et al.* (2020) at the Tasmanian Institute of Agriculture examined post-harvest treatments used to control *Listeria monocytogenes* on the surface of whole rockmelons. Data gaps on risk mitigation strategies exist for many fresh produce categories, including berries and leafy vegetables.

Further information on factors impacting contamination pre-harvest, including the impact of water quality, adverse weather events, contact with untreated manure or proximity to intensive animal production units, and contact with pests and vermin is also required. Similarly, information on post-harvest sanitation practices employed across all three sectors would support a better understanding of how existing hazards are being managed, and this will better inform the decision-making process and whether there is any need for regulatory measures.

The FSANZ documents confirm that the existence of a food safety scheme is not an effective determinant of food safety risk, nor is global best practice in food safety management. More detailed evaluation of incidents may provide an improved understanding of causation – what went wrong? Was it a failure to adequately develop and implement GAP programs, was there a failure in the sanitation process, was the decontamination process overwhelmed by excess organic matter, etc? Only by understanding the causation can steps be made to improve existing best practice.

PMA A-NZ recommendations

PMA A-NZ welcomes FSANZ consideration of approaches and strategies to reduce the risk associated with the consumption of fresh produce considered to be of higher-risk. However, we will require further information on the efficacy of existing risk mitigation methods and approaches before commenting on the utility and appropriateness of alternatives encompassed by the expression *a graduated risk-based approach*.

PMA A-NZ does not believe that increased regulation alone will result in improved food safety outcomes for the fresh produce industry or the Australian consumer. Instead we should first look to the many industry standards, codes of practices, and quality assurance schemes and ensure that they address the hazards and are operating as effectively as possible.

The industry would contend that foodborne illness attributed to fresh produce does not indicate a failure to regulate the sector but rather a failure to properly implement existing risk mitigation systems. Increasingly growers and packers are signing up to industry-based third-party food safety schemes resulting in incremental improvements in overall standards and food safety.

Scientific knowledge regarding contamination pathways for melons, berries, and leafy vegetables is still emerging, hence the choice of risk mitigation strategies that are reliable, practical, and cost effective is complex and may still not provide an appropriate level of protection of consumers.

In the meantime, control of inputs such as irrigation water (sprinkler water in the period immediately before harvest of higher-risk produce) and washing water remains a high priority, as will addressing hygienic practices, and personal hygiene during production and packing. These latter requirements are covered in Chapter 3 of the Code in the packing environment and should be rigorously applied in the majority of businesses handling higher-risk produce. The exception being where produce is packed directly in the field.

A key strategy should be the development and implementation of enhanced education and training programs for the industry to raise awareness of the risks and how to manage them.

Other non-regulatory risk management strategies designed to achieve the objective of minimising exposure to pathogens should also be explored. This includes reviewing and revising existing codes of practice and guidance materials, and enhanced consumer education about handling and preparing fresh produce and any attendant risks.
