

24 March 2020

## **Proposal P1052 Primary Production and Processing Requirements for High-Risk Horticulture**

Submission from the **Fresh Produce Safety Centre Australia & New Zealand**

**The Fresh Produce Safety Centre Australia & New Zealand (FPSC)** is an industry-led, not-for-profit company established to enhance fresh produce safety across Australia and New Zealand. Its mission is to empower the Australian and New Zealand fresh produce industry with novel and innovative systems and processes that leads to safer fresh produce for consumers. FPSC was established in 2014 with support from PMA A-NZ, and The University of Sydney under a Horticulture Innovation Australia funded-project. Our supporters represent stakeholders across the fresh produce value chain – growers and packing houses, input services, storage and transport, wholesale, retailers and exporters along with industry bodies and research organisations. Our networks exist across government and regulatory bodies, food safety standards and auditing, research and education, equipment and packaging. Further information on our supporters is at: <https://fpsc-anz.com/our-supporters/>.

### FPSC Guiding Principles

FPSC welcomes the opportunity to respond to the Proposal P1052 Primary Production and Processing Requirements for High-Risk Horticulture. In this submission, the FPSC offers the following guiding principles:

- A national approach

Of great concern to industry is the possibility that any new standard will not be implemented uniformly and consistently across all states and territories. Horticultural businesses, particularly those businesses that operate in multiple states and territories, regularly highlight the unnecessary additional compliance costs attributed to differing requirements across jurisdictions. A national approach is essential.

- Products and processes

We express caution about concentrating on products rather than the processes used to produce them. The industry approach to managing risk has evolved over the years, from being product-based, based on assumptions regarding how the product will be consumed, to focussing on the risks posed by system inputs, primarily composts, people and water, and the presence or absence of a human pathogen kill step.

- Traceability

While the importance of traceability has been highlighted as a singular weakness in the ability of a business to carry out a trade or consumer level recall, industry generally sees traceability (and product identification) as one of a number of pillars that make a strong food safety system and its compliance and not deserving of any greater attention than other food safety essentials. The requirement of food safety certification that requires, for example, 100% of product to be accounted for within two hours (HARPS 8.iii) is driving greater capability across the industry, along with the increasing availability of technology (software) to enable this requirement to be met with greater speed and accuracy.

The additional information provided in this submission primarily focuses on the work the FPSC has conducted and plans to do to strengthen the current food safety systems in Australia and New Zealand.

#### *Guidelines for Fresh Produce Food Safety (2019)*

In the call for submissions document for proposal P1052, FSANZ recognises the FPSC's *Guidelines for Fresh Produce Food Safety* (2019). The *Guidelines* document is a key industry-driven, non-regulatory source of information and guidance on food safety in fresh produce and has been reviewed twice by FPSC, first in 2015 and again in 2019.

"The *Guidelines* are designed to achieve greater consistency in the development, implementation and auditing of fresh produce food safety programs. They are applicable to all supply chain businesses, from the producer to the end customer, as well as suppliers of inputs and services. Input has been sought from a range of industry members with experience and expertise in food safety issues."<sup>1</sup> The *Guidelines* have been widely accepted across the fresh produce industry and are promoted broadly by industry assurance schemes including Freshcare (Australia's largest fresh produce assurance program and owned by 27 Peak Industry Bodies). The *Guidelines* underpin the work of Freshcare-certified businesses, underpin training delivered by Freshcare and Freshcare promotes the document to its members. <https://www.freshcare.com.au/announcement/460652-2/>

Other businesses, industry bodies and schemes also reference and promote the *Guidelines*, including internationally (see Appendix 1). FPSC has been active in promoting the most recent *Guidelines* revision including a launch at HortConnections in 2019, presentations at industry fora and events, presentations at FPSC events, promotion in our regular e-newsletter to industry and other promotions. The 2019 revision of the document has had a threefold increase in page views (734 page views at 29 July 2019 to 2415 page views in March 2020) and online reads (169 reads online at 29 July 2019 to 518 in March 2020) since the revised *Guidelines* were launched in June 2019. This does not account for the promotion of the document by other bodies and the reads on these other websites (see Appendix 1). While we recognise that good visibility does not necessarily equate to improved practices, we are encouraged by the fact that the *Guidelines* have received widespread exposure and acceptance.

In a move to deepen the adoption of the tools and approaches promoted in the *Guidelines*, the Board of Directors of FPSC resolved (at its Board meeting on 12 March 2020) to undertake additional work to support further penetration across all fresh produce businesses in Australia and New Zealand. FPSC is working on a series of add-on tools (such as a series of downloadable and printable posters for fresh produce businesses and a series of mini-guides). The objective is to promote the key messaging in the *Guidelines* to as broad an industry audience as possible, in a variety of formats, to increase awareness of food safety good practice. This work will be undertaken in 2020, and the FPSC will seek industry support to conduct this project.

At the same meeting, the FPSC Board agreed, in response to industry inquiries and requests, that the FPSC will survey the fresh produce industry for gaps in food safety training and determine the need for additional training packages. Based on the outcomes of these investigations, FPSC may develop training modules to support further adoption of the *Guidelines*.

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<sup>1</sup> FPSC. 2019. *Guidelines for Fresh Produce Food Safety*. <https://fpsc-anz.com/food-safety-guidelines-2019/>

The form of these training packages or modules is not yet determined, and may be:

- train-the-trainer packages, to equip fresh produce businesses to deliver guidelines-based in-house training programs for their staff; and/or
- face-to-face training programs to train staff of produce businesses; and/or
- online or app-based training modules for staff of produce businesses.

In these ways, and with industry encouragement and support, FPSC is promoting the *Guidelines for Fresh Produce Food Safety* (2019), with the aim of spreading even further the adoption and uptake of the food safety tools and information in this important industry-focused resource.

#### FPSC's 2025 Innovation Agenda

As part of its strategic plan 2019-2021, FPSC adopted transformational change as a strategic pillar. The FPSC resolved to hold an annual innovation forum, under its 2025 Innovation Agenda, to generate ideas and opportunities that will lead to transformational change in food safety in the Australasian fresh produce industry. The FPSC identified the first topic with the potential for transformational change to be the **Audit/Food Compliance Process**.

In June 2019, the FPSC invited 30 key stakeholders from Australia and New Zealand's horticultural and technology innovation sectors to a one-day Innovation Forum, with the theme "Food Safety Compliance beyond 2025?". It was identified that the current food safety compliance system (effectively an annual audit) is working adequately. However, the system does have its weaknesses and the purpose of this first Innovation Agenda project is to find a more robust, efficient and cost-effective food safety compliance system that underpins consumer expectations today and into the future. It was identified that any changes to the system will not in any way change the existing food safety standards such as Freshcare, GlobalG.A.P, etc but simply how those standards are implemented and managed by growers of fresh produce and assessed for compliance.

The FPSC's Innovation Agenda on the audit process is being driven by a working group from industry comprising companies along the supply chain. This demonstrates strong industry interest in improving the existing system. The findings from this project will be released over the coming months and will speak to opportunities to strengthen the current system, including technology and risk-based approaches to food safety compliance.

In addition, at its March 2020 Board meeting, the FPSC identified **Rapid Diagnostics** as the next topic of exploration for its Innovation Agenda. Reviewing global research to identify promising and emerging techniques for the rapid and specific detection of microorganisms will be the initial project in 2020 for this topic.

This submission has been approved by the Board of the FPSC A&NZ.

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## Appendix 1: Examples of organisations promoting/providing access to the Guidelines for Fresh Produce Food Safety

- AUSVEG: <https://ausveg.com.au/food-safety-quality-assurance-resources/#1508714880302-cbc8659c-28a7>
- Cherry Growers Australia Inc: [https://www.cherrygrowers.org.au/assets/Freshcare\\_02.pdf](https://www.cherrygrowers.org.au/assets/Freshcare_02.pdf)
- FreshState <https://www.freshstate.com.au/2019-guidelines-for-fresh-produce-food-safety>
- Freshcare <https://www.freshcare.com.au/announcement/460652-2/>
- NZGAP  
[https://www.nzgap.co.nz/NZGAP\\_Public/Growers/Guidelines/NZGAP\\_Public/Growers/Guidelines.aspx?hkey=4dcf643d-8138-43cb-9c22-6d3a3d2f2f80#Food](https://www.nzgap.co.nz/NZGAP_Public/Growers/Guidelines/NZGAP_Public/Growers/Guidelines.aspx?hkey=4dcf643d-8138-43cb-9c22-6d3a3d2f2f80#Food)
- PMA <https://www.pma.com/global-pma/anz/topics/food-safety>
- United Fresh: <https://www.unitedfresh.co.nz/technical-advisory-group/food-safety>
- University of Sydney: <https://www.sydney.edu.au/marie-bashir-institute/news-and-events/news/2019/07/03/new-fresh-produce-food-safety-guidelines.html>