

UPDATE OCTOBER 2011

Safety of horticulture in Australia – consultation paper report and next steps

Introduction

In May 2011, FSANZ released a consultation paper asking for feedback about our proposed approach to examining potential hazards in fresh horticultural produce and current practices to manage those hazards.

This report summarises the responses from submitters on that paper, and outlines the work we've done and are planning to do on this project.

Feedback – what submitters told us

FSANZ sought comment on analysing hazards present in fresh horticultural produce and the efficiency of existing practices to manage the risks to consumers.

We received 25 submissions from peak bodies, retailers, private companies, state food authorities and departments of health, agriculture and primary industries. Many submitters argued that most farmers do a good job of managing on-farm food safety hazards through implementing voluntary food safety schemes such as Freshcare, WQA, Coles Requirements etc. However, there are considerable concerns from growers, retailers and government about the risk to Australia's reputation posed by a minority of farmers without a food safety scheme. Views differed about how to manage this potential problem.

The main points were:

- the reputational and financial dangers to industry from farmers without adequate food safety schemes in place
- that FSANZ should acknowledge the good work done already, especially in terms of implementation of on-farm food safety schemes, and avoid duplication
- that the costs to farmers of any measures should be minimised
- that FSANZ should be looking at risk-based rather than commodity-based measures.

The danger to the industry of non-compliant farmers

There was wide-spread recognition that on-farm food safety schemes are required to help protect human health but also industry in terms of:

- the reputation of Australia's horticultural industry for producing safe food
- the financial risk to the entire industry if operations with either insufficient understanding or means do not address significant food safety risks. Evidence from previous outbreaks has shown that the economic impact on the produce sector is severe and can be long-lasting.

FSANZ recently released a consultation paper. We discuss what submitters told us and what we're going to do next.

Four major themes emerged from the consultation.

1. On-farm safety schemes are important for protecting food safety and the reputation of the sector.

Acknowledge good work done, avoid duplication

Virtually all submitters urged FSANZ to acknowledge the work that the industry has already done to ensure the safety of horticultural produce. Many pointed out that most growers already have programs in place and therefore any measures implemented should not duplicate existing efforts.

2. Much good work has already been done and should not be duplicated.

Minimise costs to industry

Another very important message to emerge was that the costs of any new measure should be minimised. There was a view that compliant farmers are already at a cost disadvantage compared with uncertified competitors. Consequently compliant farmers stated they should not bear additional costs simply to ensure the compliance of farmers without a food safety scheme in place.

3. Costs of measures should be minimised.

Use risk-based, not commodity-based measures

The aim of any food safety measure is to prevent foodborne illness. Although looking at the association of specific commodities with disease will identify common causes of illness, it is not seen as the best approach to prevent outbreaks. Many submitters urged us to look at risk-based measures, where the risk factors in the production of horticultural produce are identified. FSANZ was also urged only to apply measures to commodities exposed to risks that had no measures in place to manage the risks. For example, leafy green vegetables are considered to be high-risk due to their more common association with illness; however a lettuce grown hydroponically will have entirely different risk factors from a lettuce grown in a field fertilised with manure.

4. FSANZ should look at individual risk factors, not commodity groups.

Other points of concern

Apart from these four major points, other concerns were common to several submissions. These included the importance of national consistency and traceability, as well as concerns that imported food be treated in the same way as domestically-produced food. Some submitters questioned our omission of nuts from our work, and others identified pesticides (use of, or residues from) as requiring attention. Although views differed as to whether regulatory or industry-led measures would be appropriate, the consensus view was that the effort and cost of any measure should be commensurate with the risk posed to consumers.

5. Several other themes emerged.

What we've been doing – work completed and ongoing work

FSANZ has:

- analysed the horticulture industry to understand the complexity and diversity of horticultural production
- examined microbiological risk factors in the production of fresh horticultural produce
- understood the costs to industry and the public of outbreaks of foodborne illness
- examined existing food safety schemes to determine the level of coverage of businesses
- looked at chemical hazards in fresh horticultural produce and compliance with existing legislation to determine current risks
- determined what sort of produce comes into Australia and under what circumstances.

We have already done a lot of work on horticulture, but more is needed.

Having completed this work, we are now focussing on the different approaches to horticultural food safety and the costs and benefits of each approach. Our Regulatory Analysis Unit will be looking at the costs and benefits of a number of approaches, including the *status quo*, industry-led measures, partial regulatory coverage (e.g. traceability only or post-farm only) and full regulatory requirements.

As a result of this work, we will be able to identify the measure that provides the greatest benefit at the lowest cost to industry. This approach will be our “preferred option”.

Where to from here?

From this work, we have identified a number of options for managing horticultural food safety. Each of these options has different costs and benefits and this will be the focus of our next stage of work. We will be raising a proposal to obtain feedback on the different options and, in April 2012, will release an assessment report outlining our analysis. Stakeholders will then be able to provide us with their views on the analysis, which would be taken into account in a future, second assessment report.

As we progress this work we will work in close consultation with the horticulture industry and other interested stakeholders. FSANZ will also be conducting a number of visits to farms, packing houses and other stakeholders in order to get a better understanding of the processes and realities of horticulture production.

We'll keep you informed of what we're doing and you'll have a chance to have your say.