



Know-how for Horticulture™

**Addressing quality
management and food
safety issues in
horticulture**

Richard Bennett
Horticulture Australia Ltd

Project Number: AH99007

AH99007

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The research contained in this report was funded by Horticulture Australia Ltd with the financial support of all levy paying industries.

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ISBN 0 7341 0183 X

Published and distributed by:

Horticultural Australia Ltd

Level 1

50 Carrington Street

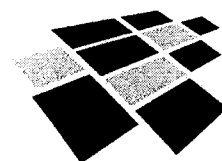
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AH99007 (15.11.2000)

Addressing Quality Management and Food Safety Issues in Horticulture

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Purpose of Report:

To provide details of activities undertaken to address quality and food safety issues in horticulture during the term of the project AH99007

Funding Sources:

- ◆ Industry funds
- ◆ AusHort Research and Development allocation

Date of Report:

6th February 2001

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MEDIA SUMMARY

The project to identify quality and food safety issues in horticulture spanned the twelve months between the 1999 On-Farm Food Safety and Quality Assurance Conference and the similar event held in November 2000. At each conference, the wrap-up session wasn't your ordinary conference summary. This session focussed on what *must* happen in the future to address those issues that are impeding the successful uptake of quality and food safety systems across all sectors and was facilitated by the writer on both occasions.

At the 1999 conference, an industry-nominated reference group tailored these issues into an Action Plan to reflect the specific challenges that exist in horticulture. The Horticultural Research and Development Corporation, through its AusHort program, funded the writer to manage this process.

The major elements of the Action Plan are as follows:

1. Identify and communicate what QA system/s is/are appropriate and/or necessary for the various levels in the supply chain.
2. Attempt to gain agreement from retailers to accept equivalent QA schemes.
3. Encourage AQIS to integrate the implementation and auditing of Certification Assurance (CA) system with other QA systems, if appropriate.
4. Understand and communicate what retailers are doing to reduce/eliminate hazards within their domain.
5. Dispel uncertainties over regulatory requirements by communicating industry obligations to state and federal food safety legislation.
6. Attempt to encourage the development of consistent chemical and microbiological sampling regimes.
7. Encourage the development of critical limits for microbiological contamination.
8. Investigate what opportunities exist to rationalise the number of audits required by a business certified to more than one system or code.
9. Investigate whether the number of audits required by any particular system or code can be reduced from existing levels, i.e. from twice per year to once per year.
10. Gather evidence from disgruntled recipients of audits and seek strategies to reduce the incidence of inconsistent audit experiences.
11. Research the issue of audit costs and suggest strategies for audit recipients to reduce their audit costs.

Successful progress has been made on all elements of the Action Plan although there is further work required on most.

INTRODUCTION

A project to identify and address quality and food safety issues in horticulture was initiated by AusHort because of growing concern that the implementation and auditing of quality management and food safety systems ('QA') had been haphazard, too complex, too expensive and not representative of actual practices. Furthermore, the requirements and applicability of an increasing number of options could be better communicated to industry. Existing information was often inconsistent.

This project spanned the twelve months between the 1999 On-Farm Food Safety and Quality Assurance Conference and the similar event held in November 2000. At each conference, the wrap-up session wasn't your ordinary conference summary. This session focussed on what *must* happen in the future to address those issues that are impeding the successful uptake of quality and food safety systems across all sectors and was facilitated by the writer on both occasions.

At the 1999 conference, an industry-nominated reference group, with special skill invitees, tailored these issues into an Action Plan to reflect the specific challenges that exist in horticulture. In most cases, there was little if any difference in the results sought by horticulture versus how the issue would impact on other sectors. The Horticultural Research and Development Corporation, through its AusHort program, funded the writer to manage this process.

The desired implications of the project for industry and the likely impact of the results include the following:

- ◆ A better informed horticultural community capable of making decisions regarding selection and implementation of system/s appropriate for their situation
- ◆ Providing accurate and timely information on the implications of regulatory requirements for the food industry
- ◆ Work with system owners, government, audit organisations and retail customers to accept equivalent systems and concurrent auditing as far as is commercially possible
- ◆ Access to a simple guide to sampling regimes necessary to provide confidence that good agricultural practices are being followed
- ◆ Cost effective auditing of systems that is conducted by suitably qualified and experienced auditors with consistent outcomes

MATERIALS AND METHODS

The project's methodology commenced by using the 1999 On-Farm Food Safety and Quality Assurance Conference as the launch of the investigative stage. This conference was the logical start point as its focus and content was entirely consistent with the project and it attracted precisely the target audience sought.

Similarly, the project effectively concluded at the same event twelve months later. This provided the opportunity to present a report on project achievements to the same target audience and to receive feedback.

Mention has been made of the industry reference group for this project. Prior to the 1999 conference, peak industry bodies and related organisations were requested to provide a nomination to the reference group. Those that responded were included. The reference group is/was as follows:

Australian Citrus Growers Inc	Peter Davidson
Australian Chamber of Fruit and Vegetable Industries	Greg Lennon replaced by Martin Clark
Australian Vegetable and Potato Growers Federation (AUSVEG)	Silvio Favero & Peter Cochrane
Australian Apple and Pear Growers Association	Andrew McNab
Strawberries Australia	Margaret Zorin replaced by Beth Luckhurst
Cherry Growers of Australia	Wayne Boucher
Australian Nut Industry Council	Chris Bennett
Queensland Fruit and Vegetable Growers/Freshcare	Margie Milgate
Quality Society of Australasia	Sue Went
Agriculture, Fisheries & Forestry Australia	Margaret Brassington replaced by Bethwyn Todd
Australian Custard Apple Growers Association	Patti Stacey
Australian Fresh Stone Fruit Growers Association	Graham McAlpine
Horticultural Research and Development Corporation	John Tyas

The first activity of the Horticulture Quality and Food Safety Reference Group was to attend the national On-Farm QA conference held in Launceston in November 1999. While this conference catered for the full range of agricultural and horticultural sectors, the opportunity existed to discuss and prioritise the range of issues that relate specifically to horticulture and to identify steps to their resolution.

During 2000, the reference group met by teleconference on a number of occasions and update reports were also circulated. Reports were also provided to AusHort when requested. The group members met face to face again at the 2000 conference to endorse the report and to revise the Action Plan should funding become available to continue the project.

RESULTS

The results of this project are based on the project Action Plan developed by the project manager and the industry reference group, as follows:

Quality / Food Safety Issue	Resolution Process
What QA system is appropriate and/or necessary for the various levels in the supply chain?	<ul style="list-style-type: none"> • Develop a matrix of the various options and indicate their suitability for growers, packers, wholesalers, distribution, food service processors, retailers, etc • Coordinate this with retailers and regulators in particular • Define what is meant by 'HACCP-based' • Define low, medium and high risk • Communicate this to all sectors
Equivalence of retailer requirements	<ul style="list-style-type: none"> • Ensure adequate & appropriate horticulture representation on the AFFA Working Group on Safety and Quality Systems' Equivalence • Encourage this Working Group or other appropriate bodies to extend the equivalence concept to include auditing activities • Communicate developments to industry
Lack of integration of AQIS Certification Assurance (CA) with other systems	<ul style="list-style-type: none"> • Discuss the likelihood of AQIS accepting other certification that covers CA elements, other auditors or other options • Advise the AQIS Horticulture Industry Consultative Committee of the issue and raise at next meeting
Lack of awareness of what retailers are doing to reduce/eliminate hazards within their domain	<ul style="list-style-type: none"> • Obtain updates from retailers and communicate to industry
Uncertainties over regulatory requirements	<ul style="list-style-type: none"> • Ensure that latest ANZFA information on the Food Safety Regulations is communicated to industry • Ensure that the influence of existing state regulations is known and communicated • Liaise with Australian Supermarket Institute, National Farmers Federation and others involved in addressing the influence of regulatory requirements
Inconsistent chemical and microbiological sampling regimes	<ul style="list-style-type: none"> • Work towards a standard sampling regime and communicate the outcomes to industry
Inconsistent critical limits for microbiological contamination	<ul style="list-style-type: none"> • Seek advice from testing laboratories and food hygiene specialists on the appropriate critical limits

	<p>for microbiological contaminants</p> <ul style="list-style-type: none"> • If agreed limits do not exist then advise HRDC and R&D Committees of the need for this work • Communicate the outcomes to industry
<p>Auditing</p> <ul style="list-style-type: none"> • Multiple audits • Consistency of auditing • Cost of audits 	<ul style="list-style-type: none"> • Obtain a definitive statement from the Joint Accreditation Scheme of Australia and New Zealand (JASANZ), the Quality Society of Australasia (QSA), the AFFA Working Group and other appropriate bodies regarding the impediment/s to rationalising auditing for those businesses certified to more than one scheme. This may include equivalent recognition of some schemes. • Make recommendations for further action • Communicate the outcomes to industry • Seek evidence of recent inconsistent audit experience from audit recipients • Raise the issue with the appropriate bodies and seek a strategy to resolve the issue/s • Communicate the outcomes to industry • Obtain an explanation of the costs involved in auditing and communicate these to industry

The following provides greater detail of progress and achievements related to each of the Action Plan issues.

1) What QA system is appropriate and/or necessary for the various levels of the supply chain:

This is the most time consuming aspect of AH 99007 with many requests for information from growers, packers, exporters, wholesalers, cooperatives, industry associations, consultants, etc.

Presentations made to meetings and conferences including:

- 1999 On-Farm Food Safety and Quality Assurance Conference
- Australian Nut Industry Council Conference 2000
- Australian Citrus Growers Inc
- Goulburn Valley Approved Supplier Program
- Australian Processing Tomato Industry Council Inc
- Australian Fresh Stone Fruit Growers Association
- Australian Asparagus Council
- Australian Banana Growers' Council
- Australian Chestnut Growers Inc
- Australian United Fresh (AUF)

- TAFE
- Queensland Nursery Industry Association
- Victorian Fresh Tomato Growers Association
- 2000 On-Farm Food Safety and Quality Assurance Conference
- Export Workshop – Global Customers and Competition Beyond 2000

Substantial confusion still exists, with the arrival of SQF 1000 and Freshcare adding to the anxiety. A paper, *Why bother with Food Safety in Horticulture* was prepared and circulated. A further document *Quality and Food Safety Options Available to Australian Horticultural Businesses* is available on the site www.horticulture.com.au along with other information sheets. System options is also included in the general information document *Quality, Food Safety and Australian Horticulture*.

2) Equivalence of retailer requirements:

The AFFA Working Group on Safety and Quality Systems' Equivalence has conducted five case studies of businesses with multiple systems and customers to explore where equivalence opportunities exist for direct suppliers to retail and food service. The case studies revealed that:

- Multiple manuals and multiple audits exist in order to satisfy multiple customers but lead to increased costs and poor utilisation of staff time and resources.
- Multiple manuals and multiple audits have not translated into greater food safety and possibly have a negative impact on profitability and competitiveness.
- The same issues as raised in the Action Plan for AH 99007, particularly inconsistent auditing, were raised by other sectors.
- AFFA is liaising with AH 99007 and other like-minded groups, and vice versa, to seek solutions. This has included various workshops and meetings with key influencers.
- This work has highlighted the very close relationship between the systems in place and issues over auditing. The latter is dealt with separately in this report.

There is some progress on retailers agreeing on equivalent quality system requirements. Coles and Franklins both accept SQF 2000 and other systems that include a HACCP Plan for direct suppliers. Woolworths are firmly of the opinion that WVQMS will not be merged into any other system. All three accept Freshcare for indirect suppliers of lower-risk fresh food such as whole fresh produce.

While Cole and Franklins recognise all JAS-ANZ registered auditors as being equivalent, Woolworths is now accepting QAS, SGS and NCSI to conduct HACCP Verification and WVQMS audits in addition to Food Operations.

3) Lack of integration of AQIS Certification Assurance (CA) with other systems:

AH 99007 has been one of many voices seeking progress from AQIS on this issue. The project seeks updates from Brian Tucker, Assistant Manager, Horticulture Section, Animal and Plant Program Branch, AQIS.

A re-vamped CA was launched in November 2000 following Minister Anderson's signing off of most QEAC recommendations in early September.

An industry-training package, HACCP- based and accredited by Murrumbidgee College of Agriculture, will be delivered in all regions starting early 2001.

No changes anticipated to audit arrangements at this stage

- Citrus industry survey considered AQIS 'best value'
- New CA will be more streamlined therefore cheaper to audit
- AQIS is not confident that suitable alternative auditors are available
- AQIS is concerned that other audit providers would only 'pick-off' more profitable business leaving the remote and expensive to service to AQIS and hence pushing rates per hour up higher for those that remain with AQIS
- There is concern that some importing countries will not accept non government auditors for quarantine functions

4) Lack of awareness of what retailers are doing to reduce/eliminate hazards within their domain:

One of the major concerns of growers is that the efforts of suppliers to meet retailer requirements appear to be lost when the product reaches the retail store due to poor internal handling practices and personal hygiene concerns relating to shoppers.

There is debate as to how far this issue should be progressed, as the easiest solution for retailers is to follow the European lead and insist that produce be supplied prepacked. This would add considerable expense to the supply side with little if any opportunity for recovery. The retailers do not appear to want it either.

An article has been distributed summarising what food safety procedures in distribution centres and retail stores each of Coles, Franklins and Woolworths are implementing internally. The article was circulated to retailers to ensure its accuracy before being published.

A further article has been circulated emphasising that growers and packers (and wholesalers and retailers) need to be able to provide evidence that they have food safety issues under control in their own businesses so that they can demonstrate due diligence in the event of a food safety incident.

Both articles were subsequently posted on the www.horticulture.com.au web site

5) Uncertainties over regulatory requirements:

After considerable speculation, the Australia New Zealand Food Authority (ANZFA) released a guide to the new Food Safety Standards. Three of the four new standards were adopted by Health Ministers in July and will become law across Australia by February 2001. They will replace existing state and territory Health Acts.

There are still consultants, retailers and poorly informed suppliers who insist that these regulations apply to all horticultural businesses. The Standard 3.1.1 specifically exempts primary food production from the definition of a food business except when the product is substantially transformed on site (for example, juice production, jams, canning etc) or there is the sale or service of food directly to the public from the orchard/ grove/ farm/ packing shed/etc.

An article was prepared and distributed in industry papers and journals highlighting this situation while still emphasising that the industry must be vigilant with respect to food safety issues. This article has been the most widely reproduced of all communication issued and has generated considerable positive feedback, particularly from growers and packers who had been told otherwise.

6) Inconsistent chemical and microbial sampling regimes:

Version 1 of the reference *Guidelines for verification activities for chemical and microbial testing* has been circulated by Delia Dray, NSW Agriculture but little further progress has been made pending funding.

Numerous other 'non official' guides have been circulating. This issue was addressed at the QA Conference in November and it was agreed that the key system owners would cooperate with this project (should it continue) or NSW Ag to complete an industry guide.

The issue is also being taken up by the SQF Technical Working Group in Victoria.

Richard Bennett chaired the horticulture element of the Verification Forum at the 7th Australian HACCP Conference in July, which went some way to clarifying a number of issues but raised others.

Related to the sampling guidelines for chemical residue testing is the issue of anomalies between the National Registration Authority (NRA) Maximum Residue Limit (MRL) Standard and the ANZFA Food Standards Code Standard A14. At April 2000 there were 650 anomalies between the two of which vegetables (130) and fruit (88) rank first and third. The project is supporting QDPI and the National Farmers Federation who are pursuing this very important issue on behalf of all industries. No publicity has been distributed due to the significant implications this issue could have on food safety programs and audit validity.

7) Inconsistent critical limits for microbial contamination

Research at the Institute for Horticultural Development will establish microbial critical limits for vegetable crops, probably during 2001. Progress was reported at the 2nd On-Farm Food Safety and Quality Assurance Conference, November 2000. No official research is being conducted for fruit crops.

8) Audit mutual recognition

A major breakthrough was Woolworths accepting three additional companies to audit WVQMS. These companies also audit SQF 2000, HACCP and ISO 9000 so a number of businesses have been able to achieve multiple system certification from the one audit.

The AFFA Working Group, through its five case studies, has identified that this is a major saving in time, expertise and cost and has pursued this issue with some success.

9) Audit frequency

A range of influences, including AH 99007, have led to changes to the SQF audit regime to now allow for seasonal (annual) audits under certain circumstances.

Growers who can decide on a quality/food safety system on the basis of audit frequency now have systems for which annual audit is the norm.

There is still interest and pressure from some sectors within horticulture to reduce the number of site audits and substitute perhaps every second site audit with a desk audit. While this will reduce the costs to growers, initial response from retailers is that the credibility of certification would be reduced to unacceptable levels under this regime. Dialogue needs to continue on this issue.

10) Auditing inconsistencies

A very popular source of discontent in horticulture with considerable time spent attending to disputes between producers and audit companies. This issues goes hand in hand with inconsistent implementation. Problems relate to inconsistent interpretation of SQF 2000, general training, implementation and auditing skills and appropriate industry knowledge requirements.

A number of meetings have been held with the Quality Society of Australasia and SQF Australia to highlight the issues of disgruntled recipients. Resolution has been achieved in all cases. Richard Bennett has been requested to assist with the review of competencies, qualifications and experience requirements of food safety auditors.

Audit issues are a regular agenda item for the SQF Technical Working Group, of which Richard Bennett is a member. He has also been invited to represent horticulture on the JAS-ANZ Food Sector Technical Committee to advise on whether food safety standards meet the criteria for JAS-ANZ accreditation and hence availability to industry.

11) Audit costs

Investigations were made to establish audit cost structures. The result, as expected, was that supply and demand played a large role in audit costs but that there was considerable scope to reduce costs to audit recipients by more intelligent purchasing. There are now groups of growers, packers and wholesalers tendering out audit

activities as regional or common location groups. This has had a significant impact on price and service levels.

A number of new auditing companies, and new auditors for existing companies, have entered the business. This increased competition has significantly reduced total audit costs by increasing time use efficiency and reducing travel and accommodation costs. It has also influenced service levels.

A related issue is the cost of chemical residue (initially) and microbial contamination testing. Initial enquiries have been made to establish a database of growers and products tested to reduce the testing load to industry and then to encourage larger batches to reduce individual test costs.

DISCUSSION

The outcomes nominated in the project proposal are as follows:

- ◆ Industry better informed of developments
- ◆ A focal point for stakeholders
- ◆ A profile for industry achievements
- ◆ Industry involvement in policy development
- ◆ Coordinated proactive approach to address issues
- ◆ Resolution of issues that impede the implementation of quality and food safety requirements
- ◆ A shift from a cynical attitude to one recognising the benefits of QA for many industry players who do not currently see value in QA

The Horticulture Action Plan started out as a fairly ambitious attempt to rectify many deep-seated issues in record time.

What it has achieved is to refine the issues that most irritate the industry and impede the successful uptake of professional food safety management. It has then recognised that these issues need the combined approach of industry pressure and cooperation with other sectors that have the same or similar impediments, other special interest groups, service providers and government.

Because of the nature of making progress under these circumstances, progress doesn't happen fast. Part of the difficulty in resolving the many issues in this project is their interdependence and reliance on other processes. But progress does happen and industry has been happy to know that the issues are being addressed, regardless of the pace at which they are being addressed.

For many horticultural businesses, the major benefit has been having a focal point of reference for QA and food safety. Many have taken advantage of that focal point and received the information they were after or have been referred to some one or some place that can assist.

A major challenge has been to balance the reactive needs of individuals with the proactive needs of industry. While progress was being made on the big issues that impact across horticulture, there was a steady stream of smaller issues and individuals with specific concerns that required attention.

In summary, all of the project's anticipated outcomes have been achieved in part or in full and to a degree relative to the time that was possible with the funding that was provided.

TECHNOLOGY TRANSFER

The main vehicle for dissemination of information gained from the project was the distribution of media releases and reports through the AHC's Trade Media database. This process proved to be quite successful with good uptake of the releases observed in many industry journals, magazines and newspapers. Media monitoring was not undertaken as part of the project so accurate statistics of coverage are not available

The releases are attached as Appendix I.

These releases were supported by attendance at numerous industry meetings and conferences. There were over 12 requests to provide specific information related to the project to meetings and conferences including:

- 1999 On-Farm Food Safety and Quality Assurance Conference
 - presentation of paper announcing the project and developing the Action Plan
 - facilitated conference workshops on *What is working well?* and *Environmental issues*
- Australian Nut Industry Council
 - Conference 2000 – Issues for the New Millenium
 - Presentation *Quality Assurance, Food Safety and the Australian Nut Industry*
- Australian Citrus Growers Inc
 - Citrus 2000 – A Quality Conference presentation *Quality Assurance – Fact or Fiction* and participation in Panel Discussion
- Goulburn Valley Approved Supplier Program
 - presentation on options, customer requirements, regulatory requirements, etc to 280 growers as part of training program
- Australian Processing Tomato Industry Council Inc
 - Address R&D Committee
- 7th Australian HACCP Conference
 - Verification Workshop horticulture group chairman
- Australian Fresh Stone Fruit Growers Association
 - Participate in Audit workshop
- Australian Asparagus Council
 - Meeting with IDO
- Australian Banana Growers' Council
 - meetings with IDM and Product Description Language Reference Group
- Australian Chestnut Growers Inc
 - address to QA training program and Board
- TAFE
 - presentation to Rural Studies staff

- Queensland Nursery Industry Association
 - presentation to State Conference *Benefits of QA in Horticulture*
- Victorian Fresh Tomato Growers Association
 - presentation to growers
- 2000 On-Farm Food Safety and Quality Assurance Conference
 - assisted to organise, presented report, initiated and chaired impromptu workshop between NRA and ANZFA to discuss MRL anomalies issue, reported on project to National QA Network, guest of AFFA at Audit Workshop, etc

An innovation of the project has been to create a 'Food Safety Forum' on the Horticulture Australia web site, www.horticulture.com.au. All media releases, information bulletins, project reports and associated information have been posted on this site. This has resulted in numerous requests for further information on particular issues and requests from allied organisations for links between sites.

RECOMMENDATIONS

As discussed previous, this was a twelve month project with a range of objectives at commencement but no map of how to get there. The Action Plan that provided the map was developed after the commencement of the project.

In hindsight, the number of issues to be addressed was greater than time allowed both in terms of the time allowed within the project and the term of the project itself. There are numerous issues that could not have been addressed within the twelve months even if time allowed because the resolution process will extend over a number of years.

It is recommended that the project be funded for a further term to enable continuity of the work already commenced. This could be by one of a number of mechanisms:

1. direct funding from peak industry bodies
2. funding as previous through the AusHort R&D program
3. creation of a part-time Industry Development Officer position specifically for quality and food safety, across all participating industries

A proposal will be prepared for the April 2001 meeting of AusHort.

In the event of further funding, the 2000 Action Plan has been revised to account for changed circumstances and priorities and work completed.

APPENDIX I

Addressing QA Issues makes progress

A major AusHort / AHC initiative is to address issues that influence the successful uptake of QA and food safety in horticultural businesses. A number of issues are currently being addressed.

1. Chemical & Microbial Sampling, Testing and Limits

- This was one of the major issues raised at last year's Launceston On-Farm QA Conference because there have been different recommendations for chemical and microbial sampling frequency and targets, particularly for packers with a number of suppliers.
- Delia Dray, NSW Agriculture, coordinated a successful workshop in Sydney in February. The outcome was that regulators, retailers, wholesalers, ag departments, auditors, etc, all agreed to cooperate in the development of a reference guide for pesticide and microbial verification activities for HACCP systems in horticulture. A draft table of contents has been circulated recently.
- The workshop also highlighted the discrepancy between Maximum Residue Limits (MRL's) included in the Australia and New Zealand Food Authority (ANZFA) Food Standards Code and the National Residue Authority (NRA). The issue will be pursued with the NRA Minor Use Committee among others.

2. Recognition of equivalent quality and food safety systems

- This project is working with the AFFA Equivalence Working Group in its endeavor to address the issue of multiple system requirements across the agrifood industry. The equivalence group has conducted a number of case studies that identify the extent to which system implementation and maintenance, in particular documentation and auditing, can be simplified and minimised. All major retail groups are represented in this work and we can hopefully look forward to progress in this area.

3. Auditing

- Dialogue has commenced with the Quality Society of Australasia (QSA) to address the issues of multiple audits, cost of audits and consistency of audits.

4. Other issues

- A range of information sheets have been developed to assist with general enquiries from growers wanting to make a start in QA / food safety.
- There is concern that OH&S, Integrated Fruit Production, environmental guidelines, etc necessitate separate systems instead of integration with existing QA.
- Integrating AQIS Certification Assurance with existing systems is also a recognised need. AQIS is now confident that there are sufficient related systems and expertise available that this can proceed and progress is being made with this.
- With food regulations being developed or implemented in most states, the implications of these regulations and their compatibility with the proposed national regulations, is being assessed.

Most growers exempt from new food legislation

Growers being told that they must implement a food safety plan because of new national legislation are not being told the full story according to Australian Horticultural Corporation Quality and Food Safety Manager Richard Bennett.

Richard was commenting on letters received by a small number of growers from a small number of fruit and vegetable wholesale merchants and rumours circulating throughout the industry. These letters and other information are insisting that suppliers implement a full food safety plan incorporating Hazard Analysis Critical Control Point methodology (HACCP) because of recently announced changes to the Australia New Zealand Food Standards Code.

Richard said that significant additions to the Food Standards Code are in the process of implementation. The additions are Standards 3.1.1 *Interpretation and Application*, 3.2.2 *Food Safety Practices and General Requirements* and 3.2.3 *Food Premises and Equipment*. They will become enforceable from 24th February 2001. A fourth Standard, 3.2.1 *Food Safety Programs*, will be considered after a study of costs and efficacy of food safety programs has been conducted.

The good news for growers and packers is that, according to guidelines issued by the Australia New Zealand Food Authority (ANZFA) in July, most businesses involved in 'primary food production' are specifically exempt from the new standards. The guidelines were published to assist in the interpretation of the new Food Safety Standards.

The new standards will apply to food businesses that handle food intended for sale (processors, commercial kitchens, etc) as well as those businesses that sell or serve food directly to the public (restaurants, retailers, etc). The definition of a food business includes the clause "... other than primary food production ...". Primary food production is then defined as "... the growing, cultivation, picking, harvesting, collection or catching of food ...". The definition of primary food production goes on to include transport and delivery, storage, treating and packing.

The definition of primary food production means that some horticultural businesses will have to comply with the new standards. This includes businesses that carry out some form of processing that "substantially transforms" the product, such as canning, peeling or juice production, or where product is sold or served direct to the public, such as farmers markets and roadside sales.

One grey area is where a packer packs produce for other growers. This issue has not been resolved as yet. If this does become mandatory, the impact will be minimal as many of these packers already have SQF 2000, HACCP, Woolworths Vendor Quality Management Standard, etc.

According to Richard, one advantage of the new standards is that they will apply throughout Australia and replace the mix of different State and Territory hygiene rules that currently apply to food businesses. For primary food production, however, the States will be able to individually apply the food safety standards where there is a demonstrated, unmanaged, food safety risk. If they do, then the standards they apply will be the same as those applying to food businesses that are not involved in primary production. It is highly unlikely that this would apply to a low risk category such as fresh produce but provision is there regardless.

The exemption for primary food production does not mean that growers and packers should be any less vigilant about the possible introduction of physical, microbial or chemical food safety hazards that could cause injury or illness to consumers. Fresh produce may be a lower risk than many other foods but it is not totally without risk. Growers and packers should remember their responsibilities and the potential damage to the industry in the event of a food safety incident and think 'safe food' at all times. Supplying safe food is still a legal requirement with steep penalties for non-compliance.

According to Richard, wholesalers can still insist that their suppliers implement a full HACCP program even if there is no legal requirement to do so. If there is a perceived market advantage, or just a need for additional reassurance that the supply chain can demonstrate due diligence, then the customer can insist on this. However, most retailers do not insist on a QA system that includes HACCP for their indirect suppliers, like they do for direct suppliers.

Richard says growers and packers should consider a QA system for their business if they believe that providing evidence of their efforts can be justified by improved management of quality and food safety or additional leverage to their marketing activities. Likewise, growers and packers should question the need for such systems if they believe that the request is unwarranted.

Richard Bennett manages a national project to address quality assurance and food safety issues that is funded by the Horticultural Research and Development Corporation through AusHort.

ENDS

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Why bother with Food Safety?

Grower meetings around the country are questioning the increasing momentum of dictates to growers regarding food safety requirements. The 'letters to the editor' columns of various trade papers and magazines have captured the emotions and made those who are keeping their feelings to themselves feel like they are not alone.

The feelings range from general discontent and the view that it's all a necessary evil, to all out rage and the wish that the wheels fall off the entire food safety and quality assurance wagon.

According to Richard Bennett, Food Safety and Quality Manager at the Australian Horticultural Corporation, there are legitimate reasons why the horticulture industry needs to provide assurances to consumers that fresh produce is as free as possible from physical, microbial and chemical contamination.

Professional Liability

The first reason he cites is that of professional liability. "The fresh produce industry does not have a perfect record," Richard asserts. "There are numerous examples of our product in fresh, minimally processed and fully processed forms leading to food-borne illness and injury."

Richard says it is generally true that horticultural products are a lower risk than many other primary foods but the industry is certainly not perfect. "When food-borne illness or injury occurs, someone (the recipient or his/her legal adviser) wants to blame someone else. Precedence has it that ignorance of a problem is no answer. Precedence also show us that the buck is passed as far down the line as possible, in our case, to the humble primary producer."

According to Richard, even the most basic quality system - with records of chemical use, training and equipment calibration, some form of traceability, a basic specification and some personal hygiene - should provide enough evidence to lighten the liability. Obviously, the more complex the system, the better the records, the more independent the audit, the better.

Customer Insistence

Richard goes on to say that the second compelling reason why food safety is essential is the customer. "Our primary customers are the retailers who sell our produce to consumers. Those customers are increasingly insisting that their suppliers (wholesalers, packers, and growers) have food safety systems in place." According to Richard, there are two main reasons why this is so:

Firstly, the larger retail chains in particular know what the damage to their own brand will be in the event of a food safety incident, regardless of who is to blame. With fresh produce, the retailer is more likely to suffer because the blame is more difficult to shift. Kraft, for example, copped most of the bad publicity for tainted peanut butter, not the stores that it was sold in. With few, if any, strong brands in produce, everyone suffers, retailer and industry alike.

Second, food safety regulations now exist in all states and draft national regulations were adopted recently. While these regulations specifically exempt primary producers (except those who process what they produce or sell direct to the public), they require retailers to get their food safety act together and this includes ensuring that suppliers provide safe food. The major retailers have made their requirements clear to their suppliers in an effort to be seen to be doing all that is fair and reasonable to provide safe food. All retailers also have, or are also putting in place, training and procedures to ensure that they have their own act in order.

Competition

Finally, according to Richard, fresh produce is an important part of the food industry. "As such, our true competitors are snack foods, confectionery, take-away foods and anything else that can meet the same consumer needs or perceived needs as fruit, vegetables, dried fruit and nuts. If we cannot match the food safety claims made by these competitors then we are at a disadvantage in the eyes of retailers and consumers," Richard declares.

In conclusion, Richard stressed that there are many other aspects to the food safety business that are being addressed. The consistency of the audit process, the absence of critical limits for microbial contamination and inconsistent chemical and microbial sampling are examples. "These issues assume that the producer has implemented or is implementing a system that is appropriate for the business position in the supply chain, i.e. direct supplier or indirect supplier, etc. That's another issue and perhaps at the core of a lot of the discontent that exists in horticulture," Richard commented.

"Regardless of the system chosen, there are legitimate reasons why we as an industry have to be able to demonstrate what is known as 'due diligence', which is to do what is fair and reasonable to avoid food borne illness and injury and have the evidence to prove it. QA is a prevention process and the old adage that prevention is better than court action certainly applies here."

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Retailers make food safety a priority

An AusHort project aimed at addressing quality and food safety issues in horticulture has identified that retailers have a responsible attitude to food safety. All three major retailers and many independents have programs in place that complement the professional approach of growers, packers, transport operators and wholesale agents to ensure safe fruit and vegetables for consumers.

This is despite Australian supermarket chains often being criticised by suppliers such as growers and packers for having a “do as I say, not as I do” attitude according to Quality and Food Safety Manager with the Australian Horticultural Corporation, Richard Bennett. He said that this was one of the issues raised when suppliers discuss quality assurance and food safety requirements.

According to feedback from retailers, Richard said there were two main external influences on their involvement in food safety, namely category and brand protection and regulatory requirements. All states and territories now have food handling regulations that make it a legal obligation for retail businesses that prepare and sell food to have a food safety plan. This includes supermarkets and specialist fruit and vegetable retailers. These regulations will soon be superseded by the new, uniform, national Food Safety Standards.

Retailers are also highly conscious of the devastating impact if consumer confidence in the safety of fresh produce is lost. Any food safety incident, particularly an avoidable one, could be a financial catastrophe for the retailer involved and for the entire category. There are a number of recent examples confirming that lost sales, brand damage and litigation costs can cripple a business, big or small. Having procedures in place to minimise or eliminate the risk of an incident is seen as critical by all retailers.

So, what are Coles, Franklins and Woolworths, who collectively account for around 70% of fresh produce retail sales in Australia, doing individually on food safety? All are being proactive in implementing food safety programs at store and distribution levels and in their supply chains.

Coles has fully implemented its retail food safety program in Victoria in line with legislative requirements. Coles has appointed a Food Hygiene Officer in each state to manage food handling and hygiene along with a supporting structure in each store.

All operators of distribution centres for Coles either have a HACCP program in place or are very close to it.

At Franklins, the Food Safe Program has been implemented in all Fresh and Big Fresh retail stores and is assessed by an independent third party auditor. This is a full HACCP program covering all departments. Franklins distribution centres are also involved with SQF 2000 either certified or close to certification in all cases.

Woolworths/Safeway has a national quality system for supermarkets and has established food safety teams in each of its store. The 'Tools of Food Safety' program was rolled out across Victorian supermarkets first. Senior store staff attended an initial two-day course followed by training sessions for other staff. There are daily checklists to be completed and a quarterly audit undertaken by the food safety team.

All Woolworths/Safeway distribution centres are required to achieve the Woolworths Vendor Quality Management Standard (WVQMS). Some have completed the implementation process and have been successfully audited while others are still working towards it. WVQMS is the same standard more than 1600 suppliers to Woolworths have achieved.

For growers and packers of horticultural products, the proactive response of the retail component of the supply chain is good news according to Richard. "Each sector of the supply chain must have confidence in the efforts of the others for the process to succeed. It provides the momentum and motivation to provide consumers with the safe, quality produce that they expect and deserve."

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Food safety conference a winner

The latest information for on-farm food safety and quality assurance in horticulture was presented at a successful conference and associated workshops held in Launceston, Tasmania recently. Hosted and organised by Tasmanian Quality Assured Inc, the conference brought together growers, facilitators, auditors, system owners and other industry specialists to work on the issues that will keep QA programs relevant, consistent and appropriate to the needs of industry.

Of particular interest to many horticultural producers were two workshops dealing with verification activities and auditing. The verification workshop focused on the need for testing to show that Good Agricultural Practices in relation to chemical label directions, spray equipment calibration and chemical use training have been carried out. The workshop recommended that one chemical residue test should be carried out on one crop grown and one chemical used per year.

The workshop also resolved to investigate how a database of residue tests could be constructed to reduce the number of tests businesses have to undertake while as the same time ensuring that adequate testing is carried out.

For microbial testing, the workshop recommended that verification tests only be carried out when critical limits for the produce exist and then only when a risk assessment confirms the need. Other possibilities for testing microbial activity on produce are when a business wishes to provide background data or when an indicator of trends is required.

The food safety auditing workshop was convened by the Food Business Group of AFFA as part of its commitment to addressing the fact that there is a multitude of quality and food safety systems resulting in multiple audits. The workshop confirmed that, in most cases, concerns over audit practices are due to inconsistent interpretation and implementation of codes and standards rather than problems with the actual auditor.

The workshop considered the development and application of a generic food safety audit checklist and supporting guidelines that would clarify requirements in areas such as water quality, persistent chemicals, microbial testing and chemical testing. It was agreed that a checklist already developed by QDPI would be used as a starting point and other existing guidelines and relevant work would be drawn on to develop the required auditing 'tools'. These could then be used by auditors, facilitators, trainers and growers alike to encourage greater consistency and integrity in the application and auditing of horticulture food safety systems.

The conference proper dealt with a large number of issues, many of which are included in the industry action plan. Prominent among these were the new national food safety standards, auditor competencies and accreditation, the cost/benefit of QA, issues to do with heavy metal and water contamination, microbial contamination of vegetables and an environmental management systems summit.

Perhaps the only area where an advance was not made was the issue of Maximum Residue Limit anomalies between the Australia New Zealand Food Authority (ANZFA) and the

National Registration Authority (NRA). Both parties, however, left the conference with a strong message reflecting the anxiety that industry feels over this issue.

At this stage, the next national conference is planned for winter 2002 and assuming progress continues at the same rate it will be action packed!

Copies of the conference proceedings are available for a small charge of \$55 (includes GST, packaging and postage) from Ellen French at TQA on tel: (03) 6331 8223, fax: (03) 6334 1957 or email: tqainc@microtech.com.au

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