

HARPS

Harmonised Australian Retailer Produce Scheme

Are you HARPS ready?

This fact sheet provides an overview of the Harmonised Australian Retailer Produce Scheme (HARPS), what producers need to do to become HARPS approved and answers commonly asked questions from growers.

What is HARPS and how does it work?

HARPS is a retailer-led scheme designed to assist with compliance to *food safety, legal and trade requirements* for suppliers to the major grocery retailers in Australia. It aims to reduce the stress associated with the adoption, maintenance and auditing of multiple food safety systems to multiple retail customers and has the potential to reduce costs. In 2012, the former Horticulture Australia Limited (HAL) took the concept of eliminating multiple audit schemes to the major retailers at the request of industry. Today, it is led by the retailers and managed by a Project Team, including the Produce Marketing Association (PMA A-NZ).

HARPS has combined the individual requirements of each of the major grocery retailers in Australia into a single scheme. Now producers must be audited to a Base Scheme plus the HARPS requirements to become HARPS approved. This is best conducted as an integrated single audit. HARPS only applies to whole fruit, whole vegetables and nuts in shell (NOT processing).

HARPS uses a risk-based approach to manage food safety issues specific to the horticultural industry; no two businesses are the same and the level of risk is relative to the specific activities undertaken.

Codex-HACCP is a good foundation for a base scheme but on its own it is not equivalent to the global benchmark requirements for food safety. HARPS encourage businesses to assess and manage their own risk using the Codex-HACCP approach so that growers and suppliers recognise how to develop and implement a robust risk-assessment that addresses the specific needs of their business.

The intent of HARPS is to also facilitate a cultural and attitudinal change towards meeting the HARPS elements, and most particularly food safety. There is a need to move away from a 'tick-and-flick' approach to a position whereby food safety is culturally embedded within every activity of a business; it should not just be the Quality Assurance personnel who are responsible for food safety but rather every person working in that business, taking a collective responsibility.

HARPS aims to reduce the stress associated with the adoption, maintenance and auditing of multiple food safety systems to multiple retail customers

What's led to the need for HARPS?

HARPS addresses the key causes of rejections experienced by the major grocery retailers as a result of issues relating to food safety, legal or trade requirements. Rejections are costly for retailers but also for growers and suppliers, particularly when product recalls (due to food safety issues) or withdrawals (due to breach of legal or trade requirements) occur.

Furthermore, the March 2018 listeriosis outbreak that has impacted the melon industry is an example how contamination at a single site can impact the livelihoods of many others. Whilst rockmelon sales have dropped by 90%, sales of watermelon and other melon varieties have also been impacted. It has also resulted in the NSW Food Authority reviewing the need for additional regulation of the rockmelon industry to ensure compliance with food safety. The additional regulation, if implemented, could lead to increased rigour, duplication and ultimately cost for producers.

As an industry, from growers through to retailers, we have a collective responsibility to ensure a continual supply of safe food for consumers. More broadly, HARPS can be considered as playing a role in increasing the focus on food safety, an issue that is increasingly important to consumers. While this may add some cost to produce businesses, the cost (and risk) of not investing in food safety is likely much greater than many might like to believe.

What's required by Producers?

The five major retailers that have developed and recognise HARPS are ALDI, Coles, Costco, Metcash (IGA) and Woolworths.

HARPS must be adopted with an approved base scheme. These schemes are:

- Freshcare Food Safety & Quality
- SQF
- BRC Global Standard for Food Safety
- GLOBALG.A.P. Integrated Farm Assurance

You can use Table 1 (on the last page of this fact sheet) to understand if your business needs to become HARPS approved. All growers and suppliers, including agents, brokers and distributors, that are supplying finished product (i.e. shelf-ready) in retail packaging (branded or generic) may be required to be HARPS approved. This also applies to any agent, broker, distributor or vendor supplying, growing and/or packaging whole produce for retail sale.

Examples Of Causes Of Rejections By Retailers (At Distribution Centers)

- *Food Safety:* Foreign body or microbiological contamination, packaging failure or incorrect temperature
- *Legal Compliance:* Incorrect date coding, barcodes and country of origin labelling
- *Trade Compliance:* Underweight product, incorrect packaging (e.g. apples packed in a pear bag)

Is my business a Tier 2 supplier and therefore requires HARPS?

If you intend or believe your product may be supplied to one or more HARPS participating retailers, then you may require HARPS. In the first instance, contact your wholesaler/market agent or Tier 1 customer that you supply your product to and confirm your supply arrangement. For example, are you on their Approved Supplier Program for a HARPS Participating Retailer or do you pack or re-pack product destined for a HARPS Participating Retailer?

You can also determine if you are a Tier 2 supplier by assessing the activities completed by your business. Generally, if you are packing or re-packing product, or conduct any of the following activities, then you are a Tier 2 supplier:

- You apply PLU and/or DataBar stickers to loose product as specified by a HARPS participating Retailer;
- You pack or re-pack retail-branded pre-packs;
- You pack or re-pack into Returnable Plastic Crates (RPCs);
- You pack or re-pack proprietary branded pre-packs;
- You pack or re-pack loose product in final retail packaging, packed to a retail specification;
- Your business is part of an Approved Supplier Program for your Tier 1 customer; and/or

- Your business provides Ancillary Services (supporting or additional services including ripening, brokerage activities, storage and cooling where product handling and traceability are the responsibility of the Ancillary Service supplier).

If you are unsure of your status or would like to discuss your specific circumstances, please call the **HARPS Helpline on 1300 852 219.**

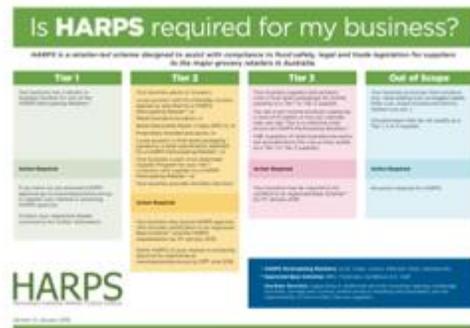


Table 1: HARPS Supplier Definition Graphic

This HARPS Supplier Definition Graphic has been developed to assist suppliers in determining whether their business requires HARPS. The terminology in this graphic replaces the previous references to Direct and Indirect suppliers, and uses a tiering system (Tier 1, 2 and 3) to define supply chain responsibilities and actions required by suppliers.

A full size table can be found at the end of this document and on the HARPS website: www.harponline.com.au

I want to adopt HARPS, how do I arrange an audit?

The retailers have approved a list of Certification Bodies that are endorsed to audit against HARPS but not all retailers have endorsed all certification bodies. If your current Certification Body is on the approved list for the retailers that you currently or intend to supply, then you only need to notify your Certification Body of your requirement to audit HARPS. The list includes:

- AsureQuality
- AUS-QUAL Pty Ltd
- BSI
- Mérieux NutriSciences
- SAI Global
- Sci Qual International
- SGS.

If your current Certification Body is not on the approved list, you will need to make contact with any of the other retailer approved Certification Bodies. The audit should be timed to include the base scheme and the HARPS audits simultaneously. (See <https://harpsonline.com.au/wp-content/uploads/2017/06/Scheme-Rules-Appendix-2-Version-2.0-1.pdf> for further information on Certification Body matrix and contact details).

What's involved in the HARPS audit?

A Pre-Assessment Checklist is available on the HARPS website and is located under the Growers/Suppliers tab in the Document Library

(www.harpsonline.com.au). This checklist will enable you to decide if you are meeting the requirements outlined in the HARPS elements. All businesses will need to review their systems and make any required changes to ensure they meet all of the HARPS elements in full. The checklist should be completed and sent to your selected Certification Body prior to the commencement of your audit.

What is the cost of a HARPS audit?

There is a charge of \$245 (+GST) HARPS approval fee that goes directly back to HARPS for ongoing maintenance of the scheme. The audit costs associated with HARPS approval will be specific to each individual business and depend on the scope of operations, such as growing, packing or ancillary services etc., including how many retailers are being supplied. The Certification Body conducting the audit(s) will advise their costs in advance of the audit and should detail any inclusions or exclusions such as travel costs, additional charges for time required to close out any corrective actions etc., and we encourage businesses to request quotes from several Certification Bodies. Access to all Certification Body details are provided on the HARPS website under <https://harpsonline.com.au/wp-content/uploads/2017/06/Scheme-Rules-Appendix-2-Version-2.0-1.pdf>

*Have you visited
www.HARPSonline.com.au?*

All you need to know about HARPS including documents mentioned in this fact sheet can be found on our website.

How do I book my HARPS audit?

1. Download information from:
<https://harpsonline.com.au/document-library/>
2. Contact Certification Body to book the audit date, scope and agree costs:
 - a. Get quotes from multiple Certification Bodies
 - b. Specify inclusions/exclusions (e.g. travel costs)
 - c. Ideally complete Base Scheme and HARPS audit together
3. The Certification Body will supply the HARPS Checklist (also available on:
<https://harpsonline.com.au/document-library/>)
4. Complete the HARPS Checklist and return to auditor 2 weeks before audit
5. Use the HARPS Checklist to identify gaps, questions and where support is required

NB: HARPS replicates the Base Scheme 'rules' to avoid complexity

I am certified under Freshcare FSQ3, can I complete a HARPS audit?

The transition of participating business from Food Safety & Quality Edition 3 (FSQ3) to Food Safety & Quality Edition 3 (FSQ4) is a process required for continued participation in the Freshcare Program. This does not impact other certifications or acceptance of the Freshcare FSQ Program to industry. Freshcare is an approved base scheme for HARPS, and this approval is not edition specific.

The Standard is currently at Edition 4 (FSQ4), released in 2016. As with all new Edition releases, all businesses participating in the Program went through a transition period, with FSQ audits from 1 January 2017 conducted to FSQ4.

The transition has now been completed and the transition information is no longer relevant as businesses have already transitioned to FSQ4. If you require further clarification please contact Freshcare.

Tier 3 suppliers: Codex HACCP

Tier 3 suppliers that are currently maintaining a Codex HACCP certification may need to change to a HARPS approved base scheme before 1 January 2019.

Tier 3 suppliers that are currently certified with one of the following approved base schemes need to continue to maintain their current system to ensure they are HARPS approved: Freshcare, SQF, GLOBALG.A.P. or BRC.

What do I need to do to remain HARPS certified?

You will need to ensure that you complete all of the requirements of the approved base schemes as well as meeting all the HARPS elements. Recertification will be subject to approval following the successful completion of a base scheme plus the HARPS audit completed by a retailer approved Certification Body.

Certificates will be issued by your Certification Body on successful completion of the HARPS and base scheme audits.

HOW WILL HARPS BE FURTHER DEVELOPED AND IMPROVED?

The current focus of the HARPS Project Team is to assist with the implementation and adoption of HARPS. A series of HARPS Awareness Sessions were held in March and April 2018 in central markets and key growing regions, and some additional sessions may still be delivered.

If you didn't manage to attend a session, please feel free to register for a webinar on the HARPS website (a recording of the webinar will also be loaded on to the HARPS website), and check the website for any additional sessions.

It's also important to ensure HARPS is practical and realistic, and that industry has a voice to raise concerns with the retailers and initiate improvements to HARPS, and specifically the HARPS elements. To this end a HARPS Technical Advisory Group has been established to provide expert opinion, advice and guidance based upon feedback from growers and suppliers.

If you have any points to raise regarding HARPS, please contact the HARPS Project Team via the website or directly at

harpsonline.com.au

It is important to ensure that HARPS is assessed accurately, consistently and fairly by auditors. HARPS is working closely with the Certification Bodies and their teams of auditors to ensure auditor competency, and secure a capable, robust and reliable auditing community. Regular HARPS auditor training workshops have been, and will continue to be, conducted.

THE HARPS TECHNICAL ADVISORY GROUP

The HARPS Technical Advisory Group is made up of suppliers, growers, auditors and scheme owners. It has been created to enable other stakeholders to engage with the retailers and table any concerns. Key objectives include:

- *Industry Approach:* Key decisions adopt a "whole of supply chain" and risk-based approach.
- *Element Review:* Current elements that have resulted in challenge or complaint are reviewed and amended; ensure they are practical and realistic.
- *Root Cause Analysis:* Issues leading to recalls, withdrawals or major non-conformances are investigated and elements refined as necessary.
- *Ongoing Improvement:* Learn from incidents and include improvements in future revisions of HARPS.

THE ALTERNATIVE STATE WITHOUT HARPS

HARPS is intended to make our products safer, enhance our domestic and export reputation and reduce the likelihood of future incidents. It has been built upon global best-practice. Australia is the first country globally to adopt a harmonised scheme across all major grocery retailers underpinned by globally recognized base schemes. Industry now has a model in place to facilitate other initiatives that may benefit from adopting an industry approach.

The previous individual retailer requirements were in place for many years. Without HARPS, it is likely that retailers would have continually raised the bar for food safety separately, leading to five individual retailer schemes instead of one. Whilst Tier 2 suppliers have perhaps struggled most with the implementation of HARPS, any separate retailer-specific requirements for Tier 1 suppliers would also have filtered down to Tier 2 suppliers. Therefore, an aligned approach is a better outcome for all of industry.

THE IMPORTANCE OF FOOD SAFETY

Food safety is critical for any horticultural/fresh produce business in Australia. It is essential for public health and contributes towards customer satisfaction, business reputation and profitability. Our products are often higher risk because many can be eaten raw, or with minimal processing, or are packaged in 'ready-to-eat' portions for improved convenience.

The food safety hazards associated with fresh produce are microbial, chemical and physical contamination.

- *Microbial contamination*, for example Listeria, Salmonella, E.coli, can cause nausea, diarrhoea and vomiting in consumers. Extreme cases can lead to permanent disorders and death. Pregnant women, young children, the elderly and those with an illness are more at risk of food poisoning from these pathogens
- *Chemical contamination* can come from pesticide residues, heavy metals, natural toxins, non-pesticide contaminants and allergens; and
- *Physical contaminants* are a regular cause of customer complaints due to the 'yuck factor', such as finding a frog or insects in a packet of salad.

Identifying potential hazards and assessing their risk is the first step in preventing contamination of fresh produce. These can occur at any stage during site preparation, growing, harvesting, ripening, storing, packing and transporting fresh produce, from initial planting up to delivery to wholesale market, retail distribution centre or retail store.

FREQUENTLY ASKED QUESTIONS

How many businesses are HARPS Approved?

HARPS was launched in May 2016 and HARPS approval was accepted by retailers in October 2016. Approximately 900 growers, suppliers and ancillary suppliers are now HARPS approved (as at April 2018).

How has HARPS been communicated to industry?

Communication has been via the major grocery retailers, peak industry bodies, the PMA A-NZ, Hort Innovation, industry magazines, food safety system owners, trainers and auditors, and presentations at industry conferences, with supporting information available on the HARPS website and a 1300 Helpline to allow producers to have questions answered in person. HARPS Awareness Sessions have been delivered to the main central markets and key growing regions. If you didn't manage to attend a session please feel free to register for a webinar on the HARPS website or view the recorded presentation, and check the website for any additional awareness sessions.

Why is HARPS reaching so far down the supply chain to Tier 2 suppliers?

There are many activities involving Tier 2 suppliers that may pose a food safety, legal and trade risk. From a retailer's perspective, a Tier 2 supplier presents almost the same risk as a Tier 1 supplier. Some retailers have previously indicated that it was their intention to require Tier 2 suppliers to be certified to the same requirements as Tier 1. HARPS is negating the additional costs that this would have brought about.

Key Food Safety Messages

- Food safety is critical for any fresh produce business in Australia
- HARPS is designed to reduce the cost and stress of food safety requirements adopted by the five major retailers in Australia
- HARPS must be adopted with a HARPS approved base scheme
- Approved schemes are Freshcare, SQF, BRC Global Standard and GLOBALG.A.P.
- There are important compliance dates to be aware of for different types of suppliers that are classified as Tier 1, 2 and 3 (see HARPS Supplier Definition Graphic at end)

FREQUENTLY ASKED QUESTIONS

Why has the 10-pallet clause been included for low-volume producers?

Feedback from smaller producers was that they require more time and more support to establish the appropriate systems to achieve HARPS approval.

Why don't retailers comply to the same standards in-store that HARPS require?

Retailers are all required to comply to strict food safety and regulatory requirements, which are audited on a regular basis, and have full time auditing teams checking in-store compliance and (unannounced) audits by external regulators (Trade Weights & Measures, Local Councils, NMI, Biosecurity, ACCC etc.). Retailers also have valuable (private label) brands to protect and therefore are heavily invested in food safety and protecting their customers.

What are the HARPS requirements for imported produce?

Regarding imports, 96% of fresh produce consumed in Australia is grown in Australia (only 4% is imported and New Zealand is the major source by volume), hence the initial focus upon domestic supply. The majority of imports are sourced from businesses that have food safety systems in place. In addition, imported products have additional inspection points e.g. biosecurity and retailers' schemes are still in place (e.g. WQA V8, CSR). The local suppliers importing the produce will also require HARPS approval. HARPS is voluntary for NZ suppliers and some businesses have already voluntarily undergone HARPS approval, however, if they are not HARPS approved, these suppliers will be meeting the same standards as suppliers located in other areas around the world.

Why can't I use paperclips, staples and other stationary in an office which is located within a packing shed?

These items are a main source of foreign object contamination in packed product, so these products can be used, but businesses must adequately demonstrate appropriate segregation and control of these items to limit risk.

Can I use brooms with wooden handles in my pack house?

Yes, as long as they are in good condition (i.e. intact with no loose pieces). This requirement is a prevention mechanism and specifically designed to avoid foreign object contamination. Procedures must be in place to ensure wooden tools, field bins and pallets etc. are regularly inspected to assess their condition and suitability for use.

I am already certified to a base scheme, so why do I need HARPS?

HARPS is more prescriptive than the base schemes (e.g. foreign object management, labelling, management of weights in line with legal requirements etc.). Withdrawals and recalls are a significant cost to everybody and HARPS aims to reduce this cost. It's also important to note that the retailers have never accepted the Base Schemes alone, hence the creation of individual over-and-above requirements by each retailer, as follows:

- Woolworths Quality Assured (WQA)
- Coles Supplier Requirements (CSR)
- ALDI Addendum
- Costco Requirements
- Metcash Requirements

FREQUENTLY ASKED QUESTIONS

Who can help me implement HARPS?

We have received feedback (predominantly from Tier 2 suppliers) that more support is required. Whilst in the majority of instances the Tier 1 suppliers are providing this assistance, HARPS is developing training course material which suitably delivers education on the requirements of HARPS. HARPS is currently working to recognise a suite of training providers to ensure HARPS training is delivered in a consistent manner and that costs are controlled. These providers will be listed on the HARPS website once agreed.

In the meantime, please be cautious of any trainers who are claiming to be HARPS 'endorsed' and are not listed on the HARPS website. Currently no person or business is HARPS 'endorsed'.

Got questions? We've got answers!
Visit our website
www.HARPSonline.com.au
or call our helpline on 1300 852 219.

Table 1 – HARPS Supplier Definition Graphic

Is HARPS required for my business?

HARPS is a retailer-led scheme designed to assist with compliance to food safety, legal and trade legislation for suppliers to the major grocery retailers in Australia.

Tier 1	Tier 2	Tier 3	Out of Scope
<p>Your business has a Vendor or Supplier Number for one of the HARPS Participating Retailers*.</p> <p>Action Required</p> <p>If you have not yet achieved HARPS approval go to www.harpsonline.com.au to register your interest in achieving HARPS approval.</p> <p>Contact your respective retailer customer(s) for further information.</p>	<p>Your business packs or re-packs; Loose product with PLU/DataBar stickers applied as specified by a HARPS Participating Retailer*; or Retail-branded pre-packs; or Retail Returnable Plastic Crates (RPC's); or Proprietary-branded pre-packs; or Loose product in final retail packaging, packed to a retail specification destined for a HARPS Participating Retailer*; or Your business is part of an Approved Supplier Program for your Tier 1 customer, who supplies to a HARPS Participating Retailer*; or Your business provides Ancillary Services*.</p> <p>Action Required</p> <p>Your business may require HARPS approval (this includes certification to an Approved Base Scheme** and the HARPS requirements) by 1st January 2019.</p> <p>Notify HARPS of your interest in achieving approval by registering at www.harpsonline.com.au by 30th June 2018.</p>	<p>Your business supplies bulk produce (not in final retail packaging) for further packing to a Tier 1 or Tier 2 supplier. You are a low volume producer supplying a total of 10 pallets or less per calendar year, per site. This is a collective total across all HARPS Participating Retailers*.</p> <p>(NB: Suppliers of retail-branded pre-packs are excluded from this rule as they qualify as a Tier 1 or Tier 2 supplier).</p> <p>Action Required</p> <p>Your business may be required to be certified to an Approved Base Scheme** by 1st January 2019.</p>	<p>Your business processes fresh produce (e.g. value-adding such as bagged salads, fresh cuts, sliced mushrooms/carrots, shelled nuts etc.)</p> <p>Virtual brokers that do not qualify as a Tier 1, 2 or 3 supplier.</p> <p>Action Required</p> <p>No action required for HARPS.</p>

* HARPS Participating Retailers: ALDI, Coles, Costco, Metcash (IGA), Woolworths
 ** Approved Base Schemes: BRC, Freshcare, GLOBAL.G.A.P., SQF
 ~ Ancillary Services: Supporting or additional services including ripening, brokerage activities, storage and cooling (where product handling and traceability are the responsibility of the Ancillary Service supplier).