



**Comments on Chapter 3 and 4 review of Australia New Zealand Food  
Standards Code**

**June 14, 2019**



## Introduction:

AUSVEG is the national peak industry body representing the interests of Australian vegetable and potato growers and is committed to securing the industry's future.

We advocate for growers to all levels of government and ensure that the industry has a strong, active voice in the public sphere. We also communicate industry issues and perspectives to government, media and the public.

AUSVEG is also a service provider for a number of levy-funded research projects that are funded by Horticulture Innovation Australia using levy and government funds.

Ensuring the results from these research projects are made available to Australian vegetable and potato growers is vital for the vegetable and potato industries to remain on the forefront of global horticulture production and for local growers to be able to operate an efficient, productive and profitable growing operation.

AUSVEG welcomes the opportunity to provide comment on the *Chapter 3 and 4 review of the Australia New Zealand Food Standards Code (code)*.

For us, as the peak body for the vegetable industry, food safety for the Australian consumer is of utmost concern, and as an industry, we are committed to provide safe and nutritious foods for consumers while supporting the AUD 3.9 billion vegetable industry. In 2016-17, there were around 2,300 Australian farm businesses growing vegetables with an estimated value of operations of over \$40,000. This represents a little over six per cent of the total value of Australian agricultural production.

In response to the code review, AUSVEG would like to raise some general concerns to the content of the document and look forward to making further comments on specific issues as they are released for comment.

## High risk process vs high risk crops

The review identifies that *The Codex Alimentarius Code of Hygiene Practice for Fresh Fruits and Vegetables (CoHP FFV)* recommended key crops as high risk and priority areas as detailed below:

- Priority 1: leafy green vegetables.
- Priority 2: berries, green onions, melons, sprouted seeds, tomatoes.
- Priority 3: carrots, cucumbers, almonds, baby corn, sesame seeds, onion and garlic, pawpaw, celery and maimai.

In our view, pinpointing specific crops as high risk is counter-productive to the intent and a recommended approach is to identify processes (or lack of them) as high risk. An analysis of the leafy and melons incidents reveal, businesses had a robust approach to food safety, and



the incidents were a result of human error. This points to a need for training and extension within the food safety spectrum to ensure that business and staff are remain up to date with their skills and that new incumbents are trained up for their roles. As well as identifying processes as critical or high risk rather than specific crops. Hence, any recommendations for regulation should encompass all horticulture vs only a part of the industry or specific crops.

### Recognition of established industry practices and systems

As mentioned above, the vegetable and horticulture industry already has a strong retailer driven focus on food safety to ensure that the Australian consumer is supplied with high quality fresh produce. Current auditing and certification schemes exist within the industry to establish a standard of food safety compliance. Certification like Freshcare food safety and quality certification is one such scheme that growers adhere to and buyers demand, ensuring an adherence to high standards of food safety. It is recommended, that any changes to the code or introduction of regulations, recognize the already established existing systems within the industry and build upon them. And additionally, be mindful of additional administrative burden on producers that any recommendations may bring.

### Industry engagement

In order to harness support and buy in from the industry, it is imperative that the stakeholders of industry be well informed, engaged and consulted throughout the process of the review and recommendations. Hence, AUSVEG welcomes the current process of engagement and encourages a continued level of involvement of the industry.

Warm Regards,

A handwritten signature in black ink that reads "Zarmeen Hassan". The signature is written in a cursive style with a large initial 'Z'.

Zarmeen Hassan  
National Manager, Extension and Engagement