

Foodborne Illness Reduction Strategy
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Australia's Foodborne Illness Reduction Strategy 2018-2021+

Following our review of the consultation paper titled 'Australia's Foodborne Illness Reduction Strategy 2018-2021+' as prepared by the Food Regulation Secretariat; the general comments are outlined below for your reference by The Voice of Horticulture (VoH).

General Comments:

- a) The Voice of Horticulture and its members are committed to ensuring Food Safety is an integral part of horticultural production and is committed to working with the Federal, State and Local agencies to ensure the produce that our industry produces are free of foodborne diseases.
Obviously, there are occasions when the current systems fail. However, it is still important to use these unfortunate circumstances to further develop and improve our programs.
- b) While the VoH and its members are aware of Food Standards Australia New Zealand (FSANZ) and the food code, we would suggest that they have limited knowledge and understanding of: -
 - Food Regulation Secretariat,
 - Food Regulation Standing Committee
 - FRSC/ISRC Food Safety Management Working Group.These structures/organisations have no, or very little, profile within industry. The whole system is seen as highly bureaucratic and regulatory, rather than advisory, educational and service orientated.
While we accept that there is a need for laws and regulations, the way to reduce foodborne illness is by achieving behavioural change through the 'supply chain'. This will occur via practical programs which industry has real ownership of.
- c) The consultation document is a useful document for ongoing discussion, however it lacks detail, and what will be important is the 'business plan' that implements the strategy. The Voice of Horticulture, representing 21 peak horticultural organisations, can act as a conduit of information in a two-way process.
- d) The Foodborne Illnesses Reduction Strategy detailed within the document is generally sound, although we would suggest that is very much a 'top down' strategy rather than

a 'bottom up' strategy. The occurrence of a foodborne illness occurs from the consumer and includes potentially one or more of those within the supply chain; as detailed in your flow chart on Page 5.

The strategy needs to work from the consumer upwards, not from the government agency downwards.

For instance; in the text box titled "*Achieving this vision will need...*" (on page 2) the fifth point needs to be the first point and the other points are how one goes about achieving.

e) The text box titled "*This will involve...*" details certain actions like:

- National actions
- State action
- Monitoring and surveillance
- Research
- Engagement.

Unfortunately, while there is reference to industry, supply chain and the consumer, they are not the focus that we believe they should be.

In addition, there is no reference to Local Government and their role in all of this.

f) The statistics in Figure 1 (page 4) are of concern.

What are other countries doing and/or doing better than Australia to achieve declines in *Salmonellosis* notification rates?

What can we learn from New Zealand, England and Wales in particular?

Some case studies on what has been achieved in these countries could be beneficial if made available, so that industry can promote them to their members.

g) While we appreciate that there are some particular sectors that the system focusses on; like poultry, eggs and specific sectors of horticulture, we are concerned that the focus maybe too much on those areas to the detriment of developing, implementing and expanding processes and programs in other sectors.

The paper references '*The implementation of primary production and processing standards*' but one would suspect that generally producers have limited understanding of these and their roles and responsibilities within them.

We believe that there is a need for a better communication and engagement process that involves 'grass-roots' producers.

h) The information detailed under the '*Goal*' (pages 5 and 6) and under '*The five core areas*' (pages 7 to 14) are generally all valid, but again our concern is that they are highly regulatory based and lack the necessary actions to achieve 'behavioural change'.

VoH believes the important components throughout these pages are as follows:

- '*Industry buy-in will be achieved through meaningful engagement, sector by sector*'.

- *'Reform will also be successful if it enhances industry productivity'.*
- *'Businesses achieve food safety outcomes because of their commitment to food safety rather than relying on audits or inspections...'*
- *'Standards should align with and support measures being developed by industry to improve food safety outcomes'.*
- *'... build our collective knowledge and drive innovation...'*
- *'A strong food safety culture comes from people understanding the importance of making food safe.'*
- *'Consolidate food safety information across jurisdictions and establish a targeted communication plan ...'*
- *'Targeting of guidance and education for industry and consumers'*
- *'Establish information-sharing arrangements between state and federal agencies and industry ...'*
- *'Establish a network of researchers, industry and government to more quickly maximise the value of research findings.'*
- *Establish national industry specific forums to support implementation.'*
- *'Focus on better state and local government engagement.'*
- *'... continue to raise awareness and improve understanding of appropriate food safety practices in the food service and retail sector and in home settings.'*

As you can see, these points focus on improving the 'ownership' of food safety by the industry, supply chain and the consumers as well as making the process far more user friendly.

i) We would certainly support any initiatives that:

- Upskill authorised officers to close the gap between knowledge and application; and
- Improve food safety culture in formal and informal training.

Industry Example:

One of our member organisations, the Australian Walnut Industry Association Inc, (AWIA) has and continues to deal with an issue within the area of food safety.

VoH encourage the Secretariat to have discussions with AWIA to obtain the specifics of the issue. You can contact Trevor Ranford, Industry Development Officer, Australian Walnut Industry Association Inc on 0417 809 172 or tco@walnut.net.au

In the meantime, we will offer the following overview: -

- Walnut grower/processor/retailer had previously been classified by the local Shire as a Class 3 facility under the Victorian legislation.
- During 2016/17 a long and protracted review was undertaken by the local Shire resulting in the classification being changed from Class 3 to Class 2.
- The decision was in part based on information supplied by the Victorian Department of Health and Human Services (DHHS). In the communique the DHHS determined that de-hulling and drying were 'substantial transformation' of the walnut.
- At least two other grower/processor facilities have been inspected by their local Shires and have retained their classification as Class 3. As we understand there are many other growers/processors with the same classification.

- AWIA has met with and continues to be in discussion with DHHS over the issues and as we understand presented a detailed response to DHHS which is currently being reviewed.

The areas of concern are: -

- The complexity of the Food Act and the manner in which it is interpreted.

As we understand the Food Act is a harmonised piece of national legislation, but it seems State jurisdictions interpret the Act in different ways. So, is there really true harmonisation?

- Actions of one local Shire that conflicted with the way other Shires have interpreted the legislation and then enacted it.
- Inability to access clear information, in this case around the classification classes, on the DHHS and local Shire websites. The information varies in both quantity and quality. There is no consistency in the information made available.
- The DHHS staff made assumptions on the activities of the both the individual and the industry processes without either visiting the business in question or communicating with the relevant peak industry organisation – in this case AWIA.
- Definition and use of the term ‘substantial transformation’. There appears to be no single and clear definition. The definition and use of the term needs to be clarified as part of the current Strategy process.

In the walnut case, the use of ‘substantial transformation’ highlighted a lack of understanding and information of the particular industry processes by DHHS. If the authorities are going to make rulings, then such rulings should be on the basis of full and detailed knowledge of the relevant processes. If this information is not available, then communication with the industry is essential before making any rulings.

We believe further discussion with AWIA and its representative(s), directly, is required to clarify any additional issues.

On behalf of the The Voice of Horticulture, we thank you for the work undertaken in preparing the consultation document and appreciate that there is need for strong collaboration across the complete supply chain. As an organisation we are willing to be an integral component of the process going forward.

If you require any further information or clarification, please do not hesitate to contact either Trevor Ranford (0417 809 172) or myself.

Yours faithfully,



Tania Chapman
Chair
The Voice of Horticulture.

Attachment The Members of The Voice of Horticulture



The Members of The Voice of Horticulture

Attachment 1

Members' Organisation
Australian Banana Growers Council
Australian Lychee Growers Association
Australian Mango Industry
Australian Melon Association
Australian Mushroom Growers Association
Australian Olives Association
Australian Processing Tomato Research Council
Australian Table Grape Association
Australian Walnut Industry Association
Avocado Australia Ltd
Chestnuts Australia
Citrus Australia
Custard Apples Australia
Hazelnut Growers of Australia
Nursery and Gardens Industry Australia
Onions Australia
Passionfruit Australia
Persimmon Australia Inc
Pistachio Growers Association
Raspberries and Blackberries Australia
Turf Producers Australia

