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Executive Summary

The International Fresh Produce Association Australia New Zealand (IFPA A-NZ) hosted its Second IFPA Food Safety Summit in Melbourne on 12 December 2023. The objective of the Summit was to progress the conversation around the major food safety challenges facing the Australian fresh produce sector and to seek consensus on how IFPA A-NZ can best support members in meeting their food safety goals and obligations.

The Summit brought together key personnel from across the entire Australian fresh produce supply chain as well as regulators and researchers. The program was divided into two components: plenary addresses from food safety experts, followed by workshop sessions that explored ongoing challenges impacting the industry, with the goal of identifying strategies for addressing food safety challenges.

The plenaries were designed to set the scene and covered the following topics:

- · Global food safety trends
- The regulatory approaches being implemented to manage fresh produce safety in Australia
- Support available to the industry to manage food safety challenges
- Role of root cause analysis to progress improvements in food safety.

During the Summit, the burden of foodborne illness in Australia was highlighted, with around 4.68 million cases of illness per annum, at an annual public health cost of \$2.81 billion (inflation-adjusted). The largest cost component came from lost productivity, followed by premature mortality, and hospitalisations. While eggs, poultry, and dairy products account for the majority of cases of foodborne illness, vegetables and fruit also contribute to this burden.

Speakers highlighted trends in food safety management and outlined the evolving regulatory approaches being developed to manage hazards associated with higher-risk horticultural products (berries, melons, and leafy vegetables) in Australia.

During the workshop sessions, attendees addressed a series of questions designed to explore and tease out food safety challenges affecting the fresh produce sector, identify innovations to enhance the safety of fresh produce, and to seek guidance on how IFPA A-NZ can support and assist members in improving produce safety.

The question and answer and workshop discussions highlighted the operational burden and the increased financial costs faced by small and medium-sized enterprises (SMEs) attempting to meet changing food regulations and standards. SMEs face the challenge of limited access to cost-effective, dependable, and relevant food safety expertise and technical support. Plus the increased regulatory burden is not supported by a price premium for this investment in food safety.

The attendees acknowledged the effort being expended to develop targeted food safety resources, guidance, and tools that are both accessible and practicable. However concerns remain regarding the lack of clarity on how the standards will be implemented, particularly around the potential for variable approaches to regulatory oversight by State and Territory regulators.

Key recommendations for the IFPA A-NZ moving forward include:

- Continue to support training and education initiatives – promoting coordination and collaboration to complement the work that is underway across the entire supply chain to support and generate resources for small businesses
- Be proactive, promoting and advocating for improvements in food safety – including leveraging global resources and support
- Advance the development of formal, structured food safety education – with programs tailored to the professional development needs of growers and packers and their staff
- Visit regional areas and promote increased engagement to see what the industry is doing and identify the challenges they face
- Continue to support summits, workshops, and roadshows – encouraging networking and learning opportunities.



Background

In recent years the safety of fresh produce has come under widespread consumer and regulatory scrutiny because of the rising burden of illness attributed to an increasingly broad range of horticulture products.

This came to prominence in 2018 when the Food Ministers requested Food Standards Australia New Zealand (FSANZ) to assess food safety risk management options across three higher risk horticulture sectors (berries, leafy vegetables, and melons). This was a result of a series of wellpublicised incidents involving these commodities impacting public health. The outcome was the development of Primary Production and Processing Standards covering berries, leafy vegetables, and melons, which were introduced into the Australia New Zealand Food Standards Code (the Code) in August 2022. The standards adopted an outcomesbased approach, which enables businesses some flexibility in how they comply. Hence any reference to an existing food safety scheme or program was considered to be unnecessarily prescriptive, and inconsistent with the outcomes-based approach.

A 30-month implementation period from the date of gazettal sees the Standards coming into effect in February 2025, with implementation and enforcement under the oversight of State and Territory food regulators. During the period since August 2022, considerable work has been underway to provide resources and guidance to support an efficient transition to the new standards by impacted sectors of the fresh produce industry.

The reality is that the majority of Australian fresh produce in the marketplace is safe and of good quality, with existing industry-based food safety programs going a long way to protecting public health. In the current environment, there is a rising demand for fresh produce because of its role in good nutrition. By consistently managing produce safety, producers are able to maintain consumer confidence and safeguard market access.

Growers and packers currently meeting Global Food Safety Initiative (GFSI)-benchmarked food safety schemes and the Harmonised Australian Retail Produce Scheme (HARPS) Standard are expected to meet the requirements of the new standards. Only relatively minor changes to the way these businesses document and manage produce safety will be required to meet the new regulatory requirements. Jurisdictions are exploring recognition of GFSI-benchmarked schemes as part of a broader means of demonstrating compliance with the new national standards.

However the uptake of these industry schemes is incomplete and in some cases, inconsistent across the fresh produce sector, leading to a situation where management systems to address food safety hazards may not be in place. Hence businesses not under an audited GFSI-benchmarked scheme will need to invest in systems to meet the requirements of the new standards.

For the grower, the rising costs of production and the increasing regulatory burdens are not being offset by a return for investing in food safety. This may result in growers leaving the industry or switching to crops that are not covered by the new standards.

The International Fresh Produce Association continues to actively support the fresh produce sector to meet consumer and regulatory expectations and requirements for safe and suitable foods. The hosting of this second summit was designed to further the conversation regarding industry commitment to food safety, address the challenges faced by the industry in meeting the new Standards, and to secure guidance on how IFPA can better support members in meeting food safety expectations and the requirements of the new standards.

Food Safety Summit

The Food Safety Summit was held in Melbourne on 12 December 2023. The summit involved leaders and key stakeholders from along the fresh produce supply chain (growers, processors, retailers), the regulatory and academia community, and other food safety professionals.

The program commenced with a series of keynote presentations, and a question-and-answer session where attendees engaged with the speakers. This was then followed by structured workshop session designed to amplify discussion on key food safety topics.

The goal was for attendees to identify the food safety challenges going forward, identify innovations to enhance the safety of fresh produce, and provide guidance on how IFPA A-NZ can support and assist members to improve produce safety.

Plenary Session

The program commenced with five keynote presentations covering the food safety challenges facing the fresh produce sector, the implementation of the new regulatory standards, and support being provided to address food safety challenges.

Speaker	Affiliation	Topic
Natalie Dyenson	International Fresh Produce Association	Food safety and the global fresh fruit and vegetable industry
Mark Rullo	Food Standards Australia New Zealand (FSANZ)	What's next for berries, leafy vegetables, and melons?
Jim Dodds	Safe Food Production Queensland (SFPQ)	The regulator: Supporting the introduction of standards for berries, leafy vegetables, and melons
Andreas Klieber	Fresh Produce Safety Centre Australia New Zealand	Engaging small growers in food safety – Horticulture food safety initiative
Tom Ross	University of Tasmania (UTAS)	Managing food safety of leafy green vegetables before harvest
Natalie Dyenson	International Fresh Produce Association	Approaches to improving the safety of fresh produce: the role of root cause analysis

The speakers highlighted the ongoing and evolving challenges of managing the burden of foodborne illness.

Ms Dyenson highlighted the headwinds, tailwinds, and opportunities faced by the industry moving forward. This included the effect climate change, supply chain diversification, business pressures and regulations, and emerging food safety hazards are having on confidence across the industry. However, advances in science and enhanced collaboration provide a way forward.

Importantly the focus on enhancing sustainability, the introduction of regenerative agriculture, the

implementation of new production technologies, and changing patterns of food consumption have all impacted the safety of horticultural products. Historically fresh produce has not been perceived as a major vehicle of foodborne illness, but in recent years the industry has been responsible for many highly publicised food poisoning incidents. Plus the challenges have been further exacerbated by the emergence of novel vehicles of illness such as onions, stone fruits, and even frozen vegetables. The failure to adequately recognise and address the hazards has had major impacts on the industry and consumer confidence.

Mr Rullo outlined the ongoing development and implementation of Standards and non-regulatory measures to manage hazards associated with higher-risk horticultural products. The new Primary Production and Processing Standards in the Australia New Zealand Food Standards Code will come into effect on 12 February 2025, and FSANZ is actively engaged in awareness raising, the development of guidance and support materials, hosting resources and information on their website, and collaborating with others to do more with less. Resources include fact sheets, infobites, and animated video content. Plus FSANZ is integrating information to produce Safe Horticulture Australia, a guidebook to assist readers in understanding the intent of the standards.

Mr Dodds described the role of the regulator (State and Territory Authorities) in supporting the introduction and enforcement of standards for berries, leafy vegetables, and melons. In Queensland, the aim is to implement a light-touch, a through-chain regulatory approach that strengthens food safety management, recognises industry arrangements, and enhances responsiveness. With the purpose of assisting the horticulture sector to develop and maintain its reputation and retain consumer confidence.

While the implementation of the Standards is the responsibility of each State and Territory jurisdiction, the Horticulture Industry Working Group is actively exploring regulatory models that facilitate greater jurisdictional consistency. This includes actions to support national alignment on the recognition of existing certification schemes, thereby reducing the burden on businesses certified to GFSI base schemes. SFPQ is actively contributing to this work including the development of the implementation strategy, the development of notification proformas, and management statements and templates for each commodity.

Dr Klieber provided an update on the recently commenced Hort Innovation Australia funded, 3-year Horticulture food safety initiative being undertaken by the Fresh Produce Safety Centre. The goal of the initiative is to improve food safety in the fresh produce industry by providing practical, trusted, and accessible information, guidance, and training to industry, as well as building stronger connections between researchers, regulators, and industry. Activities include a stocktake of food safety information, the creation of a Community

of Practice, the development of an industry engagement plan, outreach activities, and the drafting of an ongoing implementation model. The initiative will lead to enhanced collaboration across the industry, with a focus on promoting learnings and best practices that target small growers.

Dr Ross provided an update on a desktop project (Hort Innovation Australia VG 22008), being undertaken at the University of Tasmania. The project seeks to explore the potential management of leafy green vegetable safety prior to harvest. Specifically, whether preharvest sanitation could provide an additional hurdle to help manage possible pathogen contamination of leafy green vegetable crops in the field. The rationale being that in the field, sprays and irrigation are currently employed to address plant disease. While the importance of managing farming inputs is well understood, there remains much speculation about the potential efficacy and practicality (including cost and logistics)) of applying preharvest sanitisers. The results of the study may lead to recommendations for further research investment in pre-harvest management practices.

Ms Dyenson then took attendees through an exploration of how root cause analysis (RCA) can be effectively employed to unravel the causative factors leading to non-compliance or a food safety issue and to identify a permanent fix. The presentation explored the components of RCA, the range of tools used, and pointers for the effective execution of an analysis.

Australians enjoy a safe food supply, and fresh produce represents a highly nutritious and desirable component of a balanced diet. Nevertheless, Australia has around 4.68 million cases of foodborne illness per annum, with an annual cost of AU \$2.44 billion for illness and sequelae (Circa 2019). The majority of cases are associated with eggs, poultry, and dairy products, with a small but significant number of outbreaks linked to fresh produce. The costs reflect estimates of lost productivity, pain and suffering, and the cost of healthcare across all the different food groups. The impact of such incidents on the food industry is also significant. Costs associated with the withdrawal or recall of products, disposition of affected products, increased testing, impacts on market access and consumer confidence, and potential prosecution frequently overshadow public health costs.



Question and Answer Session

Following the presentations, the speakers engaged in a spirited question-and-answer session. This provided the opportunity for attendees to take a deeper dive into issues and explore some of the plenary topics in more detail.

The principal focus of the session was on the introduction of the new standards for berries, leafy vegetables, and melons, and the burden for growers of notification, additional documentation, and meeting the outcome-based requirements of the standards. Some attendees felt that there was already an excessive administrative burden imposed by existing schemes such as SQF, Freshcare, BRC, and Global G.A.P. Plus after 14 months, there was still a lack of clarity regarding implementation, creating tension between growers and State and Territory authorities.

Attendees voiced concerns about the perceived lack of clarity on notification and enforcement by State and Territory regulators, and that the standards will be a barrier to entry for small and medium-sized growers who aren't currently certified to an existing scheme. The need for this sector to have better access to technical knowledge, resources, expertise, and support was also highlighted.

The development of a collaborative regulatory delivery model was identified as a key approach to ensuring consistency across jurisdictions, as were the considerable efforts to develop guidance and support materials to assist growers meet the requirements of the standards. It was reported that the Horticulture Industry Working Group (under the Implementation Subcommittee for Food Regulation) meets regularly to support a consistent rollout of the Standards. It was again stressed that certification to a GFSI base-scheme will see growers meeting the requirements of the new standards in principle. Such a model procures

a calm space and ensures the industry oversight is not about a crisis, but rather a business-as-usual approach.

Progress in promoting and advancing the importance of managing food safety in the fresh produce sector was discussed, as was the absence of regulatory oversight until now. Comparisons were made with the evolution of food safety management systems in other industry sectors such as dairy and seafood.

Other questions included the relationships between food safety and biosecurity, and whether compliance and enforcement activity could be combined as a shared responsibility or at least streamlined. Given that food safety was a state-jurisdictional issue, the capacity to progress this is limited. Biosecurity is a Commonwealth responsibility and represents a major issue where animal health and plant protection are involved, and this largely doesn't apply to food safety in the horticulture industry. Likewise, strict regulatory supervision and the culture of a business determine the extent to which agricultural producers focus their attention on issues such as biosecurity, animal health, disease, and animal welfare.

Attendees highlighted the importance of industry associations, peak industry bodies, and extension officers providing support to small, medium-sized, and Tier 2 growers. Leveraging greater access to extension officers would provide hands-on support for small growers. It was noted that a major challenge will be in identifying small growers, and their propensity to change crops, meaning they may shift in and out from producing the regulated products.

Workshop Session

Working in groups, the attendees were then tasked with discussing and responding to questions on fresh produce safety and what IFPA can do to better support members. The goal was to encourage conversations about the issues and factors that are impeding the uptake and implementation of good food safety and good hygienic practices.

Topic	Responses received			
From your perspective (as a grower, packer, retailer, supply chain operator, educator, regulator, or consumer), what do you consider to be the future food safety challenges for the fresh produce sector?	 Climate change: floods, drought, weather events Introduction of new pathogens Poor water quality/lack of water Causes of contamination: heavy metals, foreign matter, use of untreated manures, etc Growers need to accept they are food producers, not farmers Lack of data 	 Education/awareness/training – lack of awareness of issues Surveillance to ensure systems are working and not just testing Working together – equal benefits for all Inflationary pressure Sustainability drivers – climate change Regulatory landscape Sabotage 		
What innovations and developments should the industry pursue in order to enhance the safety of fresh produce?	 Gathering more meaningful data and its effective use Education and training - skills, and knowledge Education of Tier 2 and 3 suppliers Technology management - water quality (source, efficiency, recycled 	 Traceability in cases of recall Al technology Choice of varietals – impacts on food safety Regulation of suppliers Date interoperability 		
What can we do better? More of? Less?	 Leverage global resources Formal education Collaboration with all in the sector Too much information – growers overwhelmed 	 Professional development programs for growers Training opportunities – more formal structure education 		
How can we improve our reach across the entire industry?	 Social and extension networks Have a care role and avoid duplication Tailor programs to fit with Australia Collaborate with industry buddies 	 Professional development options Free courses to promote food safety Partner with relevant industry associations Timing of events to take account of industry peaks 		
How do we support smaller growers?	 Find them – using incentives and motivators Associate membership – lower cost if resources are memberonly (or make free) Free membership for smaller growers TAFE – free courses e.g. microbiology 	 Go to growers – see what they are doing and what challenges they face Targeted roadshows, more interactions Offer not-for-profits complimentary tickets Target small growers Closer collaboration with Peak Industry Bodies 		

Summary

The summit brought together key industry personnel to explore the continuing challenges of managing the safety of fresh produce along the entire supply chain. The safety of food is of paramount importance to Australian consumers and their confidence is easily damaged. Consumers expect safe and suitable food.

Keynote speakers described the current state of fresh produce safety and the approaches being taken in Australia to introduce regulations on higher-risk products such as berries, leafy vegetables, and melons. Discussions highlighted the burden facing growers in meeting the new standards and ensuring a consistent roll-out

The workshop sessions delved into future food safety challenges facing the industry and advocated approaches that IFPA A-NZ may consider to support members (and the broader industry) to meet their food safety obligations. The increasing focus on sustainability was highlighted, and this compels the industry to reduce its environmental impact but not at the expense of food safety and security.

Mitigating the ongoing food safety risks involves education and outreach to all growers along the supply chain. This requires awareness of the hazards, and for each stakeholder to recognise their role and responsibilities for managing them within their sphere of influence.

The workshop participants also suggested ways to more effectively engage with growers and IFPA A-NZ will evaluate these in the coming months with a view to enhance the delivery of guidance and advice to growers, across all sectors of the industry. This will include consideration of the further development of targeted food safety resources, guidance, and tools that are accessible and practicable for all; an examination of how such materials can be more effectively disseminated; increased industry-wide conversations about organisational culture and the importance of business owners taking responsibility for their food safety programs.

Key recommendations for the IFPA A-NZ moving forward include:

- Continue to support training and education initiatives – promoting coordination and collaboration to complement the work that is underway across the entire supply chain, to support and generate resources for small businesses
- Be proactive, promoting and advocating for improvements in food safety – including leveraging global resources and support
- Advance the development of formal, structured food safety education – with programs tailored to the professional development needs of growers and packers and their staff

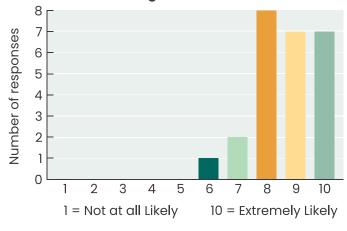
- Visit regional areas and promote increased engagement to see what the industry is doing and identify the challenges they face
- Continue to support summits, workshops, and roadshows – encouraging networking and learning opportunities.

Annex 1: Survey Form

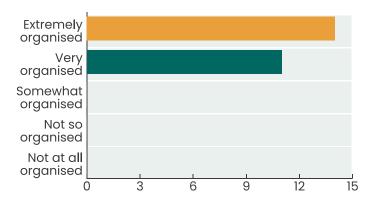
1. How	likely are you	to recomn	nend the s	ummit to	a colleagu	e?		Tick	the box 🗹
Not at all likely								Extrem	ely likely
1	2	3	4	5	6	7	8	9	10
2. How	would you ra	ite the spec	ıkers?			ı			✓
Excellent			Comments:						
	Very good								
	Good								
	Fair								
	Poor								
3. Wha	ıt is your asse	essment of	the questi	on & answ	er and wo	rkshop ses	sions?		\checkmark
	Extremely o	rganised	Comme	nts:					
	Very organi	sed							
	Somewhat o	organised							
	Not so orgai	nised							
	Not at all or	ganised							
4. How	well organis	ed was the	workshop	? Venue, c	atering, au	udio visua	l, etc		\checkmark
	Extremely o	rganised	Comme	nts:					
	Very organi	sed							
	Somewhat o	organised							
	Not so orgai	nised							
	Not at all or	ganised							
5. Ove	rall how woul	d you rate t	he Summ	it?					\checkmark
	Excellent		Comme	nts:					
	Very good								
	Good								
	Fair								
	Poor								
	ere anything mendations						did you like	e/dislike,	

Annex 2: Summary of the Food Safety Summit Survey

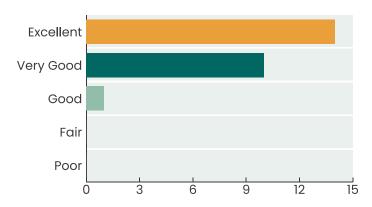
1. How likely are you to recommend the summit to a colleague?



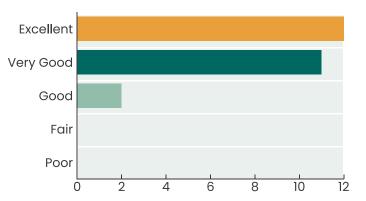
4. How well organised was the workshop? Venue, catering, audio visual, etc.



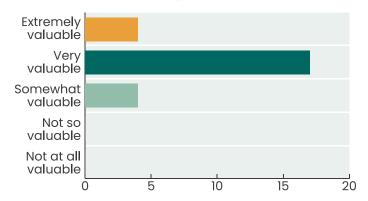
2. How would you rate the speakers?



5. Overall how would you rate the Summit?



3. What is your assessment of the question & answer and workshop sessions?



Annex 2: Summary of the Food Safety Summit Survey

Written commentary

- Consistent reference by respondents to the great/excellent speakers (7 respondents)
- Great to have Natalie Dyenson/Excellent talk (5 respondents)
- Q&A was the best part (2 respondents) good trigger for thinking

Observations

- Provide more time for the Q&A session
- Q&A dominated by certain groups
- · Absence of PIBs noted

Venue and organisation

- Top notch/great venue
- Sessions ran really well, kept to time, good length of time
- Great food
- · Well organised
- Parking was an issue (5 respondents)

Overall commentary

- Very good/fantastic/day well spent
- Thank you IFPA/Well done
- Good networking opportunity (2 respondents)

Anything else to share or recommend?

- Fantastic speakers sharing real-life experiences
- Should seek to attract small growers (3 respondents)
- Include more State regulators
- · Location:
 - Put on a roadshow go to the growers
 - Host regional events
- Host Summit in Sydney next time
- Timing December is not ideal (3 respondents)
- Provide workshop questions in advance
- Have a greater research focus
- Introduce some supply chain speakers