
Horticulture Co-design Process Final Report





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Executive Summary

This report, prepared by Safe Food Production Queensland (Safe Food), describes the process used to design a regulatory delivery framework for the horticulture industry's new primary production and processing standards. It explains the co-design approach used, including collaboration and oversight by industry and government stakeholders.

The co-design initiative aimed to develop a contemporary regulatory delivery framework (Framework) and provide an opportunity for key stakeholders to engage and provide input. The objective was to co-design a Framework that aligns with national decisions on the implementation of the new standards, meets the Queensland Government's Regulator Performance Framework, and encourages best practice in the horticulture supply chain.

To design the Framework, a Steering Committee was established supported by a Horticulture Industry Technical Advisory Group (HITAG) and a Cross-Agency Reference Group (CARG). The Steering Committee considered how the national standards could best be implemented in Queensland, assessed industry implications and oversaw the co-design process. The HITAG, primarily consisting of industry representatives, offered sector-specific feedback to the Steering Committee. The CARG's role was to advise how existing Queensland government programs, initiatives and regulatory arrangements could support implementation of the Framework.

A key aspect of the co-design process was developing a model for recognising industry certification programs, in particular those benchmarked under the Global Food Safety Initiative (GFSI).

The groups were presented with four options for Safe Food recognition of these programs and accreditation. The proposed option 3, outlined in the report below, provides the best way to meet Safe Food's regulatory obligations while recognising the significant work of the horticulture industry and its peak bodies. It provides a pathway for the industry that is risk and evidence-based and reduces the regulatory burden for GFSI-benchmarked businesses. In addition, it enhances confidence at the farm level, allows a more proactive response to food safety risks and provides transparency regarding Safe Food's activities. Further details and potential benefits are outlined in this report.

The formal co-design collaboration concluded in June 2024 and its findings and recommendations are detailed in this report. Safe Food recognises the significant work of the contributors to this initiative. It acknowledges the ongoing concerns raised by industry representatives regarding aspects of Safe Food's approach and the strong opposition expressed to certain aspects of the Framework. It reinforces the importance of ensuring a common understanding of the way regulation works and its benefits for the industry and Queensland community. Effective implementation of the horticulture standards through the proposed Framework will involve ongoing engagement and communication with all stakeholders. Safe Food is committed to continuing consultation with stakeholders as the agency works to implement the nationally agreed standards.



Purpose

This report describes the process used to design a regulatory delivery framework (Framework) for the horticulture industry's new primary production and processing standards. The report explains the co-design approach used, including collaboration and oversight by industry and government stakeholders. It highlights the issues identified and explored during the process and summarises the positions of key players and options considered. The report outlines the proposed Framework and the next steps for implementation.

Context

In 2022, Food Standards Australia New Zealand (FSANZ) developed new national standards for primary production and processing (PPP) in the horticultural industry. The new standards aim to reduce microbial hazards along the 'farm to fork' supply chain by strengthening food safety management on-farm and during initial processing.

The standards are due to come into effect on 12 February 2025. They were gazetted and incorporated into chapter 4 of the Australia New Zealand Food Standards Code ([Food Standards Code legislation | Food Standards Australia New Zealand](#))

Standard 4.2.7 PPP Standard for Berries

- Standard 4.2.8 PPP Standard for Leafy Vegetables
- Standard 4.2.9 PPP Standard for Melons

These standards will be incorporated into Queensland's Food Production (Safety) Regulation 2014 (FPS Regulation) and other elements of Queensland's food regulatory system as necessary. Together with the existing PPP standard for seed sprouts, the new standards will be a central element of Queensland's modernised Horticulture Food Safety Scheme.

Safe Food Production Queensland

Safe Food Production Queensland (Safe Food) is the body responsible for regulating the PPP of meat, eggs, dairy, seafood and horticulture in Queensland, including activities under Chapter 4 of the Food Standards Code (activities under Chapter 3 of the code are primarily the responsibility of local government). Safe Food undertakes compliance activities, grants accreditations and monitors businesses to meet its two overarching regulatory objectives:

1. Verify that melon, leafy vegetable and berry industry practices meet food safety requirements.
2. Maintain a collaborative regulatory environment that fosters industry and regulatory best practice.

Together, these objectives have been designed to reflect current and future needs, including:

- objectives of the bi-national food regulation system
- Queensland Government Regulator Performance Framework
- increasing interrelatedness of supply chains and regulatory systems
- need to balance social, economic and environmental outcomes.

The second objective is designed to move Safe Food and accreditation holders beyond a traditional regulatory approach to one that promotes sustained compliance, including during times of crisis or change. Safe Food has developed an overarching Regulatory Delivery Plan



and operating model to inform how the objectives will be met, monitored, and reported. In addition, it is drafting an implementation plan for the rollout of the Framework.

The co-design process

Throughout 2024, Safe Food led a co-design process to develop a framework for implementing the new standards across the state's horticulture industry.

Governance

Safe Food established a collaborative governance model, with all key stakeholders' input, perspectives and commitment, to ensure a contemporary regulatory approach. A Steering Committee was formed consisting of representatives from key industry and government bodies, tasked with designing the Framework. The new Framework should support a best practice regulatory approach to effectively manage food safety risks in the horticulture supply chain, while minimising the impost on the industry and government. The Framework should support Safe Food to meet its responsibility of verifying compliance with the national standards and support accredited businesses to meet their responsibility of ensuring primary produce is safe for consumption.

The Steering Committee's core deliverable was to design a framework that:

- drives best practice through the whole supply chain within Queensland
- aligns with national decisions and agreements regarding the implementation of the standards
- aligns with the Queensland Government's Regulator Performance Framework
- incorporates key indicators to measure the effectiveness of the new framework (success measurement).

The Steering Committee focused on how the national standards can be implemented effectively in Queensland while balancing minimal impost to industry and the legislated need for enhanced food safety. Importantly, the Framework's design needed to recognise the significant systems already developed and implemented by industry and Safe Food's existing regulatory and non-regulatory tools. The Steering Committee considered approaches such as baselines, information-sharing opportunities, compliance pathways and intersection with local government activities. The Steering Committee also provided advice on industry engagement opportunities.

The Steering Committee was supported by two groups: a Horticulture Industry Technical Advisory Group (HITAG) and a Cross-Agency Reference Group (CARG):

- The HITAG, comprising mainly industry representatives, offered feedback on the three sectors covered by the new horticulture standards: melons, leafy vegetables and berries. The group was also consulted on regulatory options, such as the proposed recognition model for third-party certification programs.
- The CARG, comprising Queensland Government agency representatives and chaired by the Office of Productivity and Red Tape Reduction, was responsible for considering and reporting to the Steering Committee on the feasibility of any potential legislative changes. The Group also gave advice about existing government programs that businesses may access and existing regulatory arrangements that could be adjusted to support implementation.



All three groups were supported by project officers, a secretariat and Safe Food management team members. The terms of reference of each group are in Appendix 1. HITAG and CARG representation is listed in Appendix 2.

On-site engagement

A key part of the co-design process was engaging with industry, including individual producers. Project officers visited farms in areas such as Gympie, Sunshine Coast and Lockyer Valley. They also visited agricultural schools, engaged with small growers and attended industry meetings, including HortConnection, Lockyer Valley Expo, Strawberries Queensland meetings and the Melons Australia field day in Burdekin. The Safe Food team also engaged directly with the Global Food Safety Initiative (GFSI) team and certification bodies.

The engagement activities highlighted the desire of many producers to show that they are 'doing the right thing'. The producers were very proud of their businesses and produce. They were happy to show Safe Food through their production systems and share information on how they manage food safety risks.

Throughout the co-design process, Safe Food reached out to Steering Committee members seeking opportunities to engage and learn more about the industry. This included visits to two processing facilities operated by committee members.

Issues considered

The Steering Committee and co-design team considered a range of issues and options in developing the Framework, which were informed by industry views and experience. The issues (explored in detail below) included:

- Legislative basis
- Best practice
- Regulatory responsibilities
- Accreditation
- Risk prioritisation
- Compliance
- Proportionate and risk-based surveillance
- Recognition of GFSI programs
- Service Level Agreements and information-sharing arrangements with GFSI-certified program owners
- Accountability and measurement

Legislative basis

In Queensland, the regulation of food safety is governed by two distinct but related pieces of legislation: the *Food Production (Safety) Act 2000* (FPS Act) and the *Food Act 2006* (Food Act). The FPS Act specifically targets primary production and processing, ensuring the safety of primary produce through the implementation of regulatory food safety schemes. The Food Act encompasses a broader scope, covering food-related activities. Together, the two Acts



address potential regulatory gaps, however the demarcation is not always clear to businesses and industry remains concerned about the potential for dual licensing.

Best practice

The Steering Committee considered Safe Food's objective of fostering best practice in food safety, particularly the role of regulation in encouraging best practice in the horticulture industry. Some members of the Steering Committee considered that such a goal is unrealistic and fails to recognise that most of the industry already follows GFSI benchmarked programs that promote best practices. The [GFSI](#) is a 'coalition of action' from [the Consumer Goods Forum](#) (CGF), bringing together food retailers, manufacturers and an extended food safety community to oversee third-party food safety standards for food business operators globally. They have developed a set of benchmarking requirements that a certification program must meet to obtain GFSI recognition, and criteria that a program must follow to gain approval to operate under the GFSI banner. It is important to note that while the FSANZ Consultation Regulation Impact Statement (P1052 – Primary Production and Processing Requirements for Horticulture (Berries, Leafy Vegetables and Melons) indicated that prescribed GFSI control measures align well with the risks identified in the FSANZ risk assessment, they did not assess the effectiveness of GFSI requirements.

Industry representatives emphasised that the sector's actual level of current compliance should not be underestimated. There is a widespread belief that regulatory measures should encourage rather than dictate best practices.

The co-design team worked to ensure the new Framework builds upon and enhances existing best practices, acknowledging the industry's historical progress. Stakeholders stressed that 'best practice' should be clearly defined and aligned with GFSI benchmarked programs. Further, the Framework should emphasise how it supports and complements existing benchmarks.

Regulatory responsibilities

Safe Food facilitated a process for clarifying regulatory responsibilities relating to production and processing activities. Under the proposed approach, all primary production activities will be regulated by Safe Food. Safe Food's functions will not include processing activities that fall under Chapter 3 requirements of the Food Standards Code, such as food manufacturing or retailing activities, which are licensed by local government. Producers that also process on the same site may be accredited by Safe Food (for production) and licensed by local government (for processing).

Businesses undertaking primary processing activities and performing one or more manufacturing or retailing activities covered by Chapter 3 will not require accreditation with Safe Food due to their licensing requirements under the Food Act. This approach ensures that only one regulator accredits or licenses businesses undertaking processing activities under the PPP standard and food manufacturing or retailing activities covered by Chapter 3. This will streamline regulatory oversight and reduce the potential for regulatory duplication. This approach means that businesses need to meet requirements in both Chapter 3 and Chapter 4, depending on their different activities. For example, they will need to meet PPP requirements for growing, harvesting, washing and trimming harvested produce, and then meet Chapter 3 requirements for chopping produce and mixing it with other ingredients (see table below).



Activity	Chapter 1 ⁱ	Chapter 2 ⁱⁱ	Chapter 3 ⁱⁱⁱ	Chapter 4
Primary production	QH	QH	SFPQ ^{iv} LG & QH ^v	SFPQ
Food manufacturing (general)	QH	QH	LG & QH	N/A
Food manufacturing (primary processing)	QH	QH	SFPQ ^{vi}	SFPQ
Food service	QH	QH	LG & QH	N/A
Retail (general)	QH	QH	LG & QH	N/A
Retail (meat)	QH	QH	SFPQ	SFPQ
QH: Queensland Health	ⁱ E.g. labelling, micro limits, MRL requirements (section 39, Food Act) ⁱⁱ Composition requirements (section 39, Food Act) ⁱⁱⁱ Food safety standards ^{iv} As applicable for businesses undertaking an activity captured by Chapter 4 standard ^v Primary production activities are considered a food business (section 13, Food Act) ^{vi} As applicable for businesses undertaking an activity captured by Chapter 4 standard			
LG: Local government				
SFPQ: Safe Food Production Queensland				

Under this approach, the Framework will exclude businesses that sell or supply directly to consumers, such as on-farm and farm gate sales (in line with the new standards). Industry feedback questioned why these businesses are exempt and argued for a common approach to food safety to ensure a level playing field, as direct-to-consumer sales do not necessarily minimise food safety risks.

It is acknowledged that the range of regulatory activities, involving Safe Food, the Department of Agriculture and Fisheries, Queensland Health and local government, may be difficult to communicate to stakeholders.

Accreditation

Generally, requirements for the accreditation of PPP activities are prescribed under the FPS Regulation and are determined by two factors:

- requirements of national standards adopted by the scheme
- assessment of the industry supply chain to determine the most appropriate points to apply regulatory interventions using Safe Food’s food safety baseline methodology.

Not all activities captured by a food safety scheme require Safe Food accreditation. For the horticulture industry, three categories of accreditation are proposed:

- **Producers** will require accreditation if they grow and harvest leafy vegetables, berries and/or melons, except where the product is only supplied directly to consumers at the site of the business. Producers can wash, sanitise, trim, store, mix, sort, combine, pack and transport their own produce only.
- **Producers under a preferred supplier arrangement (PSA)** will not require Safe Food accreditation if they supply their produce exclusively to one processor and are accredited under a PSA. Some industry stakeholders raised concerns about the PSA concept, its ability to ensure safe food production and whether it is potentially anti-competitive. The Steering Committee raised concerns that PSA could create loopholes for some producers to avoid regulation.



- **Processors** will require accreditation if they process melons, berries or leafy vegetables, as defined under the relevant standard. Processors can perform activities such as washing, trimming, sorting, sanitising, storing, combining harvested produce, packing and transporting. They can process their own produce and produce grown by other growers.

A complete list of activities requiring accreditation can be found in Appendix 3.

Berry producers and processors

Berry producers and processors will require accreditation; however, the application process is a modified version of a complete Safe Food accreditation. To be issued an accreditation, they will complete an online notification proforma advising Safe Food of their operations (as per the standard). While the Steering Committee generally welcomed the berry grower notification system, members called for clarity on its practical implementation and any associated charges for berry growers.

Other producers and processors

For other producers and processors, accreditations will be acquired through a digital application and assessment process. Safe Food will collect a range of operational and supporting information from each business, which will be used to assign a legislated risk category (low, medium or high risk) based on the inherent food safety risks associated with their operations.

Industry stakeholders, including those under a GFSI-benchmarked program and berry producers/processors, raised concerns about the necessity of accreditation and the payment of accreditation fees. Growers of melons and leafy vegetables who operate under a GFSI-benchmarked program will not need to complete a management statement as part of the accreditation process. In addition, if a non-certified business already has a food safety program that meets all required elements, Safe Food will assess and accept it if compliant. In such cases, the business may also be exempt from completing a management statement.

As noted earlier in the report, businesses engaged in primary processing activities that conduct additional processing activities subject to Chapter 3 requirements do not need accreditation from Safe Food for processing. This is because they are already licensed under the Food Act. The Steering Committee raised concerns about the intersection of Chapter 3 and Chapter 4 of the Food Standards Code, in particular uncertainty about when accreditation may be required and whether it accurately reflects established practices and roles within the industry's supply chain. While Safe Food acknowledged these concerns, they sit outside the scope of the co-design process.

Cost recovery

The Steering Committee heard that a cost-recovery fee structure may be perceived as an additional burden on growers. Members expressed the view that the current approach may not be suitable for horticultural industries and the proposed 'fee-for-service' model creates significant uncertainty. The Steering Committee also called for greater consideration for businesses operating across state/territory borders and how the cumulative regulatory and cost burdens will be addressed and mitigated.

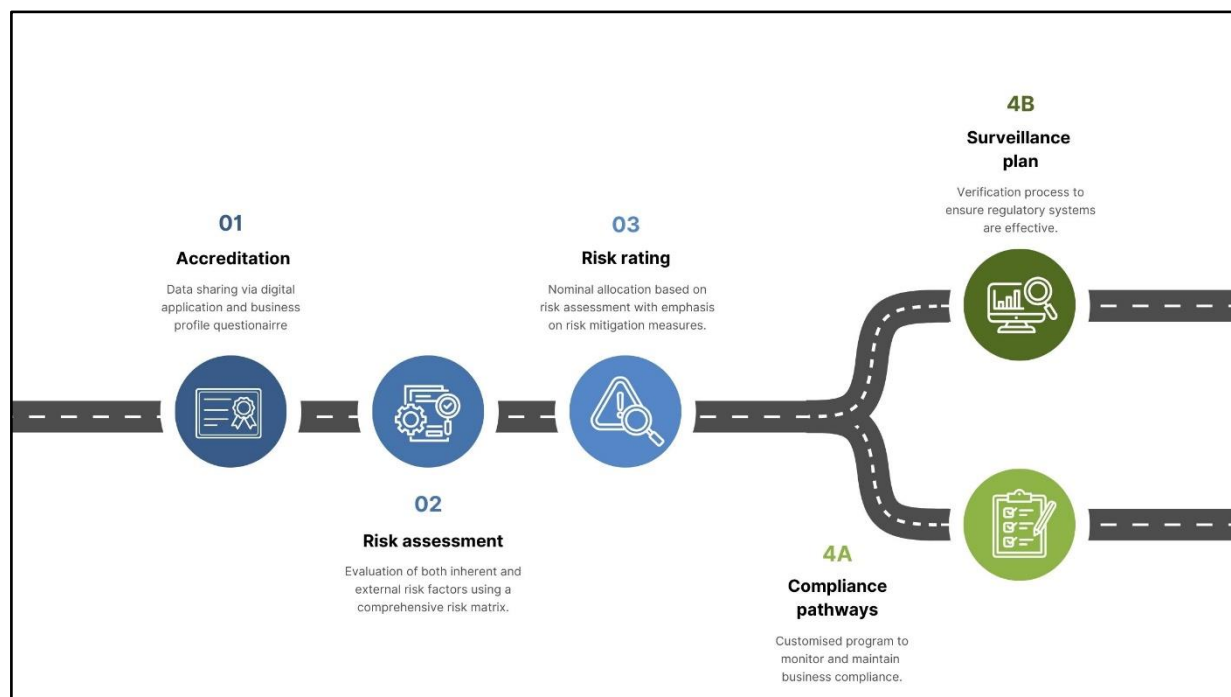
Risk prioritisation

Safe Food will apply its new risk prioritisation model to all accredited businesses and accreditation applications. This model is consistent with Safe Food's broader regulatory approach and central to the new Framework. It will form a more responsive and agile

regulatory approach and enable more targeted use of resources to inform accreditation decisions.

Once an activity is found to require accreditation and an application is made, Safe Food will apply the risk prioritisation model to assess risks and categorise businesses with a risk rating. This risk assessment will consider internal and external factors, including business profile information, regulatory risk categories, verification tools (such as audit reports and assessments), compliance tools (such as notifications and complaints), surveillance and research activities, response activities and information from other government agencies. The risk classification will also consider risk awareness and commitment to risk mitigation.

The figure below represents the draft risk prioritisation model as a key component of the accreditation process:



Industry stakeholders generally supported the proposal of a proportionate, risk-based approach but suggested that risk should be based on participation in a GFSI-benchmarked program and the size of the enterprise. Clarification is also needed on where berries fit into the model. Freshcare provided the National Implementation Working Group with examples of data sets they are willing to share with each jurisdiction as part of the recognition model, and their data-sharing capabilities satisfy Safe Food's requirements. Other certification programs, such as BRCGS and Global GAP, have also indicated their willingness to share the required information. The CARG supported the risk prioritisation approach.

Steering Committee stakeholders raised concerns about the application process and verification activities, particularly how data would be used and shared. They identified a potential disparity between the data collected and the data required. For example, stakeholders felt the requested business profile information may extend beyond food safety needs and would impose an excessive burden on producers.

The proposed horticulture Framework will build on Safe Food's existing holistic approach to assessing food safety, which takes a whole-of-production chain view to prevent, identify, isolate, control, maintain and trace risks. The Framework will allow horticulture accreditation to



be categorised based on sector, activity, location and business performance. However, the full capability of the Framework may not be realised for three to five years.

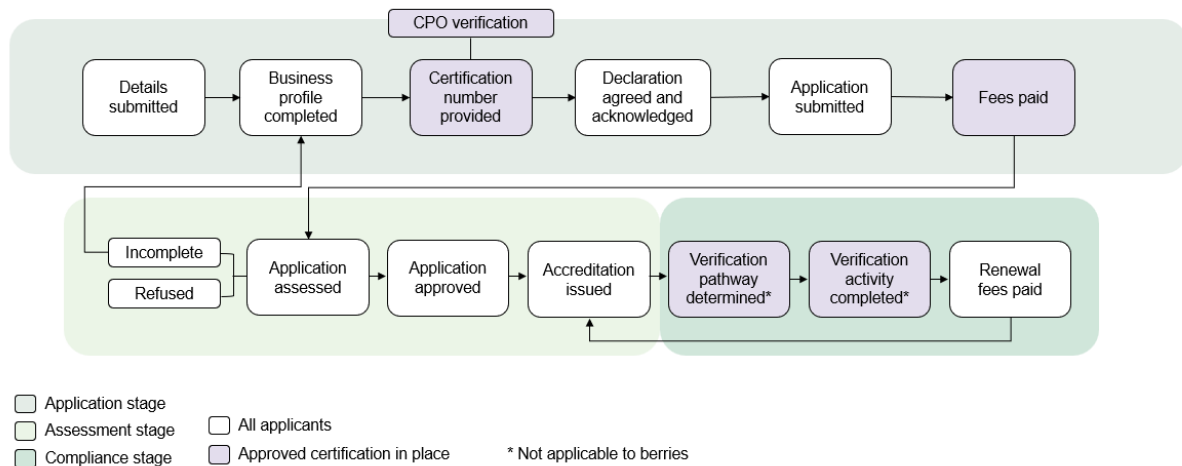
Compliance

Under the new Framework, each accredited business will be allocated a compliance pathway based on their assessed risk categorisation. Compliance pathways will be tiered, allowing businesses to move between levels as their commitment to compliance improves. This ensures that regulatory intervention is proportionate to business risk and activity. Businesses with lower risk categorisation will be allocated to lower-tiered compliance pathways, with a lighter regulatory touch. Businesses with higher risk categorisation will be assigned a higher-tiered compliance pathway and a higher level of food safety oversight. This is intended to incentivise compliance and encourage best practices.

Over time, the number of businesses with lower-tiered compliance pathways should increase, allowing the industry to operate more independently and enabling Safe Food to prioritise resources in higher-risk areas. This concept of incentivised compliance and outcome-based regulation is supported by behavioural and economic science and research.

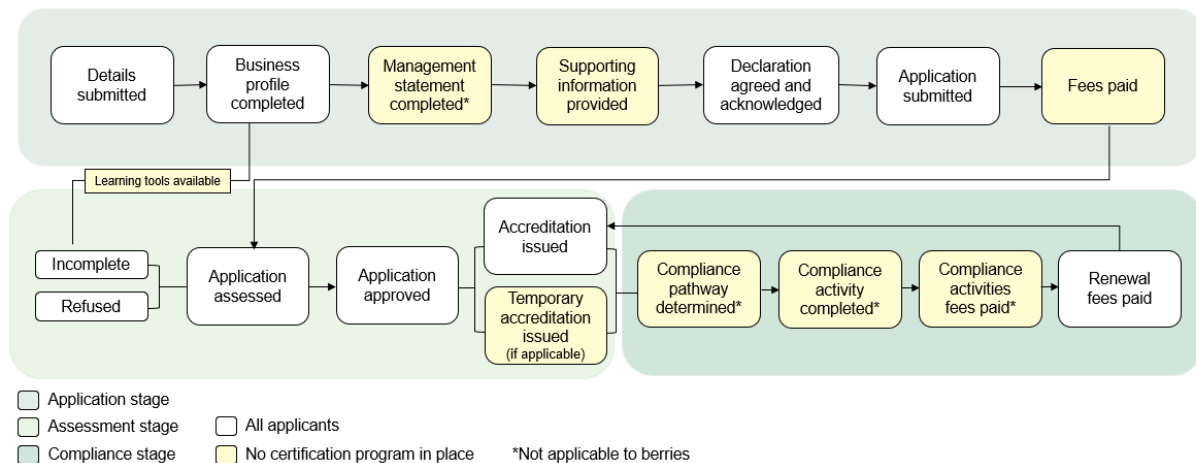
Two compliance pathways are outlined below (in addition, a compliance pathway for GFSI-benchmarked businesses is discussed later in this report).

Businesses with an approved certification program





Businesses without an approved certification program



The industry stressed that most industry production already adheres to GFSI-benchmarked programs that promote best practice. Therefore, Safe Food may incorrectly assume that the industry's compliance level is lower than it is. Concern was expressed regarding witness audits, as these are already incorporated into GFSI benchmarking. GFSI recognition is covered in a later section.

Proportionate and risk-based surveillance

Each calendar year, Safe Food will develop a compliance plan for food safety, supported by a surveillance plan. The compliance plan will focus on activities relating to each business's compliance pathway. The surveillance plan will:

- validate the effectiveness of food safety controls managed by Safe Food
- identify emerging, unmanaged food safety risks within the supply chain.

Surveillance plans will include continuous monitoring activities across a broad sweep of activities and businesses as well as verification activities—targeted assessments to validate compliance with specific standards. This is a shift from a more traditional audit-based monitoring approach.

Industry feedback noted a lack of clarity on the difference between verification and recognition at both the system and business levels. In addition, questions persist regarding who will cover the costs of verification methods, particularly the witness or shadow audits, and the extent of risk mitigation. Presently, industry program audits impose a minimum charge on growers for 16 hours (equivalent to two days of work). The introduction of shadow audits could lengthen this process, leading to additional financial burdens for growers.

Safe Food remains committed to flexibility in its approach, refining compliance and surveillance tools and developing new ones based on industry requirements. A list of proposed tools is included in Appendix 4.



Recognition of GFSI programs

The National Horticulture Implementation Working Group concluded that GFSI-benchmarked programs are equivalent to PPP standards and should be recognised in the new horticulture regulation. While all states and territories agreed to recognise these programs, each state will implement appropriate verification activities. While there are nationally agreed verification tools (see Appendix 4), it is up to each state to determine the extent of verification and which tools to use.

Safe Food is committed to establishing a pathway for recognising programs that achieve GFSI benchmarking to validate regulatory compliance. The HITAG developed recognition options that were discussed at a joint workshop with Steering Committee members. Feedback from the workshop was used to refine the options and consider regulatory and non-regulatory tools to monitor industry programs. The four possible approaches to recognising GFSI-benchmarked certification are:

- 1. No GFSI recognition—full regulatory measures:** A single regulatory framework across the horticultural sector, including GFSI-benchmarked programs, consisting of audits by Safe Food-approved auditors, spot checks and surveillance activities. Activities would include accreditation, annual monitoring and verification of auditors and businesses. This approach would be resource-intensive and reactive, relying on point-in-time food safety audits that may identify areas of food safety concern that have occurred in the past. It would also involve the duplication of food safety audits by industry and government, which would lead to higher administrative costs.
- 2. Partial GFSI recognition—limited regulatory and non-regulatory measures:** Activities include accreditation, service level agreements (SLAs) with certification program owners (CPOs) and data sharing. This would reduce the regulatory burden but rely heavily on the data maturity and data sharing arrangements of the CPOs and may limit the visibility of certification shortcomings.
- 3. Partial GFSI recognition—greater regulatory and non-regulatory measures:** A combination of regulatory and non-regulatory measures with data-sharing arrangements and light-touch verification. Activities would include accreditation, SLAs, spot checks and surveillance activities. It would leverage GFSI-benchmarked programs and reduce costs but allow proactive regulatory intervention.
- 4. Full GFSI recognition—non-regulatory measures only:** Relies solely on non-regulatory measures like GFSI-benchmarked programs. Activities include accreditation and incident response. This approach would reduce regulatory oversight, shift the focus to reactive measures and potentially lower administrative costs, but it would limit intervention options and may leave gaps in food safety management. It would be a purely reactive approach that may not meet Safe Food's regulatory responsibility of ensuring food safety outcomes.

Safe Food's preferred model is option 3 above, combining data sharing and regulatory verification. It would enable Safe Food to fulfil its regulatory obligations under the FPS Act. It should be noted that the effectiveness of industry programs (such as GFSI) was not assessed by FSANZ, which did not formally endorse any industry programs during the development of the new standards. As the relationship between government and industry matures, meaningful data is exchanged and the required outcomes of the regulations are achieved, it is possible that an approach similar to option 2 could be considered.

The potential benefits of option 3 are set out below:



DIRECT STAKEHOLDER BENEFITS	
Program owners	Enhances program credibility through state-regulated recognition.
Certified businesses	Boosts consumer confidence and market presence, supports brand reputation, facilitates exports and mitigates financial and reputational risks through proactive incident response.
Industry	Promotes continuous improvement, innovation and sustainability, with early warning systems for emerging issues.
Public	Ensures food safety, enhances public health, reduces healthcare costs, and provides timely incident response, maintaining food supply chain integrity.
KEY BENEFITS	
Efficiency	Balances regulatory oversight and non-regulatory measures, reducing administrative burdens and costs compared to a fully regulated model.
Duplication	Minimises duplication through strategic data sharing and verification, ensuring regulatory efforts complement existing measures.
Food safety outcomes	High assurance of food safety through combined data sharing and verification, ensuring compliance with FSANZ PPP standards and FPS regulations.
Data sharing	Enhances transparency and collaboration, enabling informed risk-based decisions and reliable data quality.
Verification	Ensures data accuracy and compliance through audits, assessments and technology, enhancing stakeholder trust.
Impact on Safe Food	Supports statutory obligations, resource efficiency and continuous improvement in food safety standards and compliance.

Industry feedback

At this stage, industry representatives on the Steering Committee do not support option 3 (partial GFSI recognition). Their concerns about the level of complexity and categorisation of programs and CPOs have been partially addressed in the revised options. However, there is still a concern about the administrative burden of information-sharing arrangements and the lack of trust in the industry. Industry representatives claim the option lacks details on costs, execution, stakeholder impact and integration with existing compliance frameworks. The financial implications of the cost-recovery model remain unclear, and there are concerns that farmers under GFSI-benchmarked programs might end up subsidising non-certified farms. The Steering Committee also highlighted some terminology issues that will be addressed in the final documentation to ensure consistency with standard industry terminology.

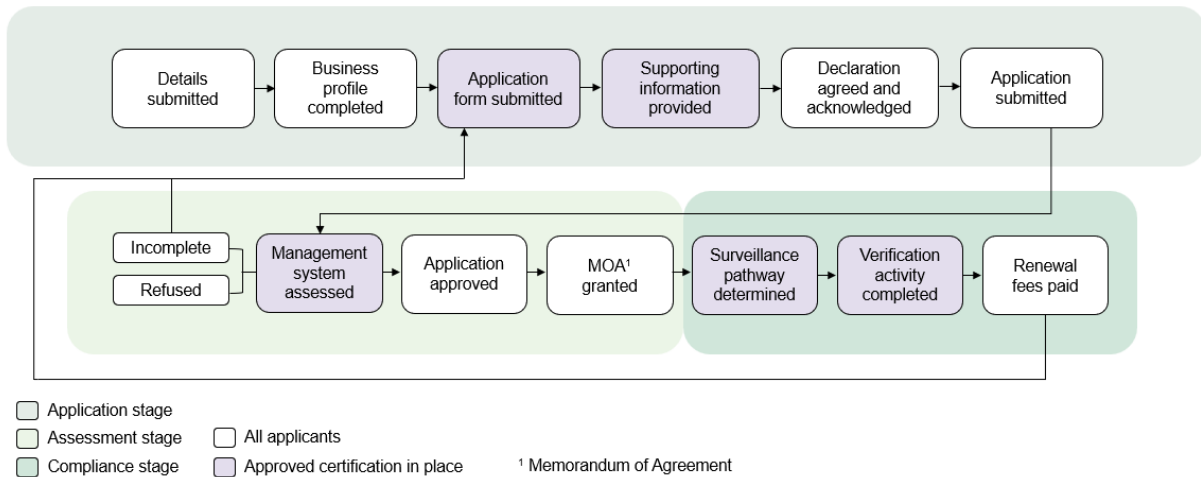
Industry showed early support for the Implementation Sub-Committee for Food Regulation (ISFR) Horticulture Implementation Working Group (HIWG) developed recognition model, pending final details. There was also a suggestion of incentivising growers to join industry certification programs by lowering or dismissing accreditation fees for program members. The



aim would be to improve food safety practices among smaller growers identified as the main risk source, noting that this proposal lies outside the scope of the Framework project.

Other industry certification programs

All industry certification program owners will have the opportunity to enter into service-level agreements with Safe Food to participate in the recognition model. The diagram below illustrates this compliance pathway. In this model, Safe Food will assess any industry program for compliance with standards and regulatory agreements.



Businesses operating under a GFSI-benchmarked program will undergo a simplified accreditation process due to the stringent compliance requirements already in place. To assist in assessing compliance with recognition criteria, Safe Food has developed a recognition criteria table (see Appendix 5). This document served as the foundation for the nationally agreed recognition proforma developed by the HIWG and was adapted to reflect industry comments.

Service Level Agreements

A signed Service Level Agreement (SLA) or Memorandum of Understanding is an agreement between Safe Food and a Certified Program Owner (CPO), and a declaration completed by individual certified businesses as part of their application for accreditation. The SLA defines the obligations of program owners concerning governance, operations, procedures, and reporting prerequisites. Additionally, it will clearly outline Safe Food's authority to conduct verification activities and the rights to amend, suspend or cancel the SLA should it fail to meet the agreed performance criteria.

Data sharing arrangements with the CPO form part of the SLA and define the business information and data points that provide Safe Food with evidence of compliance and appropriate food safety measures. The SLA also clearly sets out how Safe Food, as the regulatory agency, would react consistently and reasonably when the data indicates a risk to food safety. Further information regarding SLAs and data sharing is outlined in Appendix 5.

Accountability and performance measurement

Safe Food will release a regulatory delivery plan (RDP) detailing the agency's priorities and regulatory activities for a specified three-year period, encompassing the compliance plan and surveillance plan mentioned earlier in this report. This rolling RDP, developed with stakeholder input and subject to annual review, aims to foster ongoing industry engagement and



collaboration. It will include performance measures for individual businesses and for the overall system.

Success will be measured against key performance indicators (KPIs) that assess Safe Food’s performance against impacts, outcomes, outputs and resource efficiency. Examples of potential indicators are:

	Example indicators
Regulation (measuring impacts)	<ul style="list-style-type: none"> - Decreasing incidents and complaints - Decreasing regulatory impost - Increasing current and emerging risk awareness - Increasing industry reputation - Safe Food is a trusted authority in food safety matters
Behaviour (measuring outcomes)	<ul style="list-style-type: none"> - Distribution of risk profiles - Compliance rates and trends - Number of businesses in the lowest compliance pathway - Rate of progression to lower compliance pathways
Activities (measuring outputs)	<ul style="list-style-type: none"> - Number of accreditations - Number of audits - Guidance on emerging risks - Number of businesses assigned to each compliance pathway
Resource efficiency (measuring inputs)	<ul style="list-style-type: none"> - Number of FTEs - Budget

Results from the RDP will be documented in Safe Food’s Annual Report and Regulator Performance Report, with updates communicated to accreditation holders through routine industry consultations. Additionally, Safe Food is committed to upholding the Queensland Government’s Regulator Model Practices:

- Ensure regulatory activity is proportionate to risk and minimises unnecessary burden.
- Consult and engage meaningfully with stakeholders.
- Provide appropriate information and support to assist compliance.
- Commit to continuous improvement.
- Be transparent and accountable in actions.

These practices align with national and international principles, enhancing regulatory effectiveness and reducing burdens for all involved. They also provide the basis for measuring the success of Safe Food’s second regulatory objective of achieving best practice. The RDP received general support at the Steering Committee, but specific details and clarification, including clear KPIs, were requested. Members called for greater transparency and engagement by Safe Food. The CARG also supported the RDP.



General industry feedback

The horticulture peak industry bodies raised broad concerns about the co-design process for the proposed Framework. Following the FSANZ national standard setting process, industry stakeholders initially understood that producers with GFSI-benchmarked food safety certifications (such as Freshcare, SQF and GlobalGAP) would meet the new standards with little to no change or new requirements for businesses. While the industry remains committed to enhancing food safety, there is a strong call for a framework that effectively recognises existing industry programs and addresses non-compliance issues.

Concerns were also raised about the proposed proportionate risk-based approach, in particular the burden imposed by business profile information requirements, which stakeholders argue extend beyond the scope of food safety. Industry representatives proposed that growers with GFSI-benchmarked programs should automatically be recognised as low-risk, with corresponding low fees and minimal administrative burden.

Other suggestions voiced by industry members include:

- comprehensive risk assessment for non-GFSI-benchmarked growers, without loopholes
- clear expectations and support for berry growers, particularly those not on a GFSI-benchmarked program.

Some industry advocates proposed funding to support a cost-neutral system for the initial two years to build trust and refine the regulatory framework, while others argue that funding should prioritise the design of a cost-effective scheme from the outset. These discussions underscore the industry's commitment to collaborating on a regulatory model that enhances food safety without unnecessarily burdening producers.

Representatives of GFSI who contributed to the Steering committee did not support replacing regulatory interventions with third-party certification under GFSI-benchmarked programs. They expressed the view that third-party certification should serve as a valuable tool for regulators to incorporate into their risk-based prioritisation strategies.

Implementation plan

The standards implementation project has five stages:

1. Phase 1 – Project preparations (to September 2023)
2. Phase 2 – Framework co-design (September to December 2023)
3. Phase 3 – Framework development (December 2023 to June 2024)
4. Phase 4 – Implementation (June 2024 to December 2024)
5. Phase 5 – Roll-out (December 2024 to June 2025)

With the completion of phase 3, Safe Food is implementing the new Framework, including the new standards and regulations, in close collaboration with regulatory partners. This includes finalising the online application portal, developing supporting materials, and creating detailed audit checklists and the regulatory toolkit. Safe Food's industry engagement strategy includes attending and participating in public markets, expos, and events and communicating through established industry publications, news outlets, and Safe Food's own digital newsletter.



Safe Food prioritises networking and site visits, offering optional email updates and providing simple, digital onboarding resources. Dedicated help hotlines, email support, eLearning tools, and guidance documents are available to help interpret legislation and regulatory requirements. Safe Food is also planning to engage with certification program owners on the possibility of service-level agreements to support the implementation of the new standards.

Safe Food's proposed plan for the first 12 months may include elements of educating, enrolling, implementing and enforcing the new standards.

Conclusion

Through the co-design process, Safe Food and its diverse stakeholders have laid the foundation for implementing a modern, proactive food safety scheme for the horticulture sector. This initiative not only aims to enhance food safety across the melon, leafy vegetables, and berry industries but also sets a precedent for adaptive regulation that prioritises industry best practices and public health.

Input and feedback from industry representatives (through the governance groups and industry engagement activities) were critical to the development of the Framework. However, ongoing concerns were raised during the process and strong opposition was expressed to certain aspects of the proposal. There is a need to raise awareness of the new standards and existing regulatory systems, especially as many businesses see themselves as currently regulated under an industry program. While stakeholders supported businesses achieving best practice, there was a reluctance to share business information with Safe Food and a perception that the data may be more than that needed to support compliance. There was also a strong view amongst some stakeholders that regulation cannot drive best practice.

Safe Food acknowledges that some areas remain contentious. However, varying Safe Food's legislative obligation to monitor compliance, its intersection with the Food Act and its cost recovery model are beyond the scope of the Framework project and Safe Food's remit and would require broader government consideration.

While not all elements of the proposed Framework are supported by industry, the co-design process has provided Safe Food with a better understanding of the issues facing the sector and industry behaviours regarding food safety management. Safe Food will continue to engage industry stakeholders throughout the implementation of the Framework to maximise the effectiveness of the new standards and minimise costs and imposition on businesses.

This report and the proposed recognition model will be shared with the National Implementation Working Group for their reference.



Appendix 1 – Terms of Reference for the Steering Committee, Cross-Agency Reference Group (CARG) and Horticulture Technical Advisory Group (HITAG)

Steering Committee

Aim

The aim of the Committee is to design a regulatory framework for the implementation of the three new national horticulture primary production and processing standards (melons, berries, and leafy vegetables) in Queensland.

The framework will support a best practice regulatory approach to effectively manage food safety risks in horticulture along the supply chain, which minimises the impost on both industry participants and government agencies.

Governance and Meetings

The Committee will:

- operate on a consensus basis
- be supported by Safe Food Production Queensland (Safe Food), including secretariat and project officers
- be supported by a cross-agency reference group and industry technical advisory group
- meet bi-monthly, unless otherwise agreed
- meet face-to-face in Safe Food's Greenslopes Office or other agreed location, with online attendance available but not preferred.

The Chair will provide reports on the progress of the Committee to Safe Food's Chief Executive Officer. Safe Food's Board will provide quarterly reports Minister for Agricultural Industry Development and Fisheries.

Any Committee recommendations relating to amendments to the *Food Production (Safety) Act 2000* and Food Production (Safety) Regulation 2014 to support the framework will be referred to the Queensland Department of Agriculture and Fisheries for consideration, as the administering department for legislation under the agriculture portfolio.

Supporting groups

The Committee will be supported by two separate groups – the Cross-Agency Reference Group and the Industry Technical Advisory Group. The Committee will prepare the specific Terms of Reference for both groups.

The Reference Group have the responsibility of considering and reporting back to the Committee on the feasibility of any legislative changes suggested by the Committee. This group may also be requested to consider:

- what existing Queensland government programs and initiatives may be able to be accessed by businesses and industry to support implementation, and



- what existing Queensland government services and regulatory arrangements could be adjusted to support implementation and create greater efficiencies for government and/or industry.

The Advisory Group will provide sector specific feedback to the Committee, with a focus on the three sectors captured by the new horticulture standards and how the proposed framework could be applied to each sector. The group, which will operate on an ad hoc basis, will be consulted regarding identified specific “pain points” and will assist in consideration of impacts, and potential challenges and opportunities, resulting from the implementation of outputs of the Committee. The advisory group may also invite other stakeholders to attend meetings to inform their activities, as required.

Activities and Deliverables

The Committee will design a framework for the adoption and roll out of the three new national horticulture standards (melons, leafy vegetables, and berries). The key activities and deliverables of the Committee include:

- gaining an understanding of the current operating, commercial and regulatory environment for the industry in Queensland
- gaining an understanding of Safe Food’s regulatory philosophy, and the existing regulatory and non-regulatory tools used by Safe Food
- gaining an understanding of roles and responsibilities for all stakeholder groups in implementing the standards
- exploring best practice regulatory approaches that could be applied in Queensland
- designing a framework that drives best practice through the whole supply chain
- ensuring that the framework aligns with national agreements regarding the implementation of the standards
- ensuring that the framework aligns with the Queensland Government’s Regulator Performance Framework
- developing performance measures to monitor the effectiveness of the framework (“what does success look like”), and
- providing input to inform Safe Food’s Communications and Engagement Strategy for the implementation of the framework.

Membership

Committee membership comprises of a Chair and representatives from the following:

- Safe Food Production Queensland
- Department of Agriculture and Fisheries
- Office of Productivity and Red Tape Reduction (Queensland Treasury)
- Queensland Farmers Federation
- Queensland Fruit and Vegetable Growers Association
- Global Food Safety Initiative



- Australian Melon Association
- Bowen Gumlu Growers Association
- Bundaberg Fruit and Vegetable Growers
- Lockyer Valley Growers Inc.
- Sunshine Coast Food and Agribusiness Network

Member obligations and responsibilities

All members of the Committee and supporting groups must be willing to actively contribute in a way that ensures that a collaborative, transparent environment is provided for the co-design process. In this regard, all members must:

- contribute knowledge of and experience in Queensland's horticulture sector
- constructively participate in discussions to achieve the agreed deliverables
- act in the best interests of the whole horticulture industry and achieving an effective through-chain regulatory approach
- respect the views expressed by other members and participate in discussions in an objective and impartial manner
- observe confidentiality when required and exercise tact and discretion when dealing with sensitive issues and information, and
- promptly advise of any conflict-of-interest issues that arise during the life of the Committee. Conflict of interest issues should be communicated as soon as they arise to the Chair.

Communications

The most appropriate communication channels and frequency for information dissemination to stakeholders will be determined by the Committee.

Communiqués may be publicly released.

Timeframes

The Committee will operate until June 2024.

Secretariat and Support

The Committee, and its supporting groups, will be supported by a Secretariat and two project officers.

Qld Horticulture Cross-Agency Reference Group

Terms of Reference

Aim

The aim of the Queensland Horticulture Cross-Agency Reference Group ('the Group') is to provide cross-government advice and support to the Horticulture Regulatory Framework Steering Committee (the Committee) to inform the design of a regulatory delivery framework.



The framework will ensure the smooth implementation of the following new national horticulture primary production and processing standards in Queensland:

- Standard 4.2.7 Primary Production and Processing (PPP) Standard for Berries
- Standard 4.2.8 PPP Standard for Leafy Vegetables
- Standard 4.2.9 PPP Standard for Melons

The Standards were developed by Food Standards Australia New Zealand (FSANZ), gazetted on 12 August 2022, and come into effect on 12 February 2025.

The framework will support a best practice regulatory approach to effectively manage food safety risks in horticulture along the supply chain, which minimises the impost on both industry participants and government agencies.

Governance and Meetings

The Group will:

- be chaired by the Office of Best Practice Regulation
- operate on an “ad hoc” and consensus basis
- meet as required, including in small, targeted focus groups
- meet face-to-face in Safe Food’s Greenslopes Office or other agreed location, with online attendance available.

The Chair will provide progress reports on the work and deliberations of the Group to the Committee.

Activities and Deliverables

The Group will consider and report back to the Committee on:

- the feasibility of any legislative amendments that are being explored by the Committee
- the impacts to other regulatory systems of the above proposed amendments and the proposed framework
- existing Queensland government and local government programs and initiatives that may be able to be accessed by businesses and industry to support implementation, and
- existing Queensland government and local government services and regulatory arrangements that could be adjusted to support implementation and create greater efficiencies for government and/or industry.

It is anticipated that the key activities and deliverables of the Committee that the Group will contribute to include:

- gaining an understanding of the current operating, commercial and regulatory environment for the industry in Queensland
- gaining an understanding of roles and responsibilities for all stakeholder groups in implementing the standards
- exploring best practice regulatory approaches that could be applied in Queensland



- designing a framework that drives best practice through the whole supply chain
- ensuring that the framework aligns with the Queensland Government's Regulator Performance Framework, and
- providing input to inform Safe Food's Communications and Engagement Strategy for the implementation of the framework.

The reference group is not a decision-making body but is intended to provide a forum for discussing and sharing information on proposed components of the framework and its implementation.

Membership

Group membership comprises of a Chair (Office of Best Practice Regulation) and representatives from the following:

- Safe Food Production Queensland
- Office of Productivity and Red Tape Reduction (Qld Treasury)
- Department of the Premier and Cabinet
- Department of Agriculture and Fisheries
- Queensland Health
- Department of Employment, Small Business and Training
- Department of Regional Development, Manufacturing and Water
- Department of Environment, Science and Innovation
- Office of the Queensland Small Business Commissioner
- Local government Association of Queensland

Other Queensland Government agencies may be asked to contribute, where relevant.

Member obligations and responsibilities

All members of the Group must be willing to actively contribute in a way that ensures that a collaborative, transparent environment is provided for the co-design process. In this regard, all members must:

- contribute knowledge of and experience in Queensland's horticulture sector
- constructively participate in discussions to achieve the agreed deliverables
- act in the best interests of the whole horticulture industry and achieving an effective through-chain regulatory approach
- respect the views expressed by other members and participate in discussions in an objective and impartial manner, and
- observe confidentiality when required and exercise tact and discretion when dealing with sensitive issues and information.

Timeframes

The Group will operate until June 2024.



Secretariat and Support

The Group will be supported by a Secretariat and two project officers.

Qld Horticulture Industry Technical Advisory Group

Terms of Reference

Aim

The aim of the Horticulture Industry Technical Advisory Group (HITAG) is to provide technical advice and support to the Horticulture Regulatory Framework Steering Committee (the Committee), to inform the design of a regulatory framework for the implementation of the three new national horticulture primary production and processing standards (melons, berries, and leafy vegetables) in Queensland.

The framework will support a best practice regulatory approach to effectively manage food safety risks in horticulture along the supply chain, which minimises the impost on both industry participants and government agencies.

Governance and Meetings

The HITAG will:

- be chaired by Safe Food Production Queensland (Safe Food)
- operate on an “ad hoc” and consensus basis
- meet as required, including in small, targeted focus groups
- meet face-to-face in Safe Food’s Greenslopes Office or other agreed location, with online attendance available.

The HITAG Chair will provide reports on the progress of the work of the HITAG to the Committee.

Activities and Deliverables

The HITAG will provide sector specific feedback to the Committee, with a focus on the melons, berries, and leafy vegetables sectors and how the proposed framework could be applied to each sector.

The HITAG will provide a problem-solving forum for complex issues and will be consulted regarding identified specific “pain points”. The Group will also assist in considering the impacts, and potential challenges and opportunities, resulting from the implementation of outputs and options being explored of the Committee.

The HITAG will contribute to the following key activities and deliverables of the Committee:

- gaining an understanding of the current operating, commercial and regulatory environment for the industry in Queensland
- designing a framework that drives best practice through the whole supply chain
- developing performance measures to monitor the effectiveness of the framework (“what does success look like”), and
- providing input to inform Safe Food’s Communications and Engagement Strategy for the implementation of the framework.

When conducting its work, the HITAG should also consider (if applicable), how the proposed framework could be applied to other sectors regulated by Safe Food.



Membership

HITAG membership comprises of a Chair and representatives from the following:

- Safe Food Production Queensland
- Ausveg
- Berries Australia
- Melons Australia
- Mulgowie Farming Company
- HARPS
- Farmers Markets Association
- Fresh Markets Australia
- Hort Innovation Australia
- Fresh Produce Safety Centre
- Fresh care
- Granite Belt Growers Association

The HITAG Chair may also invite other stakeholders to attend meetings to inform their activities, as required.

Member obligations and responsibilities

All members of the HITAG must be willing to actively contribute in a way that ensures that a collaborative, transparent environment is provided for the co-design process. In this regard, all members must:

- contribute knowledge of and experience in Queensland's horticulture sector
- constructively participate in discussions to achieve the agreed deliverables
- act in the best interests of the whole horticulture industry and achieving an effective through-chain regulatory approach
- respect the views expressed by other members and participate in discussions in an objective and impartial manner
- observe confidentiality when required and exercise tact and discretion when dealing with sensitive issues and information, and
- promptly advise of any conflict-of-interest issues that arise during the life of the HITAG.

Conflict of interest issues should be communicated as soon as they arise to the Chair.

Communications

The most appropriate communication channels and frequency for information dissemination to stakeholders will be determined by the Committee.

Timeframes

The HITAG will operate until June 2024.

Secretariat and Support

The HITAG will be supported by a Secretariat and two project officers.



Appendix 2 – HITAG and CARG membership

Group	Organisation
HITAG	Ausveg
HITAG	Berries Australia
HITAG	Mulgowie Farming Company
HITAG	HARPS
HITAG	Farmers Markets Association
HITAG	Fresh Markets Australia
HITAG	Hort Innovation Australia
HITAG	Fresh Produce Safety Centre
HITAG	Fresh care
HITAG	Granite Belt Growers Association
HITAG	Melons Australia
HITAG	SQFI
HITAG	Kalfresh
HITAG	Pinata Farms
CARG	Office of Productivity and Red Tape Reduction (Qld Treasury)
CARG	Department of the Premier and Cabinet
CARG	Department of Agriculture and Fisheries
CARG	Queensland Health
CARG	Department of Employment, Small Business and Training
CARG	Department of Regional Development, Manufacturing and Water



Appendix 3 – Activities requiring accreditation

ACTIVITY	SUPPLY	ACCREDITATION REQUIRED	CATEGORY
I grow, pick, wash, trim, sort and/or pack only my own produce	From my farm gate only	NO	-
	General public at farmers markets, retail stores etc	YES	Producer
	A single packhouse (processor) at a different site	YES	Producer (PSA)
	My own packhouse at a different site	YES	Producer (PSA)
	Multiple different packhouses (processors)	YES	Producer
	Manufacturer (further processor)	YES	Producer
	Export only, no domestic supply	YES	Producer
I grow, pick, wash, trim, sort and/or pack only my own produce at a café/restaurant	My own café/restaurant as part of a meal	NO	-
	Other café's/restaurants at different sites or general public at farmers markets, retail stores etc	YES	Producer
I receive produce and wash, trim, sort and/or pack them	From my farm gate only	YES	Processor
	Farmers markets, retail stores etc	YES	Processor
	Manufacturer (further processor)	YES	Processor
	Export only, no domestic supply	YES	Processor
I grow, pick, wash, trim, sort and/or pack only my own produce and manufacture them on the same site that has a Food Business Licence	General public at farmers markets, retail stores etc	YES	Processor
I transport leafy vegetables	Between processing premises	NO	-
	To farmers markets, retail stores, home deliveries etc	NO	-
I receive produce and store them	N/A	NO	-
I receive produce and repack and/or label them	General public at wholesale markets, retail stores etc	YES	Processor
I grow, pick, wash, trim, sort and/or pack leafy vegetables at a school	School canteen or retailed from the school only	NO	-
	General public at farmers markets, retail stores etc	YES	Producer (school)



I receive leafy vegetables and wash, trim, sort and/or pack them at a school	School canteen or retailed from the school only	YES	Processor (school)
	General public at farmers markets, retail stores etc	YES	Processor (school)
Community garden	General public	NO	-
Nursery	Seeds to the general public or producers	No	-
	Seedlings I have grown from seed and sell to the general public	NO	-
	Seedlings to producers	NO	-
	Potted herbs and other leafy vegetables I receive	NO	-
	Potted herbs and other leafy vegetables I have grown	YES	Producer



Appendix 4 – Regulatory Toolbox

Traditional & Innovative Tools	
Accreditation (inc. temporary)	Preferred Supplier Arrangements
Public Accreditation Register	Food Safety Notification
Food Safety Programs	Central Information Management System (CIMS)
Food Safety Management Statements	Compliance Assessment System (CAS)
Audit (incl. third party)	Co-created baselines
Inspection	Verification studies
Investigations & enforcement	



Appendix 5 – Recognition Criteria

During the co-design process, significant effort was made to revise the recognition criteria for industry certification programs. Safe Food initially developed a comprehensive table detailing the requirements necessary to achieve recognition and meet regulatory obligations. This table played a key role in shaping the national recognition criteria for GFSI-benchmarked certification programs, which were subsequently adopted by Safe Food.

In parallel, Safe Food worked closely with the GFSI team to gain a deeper understanding of the benchmarking process, as well as the information needed to attain and maintain benchmarking status. This collaboration led to the simplification of the original criteria table, effectively reducing duplicated efforts. Safe Food also acknowledges the important contributions made by the GFSI team in the benchmarking process.

The following recognition criteria have now been agreed upon at the national level:

1. Name of the program (standard) managed by the legal entity (CPO) for which recognition is sought?
2. The program that is the subject of this application has been certified by GFSI as meeting the eligibility criteria for the GFSI benchmarking process

Yes No

N.B. Programmes that do not meet the eligibility criteria of GFSI will not be recognised by regulators.

3. Form of evidence supplied by GFSI as meeting its benchmarking process for the program that is named in this application.

- Formal acceptance letter from GFSI for the named program
- Correspondence from GFSI for the named program
- Other form of acknowledgment from GFSI

N.B. applicants that cannot supply evidence will not be considered by regulators

4. Scope of certification provided by GFSI for the program named in this application?

- BI – Growing of plants
- BIII – Pre-process handling of plant products
- CII – Processing of perishable plant products

5. Are there any limitations to the scope of activities for earned recognition compared to the PPP Standard scope, such as the exclusion of washing, sanitizing, etc.?

Yes No

6. If yes, please provide details:

7. Has the CPO applying for recognition of their program in this application ever been subject to a suspension by GFSI?

Yes No



N.B. If the program that is subject of this application is currently suspended by GFSI, the CPO will not be recognised.

8. If yes to question 6, please details of the suspension applied and evidence of clearance of the suspension from GFSI.

9. Names of certification bodies used by CPO for the named program in this application

10. Does CPO have a formal agreement with each certification body?

Yes No

11. Date of initial certification provided by GFSI as meeting its benchmarking requirements for the program named in this application

12. Evidence that CPO has undertaken self-assessment necessary to validate that it is operating in accordance with its GFSI benchmarking requirements?

- GFSI acknowledgement for the self-assessment process for the named program
- GFSI correspondence for the self-assessment process for the named program
- Other form of acknowledgment from GFSI

13. What evidence does the CPO maintain to ensure its operation of the program named in this application meets the GFSI requirement for monitoring of continued alignment?

14. What forms of evidence does the CPO supply GFSI to meet the requirements for annual monitoring of continued alignment?

- Twice a year submission of records selected at random.
- Annual office audit
- Undertake annual gap analysis to determine that no gaps exist in your program compared to the GFSI benchmarking requirements.
- Outcomes and close outs of any investigated complaints concerning operations within the program.

15. What type of acknowledgement have you received from GFSI to indicate that the requirement for annual monitoring of continued alignment has been met?

- GFSI acknowledgement for the annual monitoring process for the named program
- GFSI correspondence for the annual monitoring process for the named program
- Other form of acknowledgment from GFSI

Data sharing arrangement with GFSI-benchmarked certification program owner

The following information will be shared between GFSI benchmarked certification program owner and Safe Food:

- A table listing all GFSI certificate holders within relevant food safety programs to the scope of the FSANZ Primary Production and Processing Standards for berries, leafy vegetables and melons.



- Company names, key contacts, physical address for businesses that hold current GFSI benchmarked program certificates relevant to the scope of the FSANZ Primary Production and Processing Standards for berries, leafy vegetables and melons.
- A copy of each certificate issued to each registrant within the programs relevant to the scope of FSANZ Primary Production and Processing Standards for berries, leafy vegetables and melons.
- Number and details of Certified Members surrendered, withdrawn or suspended per certification period
- Number of members who join during the certification period
- An agreed map of the FSANZ Primary Production and Processing Standards for berries, leafy vegetables and melons to the relevant GFSI benchmarked certification programs.
- A table of major/critical corrective actions issued over time (if possible trending backwards 3–4 years), or for at least for 12 months. Within this data set, segregation of entities that have had corrective actions issued into initial or on-going certification would be required.
- A table of major/critical corrective actions profiled by each state/territory against GFSI program. This would require the following information over at 12 months (preferably 3 years):
 - the relevant business's identity to be disclosed for each major/critical corrective action issued.
 - the major/critical corrective action issued would be mapped to the specific program element of the GFSI program relevant to the scope of the FSANZ Primary Production and Processing Standard.
 - the audit date that the corrective action was issued to the business.
 - the audit type (initial or re-certification audit)
 - close out actions undertaken by the business.
 - formal close out of the corrective action by the third-party auditor.
 - Trending of major/critical CARs issued over the last 12 months, and if possible last 2-3 years.
 - Number and details of Members who received Consecutive Corrective Action requests related to food safety compliance
- Number and type of relevant complaints against the Program.
- Jurisdictions to share aggregated information from audit/inspections of non-GFSI businesses with scheme owners. Key information:
 - Key clauses of the FSANZ Primary Production and Processing Standards for horticulture where non-compliances are detected.