



**AGROECOLOGY & FOOD  
SOVEREIGNTY ALLIANCE**

**Agroecology & Food Sovereignty Alliance**

# **Submission to Review of the Food Production (Safety) Act 2000**

*Queensland Department of Primary Industries*

Submitted to:

**foodproductionsafety@dpi.qld.gov.au**

**24 April 2026**

*We thank the Queensland Government for initiating consultation on reviewing the Food Production (Safety) Act 2000. AFSA welcomes the opportunity to provide a written submission, as well as all further opportunities to participate in development and implementation of the Act. We hope the Government will facilitate robust and meaningful stakeholder engagement across all aspects of the agricultural and food sector, prioritising the voices of First Peoples, rights holders and those with lived experience within our food system.*

Contact: Tammi Jonas - AFSA Focal Point For Farmers (0422 429 362)

Prepared by: Tammi Jonas, Glen Chapman, Antoine Lenique

## Table of Contents

<b>Agroecology &amp; Food Sovereignty Alliance</b>	<b>1</b>
<b>Contact: Tammi Jonas - AFSA Focal Point For Farmers (0422 429 362)</b>	<b>2</b>
<b>Prepared by: Tammi Jonas, Glen Chapman, Antoine Lenique</b>	<b>2</b>
<b>Table of Contents</b>	<b>3</b>
<b>About the Agroecology &amp; Food Sovereignty Alliance</b>	<b>4</b>
<b>Executive Summary</b>	<b>4</b>
Food production safety risks of toxic and ultra-processed foods	5
Risk and scale-appropriate regulation	5
Duplication, harmonisation, and reduction of regulatory burden	6
Livestock, food safety, and public health	6
Engagement with smallholders and civil society	6
Summary of Key Recommendations	7
<b>Responses to the Review of Queensland's Primary Production Food Safety Legislation</b>	<b>8</b>
A primary production food safety regulatory system that is fit for purpose	8
Q.3 Queensland's existing regulatory model involves a single, standalone statutory authority (Safe Food Production Queensland). What are the challenges and benefits of this model compared with alternatives?	8
Q.4 How do you think the primary production food safety regulatory system could better reflect industry and consumer needs?	9
Q.5 How may the legislation and its administration better support state and national food safety systems? and	10
Q.6 How could the primary production food safety regulatory system provide better clarity on roles and responsibilities?	10
Q.7 Queensland currently has commodity-specific food safety schemes (e.g. meat-specific or dairy-specific). Please provide comment on whether these types of schemes still have a role to play?	11
Improving system adaptability	11
Q.8 How could Queensland's primary production safety regulatory system be more flexible, adaptable and responsive with current and emerging challenges?	12
Q.9 What current quality assurance schemes do you believe could qualify for meeting the required food safety standards under the Food Production (Safety) Act 2000?	12
Efficient and effective primary production food safety systems	12
Q.10 What examples can you provide where the primary production food safety system is focusing on compliance objectives rather than food safety outcomes?	13
Q.11 How might a regulatory system be configured to maximise efficiency and effectiveness across the primary production supply chain? And	13
Q.12 What role should business owners/accreditation holders play in maintaining and supporting this efficiency and effectiveness, if any?	13
Information and data systems	14
Q.13 Are there existing data integrity and retention systems that could align with food safety expectations? And	14

Q.14 How could Queensland’s primary production information systems serve business, community, and government into the future?	14
Q.15 How can industry data be used to monitor and validate food safety compliance?	15
Q.16 What tools are available to ensure Queensland's primary production information systems are effective into the future?	15
Q.17 Are there opportunities for food safety regulation to integrate with existing government or industry platforms to streamline information systems and lessen the administrative burden on both businesses and government?	15

## About the Agroecology & Food Sovereignty Alliance

The Agroecology & Food Sovereignty Alliance<sup>1</sup> (AFSA) is a national farmer- and First-Peoples-led civil society organisation working for socially just and ecologically sound food and farming systems. We centre the voices of First Peoples, small-scale food producers, and local communities in decision making.

As the peak body for smallholders in Australia, AFSA connects small-scale producers for farmer-to-farmer knowledge sharing, advocates for fair access to local markets and infrastructure, and pushes for scale-appropriate regulation at all levels of government.

We are part of a strong global food sovereignty movement through our membership in La Vía Campesina, the IPC for Food Sovereignty, and Urgenci: the International Network for Community-Supported Agriculture. We support the Australasian delegate to the Civil Society and Indigenous Peoples’ Mechanism (CSIPM) which is part of the UN Committee on World Food Security (CFS).

Our vision is for agroecology-oriented farms to thrive, producing nutritious food through short, fair supply chains that protect human and planetary health. This includes recognising and promoting First Peoples’ knowledges and custodianship of Country, and committing to decolonial futures for food and agriculture.

## Executive Summary

Queensland has a strong record of food safety, and the Agroecology & Food Sovereignty Alliance (AFSA) is committed to maintaining and strengthening this track record. However, AFSA highlights the disproportionate compliance burden placed on small- and medium-scale food producers under the Food Production (Safety) Act 2000 (QLD). Many AFSA members in Queensland sell directly to end consumers through farmers’ markets, community-supported agriculture, and farm gate sales. The UN *Declaration on the Rights of Peasants and Other People Working in Rural Areas (UNDROP)* asserts that ‘States shall stimulate sustainable production, including agroecological production, whenever possible, and facilitate direct farmer-to-consumer sales.’

Queensland’s food safety and regulatory systems are overdue for reform that genuinely reflects the realities of our state’s diverse food system. The current framework remains largely designed for industrial-scale production and globalised supply chains, rather than for the small- and medium-scale

---

<sup>1</sup> Formerly Australian Food Sovereignty Alliance, name changed in October 2025

Queensland farmers and producers who feed local communities through short, transparent supply chains. As a result, regulation often fails to address the diverse risks to public health—such as the proliferation of toxic and ultra-processed foods—while imposing disproportionate burdens on low-risk, small-scale producers. For example, the duplication of regulatory oversight under Safe Food Production Queensland and local government authorities, as well as the absence of meaningful engagement with smallholders and civil society, means the system prioritises bureaucratic compliance over addressing genuine food safety issues and community wellbeing. The current review of the Food Production (Safety) Act 2000 (QLD) provides an opportunity to reorient food regulation towards scale-appropriate, risk-based, and participatory approaches that uphold the health of people, animals, and the environment alike.

## **Food production safety risks of toxic and ultra-processed foods**

We note that historically, food regulation to manage health risks has focused heavily on short-term, fast-moving threats from pathogens passed to people and animals through agricultural production. However, these reforms should focus on the number of toxic and ultra-processed foods sold in supermarket chains across Queensland. From a food sovereignty perspective, toxicity must be understood holistically. A food may appear ‘safe’ by narrow industrial standards that measure only acute toxicity, yet be harmful over time due to chronic exposure to pesticides, ultra-processing, loss of nutrition, antibiotic overuse, corporate control, or ecological destruction. AFSA rejects definitions of food safety that ignore the systemic harms of industrial agriculture, and prioritises culturally appropriate, agroecological, and transparent food systems that nourish people and regenerate ecosystems. While many toxic foods may not pose an *immediate* health risk, they are unequivocally linked to the rising number of chronic illnesses globally and in Australia.

Genetically modified foods (GMOs) should also be considered under health and well-being regulations, reflecting shifts in consumer wants and needs. GMOs and other food technologies that require manipulating natural processes, controlling seed, and intensive chemical inputs cannot co-exist with socially-just and ecologically-sound food and agricultural systems. Aside from the health implications of GMOs and other food technologies such as lab-grown meat, corporate control over seeds remains a global issue of social injustice for smallholders and Indigenous Peoples. Seed sovereignty asserts that control, knowledge and traditional practice around seeds remain in the hands of communities. These social and ecological considerations underpin our positions on GMOs.

The Australian Government announced changes to Australia’s Gene Technology Regulations in 2012, to allow new GMO technologies to enter the food system without appropriate regulatory frameworks for safety assessment and food labelling. A deregulated GMO environment allows for CRISPR genome editing of plants and animals, despite this new technology being rapidly developed following the 2012 research discovery. There is now an emerging body of evidence to suggest that jumping on CRISPR and other GM technologies to manipulate food production processes could significantly increase the risk of cancer and other diseases, given that we know very little about their long-term impacts<sup>2</sup>. In countries such as Mexico, governments are pushing back against the U.S. and food corporations by banning the cultivation of GMO crops on their land. What we need is for governments to consider the parallels between agricultural chemicals and GMOs, to avoid the crushing impact of manipulating the food system with harmful inputs.

---

<sup>2</sup> [CRISPR gene editing is not quite as precise and as safe as thought.](#)

## **Risk and scale-appropriate regulation**

Microbiological testing and auditing regimes across Australia are largely blind to scale and risk, leading to a disproportionate regulatory burden on smallholders selling via direct supply chains. From standards for egg stamps to sample sizes for pathogen testing of ready-to-eat meat products to pasteurisation requirements for milk, even in community herdshares, Queensland food safety regulation is biased towards industrial food production.

Market gardeners and small-scale horticulturalists in Queensland face increasing regulation of the production and sale of fresh fruits and vegetables. Misconceptions about foodborne illness and its causes are widespread. In fact, only one per cent of all food-borne outbreaks reported in Australia in 2017 were attributed to fresh produce. Major outbreaks of foodborne disease in produce through 2022 were largely attributed to imported goods, such as frozen berries, and to industrial farming, including baby spinach sold at Costco, which was recalled for contamination with hallucinogenic plant matter. AFSA actively campaigned against the tightening of regulations on leafy vegetables, melons and berries that treat small-scale direct supply chains the same as large-scale commodity supply chains, and were disappointed to see these changes come into effect in 2025. While we acknowledge the important role of Safe Food Production Queensland in minimising the negative impacts of these requirements for some smallholders, further reform is needed to ensure that regulations are genuinely risk- and scale-appropriate.

## **Duplication, harmonisation, and reduction of regulatory burden**

The three levels of government in Australia, each with legislation and agencies that mandate food safety and standards, result in duplication of effort for small- and medium-scale food businesses.

Regulatory reform should always be conducted through a transparent and participatory approach that identifies the priority needs of small-scale farmers and food producers and which uses measures already available in the food regulatory system to prevent outbreaks:

1. Consult with small-scale farmers and food producers with regard to the cost and administrative impact of any government reforms;
2. Identify and improve any current regulatory and non-regulatory measures that can be improved, rather than adding more costly and burdensome steps for producers and processors; and
3. Provide the expected assurances to low-risk producers that there will be exemptions that apply to them should any new regulatory measures be put in place.

Any risk management measures considered should target the known source of outbreaks, namely, large-scale, intensive operations and sections of the processing industry engaged in the export and import of agricultural products. Appropriate assessments of the relationship between scale, production methods, supply chain length, logistics, and risk should be a priority.

## **Livestock, food safety, and public health**

We advocate for a structural One Health approach to food safety – an integrated, unifying approach to balance and optimise the health of people, animals and the environment. It is particularly important to prevent, predict, detect, and respond to global health threats such as the COVID-19 pandemic and the rise of zoonotic diseases. By adopting a One Health approach to developing scale-appropriate regulation, governments at all levels would be better equipped to address biosecurity and food safety risks posed by intensive livestock production, in particular.

## Engagement with smallholders and civil society

AFSA has long advocated that food safety regulations consider risks in line with the scale of agricultural production and processing activities. Part of this process should be that small-scale farmers, fishers, First Peoples and civil society are involved in the development of food safety policy and regulation.

Self-organised involvement of farmers' democratic organisations in stakeholder advisory groups, steering committees, and focus groups should be widely extended to ensure that regulation recognises the value of smallholders in feeding local communities and in reducing biosecurity risks.

Participatory Guarantee Systems (PGS) have been developed internationally by IFOAM as part of the organics movement as an alternative to 'top-down' regulation, and there is an opportunity to adapt these to deliver scale-appropriate food safety regulation across Queensland. PGS are locally-focused quality assurance systems. They certify producers based on active stakeholder participation and are built on a foundation of trust, social networks, and knowledge exchange.

## Summary of Key Recommendations

### 1. Adopt Risk- and Scale-Appropriate Regulation

- 1.1. Design regulatory requirements that distinguish between the risk profiles of large-scale industrial supply chains and those of small-scale, direct-market, and agroecology-oriented producers.
- 1.2. Provide exemptions or alternative compliance pathways for low-risk, community-focused producers to avoid unnecessary administrative burden.

### 2. Support Local Food Economies and Short Supply Chains

- 2.1. Prioritise the resilience and adaptability of local food systems in regulatory frameworks, recognising their importance particularly in times of crisis (e.g., climate events, global supply disruptions).

### 3. Promote Flexibility and Crisis Responsiveness

- 3.1. Embed mechanisms for temporary regulatory relief or streamlined processes for farmers supplying local markets during emergencies—such as natural disasters or supply chain disruptions—to allow continued safe food access.

### 4. Embrace Participatory and Community-Based Approaches

- 4.1. Empower smallholders, First Peoples, and local communities to co-design and review food safety regulations.
- 4.2. Support participatory quality assurance models, such as Participatory Guarantee Systems (PGS), as legitimate compliance options.

### 5. Maintain and Strengthen a Single Statutory Authority

- 5.1. Retain a single food safety regulator to minimise duplication, fragmentation, and confusion.
- 5.2. Invest in building sector-specific expertise within the authority, ensuring regional support staff and inspectors understand diverse farm realities and localised food systems.

### 6. Ensure Transparency, Public Oversight, and Open Access

- 6.1. Maintain public ownership and oversight of core regulatory data systems; avoid over-reliance on industry-controlled data platforms.
- 6.2. Make food safety standards, compliance materials, and data systems openly accessible and free from commercial barriers.

### 7. Integrate Climate and Disaster Resilience

- 7.1. Adapt regulatory frameworks to address the impacts of climate change, extreme weather, and emerging food safety risks.
- 7.2. Support infrastructure and practices that enhance local food system resilience and disaster preparedness.

## 8. Streamline and Harmonise Data and Record-Keeping

- 8.1. Allow for diverse, scale-appropriate record-keeping methods (digital, paper-based, or community-verified) that meet food safety goals without imposing undue costs or complexity on small-scale producers.
- 8.2. Ensure government information systems are interoperable and do not duplicate industry data in ways that burden producers.

## 9. Prioritise Food Sovereignty

- 9.1. Recognise cultural, ecological, and social dimensions of food safety alongside technical standards.

## Responses to the Review of Queensland's Primary Production Food Safety Legislation

### A primary production food safety regulatory system that is fit for purpose

The following questions relate to whether the current system is meeting industry and community needs, is responsive and delivering safe primary produce. We are seeking your feedback on whether the current regulatory system meets the Queensland Government Better Regulation Policy aim to ensure that regulation is 'necessary, effective and efficient, thereby achieving policy objectives while minimising costs on business and the community. Your feedback is sought on:

- The model for regulating food safety in primary production.
- Alignment of the national and Queensland system, both regulatory and non-regulatory, and ensuring the legislation complements other related Acts.
- Optimal approaches to ensure Queensland's commitment to its roles and responsibilities under the national food system.
- Delivering a regulatory system that meets community and industry expectations. concerning the acceptance of primary production safety standards and how the standards are managed, monitored and enforced.
- Modernising terminology of the *Food Production (Safety) Act 2000* to ensure it is in keeping with contemporary legislative drafting principles.
- Delivering clarity to industry and consumers on jurisdictional responsibilities across the primary production supply chain.
- Reviewing the number of approvals or licences required by businesses.

### Q.3 Queensland's existing regulatory model involves a single, standalone statutory authority (Safe Food Production Queensland). What are the challenges and benefits of this model compared with alternatives?

Some farmers have noted that staffing and contractors assigned to food safety oversight often lack a deep understanding of farms and the specific food safety regulations they are expected to enforce. This gap in knowledge can lead to inconsistent application of standards and fails to recognise the practical realities of non-industrial farm food production.

There is also a risk that the broad range of regulatory responsibilities under a single statutory authority may result in limited specialised knowledge. Inspectors may struggle to develop deep expertise across a wide array of food sectors, which can further exacerbate a scale-blind approach that does not account for the diverse needs and risk profiles of different producers - especially small-scale and agroecology-oriented farmers.

However, the single statutory authority model in Queensland offers important benefits, in particular by minimising regulatory processes for producers by providing a ‘one stop shop’ for compliance. This reduces confusion and duplication, creating a more streamlined experience for food producers. In fact, Victoria is moving from multiple agencies to single statutory authority in 2026 in recognition of its benefits to producers.

When a single agency is tasked with overseeing the entire food production system, there is a tendency to default to uniform standards, rather than risk-based regulation reflecting differences in scale, production method, and supply chain length. This disadvantages small-scale and low-risk producers who are subject to the same burdens as large industrial operations. **And yet AFSA’s national experience is that states with multiple regulators tend to experience greater challenges than those with a single authority.** Multiple agencies too often result in inconsistent interpretations of regulations, increased administrative burdens, and fragmented communications. Therefore, while there are areas for improvement within Safe Food Production Queensland, particularly in building sector-specific and scale-appropriate regulation, **AFSA strongly favours a single statutory authority. We recommend that any review of Queensland’s regulatory model focus on strengthening the single authority’s capacity to deliver risk-based and scale-appropriate regulation, informed by meaningful engagement with small- and medium-scale producers embedded in local food economies.**

#### **Q.4 How do you think the primary production food safety regulatory system could better reflect industry and consumer needs?**

The current review of Queensland’s food safety system presents a valuable opportunity to create a regulatory framework that is robust, meaningful, and participatory—one that places the voices of small-scale farmers, First Peoples, and local communities at its centre, while safeguarding the health of people, animals, and the environment. It is also a chance to address persistent barriers in the system, including insufficient engagement with smallholders and civil society. In addition, Queensland’s food safety framework must be adaptable to emerging challenges, including the increasing prevalence of toxic and ultra-processed foods and heightened risks from zoonotic diseases. At present, Queensland’s regulatory approach remains focused mainly on acute, short-term health risks (such as pathogens) but often overlooks broader food safety issues that impact long-term health outcomes, such as hazardous pesticide use and ultra-processed foods. **AFSA does not advocate for a lax approach to food safety, but calls for a holistic and systemic evaluation of what makes food systems, and the food they produce, truly safe or unsafe.**

A key benefit of this review is the opportunity to address the disproportionate regulatory burden currently faced by Queensland’s small-scale farmers and food producers. **Too often, small- and medium-scale food businesses in Queensland are required to comply with the same standards as large-scale operations and importers, regardless of their risk profile or production methods.** For example, a small-scale egg producer selling direct to local customers at a farmers’ market or farm gate may be subject to the same accreditation

and stamping requirements as an industrial-scale battery farm, even though their eggs are typically consumed within days and pass through fewer hands. For these small operators, manual requirements such as individual egg stamping are onerous and out of step with the scale and nature of their business. This highlights the need to reduce unnecessary regulatory burdens and introduce exemptions or alternative compliance pathways for low-risk, small-scale producers. **Many such producers not only grow food, but also process and retail it directly to consumers, resulting in shorter supply chains, fewer cold-chain and contamination risks, and enhanced traceability.**

Another key benefit of reform in Queensland is the potential to embed robust and meaningful engagement with a wide range of food system stakeholders, not only in the consultation process but within the regulatory framework itself. **AFSA maintains that it is essential to not only consult with smallholders, First Peoples, and local communities, but also to collaborate and empower civil society to collectively shape Queensland's food and agriculture systems.** Such engagement can ensure that regulation is responsive to the realities of small-scale, direct, and transparent local food economies.

### **Q.5 How may the legislation and its administration better support state and national food safety systems? *and***

### **Q.6 How could the primary production food safety regulatory system provide better clarity on roles and responsibilities?**

The food safety system would be better supported with a harmonised information sharing process between all levels of regulation and administration, so that all information and regulation is uniform, streamlined, and easy to access. We offer some specific recommendations below to achieve this.

1. First, the State should develop **standardised guidance and training for council environmental health officers on proportional regulation and food sovereignty approaches.** This would help ensure that officers across municipalities apply consistent, risk-based standards while recognising and respecting the diversity of small-scale, Indigenous, and culturally specific food systems.
2. **Councils should also have access to specialist shared teams or regional hubs**—including mobile processing inspectors, laboratory services, and technical advisors—**to pool expertise and reduce duplication.** This collaborative model would strengthen technical capacity, particularly for assessing non-industrial food systems and emerging small-scale enterprises.
3. **A harmonised inspection framework should be introduced to reduce regulatory inconsistency** while allowing for locally adapted, culturally appropriate exemptions and risk-based inspection frequencies. This would maintain strong food safety outcomes without imposing unnecessary compliance burdens on low-risk producers.
4. To shift from a punitive model toward one of partnership and education, **councils should be supported through funded programs to deliver compliance assistance workshops, practical templates, and mentorship for small producers.** There is a need for Community/Industry liaison officers, who are not compliance officers, but there specifically to assist producers in navigating the regulatory process.
5. Finally, **establishing data-sharing protocols between councils and Safe Food Production Queensland would enable more effective surveillance, recall coordination, and trend analysis,** ensuring that local insights contribute to statewide food safety intelligence and continuous improvement.

**Q.7 Queensland currently has commodity-specific food safety schemes (e.g. meat-specific or dairy-specific). Please provide comment on whether these types of schemes still have a role to play?**

**From a food sovereignty perspective, any food safety scheme—including commodity-specific models—should be evaluated according to its impact on the autonomy, resilience, and diversity of Queensland’s food system.** Commodity-specific schemes, when designed well, can recognise and address the unique risks and processes associated with different types of food production. However, they often reflect the needs and structures of large-scale, industrial operations rather than those of small-scale, agroecological, or culturally specific producers.

**AFSA supports food safety regulation that is genuinely risk- and scale-appropriate, context- and culture-specific, and participatory.** Commodity-specific schemes should not become blanket regulations that fail to account for the realities of smallholders, First Peoples, and local communities. Instead, **they should be flexible frameworks that empower communities, uphold traditional knowledge, and support short, transparent supply chains.** Where commodity-specific hazards are clearly identified, targeted measures may be justified, but these should always be balanced with exemptions or alternative compliance pathways for low-risk, small-scale or direct-market producers.

**In summary, commodity-specific schemes may still have a role to play if they are reformed to centre food sovereignty principles: supporting local control, diversity, and transparency while avoiding unnecessary regulatory burdens on those least likely to pose a food safety risk.**

### **Improving system adaptability**

The following questions relate to making the regulatory system for primary production and processing activities better integrated, streamlined and informed by evidence. The review will consider whether existing or emerging technologies or different assurance schemes could play a role in verifying compliance with requirements and whether the current regulatory system enables, has no effect, or is limiting to their use. Your feedback is sought on:

- **What adjustments to the current compliance model (which involves audits and inspections) could improve the identification, assessment, and mitigation of risks earlier and more effectively.**
- **Improving systems and providing new tools that enable the regulator’s roles and functions to continue to reflect best practice.**
- **Opportunities to support the uptake of more agriculture, food and regulatory technology to inform quality assurance and maintain/demonstrate compliance with standards.**
- **Ways to address emerging challenges in data governance by enhancing frameworks that support secure industry data sharing, facilitate inter-agency collaboration, and uphold the integrity and resilience of regulatory systems.**
- **Opportunities to embed flexibility in the regulatory framework that enable the regulator to adapt to technological advancements and innovations in food production, processing and monitoring.**

## **Q.8 How could Queensland’s primary production safety regulatory system be more flexible, adaptable and responsive with current and emerging challenges?**

**Queensland’s food safety regulatory framework must be equipped to respond flexibly and proactively to current and emerging challenges such as climate change, global conflicts, and supply chain disruptions.**

These pressures threaten both the resilience of our food supply and the safety of the food that reaches Queensland eaters. A food sovereignty approach centres the health and autonomy of communities while supporting local food economies—making it crucial that reform efforts distinguish between the risk profiles of highly centralised, industrial supply chains and those of diverse, local, and agroecology-oriented producers.

Climate change is increasing the frequency and severity of extreme weather events, which demonstrably disrupt long supply chains, creating new risks for food safety. **As we are experiencing at this moment, wars and global instability have also demonstrated the vulnerability of long, fossil-fuel dependent supply chains, leading to shortages, price shocks, and disruptions in inputs essential to industrial food production. This polycrisis repeatedly demonstrates the importance of strong and diverse local food economies to ensure Queenslanders’ ongoing access to safe, nutritious, and culturally-appropriate food.**

AFSA therefore strongly urges the Queensland Government to prioritise:

1. Supporting and strengthening local food economies and short supply chains;
2. Focusing the most stringent regulations on high-risk, industrial supply chains where the consequences of food safety failures are much greater;
3. Providing regulatory flexibility, exemptions, or alternative compliance pathways for low-risk, small-scale, and direct-market producers;
4. Integrating climate and disaster resilience into food safety planning, including through support for localised processing, storage and distribution infrastructure.

## **Q.9 What current quality assurance schemes do you believe could qualify for meeting the required food safety standards under the Food Production (Safety) Act 2000?**

As detailed on page 6, Participatory Guarantee Systems (PGS) have been developed internationally by IFOAM as part of the organics movement as an alternative to ‘top-down’ regulation, and there is an opportunity to adapt these to deliver scale-appropriate food safety regulation across Queensland.

### **Efficient and effective primary production food safety systems**

The following questions seek to understand how best to deliver a primary production food safety system and regulatory framework that maintains safeguards while minimising costs on business and the community.

It is recognised that delivering high quality, safe food is of the highest priority for Queensland consumers and for protecting the reputation of our food production industries. The review will consider how the costs of maintaining a best price safety system that delivers benefit for the entire Queensland community should be equitably managed. Your feedback is sought on:

- Ways to ensure regulatory food safety schemes provide certainty to industry, the public and government by being proportionate to risk, and effective and efficient in delivering protections and intended outcomes.
- Options to support the implementation of best regulatory practice delivery, such as through the application of the regulator model practices under the Queensland Government Regulator Performance Framework.
- Any new areas of the primary production supply chain that should be captured by the regulatory framework or any areas that should be removed or covered by a different authority.
- How best to address situations where multiple licences or approvals may be consolidated into fewer approvals or a single approval.
- How the legislative framework may support industry to grow, be innovative and take business risks.

**Q.10 What examples can you provide where the primary production food safety system is focusing on compliance objectives rather than food safety outcomes?**

In early 2022, severe flooding impacted large areas of Southeast Queensland, disrupting industrial egg supply chains and causing supermarket shortages across the state. During this crisis, many small-scale, local egg producers were still able to supply their communities directly through farm gate sales and local farmers’ markets, as their production and distribution networks are less dependent on centralised infrastructure.

However, under the existing regulatory system, these small producers were still required to meet the same accreditation and egg stamping requirements as industrial operations, despite the emergency context and direct, transparent nature of their supply chains. **In the midst of a natural disaster, these smallholders still had to meet the administrative and practical burden of industrial-scale compliance—such as stamping eggs by hand—risking limiting their ability to meet urgent community needs.**

Queensland could create provisions for exemptions or streamlined approvals for small-scale egg producers selling directly to local communities, which would not only increase their resilience and viability in general, but better assure their ability to feed communities in times of disaster.

**Q.11 How might a regulatory system be configured to maximise efficiency and effectiveness across the primary production supply chain? And**

**Q.12 What role should business owners/accreditation holders play in maintaining and supporting this efficiency and effectiveness, if any?**

When food is turned into commodities, the focus of regulation and supply chains often shifts away from human and environmental health and well-being toward efficiency, yield, and standardisation. This process diminishes local control of food and agriculture systems, reducing the diversity and adaptability that underpin resilient food systems. **While AFSA fundamentally contests the notion that efficiency should be a primary value in food systems, we recognise that genuinely efficient and effective regulation is possible**

when designed around the principle of scale appropriateness.

For Queensland, this means:

- Streamlining regulation for low-risk, community-focused producers who sell directly to consumers, including through exemptions or alternative compliance pathways; and
- Supporting community-based QA systems such as Participatory Guarantee Systems (PGS).

### **Information and data systems**

The following questions relate to information and data. Information and data systems are playing an increasingly important role in primary production supply chain management and the effectiveness of regulatory systems. Your feedback is sought on:

5. Ways to empower information and data systems through the regulatory framework to enhance data sharing and embrace 'data intelligence' to help strengthen consumer and market awareness in the primary production food safety system
6. Data management regulatory frameworks that further improve risk assessments of production and supply chain systems.
7. Whether the existing regulatory framework provides for the use of data sharing / digital technologies to demonstrate or validate food safety compliance.

**Q.13 Are there existing data integrity and retention systems that could align with food safety expectations? And**

**Q.14 How could Queensland's primary production information systems serve business, community, and government into the future?**

There are a range of existing data integrity and retention systems that could align with Queensland's food safety expectations, particularly if they are adapted to recognise the diversity of scales and models present within the state's food system.

For larger-scale and industrial supply chains, robust digital systems such as the National Livestock Identification System (NLIS), Property Identification Codes (PICs), and commercial traceability software already provide strong data integrity, traceability, and record-keeping functions. These systems are focused on managing complex supply chains with multiple actors, long transport routes, and export requirements. But these still fail to provide end to end traceability when meat processors do not implement tracing systems through the slaughter chain process.

However, for small-scale, direct-market, and agroecological producers—who often operate with short supply chains and maintain direct relationships with consumers—existing systems can be overly complex or burdensome. Many of these producers already keep thorough records suited to their scale, such as batch logs, sales records, or simple spreadsheets, which can provide adequate traceability and accountability for food safety purposes.

AFSA recommends that Queensland’s regulatory framework formally recognise and accept diverse record-keeping systems, including low-cost, low-tech, and community-based approaches, as valid means of ensuring data integrity and retention for food safety. Flexibility is paramount: food safety outcomes can be achieved by allowing small-scale producers to use systems that match their scale and risk profile, rather than imposing requirements designed for industrial operations.

**Where appropriate, participatory models such as Participatory Guarantee Systems (PGS) can also offer robust, transparent, and community-led data collection and verification, further strengthening integrity in local food systems.**

**Queensland should support a flexible, scale-appropriate approach to data integrity and retention that ensures food safety while supporting the viability and autonomy of all producers, large and small.**

### **Q.15 How can industry data be used to monitor and validate food safety compliance?**

Industry data can play a valuable role in monitoring and validating food safety compliance, provided its collection and use are transparent, equitable, and appropriate to the diversity of Queensland’s food system. As outlined in the updated 2023 Peoples’ Food Plan<sup>3</sup>, a food sovereignty framework places strong emphasis on community accountability, transparency, and participatory approaches in all aspects of food governance, including food safety.

### **Q.16 What tools are available to ensure Queensland's primary production information systems are effective into the future?**

Participatory input at all times in this process from smallholders and First Peoples is essential, as mentioned in other answers throughout this submission.

### **Q.17 Are there opportunities for food safety regulation to integrate with existing government or industry platforms to streamline information systems and lessen the administrative burden on both businesses and government?**

Most producers already engage with a variety of digital platforms—both industry and government controlled—such as the NLIS, APL, and SFPQ portals. However, integrating regulatory functions with industry-controlled platforms raises several concerns:

- Data access and transparency: when government regulation relies on industry proprietary datasets, it can limit the government’s independent access to data, potentially reducing transparency and accountability. **There is a risk that critical food safety or traceability information may be selectively shared or delayed by commercial interests rather than the public good.**
- Privatisation of public functions: Increasing privatisation of standards and data management—such as through Standards Australia, where access to food safety standards requires purchasing documents—creates barriers for small-scale producers, and limits the accessibility and democratic scrutiny needed for effective and efficient regulation.

To address these concerns, AFSA recommends:

---

<sup>3</sup> [Updated Peoples Food Plan, 2023 \(AFSA\)](#)

- Government ownership: **Core regulatory data systems should remain publicly owned**, with the government retaining independent access and oversight to ensure transparency, equity, and public accountability.
- Open and accessible standards: **Food safety standards and compliance requirements should be freely available** to all producers and the public, avoiding paywalls or proprietary restrictions that disadvantage smaller producers and reduce opportunities for sector-wide analysis.
- Protecting public interest: **Any use of industry data or platforms must be subject to clear agreements on data sharing, privacy, and public access**, ensuring public interest is not subordinated to commercial priorities. (For example, APL uses pig producers' data for market research to sell more pork. Smallholders are required to pay the levy and their data is collected, but most do not benefit from the marketing of pork sold in supermarkets.)