



Victorian
Farmers
Federation

Submission to the Victorian Government on Food Regulation Reform

Victorian Government

14 March 2025

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Summary

The Victorian Farmers Federation (VFF) welcomes the opportunity to provide this submission regarding the Victorian Government's proposal to decrease the number of food regulators. As Victoria's peak body representing primary producers, we recognise the importance of an efficient, science-based, and risk-proportionate regulatory framework that ensures food safety, product integrity, and market access while minimising unnecessary regulatory burden.

Food regulation must align with best-practice regulatory principles, uphold national and international food safety standards, and support a "paddock to plate" approach to ensure consistency across the entire food supply chain. A streamlined, fit-for-purpose regulatory system must protect consumers, enhance industry capability, and maintain Victoria's reputation as a leader in safe, high-quality food production.

The VFF supports food regulatory reform that enhances food safety, market access, and industry competitiveness while reducing the cost and complexity of compliance. The VFF support in-principle a single, independent statutory authority with a skills-based board and risk-proportionate regulatory model that ensures Victoria maintains its position as a leader the production of safe, high-quality food production. The VFF note that the UDV have stated their concerns and reasons for not supporting the Victorian dairy industry to be regulated under a new single regulator. We urge the Victorian Government to implement a modern, efficient, and nationally consistent food regulatory framework that meets industry and consumer needs.

The VFF welcomes further consultation and engagement on this matter.



Brett Hosking

President

Victorian Farmers Federation

Key Principles for Food Regulatory Reform

1. A Paddock to Plate Approach in Accordance with the Food Standards Code

The integrity of Victoria's food system depends on an integrated "paddock to plate" approach, ensuring that food safety and regulatory oversight extend from primary production through to retail and consumption. This must be consistent with the Australia New Zealand Food Standards Code (FSANZ Code) and broader national food safety requirements.

Fragmented regulation across different stages of the food supply chain creates compliance inconsistencies, inefficiencies, and increased costs. A consolidated regulatory model should provide end-to-end oversight of food production, processing, distribution, and retail to:

- Ensure seamless compliance with national food safety standards.
- Prevent gaps and overlaps in food safety enforcement.
- Provide a clear point of accountability for food regulation.

2. Use of National Standards Applied Consistently

Inconsistent application of national food safety requirements creates confusion and increased compliance costs, particularly for businesses operating across multiple jurisdictions. Victorian regulations must align with national frameworks to facilitate seamless trade and avoid unnecessary duplication.

Food regulation should be nationally consistent and based on existing national standards, including:

- FSANZ Code (as adopted in the Food Act 1984 (Vic)) under which fall the Australian Standards for Primary Production and Processing (e.g., dairy, meat, seafood).
- The Imported Food Control Act 1992 (Cth) for consistency with import requirements.
- Export market access requirements under Commonwealth agreements (e.g., under the Department of Agriculture, Fisheries and Forestry).

3. Best Practice Regulatory Principles

Reform and implementation of food safety regulation should be based on best practice regulatory principles, as outlined in the Council of Australian Governments (COAG) Principles of Best Practice Regulation and OECD Guidelines for Regulatory Policy and Governance, including:

- Risk-based regulation: Compliance obligations must be proportionate to risk, avoiding excessive oversight for low-risk activities while ensuring robust scrutiny of high-risk food products.
- Regulatory efficiency: Consolidation should eliminate duplication, improve coordination, and enhance regulatory responsiveness.
- Stakeholder engagement: Industry consultation must guide reform to ensure practical, workable outcomes.
- Transparent and accountable decision-making: The regulator must operate independently with clear performance measures.

4. Objectives for Food Safety, Product Integrity, and Market Access

Regulatory reform must ensure that Victoria maintains:

- High food safety standards that protect public health and consumer confidence.
- Truth in labelling and product integrity to prevent misleading claims and ensure compliance with FSANZ and Australian Consumer Law.
- Market access certainty, ensuring regulatory frameworks align with Commonwealth export requirements and international trade agreements.

5. Inclusion of All Food Industry Businesses & Supply Chains

A new single food safety regulatory must cover all aspects of the food supply chain to ensure consistency with the legislated objectives, including:

- Primary production, processing, and manufacturing.
- Supermarket distribution and retail supply chains.
- Food service businesses preparing meals for immediate consumption (to remain with local councils).

6. Minimising Regulatory Burden & Recognition of Industry Assurance Systems

Where possible, industry-led assurance programs should be recognised to reduce duplication and regulatory burden. Programs such as Livestock Production Assurance (LPA), and retail and supply chain commercial or proprietary HACCP-based systems have proven effective in achieving food safety outcomes while minimising unnecessary compliance costs. A new regulator should be recognised by commercial or proprietary assurance systems and auditing to minimise duplication and compliance costs to businesses.

7. Maintenance & Enhancement of Industry-Specific Technical Expertise

A consolidated food regulator must retain technical expertise in key industry sectors, including dairy, meat, horticulture, grains, and seafood. Proactive facilitation of industry capability development should be a core function, ensuring businesses understand and can meet regulatory requirements.

8. Lowering the Cost of Regulation

Victoria currently has the highest cost of food regulation in Australia, imposing disproportionate fees on food businesses. Consolidation must aim to:

- Reduce compliance costs through streamlined licensing and inspection frameworks.
- Harmonise fees to reflect a risk-based and cost-recovery approach.
- Leverage technology and automation to improve efficiency and reduce administrative overheads.

The making of any legislation associated with a new food safety regulator should include clear cost reduction estimates prior to implementation of a new system. As well as a reduction in financial cost there must also be a reduction in the compliance burden and cost associated with this.

9. Consistent, Risk-Proportionate Regulation

Victoria's food safety framework must ensure that high-risk products and activities are appropriately regulated while avoiding over-regulation of low-risk businesses. Some industries currently experience excessive regulatory oversight, while others remain under-regulated, creating an uneven playing field. A single food safety regulator should apply a risk based approach where oversight and compliance is proportionate to risk associated all with all regulatory objectives.

10. Maintaining Export Market Access

Any changes to Victoria's food regulation system must be compatible with Commonwealth agreements governing export certification, biosecurity, and trade requirements. Misalignment could jeopardise market access for Victorian food exporters.

11. Provisions for Small Business Innovation

Food regulation should support innovation in production and processing, with provisions for:

- Small businesses trialing new food safety technologies or processes.
- Risk-proportionate approvals for novel food products and start-ups.

Proposed Regulatory Model

The VFF supports a single, independent statutory authority for food regulation, ensuring:

- Local councils continue to regulate businesses preparing food for immediate consumption on-site (e.g., restaurants, cafes).
- All other food industry businesses (producers, processors, wholesalers, supermarkets) are regulated by a dedicated statutory body.
- Proposed state regulation should not be more excessive than existing federal regulation or codes.

The VFF United Dairyfarmers of Victoria (UDV) does not support a single, independent statutory authority for food regulation for dairy in Victoria. The UDV's concerns are as follows:

- Dairy Food Safe Victoria (DFSV) is a fully functional, self-funded dairy regulator that ensures food standards are upheld from the paddock to the point of export.
- The dairy industry requires different skill set board, which is already in place in the existing organisation, and the CEO is government employed.
- There are no regulatory efficiencies or cost efficiencies to be achieved by putting dairy under one food regulator.
- DFSV licence fees are proportionate to business size and risk profile, avoiding excessive burdens on small operators. Dairy Food Safe Victoria already has started the process to improve efficiency and reduce administrative overheads by leveraging technology and automation.

The Federal Government already relies on Dairy Food Safe Victoria for export certification. The model that DFSV has for compliance is a stepping stone for the Federal Government to use when/if setting up a national program.

The VFF Egg group noted the Agriculture Minister, in the second reading speech, confirmed that egg farms in Victoria do not come under local government EHOs. Therefore, the current system for egg regulation does not need any amendments, it is already low cost and effective.

Governance Structure

An independent food safety statutory body should include the following principles:

- Skills-based board (maximum 7 members) appointed by the Minister for Food & Agriculture.
- CEO appointed by the Governor in Council, ensuring independent leadership.
- Funding model:
 - Government contributions to cover public health and regulatory oversight costs.
 - Licence fees proportionate to business size and risk profile, avoiding excessive burdens on small operators.

Regulatory Efficiencies

The operation of an independent food safety statutory body should include:

- Use of the latest technology and online automated systems to streamline licensing, audits, and reporting.

- Minimal licensing requirements, capturing synergies across commodity and food types.
- The new food regulator should that where possible recognise 3rd party proprietary audits and work to minimise proprietary audits.
- Perpetual balance sheet recognition of assets from contributing predecessor agencies.
- Licence and fee structures based on:
 - Company size (number of employees).
 - Highest food safety risk product handled.
 - Accounting for multiple commodities (rather than industry-specific fees).

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The voice of Victorian farmers and rural communities since 1979

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