



QUEENSLAND  
FARMERS'  
FEDERATION



## Review of Queensland's Primary Production Food Safety Legislation April 2026

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## Contents page

|  |   |
|--|---|
| About the Queensland Farmers' Federation .....   | 2 |
| Introduction.....  | 2 |
| Summary of key recommendations .....   | 3 |
| Specific comments on discussion paper.....   | 4 |
| Relationship between Acts .....  | 4 |
| Theme 1 – A Primary production food safety regulatory system that is fit for purpose ..... | 4 |
| Theme 2 – Improving system adaptability.....   | 6 |
| Theme 3 – Efficient and effective primary production food safety systems .....             | 7 |
| Theme 4 – Information and data systems.....  | 8 |
| Conclusion .....   | 8 |

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Food Production Safety Review  
Department of Primary Industries (DPI)

Submitted via email at [foodproductionsafety@dpi.qld.gov.au](mailto:foodproductionsafety@dpi.qld.gov.au)

### Our members

- Queensland Fruit & Vegetable Growers
- Cotton Australia
- CANEGROWERS
- Greenlife Industry QLD
- eastAUSmilk
- Queensland United Egg Producers
- Turf Queensland
- Pork Queensland
- Australian Chicken Meat Federation
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallowa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Lockyer Valley Water Users

# About the Queensland Farmers' Federation

The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

## Introduction

The Queensland Farmers' Federation (QFF) welcomes the opportunity to provide feedback on the Review of Queensland's Primary Production Food Safety Legislation.

Australia (and Queensland) ranks 22<sup>nd</sup> in the world on the 2022 report of the Global Food Security Index<sup>1</sup> which is based on affordability, availability, quality and safety and sustainability and adaptation. For quality and safety, Australia ranks higher at 13<sup>th</sup> and is within 5 points of the leading country, Canada at 89.5. Interestingly, on the other parameters, Australia ranks first on affordability, 48<sup>th</sup> on availability and 33<sup>rd</sup> on sustainability and adaptation. Given that Queensland has not had significant review of food production safety legislation since its introduction in 2000, it is timely for this review .

### Australia

Score / rank (113 countries)



<sup>1</sup> Global Food Security Index <https://impact.economist.com/sustainability/project/food-security-index/>

## Summary of key recommendations

1. QFF emphasizes that food safety is a shared responsibility and regulatory approaches must address risks across the entire food chain rather than focussing disproportionately on primary production and processing.
2. QFF strongly supports a regulatory environment that imposes minimal regulatory burden while maintaining a risk-based approach to both proactive and reactive food safety interventions.
3. QFF recommends that the two Queensland Food Acts work together for the common goal of food safety for consumers.
4. QFF strongly encourages the review to look at the opportunity for Queensland Health to play a role in the other parts of the supply chain that can undermine the strict regulatory controls of production.
5. The Act needs to recognise existing food safety assurance schemes as equivalent mechanism to comply, this should be at minimal/no cost to growers and the regulator should use the industry standards and regulate the scheme owner to ensure ongoing conformance with the standards.
6. Ensure appropriate data sharing occurs between Department of Health, Department of Primary industries, Safe Food Production Queensland and industry stakeholders. Responsible data sharing is integral to the system working efficiently and smoothly.
7. QFF recommends that demonstration of skills and knowledge be a pre- requisite for any registration in particular for smaller growers who may have good intent but not the knowledge to comply. For example, a requirement of being registered to sell eggs could require completion of an online module covering food safety and biosecurity. Disease such as *salmonella enteritidis* causes significant human health risks and the cause is often breaches with biosecurity.
8. Recognise that biosecurity and animal welfare are integrally linked with food safety as compromises in these areas can lead to food safety risks for human consumption. However, ensure that legislative intent does not create grey areas and conflict with other legislation and ensure the right for growers to continue their business

## Specific comments on discussion paper

### Relationship between Acts

#### Comments

- The relationship between the Acts works well in aligning with the National Food Standards Code for jurisdictional harmonisation and is easily understood.
- For the two Queensland Acts, Food Act 2006 and Food Production (Safety) Act 2006, which are primarily administered by Queensland Health and Safe Food Production Queensland respectively, there can be some confusion with an overlap in responsibility in the supply chain primarily. QFF does not support the two Acts becoming one as in NSW but instead making it clearer the connection and roles and responsibilities of each jurisdiction for the two Acts. The reason for keeping them separate is that administration is now appropriately given to the jurisdiction which has the knowledge and skills to administer them. Keeping it to just Queensland Health for example would expose greater risk to food safety of the agricultural industries and their global recognition of safe food.
- **Updating Regulation:** The National Food Standards Code is accepted by all jurisdictions but varies according to whether any changes are automatically adopted into the regulation or whether it requires regulation change to adopt the changes. QFF recognises the need for timely legislation and that regulation changes can take months to be adopted. However, there are times when changes need to be reviewed by individual jurisdictions for overlaps and clashes with other Queensland legislation, relevancy and practicality. An example is *The Animal Care and Protection Act 2001* which automatically adopts the Scientific Code changes when they are made. This has caused clashes with other specific Queensland legislation where the Veterinary Surgeon's Act requires certain acts to be done by a veterinarian, but the Scientific Code allows for non-veterinarians to perform acts of veterinary science. For this reason, QFF supports the current system of Queensland adoption of the Food standards but encourages assessing ways to streamline the adoption into subordinate legislation.

### Theme 1 – A Primary production food safety regulatory system that is fit for purpose

#### Comments

- **Commodity Specific Food Safety Assurance Schemes:** Specific commodity specific food safety schemes are an essential part of the current food safety regulatory framework. . For farmers who grow different types of agriculture product, there can be a regulatory burden of higher costs (separate audits etc) but they are risk specific for real risks and one size does not fit all. Examples of

food assurance schemes across agriculture (many incorporated into FSANZ) include:

- Horticulture: Freshcare and Commodity Specific Food Safety Guidelines for Melons are two examples of industry owned on farm assurance program covering food safety, quality and environmental sustainability.
- Meat and Livestock: Livestock Production Assurance (LPA), National Feedlot Accreditation Scheme, Australian Export Meat Inspection System and National Saleyard Quality Assurance all provide for safety and quality.
- Dairy: Standard 4.2.4 is a primary production and processing standard for dairy products and Raw Milk Cheese Assessment has special safety requirements for producers using unpasteurised milk.
- Eggs: Primary Produce (Food Safety Schemes) (egg) Regulations.
- **Role of Food assurance schemes:** Food assurance schemes play an essential role in food safety production.
  - They need to be recognised in the Act as an equivalent means of complying with the Act and subordinate legislation.
  - There should be no, or minimal cost to growers for the Queensland government to accept food safety certification undertaken through the recognised assurance schemes. In these situations, there is very little rationale for any regulator auditing food safety. The regulator should instead regulate the schemes and standard owners.
  - The question in the discussion paper on whether these food assurance schemes still have a role to play leads to broader queries as to what the government's objectives are. Noting this, if there is an opportunity to engage further with the review at some point to better understand governments priorities and intent, that would be highly beneficial.
- **Food safety and linkages to other parts of the supply chain:** Processing is always the easy target because the regulations provide governments with a regulatory touch point (i.e. lower microbiological limits on carcasses) but it does not recognise the responsibilities in other parts of the supply chain, including at the food business operator level, retail and consumer handling. The current regs do not provide Safe Food Production QLD with any legislative powers to look beyond processing and generate a holistic approach to food safety management, and there is a legal disconnect with QLD Health and councils in terms of food safety management, where the processing side ends up bearing significantly more responsibility for hygienic production
- **The intersection between animal welfare and food regulation** needs to be carefully managed. Current situations in Victoria (described in next dot point)

highlight the importance of legislative intent (use/misuse of food safety pathways to advance animal activist agendas in animal welfare.

- Other jurisdictions particularly Victoria are increasingly being legally challenged (by activist groups) on their roles and responsibilities as related to animal care and protection at slaughter establishments (transport, lairage, stunning, slaughter and bleed out). It would be detrimental to regulation that inadvertently introduces legally grey areas for animal welfare (e.g. through POCTA provisions in the Victorian Act) on animal slaughter that inherently has a different intent (i.e. killing an animal for food is not 'protecting the animal from harm'). If there are any proposals in the legislation around sentience, this introduces grey areas depending on how sentience is interpreted/implemented.

## Theme 2 – Improving system adaptability

### Comments

- **Adjustments and improvements to current compliance model:**
  - **Egg Industry:** Safe Food Production Queensland requires anyone who sells one egg to be registered with Safe Food and be compliant with audits. Audits for major commercial enterprises have a different complexity to small growers. QFF is aware that the current audit arrangement is a grower self-assessment tool not requiring a visit but audited if required. While self-assessment is welcome, for smaller producers, their knowledge may not be based on any form of training or knowledge. QFF recommends that, especially for small to mid-tier farms, a requirement of being registered requires completion of an online module covering food safety and biosecurity. Disease such as *salmonella enteritidis* causes significant human health risks and this is associated with likely biosecurity breaches. Spot audits are recommended to keep everyone alert, vigilant and compliant.
  - **Other industries:** Requirements to do online training modules could also be applied across commodities for all smaller enterprises to enhance knowledge and skills before being registered to sell food.
- **Addressing challenges and opportunities**
  - **Poultry meat and opportunity for Queensland Health to improve consumer safety from food borne organisms:**
  - The public is still largely unaware of how to prepare and eat food safely. This is not a production issue. Recent Food Safety Information Council (FSIC) survey findings highlight that unsafe at-home practices persist and are, in some cases, increasing. The 2025 national survey found that 51% of Australians still wash whole raw chicken before cooking, up from 49% in 2021. Similarly, 48% wash chicken pieces with skin on, and 44% wash

skinless pieces. Washing chicken is not necessary and actually increases risk of splash spreading microbial load across other food on the bench top.

- **Campylobacter outbreak linked to duck liver pate in Australia**<sup>2</sup> A case in July 2025 reported investigators observed raw pate trapped under the mixer lid seal at the end of the cooking process, suggesting that raw material could easily be re-introduced into the finished cooked product. This case demonstrates that the key control point for pathogens such as *Campylobacter* is effective cooking and hygienic handling at the food service or consumer level. Even where upstream systems operate under strict regulatory controls, these safeguards can be undermined by poor practices later in the supply chain. Accordingly, this outbreak provides clear evidence that food safety is a shared responsibility and that regulatory approaches must address risks across the entire food chain, rather than focusing disproportionately on primary production and processing.

### Theme 3 – Efficient and effective primary production food safety systems

#### Comments

- **Maximising efficiency and effectiveness**
  - QFF supports ongoing efforts to maintain safeguards while minimising costs on business, regulatory creep and impacts on the community.
  - Proposed changes to specific schemes would be complex and QFF highly supports effective engagement with specific industries when reviewing specific elements. The scope of this submission does not allow for a comprehensive analysis of all the potential ramifications of change.
  - Attention should be paid for separate schemes and audits to coordinate their visits to farms. Sometimes in a regional area, they may be the same person and there are costs involved in ceasing activities for the days the auditor is on farm, extra travel costs etc. If components are included in other commercial audits e.g. retailer requirements, then if the farm can show the auditor the results of these, it may mean a visit is not necessary.

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<sup>2</sup><https://www.poultrymed.com/Poultrymed/Templates/showpage.asp?DBID=1&LNGID=1&TMID=178&FID=12100&PID=0&IID=98948>

## Theme 4 – Information and data systems

### Comments

- **Sharing data:** There is currently an issue with sharing data between agencies due apparently to Privacy Laws. For a particular issue which affects multiple agencies there needs to be an easy way to share each other's data. This should be extended to industry stakeholders.
- For example, an outbreak of *salmonella enteritidis* is primarily a Queensland Health concern, but it also signals that biosecurity arrangements on the farm are at fault. If DPI then wants to send an alert out to all the registered egg producers, it would have to rely on Safe Food to send out to its list of registered farms. However, Safe Food's legislation only provides for food safety issues and not biosecurity so it is not clear whether they could send out for example a message or training module to improve their biosecurity.
- **Agricultural industries need to be an integral part of the data share.** Industry stakeholders need to be added to the data sharing challenges (in addition to the inter-agency challenges). It is difficult for industry stakeholders, who are often those best positioned to manage an issue at an operational level, to manage issues that they are not aware of due to:
  - data sharing pathways precluding communication to them, that have them well down the information distribution priority list, where communication is delayed vs timely, or
  - that distil the information so heavily that it can't be meaningfully actioned. (e.g., when a food processing facility is not a party to established/approved information sharing systems and hence doesn't find out about issues they can/would manage if they were aware).
- QFF recommends that data sharing between agencies and agriculture industry stakeholders with appropriate safeguards for privacy be specifically looked into.
- QFF also recommends that biosecurity and animal welfare, the causative aspects of food safety issues, be recognised and included in data sharing where appropriate.

## Conclusion

The current regulatory system for safe food production is focussed on upstream systems operating under strict regulatory controls when these safeguards can be undermined by poor practices later in the supply chain. The review of the *Food Production (Safety) Act 2000* needs to include *the Food Act 2006* administered by Queensland Health as there are opportunities to increase food safety for consumers by assessing the risk of other parts of the supply chain including consumer education. The

agricultural industries have assurance schemes that maintain the highest standards of food safety and would oppose potential changes that might introduce more regulatory burden when the outcome of food safety is everyone's responsibility. We look forward to continued engagement with DPI and other stakeholders and are available to discuss any aspect of this submission.

Kind regards,

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Chief Executive Officer



**This submission is provided by the Queensland Farmers' Federation**

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