



eat well
tasmania

SUBMISSION

to the Department of Natural Resources
and Environment Tasmania

Development of the Primary Produce Safety (Horticulture Produce) Regulations 2026 – Phase 2 Consultation

July 2026



enjoy healthy eating, support local produce

Executive Summary

Eat Well Tasmania welcomes the opportunity to contribute to consultation on the proposed Primary Produce Safety (Horticulture Produce) Regulations 2026.

Eat Well Tasmania strongly supports the objective of protecting public health through contemporary, evidence-informed and proportionate food safety regulation. Safe food is a fundamental component of a healthy food system. Equally, healthy communities depend on equitable access to affordable nutritious food, resilient local food systems, food literacy, community participation and strong collaboration across government, industry and the community.

Throughout this consultation, Eat Well Tasmania has engaged with a broad cross-section of Tasmania's food system, including community organisations, community gardens, neighbourhood houses, growers, educators, local government and members of the public. While there is broad support for strengthening food safety where genuine risks exist, there is also significant concern that applying regulatory requirements to home growers and community-scale food initiatives may create unintended consequences that outweigh the public health benefit.

Eat Well Tasmania is particularly concerned that the current breadth of the proposed definition and application of "supply" may unintentionally capture low-risk community food growing and local food exchange activities that present fundamentally different food safety risks to larger-scale production and distribution systems.

From Eat Well Tasmania's perspective, food safety regulation should be proportionate to demonstrated risk. Regulatory effort should be directed towards larger-scale commercial production, processing and supply chains where food safety risks are greatest and where traceability and formal regulatory oversight provide the greatest public health benefit.

Conversely, Eat Well Tasmania does not support mandatory notification, registration or food safety documentation requirements applying to non-commercial home growers, community gardens, crop swaps, neighbourhood houses, school kitchen gardens, charitable food sharing initiatives or similar community-based activities. These initiatives make an important contribution to healthy eating, food literacy, social connection, food security, food waste reduction and access to affordable fresh produce across Tasmania.

The consultation process has highlighted genuine concern that additional administrative requirements, perceived regulatory burden and uncertainty regarding compliance may discourage individuals and communities from growing and sharing leafy greens, berries and other fresh produce. Such outcomes would be inconsistent with longstanding public health efforts that encourage Tasmanians to grow food, eat more fruit and vegetables, reduce food waste and strengthen local food systems.

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Executive Summary continued

Should regulatory requirements apply to any part of the horticulture sector, implementation must be supported through practical education, accessible information and proportionate administrative requirements. Guidance should be available in plain English, translated where appropriate, delivered through trusted community networks, and supported by practical assistance rather than relying solely on online documentation. Administrative requirements should be limited to what is necessary to manage food safety risk and should not create unnecessary barriers to participation.

Eat Well Tasmania also encourages ongoing monitoring of the broader impacts of the Regulations. Evaluation should consider not only food safety and public health outcomes, but also impacts on food security, healthy eating, participation in community food initiatives, access to affordable produce, community resilience and public confidence in Tasmania's local food system.

Tasmania has an opportunity to strengthen food safety while continuing to support thriving local food systems and healthy communities. We believe these objectives are complementary and can best be achieved through a genuinely proportionate, risk-based regulatory approach that focuses regulatory oversight where it delivers the greatest public health benefit.

Key Recommendations

Eat Well Tasmania encourages Biosecurity Tasmania to:

1. Refine the application of the Regulations so that home growers, community gardens, crop swaps, neighbourhood houses, school kitchen gardens, charitable food initiatives and other low-risk community food activities are exempt from mandatory notification, registration and food safety documentation requirements.
2. Focus regulatory oversight on higher-risk larger-scale production, processing and distribution systems, processing and supply chains, ensuring regulation remains proportionate to demonstrated food safety risk.
3. Provide comprehensive implementation support through practical education, clear guidance, plain English and translated resources, community-based engagement and accessible assistance that enables producers and organisations to understand and meet their obligations.
4. Ensure regulatory implementation does not unintentionally reduce access to affordable leafy greens and berries or discourage community food growing, sharing and food literacy initiatives that contribute positively to public health and food security.
5. Undertake a post-implementation review that evaluates both food safety and public health outcomes and broader public health impacts, including effects on community participation, food security, equitable access to healthy food, local food systems and consumer confidence.





About Eat Well Tasmania

Eat Well Tasmania is Tasmania's statewide healthy eating organisation.

For almost 20 years, we have worked alongside government, community organisations, local government, health services, educators, researchers, food producers, industry and communities to improve the health and wellbeing of Tasmanians through healthier food systems.

Our role is to connect people, organisations and ideas that strengthen Tasmania's food system. We facilitate collaboration, build partnerships and support collective action that improves equitable access to healthy, affordable and locally produced food while strengthening community wellbeing.

Our work spans healthy eating, food literacy, food environments, community capacity building, systems leadership and public policy. We recognise that healthier communities are underpinned by safe food, resilient local food systems and opportunities for people to grow, access and share healthy food within their communities.

As Tasmania's statewide connector, Eat Well Tasmania works across the entire food system. This includes partnerships with government, local government, producers, community gardens, neighbourhood houses, schools, food relief organisations, researchers, health services and community organisations. This whole-of-system perspective provides a unique understanding of how public policy and regulation can influence healthy eating, food security, community participation and equitable access to nutritious food.

Eat Well Tasmania supports evidence-informed policy and regulatory approaches that protect public health while recognising the broader social, economic and community benefits of local food systems. We welcome opportunities to contribute to policy discussions that strengthen food safety, improve health outcomes and support thriving, resilient and equitable food systems for all Tasmanians.



Introduction

Eat Well Tasmania welcomes the opportunity to provide feedback on the proposed Primary Produce Safety (Horticulture Produce) Regulations 2026.

As Tasmania's statewide healthy eating organisation, Eat Well Tasmania recognises that safe food, healthy eating and resilient local food systems are interconnected foundations of good public health. Strong food safety regulation plays an important role in protecting consumers and maintaining confidence in Tasmania's food system. Equally, public health is strengthened when people have equitable access to affordable, nutritious food and opportunities to grow, share and enjoy locally produced food within their communities.

While Eat Well Tasmania does not represent horticultural producers or provide technical food safety advice, we work across Tasmania's food system and regularly engage with producers, community gardens, neighbourhood houses, schools, local government, food relief organisations, health services, researchers and community organisations. This provides a unique public health and food systems perspective on how regulation influences healthy eating, food security, food literacy, community participation and equitable access to healthy food.

Eat Well Tasmania acknowledges the Department's extensive consultation throughout the development of the proposed Regulations and the significant work undertaken to respond to stakeholder feedback. We support the objective of strengthening food safety through a contemporary, evidence-informed and proportionate regulatory framework.

However, we are concerned that the current application of the proposed Regulations may unintentionally capture a broad range of low-risk community food activities through the definition of "supply", despite these activities presenting fundamentally different levels of food safety risk to larger-scale production and distribution systems. Community gardens, crop swaps, neighbourhood houses, school kitchen gardens, charitable food initiatives, roadside honesty boxes, backyard food growers and small-scale local exchange all make important contributions to healthy eating, food literacy, food security, community resilience and social connection.

From Eat Well Tasmania's perspective, regulatory effort should be proportionate to demonstrated risk. The method by which food changes hands; whether it is gifted, donated, swapped or sold in small quantities; does not necessarily determine food safety risk. Rather, greater regulatory oversight should focus on larger-scale production, processing and distribution systems where the complexity of supply chains and potential public health consequences are significantly higher.

Eat Well Tasmania is concerned that applying notification and documentation requirements to low-risk community food growing and sharing may discourage participation in activities that governments have long encouraged to improve healthy eating, reduce food insecurity, minimise food waste and strengthen local food systems. Consultation has highlighted genuine concern from community members that increased administrative requirements and regulatory uncertainty may result in people choosing not to grow or share fresh produce, particularly leafy greens and berries.



Introduction continued

Should regulatory requirements apply, implementation must be supported through practical education, accessible guidance, translated resources where appropriate and proportionate administrative processes that are simple to understand and complete. Compliance requirements should be limited to what is genuinely necessary to manage food safety risk and should not create unnecessary barriers for volunteers, community organisations, culturally and linguistically diverse communities or people with limited digital literacy.

This submission reflects Eat Well Tasmania's public health perspective and seeks to support a regulatory framework that protects consumers while continuing to strengthen healthy eating, equitable access to nutritious food, food security and resilient community food systems across Tasmania.

EAT WELL TASMANIA PERSPECTIVE

Strong food safety and thriving community food systems are complementary public health outcomes. Effective regulation should focus on demonstrated risk, protecting consumers while enabling the safe growing, sharing and local exchange of healthy food that strengthens food security, food literacy, community participation and resilient local food systems.



Submission Principles

The following principles underpin Eat Well Tasmania's submission.

Public Health

Safe food is fundamental to protecting and improving the health of Tasmanians. Public health is strengthened through regulatory approaches that protect consumers while supporting equitable access to nutritious food, healthy eating, food security and resilient communities.

Shared responsibility

Food safety is a shared responsibility across the food system. Government, producers, community organisations and consumers all have a role to play in protecting public health. Alongside proportionate regulation, consumer education about safe food handling, washing fresh produce, appropriate storage and preparation practices is an important component of reducing food safety risks.

Proportionate, risk-based regulation

Food safety regulation should be proportionate to demonstrated risk. Regulatory oversight should focus on activities where the potential public health consequences of contamination are greatest. Low-risk community food growing, direct local food exchange and community food initiatives should not be subject to regulatory requirements that are disproportionate to the level of risk they present.

Healthy food systems

Food safety is one component of a healthy food system. Strong food systems also depend on access, affordability, sustainability, food literacy, community participation and opportunities for people to grow, share and access locally produced food.

Community participation

Community gardens, crop swaps, neighbourhood houses, school kitchen gardens, charitable food initiatives and other community food activities make important contributions to healthy eating, food literacy, social connection, food security and community resilience. Public policy should support these activities wherever possible while maintaining appropriate food safety protections.

Education before compliance

Successful implementation depends on practical education, clear communication and accessible support. Information should be provided in plain English, translated where appropriate, delivered through trusted community networks and supported by practical assistance. Administrative requirements should be proportionate, simple to understand and limited to what is necessary to achieve food safety objectives.



Submission Principles continued

Collaboration

Effective food safety and public health outcomes are strengthened through partnerships between government, producers, industry, local government, education, health services and community organisations. Leveraging existing networks will support awareness, build capability and encourage consistent understanding across Tasmania's diverse food system.

Continuous improvement

Ongoing monitoring and evaluation should assess not only food safety and public health outcomes, but also broader impacts on healthy eating, food security, equitable access to nutritious food, community participation and resilient local food systems. Regulatory frameworks should continue to evolve in response to evidence and stakeholder experience.



Question 1

Please share any feedback that you have about the revised draft Regulations.

As Tasmania's statewide healthy eating organisation, Eat Well Tasmania works across the food system to strengthen healthy eating, food security and resilient local food systems. We bring together government, local government, producers, community organisations, neighbourhood houses, community gardens, educators, researchers, health services and industry to improve the health and wellbeing of Tasmanians.

We acknowledge the Department's extensive consultation throughout the development of the Regulations and recognise the significant effort made to respond to stakeholder feedback following Phase 1 consultation. The revised draft demonstrates a genuine commitment to developing a more practical and proportionate regulatory framework while maintaining the important objective of protecting public health through safe food.

Eat Well Tasmania strongly supports food safety regulation that is evidence-informed, proportionate and focused on protecting consumers. We also support nationally consistent approaches where they improve food safety and public health outcomes and provide clarity for producers and regulators.

However, from a public health and food systems perspective, we remain concerned that the current application of the proposed Regulations continues to capture a broad range of low-risk community food activities through the definition and application of "supply". Activities such as backyard food growing, community gardens, crop swaps, neighbourhood houses, school kitchen gardens, charitable food initiatives, roadside honesty boxes and other forms of direct local food exchange operate very differently from larger-scale production, processing and distribution systems and should not automatically be subject to the same regulatory requirements.

Eat Well Tasmania considers that regulatory effort should be proportionate to demonstrated food safety risk. The method by which food changes hands; whether it is gifted, donated, swapped or sold in small quantities; does not, in itself, determine food safety risk. Greater regulatory oversight should instead focus on larger-scale production and supply systems where complexity, distribution pathways and potential public health consequences are significantly greater.

Community food initiatives make an important contribution to Tasmania's public health outcomes. They increase access to affordable fresh produce, strengthen food literacy, reduce food waste, build social connection and improve food security across many communities. They also support long-standing government objectives that encourage Tasmanians to grow more food, eat more fruit and vegetables and participate in healthier food environments.



Question 1 continued

Throughout consultation, Eat Well Tasmania has heard genuine concern from community organisations and members of the public that notification requirements, documentation obligations and uncertainty regarding compliance may discourage participation in these activities. Even where regulatory requirements are intended to be relatively simple, the perception of increased bureaucracy has the potential to reduce community food growing and sharing, particularly among volunteers, culturally and linguistically diverse communities, older Tasmanians and community organisations with limited capacity.

Experience from other Australian jurisdictions also suggests that proportionate food safety regulation can effectively focus regulatory oversight on higher-risk production systems while allowing low-risk community food growing and direct local food exchange to continue without unnecessary regulatory burden. Eat Well Tasmania encourages Biosecurity Tasmania to consider these approaches when finalising the Regulations.

Accordingly, Eat Well Tasmania encourages a regulatory framework that:

- protects consumers through strong, evidence-informed food safety regulation where public health risks are greatest
- exempts home growers, community gardens, crop swaps, neighbourhood houses, school kitchen gardens, charitable food initiatives and other low-risk community food activities from mandatory notification, registration and food safety documentation requirements
- recognises the significant contribution that community food initiatives make to healthy eating, food security, food literacy and resilient local food systems
- provides practical education, clear communication and accessible support before compliance expectations are introduced; and
- monitors both food safety and public health outcomes and broader impacts on healthy eating, food security, community participation and equitable access to nutritious food.

Tasmania has a strong culture of growing, sharing and celebrating locally produced seasonal food through farm gates, roadside stalls, farmers' markets, community gardens and neighbourhood food initiatives. These activities strengthen local economies while improving public health, social connection and food resilience. The final regulatory framework should continue to support these important community outcomes while ensuring food safety protections remain focused where they deliver the greatest public health benefit.

EAT WELL TASMANIA PERSPECTIVE

Effective food safety regulation should be proportionate to demonstrated risk. Protecting consumers and supporting healthy communities go hand in hand. Regulation should focus where food safety risks are greatest while supporting low-risk community food growing and local food sharing that strengthens healthy eating, food security, food literacy and resilient local food systems.



Question 2

Are there any parts of the revised draft Regulations that could be clearer?

From Eat Well Tasmania's perspective, the greatest area requiring further clarity is the practical application of the Regulations to low-risk community food activities.

Throughout consultation, we have observed significant uncertainty among community organisations, educators, community gardens, neighbourhood houses, volunteer groups and individual Tasmanians regarding whether their activities are captured by the proposed Regulations. This uncertainty has centred particularly on the broad definition and application of "supply" and whether activities such as sharing produce, crop swaps, community gardens, roadside honesty boxes, charitable food initiatives, school kitchen gardens and backyard food growing are intended to fall within the regulatory framework.

Where uncertainty exists, there is a genuine risk that individuals and organisations will choose not to grow, share or provide fresh produce to their communities rather than attempt to navigate regulatory requirements they do not fully understand. From a public health perspective, this would represent an unintended consequence that could reduce healthy eating, food literacy, community participation and equitable access to nutritious food.

Eat Well Tasmania considers that additional clarity is required to ensure people can confidently determine whether their activities are captured by the Regulations and, importantly, whether they should be.

Clearer guidance should explain:

- how the term "supply" is intended to apply across different settings
- which low-risk community food activities are exempt from the Regulations
- the distinction between large-scale production and distribution systems and direct community food growing and local food exchange
- when notification or accreditation requirements apply
- what documentation is genuinely required for those captured by the Regulations; and
- where individuals and organisations can access practical advice and support.

Should notification requirements remain for any sector, guidance materials should be practical, concise and proportionate to the level of risk. Information should be available in plain English, translated into relevant community languages where appropriate, supported by visual decision-making tools and delivered through trusted organisations that already work alongside affected communities.

Eat Well Tasmania is also concerned that lengthy documentation, complex administrative requirements and reliance on online information alone may create barriers for many Tasmanians, particularly volunteers, culturally and linguistically diverse communities, older people, community organisations and individuals with limited digital literacy. Food safety education should prioritise understanding and practical capability rather than administrative compliance.



Question 2 continued

Providing practical examples that reflect real community settings; including community gardens, crop swaps, neighbourhood houses, school kitchen gardens, charitable food initiatives, roadside honesty boxes and small-scale local food exchange; would significantly improve understanding and encourage consistent interpretation across Tasmania.

Recommendation

Eat Well Tasmania encourages Biosecurity Tasmania to:

- provide greater clarity regarding the intended application of the definition of "supply", particularly in relation to low-risk community food activities
- clearly identify activities that are exempt from the Regulations
- develop practical, concise and proportionate guidance that reflects the level of food safety risk
- provide information in plain English and translated formats, supported by visual resources and practical examples; and
- work through trusted community networks to deliver education and support before compliance expectations are introduced.

EAT WELL TASMANIA PERSPECTIVE

Good regulation is understood regulation. Public confidence is strengthened when people can easily understand whether the Regulations apply to them, why they apply, and what is genuinely required. Education should remove barriers; not create them; and should support people to continue growing and sharing healthy food safely within their communities.



Question 3

Do you consider the proposed tiers in the Regulations to be appropriate for Tasmania's context?

Eat Well Tasmania supports the principle of a tiered, risk-based regulatory framework. Food safety regulation should recognise that different activities present different levels of food safety risk and that regulatory oversight should be proportionate to those risks.

However, Eat Well Tasmania does not consider the proposed lowest tier to be appropriate in its current form.

From a public health perspective, we are concerned that the proposed application of notification requirements captures a broad range of low-risk community food activities that do not present the same food safety risks as larger-scale production, processing and distribution systems.

Activities including home food growing, community gardens, crop swaps, neighbourhood houses, school kitchen gardens, charitable food initiatives, roadside honesty boxes and other forms of direct local food exchange operate through short, local supply pathways with limited handling and direct relationships between growers and consumers. These settings are fundamentally different from larger commercial supply chains where produce may pass through multiple handling, storage and distribution points before reaching consumers.

Eat Well Tasmania considers that regulatory oversight should be directed towards those areas where the greatest public health benefit can be achieved. Applying notification and administrative requirements to low-risk community food activities risks creating unnecessary barriers while delivering limited additional food safety benefit.

Throughout consultation, Eat Well Tasmania has heard genuine concern that some individuals and community organisations may choose to stop growing or sharing leafy greens and berries altogether rather than navigate regulatory requirements that they perceive as complex or intrusive. If realised, these behavioural changes could reduce community participation, food literacy, food security and equitable access to healthy food, undermining broader public health objectives.

Eat Well Tasmania also notes that approaches adopted or considered in other Australian jurisdictions have generally focused regulatory oversight on higher-risk production systems while recognising the comparatively lower food safety risks associated with direct community food growing and local food exchange. This demonstrates that proportionate regulation can protect public health while avoiding unnecessary regulatory burden for low-risk activities.

For these reasons, Eat Well Tasmania recommends that the proposed lowest tier be reconsidered.

Rather than applying notification requirements to all activities captured through the current definition of "supply", the Regulations should exempt low-risk community food growing and direct local food exchange where food safety risks are demonstrably low and where the broader public health benefits of participation are substantial.



Question 3 continued

This would enable regulatory effort and resources to remain focused on higher-risk production, processing and distribution systems where food safety oversight is most likely to improve consumer protection.

Recommendation

Eat Well Tasmania recommends that Biosecurity Tasmania:

- retain a risk-based tiered regulatory framework
- remove mandatory notification, registration and food safety documentation requirements for low-risk community food activities, including home growers, community gardens, crop swaps, neighbourhood houses, school kitchen gardens, charitable food initiatives and other forms of direct local food exchange
- refine the application of the definition of "supply" so that activities presenting substantially different levels of food safety risk are not regulated in the same manner; and
- continue monitoring evidence from Tasmania and comparable Australian jurisdictions to ensure the regulatory framework remains evidence-informed, proportionate and focused on areas of greatest food safety risk.



Question 4

Some guidance documents are currently available and provided on the consultation webpage. What other material would assist you or your business to achieve compliance with the new Regulations?

Eat Well Tasmania's primary recommendation is that low-risk community food activities; including home growers, community gardens, crop swaps, neighbourhood houses, school kitchen gardens, charitable food initiatives and other forms of direct local food exchange; should be exempt from mandatory notification, registration and food safety documentation requirements.

Should regulatory requirements remain for any sector, successful implementation will depend on practical, accessible and proportionate education that enables people to understand what is required, why it is required and how to safely meet any applicable obligations.

Throughout consultation it has become evident that many people remain uncertain about whether the proposed Regulations apply to them at all. This uncertainty highlights the importance of providing guidance that is clear, consistent and accessible before compliance expectations are introduced.

From Eat Well Tasmania's perspective, implementation resources should include:

- clear plain English guidance explaining who is, and is not, captured by the Regulations
- practical explanations of how the definition and application of "supply" applies across different settings
- simple visual decision-making tools to help individuals and organisations determine whether the Regulations apply to their activities
- practical case studies reflecting real-world scenarios, including community gardens, neighbourhood houses, school kitchen gardens, crop swaps, charitable food initiatives, roadside honesty boxes, micro growers and larger-scale commercial producers
- concise implementation checklists that are proportionate to the level of food safety risk rather than lengthy or unnecessarily complex documentation;
- translated resources and culturally appropriate communication materials for communities where English is not their first language
- short instructional videos, webinars and face-to-face information sessions delivered through trusted community organisations and existing networks
- frequently asked questions that continue to evolve in response to stakeholder enquiries and feedback; and
- communication resources that local government, community organisations, neighbourhood houses and industry bodies can readily share through their existing networks.



Question 4 continued

Guidance materials should not focus solely on regulatory obligations. They should also reinforce practical food safety messages for consumers and communities. Food safety is a shared responsibility across the food system. Whether fresh produce is purchased from a supermarket, farmers' market, roadside stall, community garden or grown at home, consumers also play an important role by following good food hygiene practices, including appropriate washing of fresh produce where required, safe storage, preparation and reducing the risk of cross-contamination. Building food safety capability across the entire food system; from growers and community organisations through to consumers; will strengthen public health outcomes.

Eat Well Tasmania also considers it essential that any documentation required under the Regulations remains proportionate to the level of food safety risk. Administrative requirements should be limited to information that is genuinely necessary to achieve food safety objectives and should avoid creating unnecessary paperwork or complexity that may discourage participation in low-risk community food activities.

Education should not rely solely on online information or downloadable forms. Many volunteers, community organisations, culturally and linguistically diverse communities, older Tasmanians and people with limited digital literacy will benefit from practical support delivered through trusted local networks. Investing in education, capability building and community engagement is likely to achieve stronger and more sustainable food safety and public health outcomes than relying primarily on regulatory compliance processes.

Ultimately, the objective should be to build understanding, confidence and capability; not simply increase administrative compliance.

Recommendation

Should regulatory requirements remain, Eat Well Tasmania encourages Biosecurity Tasmania to:

- prioritise education before compliance
- provide practical, concise and proportionate guidance that reflects demonstrated food safety risk
- ensure all information is available in plain English, translated where appropriate, and accessible through a variety of formats
- minimise unnecessary paperwork and administrative burden
- deliver education and practical support through trusted community organisations and existing statewide networks; and
- continue refining guidance materials in response to stakeholder feedback throughout implementation.

EAT WELL TASMANIA PERSPECTIVE

Successful food safety relies on shared responsibility, trust and practical support, not unnecessary bureaucracy. Education should empower people to grow, share and access healthy food safely, while regulation remains proportionate to demonstrated risk.



Question 5

What support could the Regulator provide during the transition period to help you or your business achieve compliance with the new Regulations?

Eat Well Tasmania's primary recommendation is that low-risk community food activities; including home growers, community gardens, crop swaps, neighbourhood houses, school kitchen gardens, charitable food initiatives and other forms of direct local food exchange; should be exempt from mandatory notification, registration and food safety documentation requirements.

Should regulatory requirements remain for any sector, the transition period presents an important opportunity to build understanding, confidence and capability before any compliance expectations are introduced.

Throughout consultation it has become clear that many individuals and community organisations remain uncertain about whether the proposed Regulations apply to them and what would be required if they do. Supporting these communities through practical education, accessible information and ongoing engagement will be critical to achieving positive food safety and broader public health outcomes while maintaining confidence in the regulatory framework.

Eat Well Tasmania encourages Biosecurity Tasmania to adopt an education-first approach that prioritises capability building over administrative compliance during the transition period.

Support should include:

- accessible telephone and email advice services that provide timely, practical and consistent responses to enquiries
- regional information sessions and workshops delivered across Tasmania, including rural and regional communities
- webinars and short educational videos explaining the Regulations using practical, community-based examples
- translated resources and culturally appropriate communication materials for communities where English is not their first language
- practical support delivered through trusted organisations including community gardens, neighbourhood houses, local government, health services, multicultural organisations and community organisations
- ongoing refinement of guidance materials in response to stakeholder feedback and frequently asked questions
- practical implementation assistance for organisations requiring support to understand whether the Regulations apply to them and, if so, how to meet any applicable obligations; and
- a staged implementation approach that focuses on education, awareness and capability building before any compliance activity is undertaken.



Question 5 continued

Eat Well Tasmania also considers that implementation support should extend beyond providing information. Many volunteers, community organisations and individuals will benefit from practical, face-to-face assistance that helps them understand whether the Regulations apply to their activities and what, if any, obligations they have. Building confidence through trusted local support is likely to achieve stronger long-term outcomes than relying solely on written guidance or online resources.

The transition period also presents an opportunity to strengthen community food safety knowledge more broadly. Public education campaigns that reinforce safe food handling practices in the home; including appropriate washing of fresh produce where required, safe storage, refrigeration, preparation and reducing the risk of cross-contamination; will complement the regulatory framework and help reduce food safety risks across the entire food system. Food safety is a shared responsibility, and strengthening consumer knowledge is an important component of protecting public health.

Tasmania already has strong networks that support healthy eating, food literacy and community food initiatives. Community gardens, neighbourhood houses, local government, schools, food relief organisations, multicultural organisations and health services all have trusted relationships with the communities most likely to be affected by the proposed Regulations. Working through these existing partnerships will enable information to reach diverse audiences more effectively, improve understanding and reduce unnecessary concern.

Where regulatory requirements apply, implementation should remain proportionate, supportive and focused on building long-term capability rather than creating unnecessary administrative burden. Investing in education, community engagement and practical support is likely to achieve stronger and more sustainable food safety and public health outcomes than relying primarily on regulatory processes alone.

Recommendation

Should regulatory requirements remain, Eat Well Tasmania encourages Biosecurity Tasmania to:

- adopt an education-first approach throughout implementation
- invest in practical capability building through trusted community organisations and existing statewide networks
- provide accessible support through multiple formats, including face-to-face engagement, translated resources and practical implementation assistance
- prioritise understanding, confidence and voluntary uptake before compliance activity
- strengthen community food safety education alongside producer education through practical consumer food safety messaging; and
- continue working collaboratively with stakeholders to refine implementation in response to community feedback and emerging evidence.

Eat Well Tasmania Perspective

Successful implementation relies on trust, education and partnerships. Food safety is a shared responsibility, and education should empower communities while regulation remains proportionate to risk.



Final Recommendations

Drawing on the public health and food systems perspective outlined throughout this submission, Eat Well Tasmania encourages Biosecurity Tasmania to adopt the following recommendations.

Recommendation 1 | Exempt low-risk community food activities

Amend the proposed regulatory framework so that low-risk community food activities; including home growers, community gardens, crop swaps, neighbourhood houses, school kitchen gardens, charitable food initiatives, roadside honesty boxes and other forms of direct local food exchange; are exempt from mandatory notification, registration and food safety documentation requirements.

Regulatory oversight should remain proportionate to demonstrated food safety risk and focus on larger-scale production, processing and distribution systems where the potential public health benefit of regulation is greatest.

Recommendation 2 | Refine the application of "supply"

Review the definition and practical application of "supply" to ensure activities presenting fundamentally different levels of food safety risk are not captured by the same regulatory requirements.

The method by which food changes hands; whether it is gifted, donated, swapped or sold in small quantities; should not, in itself, determine regulatory burden. Greater consideration should be given to factors such as production scale, handling, processing, storage, distribution and overall food safety risk.

Recommendation 3 | Education before compliance

Where regulatory requirements remain, prioritise education, capability building and practical support before compliance expectations are introduced.

Implementation should include clear plain English guidance, translated resources where appropriate, practical examples, visual decision-making tools, community workshops, webinars and ongoing access to trusted advice channels. Administrative requirements should remain proportionate to demonstrated food safety risk and avoid unnecessary bureaucracy.

Recommendation 4 | Work through trusted community networks

Partner with existing statewide and regional organisations; including local government, neighbourhood houses, community gardens, schools, health services, multicultural organisations, food relief organisations and community networks; to deliver education, build capability and support understanding across Tasmania.

Leveraging trusted relationships will strengthen awareness, reduce confusion and improve long-term food safety and public health outcomes.

Final Recommendations continued

Recommendation 5 | Measure success through public health outcomes

Undertake a comprehensive post-implementation review that evaluates not only food safety and public health outcomes, but also the broader impacts of the Regulations on:

- community participation
- healthy eating
- food literacy
- food security
- equitable access to nutritious food
- participation in community gardens and other community food initiatives;
- local food systems; and
- consumer confidence in Tasmanian produce.

Future refinements should be informed by evidence, stakeholder feedback and the broader public health outcomes achieved through the regulatory framework.

EAT WELL TASMANIA PERSPECTIVE

Community food growing and sharing play an important role in healthier eating, food security and connected communities. Regulation should protect consumers without creating unnecessary barriers to these low-risk activities.

Eat Well Tasmania believes Tasmania can strengthen food safety without weakening the community food systems that help people eat well. These are not competing objectives; they are complementary public health outcomes that should be advanced together through proportionate, evidence-informed regulation.





Conclusion

Eat Well Tasmania appreciates the opportunity to contribute to the development of the Primary Produce Safety (Horticulture Produce) Regulations 2026.

This submission reflects Eat Well Tasmania's public health and food systems perspective and our commitment to supporting a regulatory framework that protects consumers while strengthening healthy communities, equitable access to nutritious food and resilient local food systems.

We acknowledge Biosecurity Tasmania's willingness to engage extensively with stakeholders throughout this consultation and recognise the significant work undertaken to refine the proposed Regulations in response to community feedback. We believe there remains an important opportunity to further strengthen the framework by ensuring regulatory effort is proportionate to demonstrated food safety risk and focused where it delivers the greatest public health benefit.

Eat Well Tasmania supports strong food safety regulation. However, we also believe that regulation should not unintentionally discourage the low-risk community food growing and local food sharing activities that contribute to healthier eating, food literacy, food security, social connection and resilient communities across Tasmania.

By exempting low-risk community food activities from unnecessary regulatory requirements, investing in education before compliance and directing regulatory oversight towards higher-risk production, processing and distribution systems, Tasmania can achieve both strong consumer protection and thriving local food systems.

Safe food, healthy communities and resilient local food systems are complementary outcomes. Through continued collaboration between government, industry and the community, Tasmania has an opportunity to deliver a regulatory framework that protects public health while continuing to encourage the growing, sharing and enjoyment of safe, locally produced food for generations to come.

EAT WELL TASMANIA PERSPECTIVE

Protecting consumers and strengthening community food systems go hand in hand. Regulation should be proportionate to risk, prioritise education and support Tasmanians to continue growing, sharing and accessing healthy food with confidence.