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SUBMISSION

23 November 2026

Food Standards Development
Health Protection and Regulation
SA Health
PO Box 6, Rundle Mall
ADELAIDE SA 5000

Via email: FoodPolicyPrograms@sa.gov.au

Dear Food Standards Development team,

Re: Submission to the South Australia Food Act Review

Livestock SA is the peak industry organisation for South Australia's red meat and wool producers. Representing over 5,200 sheep producers, 2,700 beef cattle producers and several hundred goat producers across the state, we work to secure a strong and sustainable livestock industry. South Australia's $4.3 billion livestock industry is a key economic contributor to the state and supports 21,000 South Australian jobs across the red meat and wool industries.

Livestock SA welcomes the opportunity to provide a submission to South Australian Food Act Review, which is important to our members and industries. We recognise that this is an initial consultation to identify issues and inform the development of options for further consultation, rather than consideration of specific legislative amendments.

Livestock SA supports a food regulatory system that protects public health, maintains consumer confidence and supports market access. Requirements should be evidence based, proportionate to risk and administered consistently, with clear responsibilities and no unnecessary duplication.

South Australia's livestock and meat supply chains already operate under the *Primary Produce (Food Safety Schemes) Act 2004* and the *Primary Produce (Food Safety Schemes) (Meat) Regulations 2017*. Reform of the Food Act must recognise the interaction between these frameworks, enable emerging processing models such as mobile and micro-abattoirs, and ensure any new powers are evidence based and proportionate.

Summary of recommendations

Livestock SA recommends that the South Australian Government:

1. Ensure meat processing businesses accredited under the P*rimary Produce (Food Safety Schemes) Act 2004* are not subject to duplicate Food Act requirements, with SA Health and Primary Industries and Regions South Australia jointly setting out which requirements apply

to meat processing under each framework before any legislative change, in consultation with industry and supported by a regulatory impact assessment.
2. Develop a dedicated accreditation pathway for mobile and micro-abattoirs under the *Primary Produce (Food Safety Schemes) Act 2004* and the *Primary Produce (Food Safety Schemes) (Meat) Regulations 2017*, and ensure the Food Act recognises that accreditation so that mobile and micro-abattoirs are not subject to duplicate Food Act requirements.
3. Ensure any centralised registration or licensing system recognises existing meat accreditation and does not duplicate it.
4. Provide for timely, coordinated identification, traceability and communication of food safety and food-tampering incidents, with targeted, evidence-based public communication.
5. Require any expanded power to publicly identify a business, producer or product to be evidence based, necessary and proportionate, to limit disclosure to what is reasonably necessary, to provide procedural fairness where circumstances allow, and to include a mechanism to correct inaccurate attribution.
6. Include criteria, transparency and industry consultation in any expansion of guideline-making under section 92.
7. Support mandatory notification of credible suspected food tampering, with a clear reporting threshold and guidance on SA Health and SAPOL obligations.

Rationale for the recommendations

1. Interaction with the *Primary Produce (Food Safety Schemes) Act 2004*

Livestock SA considers that the interaction between the Food Act and the *Primary Produce (Food Safety Schemes) Act 2004* should be explicitly considered in developing the next stage of reform.

The Act is specifically concerned with food safety matters relating to the production of primary produce and establishes a framework under which food safety schemes and accreditation requirements can operate.

Importantly, the scope of 'production of primary produce' under section 8 extends beyond growing or raising primary produce. It includes:

- sorting or grading;
- freezing, packing, refrigeration, storage, treating or washing;
- meat processing;
- transportation, delivery or handling; and
- livestock sales at saleyards.

Section 8(2) excludes processes that add food to primary produce or markedly increase its shelf life only where the activity is not specifically listed in section 8(1). Because meat processing is listed and defined to include mincing, curing, cooking, salting and fermenting meat, these activities remain within the primary produce framework.

The relevant regulatory boundary cannot simply be characterised as one between activities occurring on farm and activities occurring after the farm gate. Before additional Food Act requirements are applied, government should assess whether and to what extent the activity is already regulated under the primary produce food safety framework.

Businesses should be able to readily determine:

- which requirements apply to each activity;
- which agency has lead regulatory responsibility;

- what is covered by existing accreditation;
- whether additional notification, registration or approval is required;
- which inspections, audits and fees apply; and
- how regulatory decisions can be reviewed.

A producer should not face two separate regulatory processes addressing substantially the same food safety risk. Where separate requirements address distinct risks, their purpose should be explained. Where requirements duplicate controls for the same activity and risk, they should be removed or coordinated.

The Discussion Paper states that primary producers are outside the definition of a food business, except where undertaking high-risk processing regulated by SA Health, such as handling and vacuum packaging ready-to-eat meat, and that primary production businesses are not required to notify as a food business where they are currently regulated and require accreditation under the *Primary Produce (Food Safety Schemes) Act 2004*.

Livestock SA supports this intent but considers the wording ambiguous. Section 8 expressly includes packing and meat processing, so it is unclear where vacuum packaging falls when undertaken by a PIRSA accredited business.

The exclusion relates only to notification and does not clarify whether accredited businesses may face Food Act inspections, audits, fees or future registration or licensing.

The *Food Act 2001* is administered by SA Health, while the primary produce legislation and Meat Regulations are administered by PIRSA. SA Health should therefore develop the next stage jointly with PIRSA. Industry must be consulted and a regulatory impact assessment completed before legislative change.

Recommendation 1. The South Australian Government should ensure that meat processing businesses accredited under the Primary Produce (Food Safety Schemes) Act 2004 are not subject to duplicate requirements under the Food Act. Before any legislative change, SA Health and Primary Industries and Regions South Australia should jointly set out which requirements apply to meat processing under each framework, in consultation with industry and supported by a regulatory impact assessment.

2. A clear regulatory pathway for mobile livestock processing

Access to suitable processing is important for producers seeking service-kill arrangements, differentiated products and direct relationships with customers.

Access to suitable livestock processing is becoming an increasing challenge for small and medium-scale producers. The Nous Group's February 2026 national study, *Fragility to Resilience: Local meat processing in Australia at a crossroads*[1], surveyed more than 450 producers. Two-thirds said their current processor did not meet their needs and nearly one in ten reported no access to processing.

The Nous report identifies mobile and micro-abattoirs as emerging options that can complement regional processing infrastructure, providing an option for smaller-volume producers, reducing reliance on distant large-scale facilities and potentially reducing livestock transport distances. The

[1] Located at: fragility-to-resilience_full-report_Nous_Group.pdf

report also identifies limited processing access in South Australia, particularly on Kangaroo Island and in the Limestone Coast.

Growing consumer interest in knowing where food comes from creates an economic opportunity for South Australian livestock producers, but that opportunity depends on access to suitable processing.

Consumers place high trust in producers: the Food Standards Australia New Zealand (FSANZ) 2025 *Consumer Insights Tracker*[2] found that farmers and producers are the most trusted actors in the food system, trusted by 82.9 per cent of consumers, while 2026 YouGov polling found that almost half of Australians (49 per cent) consider buying local and supporting local suppliers or small business to be important when grocery shopping.[3] At the same time, processing shortages can prevent producers from retaining the identity and value of differentiated products through to the consumer. The *Australian Organic Market Report 2026*[4], for example, identifies shortages of certified abattoir capacity as a constraint that can force organically raised livestock into conventional markets at the cost of organic premiums.

Mobile processing should therefore be viewed not only as an abattoir access measure, but as enabling infrastructure for regional economic development, producer value-adding, paddock-to-plate supply chains and the growing consumer demand for locally produced food with a known origin. Mobile processing and small-scale fixed abattoirs may complement existing regional infrastructure and provide additional options for particular producers and markets.

The Nous report identifies regulatory complexity and the lack of proportionate, scale-appropriate regulation as a national barrier to small and alternative meat processing models. South Australia's current meat food safety framework does not expressly prohibit mobile abattoirs, and the applicable food safety outcomes can be achieved by a properly designed mobile facility. The existing regulatory framework is primarily structured around conventional fixed premises and does not provide a clear, dedicated approval pathway for a processing facility operating across multiple host sites.

Livestock SA's commissioned feasibility study[5] examined mobile livestock processing opportunities on Kangaroo Island and the Fleurieu Peninsula. It identified a potential regional opportunity, particularly where mobile slaughter forms part of an integrated branded meat business supported by fixed chilling, boning, packing and value-adding infrastructure. It also found no explicit regulatory prohibition on mobile processing, while emphasising the need for early and detailed engagement with PIRSA and other authorities.

Regulatory clarity alone will not establish commercial viability. Successful projects will also require experienced operators, coordinated livestock supply, suitable infrastructure, a skilled workforce and reliable markets for the whole carcase.

The Government should nevertheless ensure that uncertainty about approval requirements does not unnecessarily prevent otherwise viable projects from being assessed.

The Food Act Review Discussion Paper identifies that other states and territories have reviewed their legislation in recent years and made changes to modernise and improve their food safety systems. Victoria and NSW show that this modernisation can accommodate mobile and small-scale processing

[2] Located at: Trust and confidence in the food system, health and dietary behaviours.pdf

[3] Located at: Local or Sustainable Products Important to Almost Half of Shoppers | Shop! ANZ

[4] Located at: Australian-Organic-Market-Report-Snapshot-2026.pdf

[5] To be publicly released soon. Available on request.

without reducing food safety standards. Victoria amended its *Meat Industry Act 1993* in 2019[6] to enable vehicles to operate as meat processing facilities, establishing a pathway for mobile abattoirs while maintaining the applicable food safety standards. More recently, Victoria's 2025 planning reforms[7] reduced planning barriers for qualifying micro-abattoirs, recognising their role in supporting small and medium scale farmers, regional economies and food supply. NSW has similarly demonstrated that commercial mobile livestock processing can be licensed within an outcomes-based food safety framework, with Australia's first commercial mobile abattoir licensed in that State in 2019[8].

Drawing on these examples, Livestock SA considers there is an opportunity for the South Australian Government to establish a clearer regulatory pathway for mobile livestock processing.

Mobile processors should be required to achieve the same food safety outcomes as conventional facilities; however, regulatory arrangements designed around fixed premises should not unnecessarily prevent safe mobile processing models.

To achieve this, the Government should investigate a dedicated mobile and micro-abattoirs accreditation framework under the *Primary Produce (Food Safety Schemes) Act 2004* and the *Primary Produce (Food Safety Schemes) (Meat) Regulations 2017*, under which the mobile processing unit, its food safety system and standard host site requirements can be approved for operation across multiple compliant locations.

This should be supported by:

- a single lead regulatory agency;
- mutual recognition between the Primary Produce and Food Act frameworks;
- proportionate inspection and fee arrangements; and
- clear planning and environmental requirements.

Food safety approval is only one of the hurdles facing mobile and micro-abattoir operators. The accreditation pathway should be developed alongside a review of EPA, land planning and other approvals, which are further barriers to investment. Livestock SA recognises that these matters are outside the scope of this reform and will provide a copy of this submission to the Department of Agriculture, Fisheries and Forestry, requesting that it consider such a review.

Recommendation 2. The South Australian Government should develop a dedicated accreditation pathway for mobile and micro-abattoirs under the *Primary Produce (Food Safety Schemes) Act 2004* and the *Primary Produce (Food Safety Schemes) (Meat) Regulations 2017* and ensure the Food Act recognises that accreditation so that mobile and micro-abattoirs are not subject to duplicate Food Act requirements.

3. Centralised registration or licensing

Livestock SA acknowledges the potential benefits of a consistent statewide approach, particularly where it removes duplication between council areas and improves incident management. Livestock SA would support a centralised model only where existing accreditation is recognised rather than another requirement being added.

[6] Located at: Victoria passes legislation to allow mobile meat processing - Beef Central

[7] Located at: Strengthening Food Security In Victoria | Premier

[8] Located at: Provenir-Farm-Online-syndicated-010719.pdf

Abattoir operations are classified P2 and are already subject to a dedicated accreditation and food safety regime. Any new system should explain what additional risk it regulates. The Discussion Paper draws on the Auditor-General's 2026 review of food safety in council areas[9] to support a centralised system. That review excluded the *Primary Produce (Food Safety Schemes) Act 2004*, which is administered by PIRSA and sets food safety requirements for the meat industry among others, so it does not provide evidence that accredited meat businesses need further registration or licensing.

Recommendation 3. Any centralised registration or licensing system should recognise meat businesses already accredited under the *Primary Produce (Food Safety Schemes) Act 2004* and the *Primary Produce (Food Safety Schemes) (Meat) Regulations 2017* and should not duplicate those requirements.

4. Rapid identification and response to food safety incidents

Livestock SA supports a system that enables potential food safety incidents, including deliberate tampering, to be identified, investigated, traced and contained quickly. Effective responses require clear agency responsibilities, timely information sharing and access to reliable product and supply chain records. Existing traceability and business record systems should be used wherever suitable, rather than creating parallel reporting requirements without demonstrated need.

Effective information sharing, product traceability, investigation and targeted communication should isolate risks to the affected product or business wherever evidence permits, rather than unnecessarily damaging an entire commodity or industry.

Recommendation 4. The Food Act should provide for timely, coordinated identification, traceability and communication of food safety and food tampering incidents. Public communication should be evidence based and targeted, protecting consumers while avoiding unwarranted impacts on unaffected products, producers and industries.

5. Public disclosure during food safety incidents

Livestock SA accepts that SA Health must be able to warn the public quickly when an incident poses a significant public health threat. However, naming a producer, processor, business, product or commodity before the source has been properly established can do serious and lasting commercial and reputational harm, often to businesses that have done nothing wrong.

Any expanded power should therefore be exercised only where it is demonstrably needed and in proportion to the risk, and should be backed by the evidence available at the time. Public statements should reveal no more than is required to protect consumers, affected businesses should be given a chance to respond where time permits, and an error in attribution should be corrected promptly and publicly.

Recommendation 5. Any expanded power to publicly identify a business, producer or product during a food safety incident should be evidence based, necessary and proportionate, should limit disclosure to what is reasonably necessary, should provide procedural fairness where circumstances allow, and should include a mechanism for promptly correcting inaccurate attribution.

[9] Located at: Managing food safety in council areas | Audit Office of South Australia

6. Adoption of guidelines under section 92

Livestock SA recognises the value of formally recognising contemporary technical guidance. Expanding the sources from which guidelines may be adopted should not permit significant obligations to be introduced without consultation and scrutiny. Guidelines should not be used to introduce substantive obligations beyond legislative authority.

Recommendation 6. Any expansion of guideline making arrangements under section 92 should include appropriate criteria, transparency and industry consultation, particularly where a guideline could materially alter regulatory or compliance expectations.

7. Reporting suspected food tampering

Livestock SA supports notification to SA Health of credible suspected food tampering. The legislation should establish a clear and reasonable threshold based on reasonable grounds to suspect deliberate interference, rather than every unsubstantiated allegation or minor concern. Guidance should explain the respective obligations to notify SA Health and SAPOL and avoid unnecessary duplication.

Recommendation 7. Livestock SA supports mandatory notification to SA Health of credible suspected intentional food tampering, provided the legislation establishes a clear and practical reporting threshold and guidance clearly explains the respective reporting requirements to SA Health and SAPOL.

Conclusion

Livestock SA supports modernisation of the Food Act where reform improves public health outcomes, regulatory consistency and efficient risk management. A central consideration must be the interaction between the Food Act and the primary produce framework, whose statutory scope includes packing, refrigeration, storage, transportation and handling, meat processing and livestock sales at saleyards.

Existing meat accreditation should be recognised and not duplicated. The framework should also enable emerging processing models through a dedicated accreditation pathway for mobile and micro-abattoirs. Any expanded powers relating to incidents, public disclosure, guidelines and tampering notifications should be evidence based, proportionate and developed in consultation with industry.

Livestock SA welcomes further consultation on detailed options, their practical operation and their costs and benefits before legislative changes are progressed. Please contact the Livestock SA office on (08) 8297 2299 or via email at admin@livestocksa.com.au to discuss this submission further.

Yours sincerely

Travis Tobin
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