



Australian Government

Department of Agriculture, Fisheries and Forestry

Business Regulation Benchmarking – Food Safety
Productivity Commission
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Performance Benchmarking of Australian Business Regulation – Food Safety

The Australian Government Department of Agriculture, Fisheries and Forestry (DAFF) is pleased to provide comments on the Productivity Commission's issues paper on Performance Benchmarking of Australian Business Regulation – Food Safety.

DAFF is the Australian Government Department with responsibility for industries that span the food supply chain, from agriculture to food processing. DAFF jointly shares responsibility with the Department of Health and Ageing (DoHA) for food regulatory policy within the Australian Government.

While this study is concerned with regulation directed at assuring the provision of safe food to the public, we note that stakeholders are free to raise any additional matters in their submission that may be relevant to the study.

DAFF considers that non food safety regulations also impose significant regulatory costs on business. These include, for example:

- Food labelling requirements that provide consumer information on nutrition, genetic modification and country of origin.
- Missed opportunity costs for industry arising from the complex and cumbersome standards development process, and inconsistent implementation and enforcement of regulations. This type of regulatory burden has a significant impact on Australian industry's opportunities to innovate and compete in a global market place.

These issues are major concerns for the food industry, and their consideration in this study would provide for a more accurate benchmark in terms of the real cost to industry of regulatory burden. The inclusion of these issues for benchmarking purposes would also be beneficial for industry and government for future policy development.

Australia has a world class food regulation system, which ensures that public health and safety is protected as a number one priority. This study however provides an important opportunity to improve the existing system by benchmarking and measuring the impact of regulatory burden on the food industry, and by informing and complementing broader government reform processes.

Yours sincerely

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