



Primary Produce Traceability Program

Product Integrity Branch - Biosecurity Tasmania

PO Box 303

Devonport TAS 7310

Email: product.integrity@nre.tas.gov.au

30 September 2022

RE: Tasmanian Primary Produce Traceability Strategy 2022-2027 Consultation Draft

To whom it may concern,

The Tasmanian Farmers and Graziers Association (TFGA) is the leading representative body for Tasmanian primary producers. Agriculture is one of the key pillars of the economy and the TFGA is committed to ensuring that the sector remains profitable and sustainable. The TFGA welcomes the opportunity to provide further feedback regarding the Tasmanian Primary Produce Traceability Strategy 2022-2027 Consultation Draft.

The TFGA recognises the importance and vital role of traceability in the agricultural supply chain and the significant role it plays in terms of biosecurity, domestic and international market access and preserving Tasmania's reputation for producing safe, high-quality food.

The TFGA concurs with the challenges identified within the draft strategy that impede current traceability systems and the implementation of enhanced systems, due to the nature of primary produce supply chains. These challenges and the impacts they have on primary producers must be considered throughout the development of any of the proposed policy actions outlined in the draft strategy.

As outlined in our previous submission, it must be recognised that the majority of Tasmanian primary producers operate mixed farming enterprises therefore any enhancements made to traceability standards need to be flexible and not create undue burden on businesses. Most primary producers are part of an industry quality assurance program (in some cases, multiple programs) based on which processors they supply and which incorporate traceability standards that producers must adhere to. These existing frameworks need to be considered to ensure that extra layers of complexity are not imposed on producers.

A proposed policy action for *Principle 2 - Information Management*, is the establishment of mandatory record keeping and archiving requirements for product traceability information along the supply chain. This proposed action is somewhat ambiguous and whilst the draft strategy also states that it aims to enable data collection and record keeping that is meaningful, timely and accurate that has been collected and preserved for mutually agreed purposes, we are unable to support this proposed

ACN 009 477 810

ABN 51 009 477 810

P: (03) 6332 1800

W: www.tfga.com.au

A: PO Box 193

56a Charles St

LAUNCESTON TAS 7250

action without further clarity regarding the consultation and implementation process for such requirements. An example of these issues is the need to ensure existing quality assurance processes are incorporated into this processes as efficiently as possible, rather than creating multiple additional layers of reporting which duplicate these existing processes.

The TFGA's initial submission in response to "*Preparing the Tasmanian Primary Produce Traceability Strategy 2022 – 2027*" provides further context on the position of our members regarding primary produce traceability. Please don't hesitate to contact me if you require further information.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Hugh Christie', with a stylized flourish at the end.

Hugh Christie
Chief Executive Officer