

Preparing the Tasmanian Primary Produce Traceability Strategy 2022-2027

Ensuring confidence in the safety, quality, and authenticity of
Tasmania's primary produce from paddock to plate



Grow



Make



Protect



Experience



August 2021

Have your say

The community is invited to have their say and inform the development of the *Tasmanian Primary Produce Traceability Strategy 2022-2027*.

How to make a submission

All written submissions on this consultation paper must be received by 11:59 pm on 20 September 2021.

Submissions can be forwarded to:

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

Mail: Primary Produce Traceability Program
PO Box 303, Devonport, TAS, 7310

Other than indicated below, submissions will be treated as public information and may be published on our website. No personal information other than an individual's name or the organisation making a submission will be published.

Accessibility of submissions

The Government recognises that not all individuals or groups are equally placed to access and understand information. We are therefore committed to ensuring Government information is accessible and easily understood by people with diverse communication needs.

Where possible, please consider typing your submission in plain English and providing it in PDF or Microsoft Word format via email. The Government cannot take responsibility for the accessibility of documents provided by third parties.

Important information to note

Your name (or the name of the organisation) may be published unless you request otherwise. In the absence of a clear indication that a submission is intended to be treated as confidential (or parts of the submission), the Department will treat the submission as public.

If you would like your submission treated as confidential, whether in whole or in part, please indicate this in writing at the time of making your submission clearly identifying the parts of your submission you want to remain confidential and the reasons why. In this case, your submission will not be published to the extent of that request. Copyright in submissions remains with the author(s), not with the Tasmanian Government.

The Department will not publish, in whole or in part, submissions containing defamatory or offensive material. If your submission includes information that could enable the identification of other individuals, then either all or parts of the submission will not be published.

The *Right to Information Act 2009* and confidentiality

Information provided to the Government may be provided to an applicant under the provisions of the *Right to Information Act 2009* (RTI). If you have indicated that you wish all or part of your submission to be treated as confidential, your statement detailing the reasons may be taken into account in determining whether or not to release the information in the event of an RTI application for assessed disclosure. You may also be contacted to provide any further comment.

Citation:

Biosecurity Tasmania (2021) *Consultation Paper – Preparing the Tasmanian Primary Produce Traceability Strategy 2022-2027*

Date:

August 2021

Enquiries:

Product Integrity Branch

Biosecurity Tasmania

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Water and Environment (DPIPWE)

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Minister's Foreword

I am pleased to introduce the Consultation Paper "*Preparing the Tasmanian Primary Produce Traceability Strategy 2022-2027*".

This Paper and the associated consultation process encourage people to have their say in the development of the *Tasmanian Primary Produce Traceability Strategy 2022-2027* (the Strategy).

The Strategy will guide the development and delivery of Tasmania's primary produce traceability arrangements, and in turn, support growth along the entire supply chain in those relevant industry sectors.

The Strategy will ensure that Tasmania's primary produce traceability programs are delivered in a strategic and integrated way, whilst complementing and strengthening interagency and national biosecurity arrangements and priorities for industry development and growth.

You will see that this Consultation Paper adopts the '**Grow, Make, Protect and Experience**' themes in its strategic vision. These themes encapsulate the services delivered to DPIPW's customers: the Tasmanian community, industry, and visitors to the State.

The developed Strategy will support the Department's objectives to cultivate prosperity in Tasmania's primary industries and food sectors, secure a healthy and productive environment for all Tasmanians, and build an efficient and effective organisation.

Guy Barnett MP
Minister for Primary Industries and Water

August 2021

Section 1 – Introduction

VISION: A Traceability Framework that provides confidence in the safety, quality and authenticity of Tasmania’s primary produce

1.1. The role of primary produce traceability in Tasmania

Tasmania has a reputation for producing safe, high quality agricultural products and food, for both the domestic and export markets. Traceability systems help to ensure both the integrity and safety of our produce.

To continue to build on our reputation, including maintaining and improving our competitive advantage in international markets, we need to continue to enhance our traceability systems to ensure our agricultural products are safe and attractive to all markets. This includes broadening the scope of Tasmanian traceability requirements from primarily applying to meat production to encompass a variety of agricultural industry sectors producing food and agricultural products.

Traceability systems protect our producers from counterfeiting and underpin the confidence of customers and consumers.

Enhancing traceability can improve:

- Biosecurity management for a broader scope of Tasmanian primary produce;
- Market access both domestically and internationally;
- Supply chain information; and
- Protection from counterfeiting and brand protection more generally.

1.2. A Tasmanian Primary Produce Traceability Strategy

The Product Integrity Branch of Biosecurity Tasmania is proposing the development of a discrete, five-year Primary Produce Traceability Strategy (the Strategy), that is intended to align with programs conducted by other Tasmanian traceability stakeholders including Brand Tasmania and the Department of State Growth. The Strategy will be designed to:

- Provide enhanced market access for Tasmanian producers;
- Provide enhanced product integrity and protection for Tasmanian producers from counterfeit products;
- Set the strategic vision in regard to primary produce traceability (PPT) in Tasmania to deliver greater value for Tasmania’s primary industries and the Tasmanian economy;

- Build capacity to respond to challenges and biosecurity incidents which further enhances our reputation for safe food and primary produce; and
- Protect and enhance the reputation for excellence in the product integrity of Tasmanian primary production.

1.3. The purpose of this paper

This paper has been prepared to provide a consultative mechanism for Tasmanian primary producers and other Tasmanian stakeholders to provide input and information to assist in the development of the Strategy.

1.4. The Tasmanian Primary Produce Traceability Strategy to align with the National Traceability Framework

One of the outcomes of the Agriculture Senior Officials Committee (AGSOC) National Traceability Project was to produce a National Traceability Framework. On the 7th March 2019, the Federal Government released the National Traceability Framework (NTF) titled “Enhancing Australia’s world-class agricultural traceability systems”. The NTF can be found at the following link [National Traceability Project - Department of Agriculture](#).

It is a tool designed to guide Australian agricultural industries and food producers, governments and related businesses in enhancing traceability systems.

The NTF encourages agricultural industries to produce Industry Action Plans to enhance traceability and provides a template for industries to use in the development of the plans.

The outcomes that the NTF seeks to achieve are as follows:

Outcome 1: All participants along the supply chain are able to trace their goods one step forward and one step back as a minimum, with a view to increasing end-to-end capabilities in the future in order to remain competitive in an environment that is generating the rapid adoption of new technology on a global scale.

Outcome 2: The speed and type of data required when tracing goods through the entire supply chain reflects the associated risk, with higher risk food and other agricultural products in terms of food safety and biosecurity, able to be traced much faster than lower risk food and other agricultural products. The economic impact of any incident is reduced because food safety incidents or pest or disease outbreaks can be quickly contained.

Outcome 3: Accurate records are maintained, available for scrutiny by all participants in the supply chain including end product consumers; and can be interrogated to enable more targeted tracing of food and other agricultural products.

Outcome 4: All participants in the supply chain have the potential to benefit from the opportunity afforded to food and other agricultural products in market access and competitiveness by being able to establish and market provenance, and to provide stronger assurances about provenance.

Outcome 5: Opportunities presented by new technologies and platforms for automation are explored and harnessed as appropriate to keep Australian food and agricultural production at the forefront of an internationally competitive landscape.¹

Whilst the *Tasmanian Primary Produce Traceability Strategy 2022-2027* will be uniquely Tasmanian, where possible, it will seek to facilitate the achievement of the above outcomes of the NTF.

¹ Australian National Traceability Framework, produced by the Australian Government March 2019

Section 2 – Current Primary Produce Traceability Requirements in Tasmania

2.1. A summary of traceability requirements under the Tasmanian *Animal (Brands and Movement) Act 1984* and *Animal (Brands and Movement) Regulations 2014*

The *Animal (Brands and Movement) Act 1984* and *Regulations 2014* prescribe the requirements regarding the movement and traceability of the various types of livestock in Tasmania. The following is a summary of current requirements:

Cattle: Movements recorded on National Livestock Identification Scheme (NLIS) database via the use of vendor declarations and utilising electronic identification technology.

Sheep: Visual Tags are used rather than electronic tags. Mob based movements recorded in the NLIS Database via vendor declarations on a voluntary basis.

Goats: As per Sheep above.

Pigs: Identified by tattooing rather than tags and traced by a waybill and vendor declaration that may contain information about multiple animals.

2.2. Other Livestock, Poultry, Seafood, Plants and Plant Products

The *Animal (Brands and Movement) Act 1984* and *Regulations 2014* do not provide any specific regulation in regard to branding and traceability for other livestock, poultry, seafood, plants and plant products, however, there are other legislative frameworks that impose traceability requirements in various forms and to various levels for other primary produce.

For example, there are stamping requirements on eggs. Tasmania, in line with all Australian States and Territories, is required to apply *Standard 4.2.5 - Primary Production and Processing Standard for Eggs and Egg Products* (Egg PPP Standard) set in the Australia New Zealand Food Standards Code.

The Egg PPP Standard requires individual eggs to be stamped with the producer's unique identification so the source of any food safety or biosecurity incident involving eggs can be readily traced and non-compliant eggs removed from the market. The Standard is adopted in Tasmania via the *Primary Produce Safety (Egg) Regulations 2014*, which are made under the *Primary Produce Safety Act 2011* and establish the Egg Food Safety Scheme.

A key objective of the Egg Food Safety Scheme is to have full enhanced traceability in case of an egg-borne food safety or biosecurity incident.

The Tasmanian *Primary Produce Safety Act 2011* provides a head of power for the national Primary Production Processing Standards to be enforced in Tasmania. These standards also require some traceability requirements in other industry sectors.

Question for Consideration #1: Do you see traceability as important to your business, customers, and industry? Can you identify the drivers and benefits for your business and industry operating a traceability system? Please include responses to these questions in your Submission.

Section – 3 Proposed Principles of a Primary Produce Traceability Strategy





3.1 Proposed Principles

The proposed Strategy will be formulated to align to and be underpinned by the following principles (not in order of priority):

- **Industry ownership:** developing approaches to tracing agricultural products and foods is the primary responsibility of industries who will be assisted by government regulation and support.
- **Industry-government partnerships:** facilitating genuine partnerships between government agencies and industry to assist all Tasmanian primary production industries to harness market access opportunities and manage risks.
- **Information Management:** enabling data collection that is meaningful, timely and accurate that can be readily shared between all supply chain stakeholders and government for mutually agreed purposes.
- **Visibility through the entire supply chain:** enabling tracing of foods and other agricultural products through the supply chain covering transactions from the place of origin, through all stages of distribution.
- **Flexible Framework:** recognising and accommodating a broad range of industry needs across agricultural industry sectors that vary in their risk profile, supply chain complexity and reasons for traceability.
- **Integrity:** supporting and enhancing existing industry systems to facilitate consumer and market trust by delivering transparency along the entire supply chain.
- **Collaboration and Shared Purpose:** development of approaches that allow high levels of collaboration between government agencies and within industry sectors to achieve shared objectives and outcomes.

Question for Consideration #2: Are there any other Principles that you believe should be included in a Tasmanian PPT Strategy? Please include these in your Submission.

Section 4 – Developing a strategic direction for traceability in Tasmanian primary produce industries

VISION	A Traceability Framework that provides confidence in the safety, quality, and authenticity of Tasmania’s primary produce			
APPROACH	<p>Grow</p>  <p>Support and promote Tasmania’s primary producers to grow their businesses and markets.</p>	<p>Make</p>  <p>Support the safe production of Tasmanian Primary Produce.</p>	<p>Protect</p>  <p>Protect industry, economic development and the environment through sound policies and regulation.</p>	<p>Experience</p>  <p>Ensure collaboration with the community and reflect the unique Tasmanian brand and the quality and experience of life in Tasmania.</p>
GOALS	<p>Goal 1: Cultivate prosperity in Tasmania’s primary industries and food sectors.</p>	<p>Goal 2: Collaborate and develop effective partnerships.</p>	<p>Goal 3: Mitigate risks to primary industries and consumers.</p>	<p>Goal 4: Improve information provided to primary industries and consumers.</p>
OBJECTIVES	<p>Objective 1: Ensure Tasmanian primary industry practices meet legislative requirements for product integrity.</p> <p>Objective 2: Facilitate the trade of Tasmanian primary produce by ensuring it meets state, national and international product integrity standards.</p>	<p>Objective 3: Guide the development and delivery of Tasmania’s PPT arrangements in a strategic state-based approach.</p>	<p>Objective 4: Build government and industry capacity to respond to future product integrity challenges, trends, risks, and areas of projected growth.</p>	<p>Objective 5: Promote consumer confidence in the safety and integrity of Tasmanian primary produce.</p>

<p>DESIRED OUTCOMES</p>	<p>Outcome 1: Traceability and market access measures which are supportive of, and commensurate with, industry growth.</p> <p>Outcome 2: All participants in the supply chain have the potential to benefit from the opportunity afforded to food and other agricultural products in market access and competitiveness by being able to establish and market provenance, and to provide stronger assurances about provenance.</p> <p>Outcome 3: Opportunities presented by new technologies and platforms for automation are explored and harnessed as appropriate to keep Tasmanian food and agricultural production at the forefront of an internationally competitive landscape.</p>	<p>Outcome 4: Increased ownership and commitment to a documented strategic approach to primary produce traceability in Tasmania.</p> <p>Outcome 5: The speed and type of data required when tracing goods through the entire supply chain reflects the associated risk, with higher risk food and other agricultural products in terms of food safety and biosecurity able to be traced much faster than lower risk food and other agricultural products. The economic impact of any incident is reduced because food safety incidents or pest or disease outbreaks can be quickly contained.</p>	<p>Outcome 6: Increased government and industry resilience to known risks</p> <p>Outcome 7: All participants along the supply chain are able to trace their goods one step forward and one step back as a minimum.</p> <p>Outcome 8: Accurate records are maintained, available for scrutiny by all participants in the supply chain including end product customers and consumers; and can be interrogated to enable more targeted tracing of food and other agricultural products.</p> <p>Outcome 9: Enhanced product integrity and protection for Tasmanian producers from counterfeit products.</p>	<p>Outcome 10: Increased stakeholder awareness and understanding of primary produce traceability and its value to Tasmanian agriculture.</p> <p>Outcome 11: Increased understanding of primary produce traceability requirements and benefits across the entire spectrum of primary production in Tasmania.</p> <p>Outcome 12: Collaboration between Tasmanian government agencies and shared ownership of the benefits of promoting and supporting frameworks for primary produce traceability to promote the Tasmanian Brand and growth in the sector.</p>
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DPIPWE recognises that there is a significant amount of diversity in the capacity of industry sectors to implement adequate traceability systems and that there are also differing levels of maturity in this regard, not only between industry sectors, but between industry enterprises within a specific sector.

Whilst there has been industry-wide traceability systems in place for livestock for a considerable period of time, there is a more limited approach in the plant sectors which has been driven by market demand and the business activities of the particular enterprise.

Similarly, seafood producers have been required to address traceability of their products as part of the requirements of the Seafood Primary Production Processing Standard. However, these systems are also more enterprise specific.

The strategic direction and the Strategy itself will need to ensure that there is an ability for industry sectors to adopt flexible traceability approaches and systems, depending on their current capacity, maturity and respective drivers in relation to the adoption of traceability systems.

Question for Consideration #3: Are there any other Goals, Objectives or Outcomes that you believe should be included in a Tasmanian PPT Strategy? Please include these in your Submission.

Section 5 – Next steps

5.1. Consultation

This paper is the first consultation mechanism of many that will be used throughout the development of the Strategy and the subsequent legislative change processes.

The submissions received as part of this initial consultation process will be collated and evaluated to inform the strategy development process.

Further industry specific consultation will be undertaken as the Strategy is developed to ensure that industry has input toward and ownership of elements of the Strategy.

Submission requirements can be found in Section 6.1 of this document.

5.2. Strategy Development

It is intended that the Strategy will be a living document which may change over time as new technologies and opportunities present themselves to industry. Changes will form part of an annual review of the Strategy.

It is anticipated that the initial consultation draft of the Strategy should be released for comment by 31 December 2021.

Following release of the Strategy, work will commence on drafting PPT Regulations and Standards which will sit under the *Biosecurity Act 2019*. Further community and industry consultation will form part of the legislative development process.

Section 6 – Have your say in the development of the Strategy

6.1 Submission requirements

Where possible, please consider typing your submission in plain English and providing it in either PDF or Microsoft Word format via email to product.integrity@dpiwwe.tas.gov.au or via post to:

Primary Produce Traceability Program
PO Box 303
Devonport TAS 7310

The following should be included in your submission:

1. The name of the individual preparing the submission.
2. If the submission is on behalf of an organisation or enterprise the name of that organisation or enterprise.
3. The industry sector in which you operate or the industry sector/sectors that you represent.
4. The current traceability systems used by your business or industry (including any associated technology/applications).
5. The preparedness of your enterprise and/or industry to adopt (or enhance) your traceability systems.
6. Any past trials or traceability pilots that you have undertaken or that you know your industry has undertaken and the results of those trials/pilots.
7. Details of your supply chains and any issues or barriers to adopting traceability systems associated with those supply chains.
8. How your primary produce is transported/labelled, i.e. is it transported in a bulk package (or as a mob) or is each individual product/animal traced.
9. Any other principles, goals, objectives or outcomes you would like to see form part of the Strategy.

All submissions must be in writing and lodged by 11.59 pm on 20 September 2021.