



Tabatha Badger MP
Member for Lyons, on behalf of the Tasmanian Green MPs

26 July 2026

Dear Biosecurity Tasmania/NRE,

Thank you on behalf of the Tasmanian Green MPs, and our concerned constituents, for the opportunity to make a submission to phase 2 of the proposed Primary Produce Safety (Horticulture Produce) Regulations 2026.

The Tasmanian Greens support sound biosecurity and public health measures in Tasmania. However, we view the current draft regulations as an extreme over-reach that will detrimentally impact small scale, not-for-profit, non-commercial, and home growers. They also contradict the aims of the Tasmanian government's Food Resilience Strategy 2025-2031.

Our state has a unique and respected 'paddock to plate' reputation beloved by locals and tourists. This envied reputation is not exclusively built upon high-end commercial produce, it is underpinned by the accessible and quaint, quality roadside stalls, markets, community gardens, and food swaps.

In submissions to phase one, the overwhelming majority of comments were based on the need for a balanced tiered system for fresh produce suppliers. While a tiered system is presented in phase two, it is not close to balanced or equitable for small-scale operations.

As drafted, the proposed system would detrimentally impact our Tasmanian roadside vendors, community gardens and food donations, produce swaps, and small-scale operations who have minimal monetary income, due to the level of administration and resources required under the scheme. This would result in increased food insecurity for community members who most need affordable fresh produce.

Operators and home growers who are not-for-profit, noncommercial – such as crop swaps, food sharing, or producers who donate to community groups – should not be captured as proposed.

Similarly, roadside stall vendors, who realistically make a very minimal profit, if any, would be paralysed and disincentivised by the present plan.

We concur with the need for produce traceability for the rare event of a health or biosecurity issue potentially causing public harm. Indeed, with the changing climate it is a fact that we will see an increase in biosecurity threats in our state. But the traceability required can be achieved

with a simple database and public education programs. As it stands, the example paperwork for base level tiers for a database, seems excessive.

We also question whether, when considering future budget cuts forecast over the forward estimates for Biosecurity/NRE, the department would have the resources for the back-end level of administration required for the scheme as proposed.

Tasmania's Food Resilience Strategy 2025-2031 strives for a community-led food system that is sustainable and equitable. The regulations would severely hamper this aim given the heavy level of administration and costs proposed for smaller producers and operators.

We are in a cost of living and health crisis where access to affordable or free fresh produce is critical for many Tasmanians. We should be doing everything possible to ensure the availability of healthy food for all.

We urge Biosecurity Tasmanian/NRE to maintain a tiered system of regulations, but to ensure each level is realistic and equitably achievable for the cohort it captures. Equitability will mean that both the level of administration and fees charged (or not charged), are proportional to the different types of growers in each tier. There needs to be further exemptions, or greater clarification, for the large group of 'home growers' that is far wider than just the present 'gifting of goods to neighbours'.

Tasmania's non commercial, community gardens, home growers, crop swappers and small roadside vendors should not be disadvantaged or disincentivised, with changes to food regulations. The principle of ensuring food safety can be easily achieved to this group of growers through education, which is where we believe the energy and resources of Biosecurity Tasmania should be directed.

Like us, we understand you will have received a myriad of terrific ideas from small food producers, suggesting several alternative pathways forward. Please hear these ideas to ensure Tasmania continues to expand the production and sharing of sustainable and accessible fresh produce.

Warm regards,

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

Tabatha Badger MP

Greens Spokesperson for Primary Industries, on behalf of the Tasmanian Green MPs.