#### 7.1.6 FOOD SAFETY REGULATION REFORM

Responsible Manager:	Greg Talbot, Manager Community Safety and Amenity
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#### RECOMMENDATION

#### That Council

- 1. Notes the Victorian Government's proposed reforms to food safety regulation and the establishment of Safe Food Victoria as a single regulator.
- 2. Notes that the consultation was held from 11 September to 17 October 2025, and there was not sufficient time to present a report to Council for consideration during the consultation period.
- 3. Notes the officer submission provided in response to the proposed reforms as set out in Attachment One.

#### **INTRODUCTION**

The Victorian Government has announced plans to reform food safety regulation by establishing a new single regulator – Safe Food Victoria. The purpose of this report is to inform Council about the proposed reforms and to share a submission submitted by Councils Public Health team.

#### **COUNCIL PLAN STRATEGIC OBJECTIVES**

### A healthy, safe and connected community

A community where all people have the opportunity to experience enhanced levels of social, emotional and physical wellbeing.

# A council with good governance, strong leadership and community involvement in decision making

A Council that provides governance and leadership for the benefit of our community through community engagement, advocacy, decision making and action.

#### **BACKGROUND**

Food safety in Victoria is currently governed by four separate pieces of legislation and overseen by multiple regulators. Responsibility is shared across several government departments, Ministers, Dairy Food Safety Victoria, PrimeSafe and local councils.

In the first stage of reform, a new, independent regulator – Safe Food Victoria - will be established consolidating PrimeSafe, DFSV and food safety functions from the Health Regulator and Agriculture Victoria. The intention is for Safe Food Victoria to be operational by mid-2026, reporting to the Minister for Agriculture.

The second stage of reform will develop a new, modernised regulatory framework for food safety and further consolidate functions in Safe Food Victoria. During this stage, the optimal role for local government within this system will be considered.

#### **DISCUSSION**

#### **Role of Local Councils**

Under the existing framework the Department of Health is responsible for setting food safety standards in Victoria and for providing coordination, advice and support to local councils in the implementation of these standards.

Councils play a critical role in regulating food businesses—including mobile food vendors—within their respective municipalities. Councils are tasked with allocating resources to deliver a range of essential functions, including business registration, education and guidance, surveillance, inspection, compliance and enforcement, as well as responding to incidents and public health matters.

These responsibilities are primarily carried out by Environmental Health Officers, who also oversee a variety of local environmental issues.

All food businesses in Victoria are assigned a food safety classification (from Class 1 to Class 4) based on the level of food safety risk associated with their operations and activities:

Class 1 – Highest Risk: Premises that serve potentially hazardous food to vulnerable populations, such as aged care facilities, hospitals, and childcare centres.

Class 2 – High Risk: Most common classification, includes businesses handling unpackaged, potentially hazardous food such as restaurants, cafes, and takeaway shops.

Class 3 – Moderate Risk: Premises selling pre-packaged potentially hazardous food or low-risk unpackaged food, such as milk bars and convenience stores.

Class 4 – Low Risk: Premises that only retail pre-packaged, non-hazardous food or conduct occasional low-risk activities (e.g., fundraising sausage sizzles).

According to information provided by the Victorian Government, the establishment of Safe Food Victoria is intended to change the structure of the state's food safety regulatory framework. The food safety regulatory oversight role currently held by the Department of Health will be transferred to Safe Food Victoria. The new regulator will also assume responsibility for the support, education, and coordination of local councils, functions that are presently managed by the Department of Health.

Local councils are expected to retain their current regulatory responsibilities during Stage 1 of the reforms, with no immediate changes anticipated. The government has indicated that Stage 2 of the reforms will involve a review of the longer-term role of local councils within the food safety system, with a stated objective of ensuring that regulatory activities are proportionate to the risk posed by each activity or business.

It is anticipated that this staged approach will result in a more streamlined and coordinated system for the regulation of food premises and will seek to make more effective use of local government resources and expertise than the current framework.

#### **Submission**

Local government was invited to make submissions on the proposed reforms during the consultation period from 11 September to 17 October 2025. The consultation was open for a very limited amount of time and did not allow sufficient time for officers to present a report and submission to a Council meeting for consideration. Given this, officers undertook an assessment and responded during the consultation period. As part of this process, Council's submission was framed in response to the following questions:

- What works well with the current food safety regulation system (that could be retained)?
- What does not work well with the current food safety system that could be addressed?
- What enhancements or new approaches would you like to see in the way Victorian councils continue to operate their food safety role?
- What do you think is the optimal role for Victorian councils within the new food regulator system?

The officer's submission is summarised below and is provided in Appendix One:

**Local Knowledge & Relationships:** Councils' Environmental Health teams have deep local knowledge, enabling tailored, risk-based food safety strategies and fostering trust with food businesses.

**Responsiveness:** Councils are well-placed to respond quickly to food safety incidents, minimizing public health risks through timely interventions.

**Collaborative & Educative Approach:** Councils support compliance by working alongside food businesses, providing practical guidance and ongoing education.

**Need for Consistency:** There are inconsistencies in regulatory approaches across sectors. Officers call for a unified, statewide registration and management system to ensure uniformity.

**Guidance & Training:** Supports Recommendation 10 of the Victorian Auditor-General's Office report—calls for improved, co-designed guidance and regular training for Environmental Health Officers.

**Engagement with EHPA:** Recommends Safe Food Victoria build a strong partnership with Environmental Health Professionals Australia (EHPA) for consistent communication and professional development.

**Scientific Leadership:** The state regulator should lead with scientific authority, collaborating with local councils to ensure evidence-based, adaptive, and credible food safety regulation.

**Regulatory Responsibilities:** Supports integrating PrimeSafe and Dairy Food Safety Victoria into Safe Food Victoria, with some small-scale retailers better regulated by local government.

**Funding Model:** Argues that full cost recovery is rarely achieved; regulatory fees should consider business activity, risk, size, location, and public benefit. Funding must be fair, sustainable, and not compromise service quality.

**Role of Councils:** Councils should remain primary regulators for local food businesses, leveraging their local knowledge and relationships, and acting as the first point of contact for proprietors.

**Data & Reporting:** Calls for a unified data reporting system and more timely, comprehensive release of food safety data at the state level to support effective regulation.

**Flexibility & Risk Focus:** Councils need flexibility to prioritize regulatory activities based on assessed food safety risk, focusing resources on higher-risk premises.

**Collaboration:** Safe Food Victoria should lead in establishing collaborative frameworks (e.g., MOUs, joint working groups) to improve coordination between authorities.

**Consultative Committees:** Should include diverse representation (local government, industry, academia, consumer advocates) and cover areas like risk assessment, emerging technologies, vulnerable populations, and regulatory consistency.

#### FINANCIAL IMPLICATIONS

There are no immediate financial implications arising from this report. However, it should be noted that future financial impacts may result from the implementation of the proposed reforms. These potential impacts cannot be assessed at this stage, as the full details of the reforms are not yet known.

#### **POLICY IMPLICATIONS**

There are no policy implications to this report.

#### **CONSULTATION**

Community consultation was not required.

#### **SOCIAL IMPLICATIONS**

There are no social implications to this report.

#### **HUMAN RIGHTS CONSIDERATIONS**

There are no human rights implications to this report.

#### **GENDER IMPACT ASSESSMENT**

A GIA was not completed because this agenda item is not a 'policy', 'program' or 'service'.

#### **CONCLUSION**

The Victorian Government's proposed reforms will introduce Safe Food Victoria as a single regulator and review the ongoing role of local councils. The Public Health team's submission highlights the importance of local expertise and collaboration in food safety regulation. Officers will continue to monitor the reforms and advocate effective, risk-based outcomes as further details become available.

### **ATTACHMENT LIST**

1. Attachment One - Food Regulation Reform Submission [7.1.6.1 - 15 pages]

# The future of food safety regulation in Victoria

**Submission on behalf of Monash City Council** 

15 October 2025



### Introduction

We welcome the opportunity to contribute to the consultation process and thank you for inviting councils to share their experiences, insights and perspectives on the proposed reforms to Victoria's food safety regulatory framework. Meaningful engagement with local government is essential to shaping a system that is both practical and responsive to the needs of our communities.

Victoria's food safety regulatory framework is at a pivotal point, with proposed reforms offering a significant opportunity to strengthen regulatory consistency, enhance risk-based oversight, and improve public health outcomes across the food sector. Council's play a vital role in this system, regulating a broad and diverse range of food businesses and ensuring compliance at the local level.

This submission outlines the critical role of the state regulator as a leader, highlights the unique and essential contribution of local councils. It also presents recommendations for future improvements, including reference to Recommendation 10 of the Victorian Auditor-General's Office (VAGO) report, which calls for improved guidance and training for Environmental Health Officers.

In preparing this submission, we have responded to the key consultation questions structured around the four reform themes – *regulatory approach*, *governance*, *funding and role of local councils*. Our aim is to support the development of a robust, equitable and sustainable food safety system that protects public health and reflects the realities faced by local government.

### **Regulatory Approach**

What aspects of the current food safety regulatory approach do you believe are working particularly well and should be retained or expanded?

#### Local Knowledge and Relationships

Councils' Environmental Health teams possess a deep understanding of their communities, including the unique characteristics of local food businesses, cultural practices and community needs. This deep rooted local knowledge enables Council's to implement tailored, risk based strategies that are both practical and effective. Their familiarity with operators fosters trust and facilitates more meaningful engagement around food safety.

#### Responsiveness

Councils are uniquely positioned to respond swiftly to emerging food safety concerns, such as outbreaks, contamination events, or non-compliance issues. Local Council's proximity to food businesses allows for timely interventions and communication with affected stakeholders. This responsiveness is critical in minimising public health risks and maintaining consumer confidence.

#### **Collaborative Approach**

Many Councils have adopted educative and supportive regulatory practices, fostering a positive food safety culture and compliance. By working alongside food business operators, Council's provide practical guidance, tailored education and ongoing support that encourages not only compliance but also a commitment to continuous improvement.

# What enhancements or new approaches would you like to see in the way Safe Food Victoria operates?

#### **Consistency Across Sectors**

There are inconsistencies in regulatory approaches, particularly where different regulators oversee similar businesses. These inconsistencies can lead to confusion among operators, create uneven compliance expectations and undermine the goal of a uniform food safety standard across the sector.

#### **Guidance and Training**

As highlighted in Recommendation 10 of the Victorian Auditor General's Office (VAGO) report, there is a need for improved, co-designed guidance and regular training for Environmental Health Officers (EHOs) to ensure consistent standards and skills across the state. Topics of relevance will include emerging risks, technologies and regulatory changes.

Safe Food Victoria must be equipped to provide clear guidance and ongoing training to Environmental Health Officers and be responsive to any issues or challenges they encounter in the course of their work.

#### **Engagement with EHPA**

As a key stakeholder in the environmental health profession, it is recommended that Safe Food Victoria establish and maintain a strong, collaborative relationship with Environmental Health Professionals Australia (EHPA). Such a partnership would help meaningful engagement with the profession. Strengthening this connection would also support consistent communication, professional development and the sharing of practical insights from those working directly with food businesses at the local level.

#### **Unified Registration System**

Implementing a consistent, statewide registration and management system for all councils would significantly enhance uniformity in food safety regulation. A unified approach would promote consistency in processes, documentation and enforcement, making it easier for EHOs and business operators to operate across jurisdictions.

#### FoodTrader (Oscar) Integration

Ideally,\_FoodTrader (Oscar) requires an inspection module, or the capability to integrate with Coucnil's existing licence management system. Such integration would support Safe Food Victoria in monitoring and managing food safety data across jurisdictions, ensuring immediate and consistent data reporting.

#### Scientific Based Leadership

To ensure Victoria's food system remains evidence-based, adaptive, and credible, the State Food Regulator must lead with scientific authority—setting a national benchmark in food safety regulation. This leadership should be grounded in food science expertise, including microbiology, toxicology, food technology, and risk assessment, to guide strategic decision-making and policy development in response to emerging risks and evolving food system complexities. While regulation is a vital structural component, its effectiveness depends on being shaped by scientific insight and operational relevance.

Crucially, the Regulator must collaborate closely with local council environmental health leaders, fostering a shared commitment to public health protection. This enables EHOs across councils to operate with clarity, confidence, and consistency—delivering public health protections that are not only compliant, but also intelligent, responsive, and grounded in the best available knowledge. Through rigorous learning and development programs, the Regulator can impart scientific knowledge to EHOs, ensuring consistent, high-quality practice across jurisdictions. This cascading model of scientific leadership not only strengthens local capability but also reinforces Victoria's position as a leader in intelligent, responsive, and science-driven food safety governance.

By investing in these enhancements, Safe Food Victoria can ensure that food regulation remains credible, adaptive, and science driven. A strong partnership between state and local government, underpinned by clear policy direction and sustained investment, will empower EHOs to uphold high standards of public health protection across Victoria.

#### Regulatory Responsibilities

The proposed integration of PrimeSafe and Dairy Food Safety Victoria into the new Safe Food Victoria presents an opportunity to streamline regulatory oversight and promote a more unified approach to food safety across the state. Small scale retailers operating under these agencies may be better suited to local council regulation, given councils existing relationships with these businesses and their capacity to provide tailored, community based oversight.

### Governance

What types of professional experience or areas of expertise do you think are essential for members of the Safe Food Victoria board?

The Safe Food Victoria board should comprise members with a diverse range of professional experience and expertise to ensure robust governance and effective decision making. Key areas of expertise include:

#### Public Health and Food Safety Regulation

- A strong understanding of food safety legislation, compliance frameworks and risk based regulatory approaches.
- Experience in managing public health programs and interpreting scientific evidence to inform policy

#### Environmental Health Practice

- Practical experience in food safety inspections, enforcement, and local government operations.
- An insight into the challenges faced by Councils and Environmental Health Officers (EHOs) in implementing food safety standards.

#### Legal and Regulatory Expertise

- Knowledge of administrative law, enforcement processes and legislative interpretation to ensure decisions are legally sound and defensible.

#### **Industry and Business operations**

- Experience in food manufacturing, retail or hospitality sectors to provide a balanced perspective in compliance impacts and operational realities.
- Understanding of supply chain management and food production systems.

#### Risk Management and Governance

- Skills in corporate governance, strategic planning and risk assessment to guide the board in setting priorities and ensuring accountability.

#### Data Analytics and Technology

- Expertise in data systems, digital transformation and analytics to support evidence based decision making and modern reporting systems.

#### Community Engagement and Communication

- Ability to foster stakeholder relationships, promote transparency and build trust between regulators, councils and businesses.

# If consultative committees were established, what are some of the areas they should cover?

Consultative committees should cover the following areas:

#### Food Safety Risk Assessment and Management

- Identifying high risk food sectors and activities
- Developing consistent criteria for risk classification
- Advising on appropriate regulatory responses
- Evaluating emerging risks

#### **Emerging Food Technologies and Trends**

- Help shape Acts and Regulations to ensure they remain relevant
- Monitor and assess new food technologies

#### **Vulnerable Populations and Community Health**

 Explore how food regulation intersects with food security and access, particularly for vulnerable groups. This includes considering the role of charitable organisations, food donation programs and community food suppliers, and ensuring that regulation supports rather than hinders public health initiatives.

#### **Industry practices and innovation**

- Examine evolving industry practices e.g. high risk foods provided via vending machines
- Advise on how regulation can accommodate innovation while maintaining safety standards
- Identify gaps where current frameworks may not apply effectively.

#### Regulatory Consistency and Best Practice

- Promote consistency across jurisdictions by identifying best practices, standardising procedures and supporting uniform interpretation of legislation.

How should consultative committees be structured to ensure the board of Safe Food Victoria receives the expert advice it needs?

To provide effective and expert advice, consultative committees should:

- include diverse representation from key stakeholder groups, including local government Environmental Health Officers, industry representatives, academic experts, consumer advocates, and public health professionals
- operate under clear terms of reference, with transparent processes for providing advice and decision-making

- Report regularly to the Safe Food Victoria board, with established mechanisms for feedback, follow up and continuous improvement
- Maintain rotating membership to bring fresh perspectives, avoid stagnation and prevent entrenchment of specific interests
- Include Environmental Health Professionals Australia (EHAP) as a peak body representing Environmental Health Officers in Victoria. EHOA's involvement is essential to ensure that the voice of the profession is consistently heard and that Safe Food Victoria remains connected to frontline regulatory practice.

### **Funding**

While the discussion paper suggests that local councils fully recover costs for food safety regulation, this does not reflect the reality. Many Councils rely on ratepayer contributions to subsidise Environmental Health activities, as fees from food businesses often fall short of covering service delivery costs. This funding gap is influenced by factors such as wage variability, system costs and council location. Metropolitan, regional and rural councils face different challenges and costs, including travel, staffing and business density.

What factors should be considered when determining regulatory fees and charges? For example, should it be based on business activity, risk, size?

When setting regulatory fees and charges, the following factors should be considered to ensure fairness and sustainability:

#### **Business Activity**

The nature of the food business (manufacturing, retail, hospitality, community) affects the level of regulatory oversight required.

#### Risk Profile

Higher-risk businesses should contribute more, reflecting the greater resources needed for monitoring and enforcement.

#### **Business Size**

Larger businesses typically require more time and regulatory attention and should pay proportionally higher fees.

#### **Location and Accessibility**

Costs vary depending on whether a business is in a metropolitan, regional, or rural area.

#### **Public Benefit**

Some regulatory activities provide broad public health benefits and should be partially funded by government, not solely by business fees e.g. not for profit and charitable organisations.

#### Time and resources

Fees should also reflect the actual time, staffing and system costs incurred by the regulator in managing food safety over a 12 month registration period. This includes not only routine activities but also the likelihood of additional regulatory interventions such as follow-up inspection, responses to foodborne illness outbreaks, investigation of complaints, food sampling programs, education and support and pre-registration assistance. By factoring in these elements, the fee structure can better align with the level of service delivered.

Given that the regulator will be financially independent, what risks, benefits or other considerations need to be taken into account in the funding model?

The funding framework for Victoria's food safety regulation must be designed to accurately reflect the true cost of delivering services, while also acknowledging the diverse financial and operational contexts of local councils. In practice, full cost recovery is rarely achieved, and many Councils rely on ratepayer contributions to subsidise food safety activities, placing additional strain on already limited resources.

Reforms should adopt a more equitable and sustained approach to fee-setting, taking into account factors such as business activity type, risk profile, size and geographical location. Importantly, financial independence must not come at the expense of accountability, fairness, transparency or long term viability. A balanced funding model should support both effective regulation and the capacity of Council's to protect public health without compromising service quality or accessibility.

### **Role of Local Councils**

Local Councils play a vital role in Victoria's food safety system. Environmental Health Officers (EHOs) are at the coalface of communities, providing not only regulatory oversight but also practical guidance, education, and support to business proprietors. Council's deep local knowledge and integration with other council services such as Economic Development, Business Place makers (work with local business groups), Building and Planning Departments that make up a matrix of support that is unique and irreplaceable.

EHOs often guide proprietors through the journey of establishing, building, and maintaining successful businesses. This support goes far beyond what is covered by registration fees, including time spent on education, troubleshooting, and facilitating connections with other council services. Many business owners may not be aware of the extent of this support, nor the hours spent investigating foodborne illness outbreaks, without any cost recovery. Councils also absorb costs when discounts are applied for community groups, further demonstrating their commitment to public health and community wellbeing.

# What works well with the current food safety regulation system? (that could be retained)?

One of the most effective aspects of the current food safety regulatory system is the strong foundation of local knowledge and relationships that exist between Environmental Health Officers (EHOs) and food business operators. EHOs understand local context which allows for more meaningful engagement and practical support.

Additionally, the integration of food safety regulation with other Council services, such as economic development, planning, building and community health, creates a more holistic and coordinated approach. This cross-functional collaboration enhances the ability of Councils to support food businesses throughout their lifecycle, from set up and licensing to ongoing compliance and improvement.

Councils also demonstrate a high level of responsiveness when managing food safety incidents. Their proximity to businesses and communities allows them to act quickly in the event of outbreaks, complaints, or emerging risks, ensuring timely interventions that protect public health.

# What does not work well with the current food safety system that could be addressed?

#### Consistent Interpretation of regulation

One of the key challenges within the current food safety regulatory system is the lack of consistency in how regulations are interpreted and applied across different jurisdictions

and regulatory bodies. Similar food businesses may be subject to varying expectations depending on which authority oversee them, leading to confusion for operators and undermining the goal of a uniform regulatory standard. These inconsistencies can result in businesses receiving conflicting advice or facing different requirements, even when operating under the same legislative framework.

Enforcement practices also vary significantly between Councils and regulators, contributing further to uneven experiences for food businesses. This variability can affect the perceived fairness and effectiveness of the system and may discourage compliance or innovation. Addressing these inconsistencies through clearer guidance, streamlined processes and coordinated enforcement strategies would greatly enhance the overall integrity and functionality of Victoria's food safety framework.

#### Collaboration between authorities

Currently, there is a lack of formal coordination and collaboration between regulatory authorities, with Memorandums of Understanding (MOUs) either absent ort having lapsed over time. This disconnect can lead to fragmented oversight, inconsistent communication and inefficiencies in regulatory practice. To address this, Safe Food Victoria should take a lead role in establishing and maintaining collaborative frameworks, such as MOUs and joint working groups between relevant agencies and local councils. A coordinated approach would improve information sharing and strengthen the overall effectiveness of Victoria's food safety system.

#### Flexibility to focus on risk

Additionally, Council's require flexibility to prioritise regulatory activities based on assessed food safety risk. This means having the discretion to allocate inspection resources strategically – focusing more intensively on higher risk food premises, such as Class 1 and Class 2 business, while reducing the frequency or scope of inspections for lower risk premises, such as those classified as Class 3. Such an approach supports smarter regulation by ensuring that public health protection efforts are proportionate to the level of risk posed by different types of food operations.

This risk based prioritisation allows Councils to make the most of limited resources, respond effectively to emerging issues and maintain high standards of oversight where it matters most. Currently, the same level of emphasis is placed on requiring EHOs to inspect lower-risk food premises (such as Class 3) as is placed on higher-risk premises (such as Class 2 food businesses). Councils need greater flexibility to prioritise inspections and resources toward businesses that present a higher risk to public health. This may involve allocating more assessments and inspections to higher-risk premises and reducing the frequency for lower-risk businesses.

#### Food Safety Programs

In our view, current Food Safety Programs are not achieving their intended impact. The regulatory framework underpinning these programs lack a strong scientific basis and appears to prioritise appeasement of industry over public health outcomes. Many food business operators demonstrate limited understanding of what a food safety program entails, which undermines the effectiveness of these programs.

From a regulatory perspective, this presents significant challenges. Businesses often fluctuate between conducting high-risk and low-risk activities throughout their registration period, making consistent oversight difficult. This complicates efforts to ensure that food safety management remains a core focus and that safe and suitable food outcomes are consistently achieved.

#### Food safety data

A more a timely and comprehensive release of food safety data at the state level is essential to support effective regulation and public health outcomes. This should include systematic collation, analysis and review of relevant data such as inspection outcomes, compliance trends, outbreak responses and sampling results.

Once analysed, these insights should be clearly communicated to local councils to highlight priority issues, emerging risks and areas requiring targeted attention. Regular, coordinated data sharing would enable councils to align their efforts with state level priorities, improve consistency in enforcement and support evidence based decision making across the food safety system.

## What enhancements or new approaches would you like to see in the way Victorian councils continue to operate their food safety role?

Stronger engagement with local councils is essential to ensure alignment and collaboration across all levels of governance. This involves establishing regular communication channels, fostering partnerships, and creating opportunities for shared learning and feedback. Equally important is the provision of clear, consistent advice and the uniform application of legislative requirements and standards. Consistency in interpretation and enforcement not only promotes fairness but also builds confidence among councils and the communities they serve. A coordinated approach will help reduce ambiguity, improve compliance, and support a more strategic and unified public health framework across the state.

A unified data reporting system would significantly enhance consistency, accuracy and efficiency across councils. The current systems provided to local government for reporting food safety data requires review, as many councils face challenges in meeting reporting expectations due to limited functionality, lack of integration and insufficient support.

To fulfill their reporting obligations effectively, councils need substantially greater assistance, including clear guidance, technical advice and system improvements. Whether through a single statewide platform or through systems that integrate seamlessly with existing council licence management tools, the goal should be to enable timely, consistent and comprehensive data capture.

Improved data systems would also support Safe Food Victoria in monitoring trends, identifying emerging risks and ensuring that councils are aligned in tehri approach to food safety regulation.

# What do you think is the optimal role for Victorian councils within the new food regulator system?

The optimal role for Victorian councils within the new food regulator system should leverage their unique position as the "eyes and ears on the ground". Councils are best placed to maintain close, ongoing relationships with local food business operators and their staff, fostering trust and open communication. This local presence enables councils to provide timely advice, support compliance, and identify emerging risks early.

Council's also hold valuable historical knowledge about individual businesses, including past compliance records and operational practices. This continuity is highly beneficial for both regulators and businesses, as it reduces duplication of effort, streamlines processes, and ensures a more informed and tailored approach to regulation. For businesses, this means less time spent explaining their operations, greater consistency in advice, and a stronger sense of trust and familiarity with the regulatory process.

By acting as a critical link between the state regulator and local businesses, councils can help ensure that regulatory objectives are met while supporting a collaborative, risk-based approach that prioritises public health outcomes.

Therefore, it is our strong view that:

- Councils remain the primary regulators for local food businesses, leveraging their local knowledge and relationships.
- Councils act as the first point of contact for proprietors, guiding them through regulatory requirements and supporting business development.
- Councils be integrated partners in the new regulatory system, with clear roles, adequate resources, and recognition of their broader contributions to public health and local economies.

### The importance of maintaining proactive and reactive Public and Environmental Health

Environmental Health Officers (EHOs) play a vital role in local councils by proactively engaging with food businesses to uphold public health standards and regulatory compliance. Their work is not only regulatory but also educational and collaborative, fostering a culture of continuous improvement in food safety practices across diverse food business types.

One of the most significant contributions of EHOs is the strong rapport they build with food business operators. This relationship is founded on trust, consistency, and mutual respect. Through regular inspections, guidance, and support, EHOs help businesses

understand and meet their legal obligations while also encouraging best practices. This rapport enables open communication, making it easier for EHOs to identify risks early and for businesses to seek advice without fear of punitive action.

Proactive inspections and assessments of food manufacturing facilities are particularly important. These environments often operate under different food safety management systems compared to retail food businesses. Manufacturers typically produce fewer product varieties but in larger volumes, which simplifies process flowcharts and makes it easier for EHOs to identify potential hazards. The knowledge gained from these assessments is invaluable and frequently transferred to retail settings, especially home-based retailers who may be producing single production lines.

For example, an EHO who has assessed a manufacturing facility's allergen control procedures or temperature monitoring systems can use that insight to educate smaller retail businesses on how to implement similar controls at an appropriate scale. This cross-sector learning helps elevate food safety standards across the board, ensuring that even the smallest operators benefit from the rigorous practices observed in larger facilities.

Moreover, when investigating food complaints, EHOs' familiarity with manufacturing processes allows them to quickly pinpoint issues due to the less dynamic nature of production lines. This efficiency is crucial in protecting public health and resolving complaints swiftly. The structured nature of manufacturing also provides EHOs with clear documentation and traceability, which aids in root cause analysis and corrective action planning.

The importance of EHOs transferring knowledge from manufacturers to retailers is especially evident in the rise of home-based food businesses. These operators often lack formal training or access to industry-grade systems. EHOs bridge this gap by sharing practical, scalable solutions derived from their experience with manufacturers. This not only improves compliance but also empowers small businesses to grow responsibly.

In summary, EHOs in local councils are essential to maintaining and improving food safety standards. Their proactive work, built on strong relationships with businesses, enables them to act as both regulators and educators. By leveraging insights from food manufacturing assessments and applying them to retail contexts, EHOs ensure that food safety practices are robust, consistent, and adaptable across the entire food sector. Their role is indispensable in safeguarding public health and supporting the sustainable development of food businesses in the community.

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