

30th July 2026

SCHOOL FOOD MATTERS

Delivering the School Lunch Program across Tasmania

Submission: Draft Primary Produce Safety (Horticulture Produce) Regulations 2026

School Food Matters (SFM) welcomes the opportunity to comment on the Draft Primary Produce Safety (Horticulture Produce) Regulations 2026. SFM is a Tasmanian not-for-profit that delivers the School Lunch Program (SLP) in partnership with Loaves and Fishes Tasmania (LFT), providing meals to students across approximately 60 schools statewide.

LFT has already published a detailed submission on these draft regulations, which SFM supports in full. This document is intended as a companion piece, adding a perspective specific to SFM's role in delivering a structured, recurring, statewide school food program. SFM is well placed to speak to what proportionate regulation looks like for an established, recurring, non-commercial food program operating at scale across the education sector.

Consistency with child health and nutrition objectives

The School Lunch Program aims to improve student health, nutrition and food literacy outcomes. Access to fresh, local and, where possible, garden-grown produce is central to that purpose. SFM encourages NRE to consider food safety regulation for community and school food programs alongside these health objectives, ensuring that proportionate regulatory settings support, rather than inadvertently constrain, children's access to fresh and locally grown food through school programs.

A structured, recurring food program that is still not commercial in scale or intent

The SLP is not a commercial horticultural production. It is a recurring, government funded, non-profit food service delivered in partnership in Tasmanian schools. We work alongside and liaise regularly with DECYP and its representatives. We understand there are already ongoing interdepartmental conversations occurring between the Department of Health and DECYP regarding the food in schools, and we encourage these discussions to include codesign with those in schools who run programs such as the SLP, so that any resulting frameworks reflect practical, on-the-ground realities. We are

concerned the draft regulations, as currently framed, may not clearly provide for this kind of program: one that is regular and structured, but non-commercial in purpose, small-scale in individual sourcing terms, and delivered for public benefit rather than profit. We ask NRE to clarify how recurring, non-commercial, program-based food activities of this kind would be treated, and to ensure the proposed Community Food Pathway is broad enough to capture them alongside more occasional donations.

School gardens feeding directly into school lunch programs

LFT's submission includes school garden produce among the examples of a community food activity that could be captured by a Community Food Pathway. SFM can add first-hand to this point: kitchen and vegetable gardens in Tasmanian schools already contributes produce toward student lunches in some SLP schools, and this pathway from garden to plate has real value for food literacy, teaching food safety significance, nutrition education and student engagement. Regulatory settings that impose formal accreditation or documentation requirements on this kind of small-scale school setting may discourage schools from continuing or expanding garden-to-lunch programs, at a direct cost to the educational and nutritional benefits they provide. We ask that any notification or guidance requirements for school gardens supplying school food programs be kept simple, practical and proportionate to the very small volumes typically involved.

Existing food safety systems as evidence of a mature risk-management approach

LFT's Recommendation 4 proposes recognising receiving organisations as food safety partners. SFM can offer concrete evidence in support of this recommendation. Across the SLP, SFM already operates a documented food safety management framework, including a food poisoning and allergen incident response procedure with supporting flowcharts, a replacement goods standard operating procedure, a two-path student consent process, and a mock food recall exercise conducted using real program data. This demonstrates that organisations delivering community and school food programs are not operating without food safety governance; rather, many already maintain systems that could reasonably be recognised, and built upon, within a proportionate regulatory framework, reducing duplication for both regulators and community organisations.

Operational impact of compliance settings on statewide, regional delivery

Because the SLP is delivered by Program Coordinators working directly with schools across three regions, SFM is well placed to comment on the practical, on-the-ground

impact of compliance requirements. Notification, documentation or accreditation thresholds that are workable for a single organisation can become disproportionately burdensome when multiplied across 60 schools. We encourage NRE to consider this operational reality when setting thresholds, and to favour approaches, such as simple notification or self-assessment tools, that can be applied consistently and with minimal administrative burden across a large number of small, geographically dispersed sites. In implementing these regulations, NRE would also need to consider how to support DECYP, in turn, to support individual schools with the practical compliance procedures required, given schools are the frontline delivery point for these programs.

SFM supports all four recommendations set out in LFT's submission, and offers the following additional recommendations, specific to structured, program-based food activities such as the School Lunch Program.

Recommendations:

Recommendation 1: Align implementation with child health and nutrition objectives.

Ensure that the implementation of these regulations is considered alongside, and supportive of, Tasmania's child health, nutrition and food literacy objectives, particularly as they relate to school food programs.

Recommendation 2: Keep requirements for school garden-to-program produce simple and proportionate.

Develop clear, simple guidance for school and community gardens supplying food directly into school or community food programs, avoiding formal accreditation requirements disproportionate to the very small volumes typically involved.

Recommendation 3: Recognise established organisational food safety systems within a risk-based compliance framework.

Allow organisations that already operate documented food safety management systems, such as incident response procedures, consent processes and recall protocols, to have these systems recognised as part of demonstrating compliance, reducing duplication while maintaining safeguards.

Recommendation 4: Recognise structured, recurring, non-commercial food programs within the Community Food Pathway.

Ensure the proposed Community Food Pathway explicitly provides for recurring, program-based food activities delivered by not-for-profit organisations, such as school food programs, and not only occasional or one-off community donations.

Recommendation 5: Design compliance thresholds with regional and statewide delivery models in mind.

Test proposed notification, documentation and accreditation thresholds against the operational reality of organisations delivering food programs across many small, geographically dispersed sites, to avoid disproportionate administrative burden

SFM would welcome the opportunity to discuss this submission further and thanks NRE for its consideration of the School Lunch Program's operating context in finalising these regulations.

Kate Carlin

School Lunch Program Manager, School Food Matters

kate@schoolfoodmatters.org.au

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