

THE CITY OF
GREATER GEELONG

SUBMISSION TO THE FUTURE OF FOOD SAFETY REGULATION IN VICTORIA

OCTOBER 2025

Contents

Executive summary	3
Submission	5
Introduction.....	5
Regulatory Approach	5
Recommendations: Regulatory Approach.....	6
Governance	7
Recommendations: Governance.....	8
Funding	8
Recommendations: Funding	9
Role of Local Councils	9
Recommendations: Role of Local Councils.....	11
Conclusion.....	12
References	12

Executive summary

The City of Greater Geelong is pleased to present its submission to the future of food safety regulation in Victoria. As the largest regional municipality in Victoria, encompassing a diverse population of nearly 300,000 residents and spanning suburban, coastal, and country areas, the City plays a pivotal role in ensuring food safety under the *Victorian Food Act 1984*.

Local Government is currently entrusted with the responsibility for the day-to-day regulation of food premises, including business registration and classification, routine inspections, food sampling, and enforcement actions.

The Food and Accommodation Services sector in Greater Geelong includes 2287 *Victorian Food Act 1984* registered businesses (Class 1-3) and a further 500 businesses maintained as Class 4 notifications, as well as 226 accommodation businesses. The Retail Trade sector accounted for 1,427 businesses in 2024. These figures highlight the importance of robust food safety systems to protect public health across a broad and dynamic business landscape.

The City's approach focuses on supporting compliance and continuous improvement through education, surveillance, and targeted enforcement.

This submission identifies key areas for regulatory enhancement and offers **16** recommendations for consideration by the Victorian Government.

RECOMMENDATIONS

Regulatory Approach

1. Retain and Expand Specialist Expertise

Existing expertise, spanning food technologists, industry specialists, experienced EHOs, and auditors, which enables informed, risk-based decision-making and practical guidance must be preserved and expanded within Safe Food Victoria to maintain strong compliance outcomes and sector confidence.

2. Reform Food Classification

Food classifications under the *Victorian Food Act 1984* should be reviewed, particularly for businesses currently deemed low-risk and only requiring Local Government notification.

3. Risk Hazards Should be Based on Inherent Risk

Regulatory oversight should be proportionate to actual food safety risks, creating a fairer and more transparent system while improving public health outcomes, therefore, risk ratings should be based on inherent hazards of the food served, not on the controls in place.

Governance

4. Skills-Based Board Composition

The board should include members with broad food industry experience across manufacturing, retail, auditing, and quality assurance, alongside representation from Registered Training Organisations (RTOs) delivering hospitality and food safety training, with representation from both state and local government levels held to maintain alignment between policy and enforcement.

5. Structured Consultative Committees

Committees should operate under clear terms of reference, with diverse membership, independent chairs, and formal reporting processes to provide evidence-based advice to the board that focuses on strategic areas such as emerging food trends and technologies, allergen management, and training standards.

6. Best-Practice Governance Principles

Committees should adopt rotating membership for fresh perspectives, transparent communication through published summaries, and structured reporting aligned with board priorities, allowing them to remain responsive, risk-based, and future-ready.

Funding

7. Adopt a Risk-Based Fee Structure

Fees and charges should be proportionate to the risk profile, business activity, and scale of operations.

8. Stage Further Consultation Post-Reform

To ensure transparency and stakeholder confidence, before finalising the fee structure additional consultation, after Stage 1 reforms, should be held to clarify whether fees apply solely

to businesses regulated by Safe Food Victoria or also involve Local Governments.

9. Embed Best-Practice Governance and Accountability

Draw on proven models from [FSANZ](#), [ACCC](#), and [EPA Victoria](#), which combine cost recovery with government oversight supported by independent audits, public reporting, and periodic reviews to maintain impartiality and trust.

10. Ensure Predictability and Equity

Fees should be equitable and not disproportionately burden regional or small operators, introduce measures such as multi-year funding cycles and capped fee increases to provide stability for businesses.

Role of Local Council

11. Retain Local Government as On-the-Ground Regulators

Local Government should remain the primary regulators for food businesses within their boundaries, including responsibility for registration, education, assessment, compliance monitoring, enforcement and food complaint and food-borne outbreak inspections.

12. Implement Statewide Training and Support

Establish ongoing, funded training programs for Environmental Health Officers (EHOs) to ensure consistent skills and risk-based assessment methodologies by all Local Governments.

13. Develop Timely Guidance and Resources

Safe Food Victoria should prioritise the development and distribution of food safety guidance materials needed by both industry and Local Governments, to prevent inconsistent enforcement and unnecessary compliance costs for businesses.

14. Introduce a Statewide Licensing and Inspection System

Implement a single, mandatory, fit-for-purpose database for all environmental health functions, including *Victorian Food Act 1984* registrations, sampling data, complaints, and related permits that integrates with Local Government payment

platforms to reduce duplication and ensure consistent workflows across Victoria.

15. Review Food Classification and Oversight

Simplify the classification system to be hazard-based rather than control-based, and introduce mechanisms for regular review of Class 4 businesses. This would include introducing the ability for Local Governments to charge a fee Class 4 notifications.

16. Explore Alternative Registration Models

Investigate the feasibility of a notification-based registration system, similar to Western Australia, where businesses maintain ongoing registration and pay per inspection.

Submission

INTRODUCTION

The City of Greater Geelong (the City) welcomes the opportunity to contribute to the future of food safety regulation in Victoria.

With almost 300,000 residents, the City of Greater Geelong (the City) is Victoria's largest regional municipality. Located 75 kilometres south-west of Melbourne, the municipality covers an area of 1,252 km², comprising suburban, coastal and country areas.

The City of Greater Geelong plays a key role in food safety regulation under the *Victorian Food Act 1984* (Food Act), which currently delegates responsibility for the day-to-day regulation of food premises to Local Government. This includes:

- Registration and classification of food businesses (Class 1 to Class 4).
- Routine inspections and assessments of food premises.
- Food sampling and surveillance to ensure compliance.
- Education and enforcement actions for non-compliant businesses.
- Food complaint and food borne-outbreak investigations.

The Food and Accommodation Services sector in Greater Geelong includes 2287 *Victorian Food Act 1984* registered businesses (Class 1-3) and a further 500 businesses maintained as Class 4 notifications, as well as 226 accommodation businesses. The Retail Trade sector accounted for 1,427 businesses in 2024. These figures highlight the importance of robust food safety systems to protect public health across a broad and dynamic business landscape.

The Geelong Food Relief Centre also supports over 55 community agencies and operates two minimarts, distributing over 1,100 tonnes of food annually. This reflects a further large network of food-related services and outlets in the region.

A 2023 audit by the Victorian Auditor-General found that the City, like many Local Governments, faced challenges in fulfilling their food safety regulation responsibilities due to staffing shortages and disruptions from COVID-19. The City was unable to meet statutory requirements to assess/inspect all registered food businesses each year.

The City also has ongoing difficulty in identifying unregistered businesses that stems from a trend towards businesses operating online, solely through social media channels, and at home.

Addressing these issues will be essential in any future revisions of the regulatory framework.

The City also has a *Food Policy* aimed at improving food access, availability, and security. It supports community food production (e.g., gardens, farmers markets) and promotes a fair food system that ensures healthy food is accessible to all, continued equity in food access needs to be considered in any future iteration of the regulatory environment.

The proposed reforms, to be undertaken in two stages, over the coming years include two stages.

Stage 1: Establishment of Safe Food Victoria - 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.

Stage 2: Development of a new framework for food safety in Victoria - 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.

The City provides the following response to the proposed reforms for consideration by the Victorian Government.

REGULATORY APPROACH

The current regulatory approach to food safety in Victoria is governed primarily by the *Food Act 1984*, which mandates that all food businesses must handle food safely and ensure it is suitable for human consumption. These businesses are also required to comply with the *Australia New Zealand Food Standards Code*, which sets out outcomes-based standards for food safety. In addition to the *Victorian Food Act 1984*, there are several sector-specific laws such as the *Meat Industry Act 1993*, *Seafood*

Safety Act 2003, and *Dairy Act 2000*, each regulating particular parts of the food supply chain.

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

One of the most effective aspects of Victoria's current food safety regulatory approach is the solid foundation of specialised technical expertise within regulatory bodies, which should be retained and expanded. Agencies such as Dairy Food Safety Victoria (DFSV) and PrimeSafe employ professionals with deep scientific and technical knowledge specific to their industries. This ensures that regulatory decisions and compliance activities are informed by a thorough understanding of sector-specific risks, such as microbiological hazards in dairy or meat processing.

The Department of Health's food safety unit also benefits from a diverse mix of expertise, including experienced Environmental Health Officers (EHOs), food technologists, industry specialists, and auditors with manufacturing backgrounds.

This combination of regulatory and practical industry knowledge supports a risk-based, outcomes-focused approach that aligns with the *Australia New Zealand Food Standards Code*. It enables regulators to provide clear, practical guidance, interpret complex standards accurately, and respond effectively to emerging technologies and food trends.

The recent restructure of Department of Health has seen a reduction of expertise in the Food Safety Unit. This has resulted in Local Government EHO's being less able to access support and guidance that formed a valuable part of the interface between the regulator and Local Government.

Maintaining and strengthening this capability is essential as reforms progress toward a consolidated regulator, Safe Food Victoria. While streamlining processes and reducing duplication are important, these changes must preserve the technical depth that underpins effective risk management. Expanding access to industry specialists, investing in ongoing professional development, and leveraging innovative tools such as DFSV's RegTech initiatives would further enhance responsiveness and resilience. In short, the specialised knowledge embedded in Victoria's food safety framework is a cornerstone of its success and should remain central to any future regulatory model.

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

An important enhancement for Safe Food Victoria would be to reconsider food classifications under the *Victorian Food Act 1984*, particularly for businesses currently deemed low-risk and only requiring notification with Local Governments. For example, Class 4 businesses such as bars and coffee vans often handle potentially hazardous foods like milk or garnishes, as well as allergen-free requests, yet their classification does not always reflect the actual risk posed by the food they serve.

A more robust approach would be to base risk ratings on inherent hazards rather than existing controls. Currently, businesses can appear lower risk because they have strong controls in place, even if they serve high-risk foods.

This can lead to inconsistencies in regulatory oversight. Instead, risk should be assessed primarily on the type of food and processes involved, such as handling raw meat, dairy, or ready-to-eat items, rather than on the sophistication of the controls implemented.

This shift would ensure that regulatory attention is focused where the greatest potential for harm exists, improving food safety outcomes without unnecessarily burdening genuinely low-risk operators. It would also create a more transparent and equitable system, where businesses understand that classification is tied to the intrinsic hazards of their operations.

Recommendations: Regulatory Approach

To ensure Safe Food Victoria delivers a modern, risk-based and effective regulatory system, two key enhancements should be prioritised:

1. Retain and Expand Specialist Expertise

Existing expertise, spanning food technologists, industry specialists, experienced EHOs, and auditors, which enables informed, risk-based decision-making and practical guidance must be preserved and expanded within Safe Food Victoria to maintain strong compliance outcomes and sector confidence.

2. Reform Food Classification

Food classifications under the *Victorian Food Act 1984* should be reviewed, particularly for businesses currently deemed low-risk and only requiring Local Government notification.

3. Risk Hazards Should be Based on Inherent Risk

Regulatory oversight should be proportionate to actual food safety risks, creating a fairer and more transparent system while improving public health outcomes, therefore, risk ratings should be based on inherent hazards of the food served, not on the controls in place.

In summary Safe Food Victoria should combine streamlined processes with deep technical expertise and a hazard-based risk model to deliver a robust, future-ready food safety system.

GOVERNANCE

Victoria's food safety governance framework is currently fragmented, with responsibilities shared across multiple regulators, including Dairy Food Safety Victoria, PrimeSafe, Agriculture Victoria and the Department of Health, alongside Local Government. This structure has led to duplication, inconsistent oversight, and complexity for businesses navigating compliance.

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

For the Safe Food Victoria board to operate effectively, it is essential to include members with broad food industry experience across manufacturing, retail, auditing, and quality assurance.

This diversity ensures decisions are informed by practical knowledge of food production and service environments. Representation from Registered Training Organisations (RTOs) and stakeholders who are creating training modules should also be prioritised, as training and skills development are critical for food businesses. Leading RTOs that deliver hospitality qualifications, such as *Certificate IV in Hospitality (SIT40422)*, *Food Safety Supervisor* and *Food Safety Handler* courses, can provide valuable insights into workforce capability and compliance challenges.

Additionally, all regulators should be represented, including those at the state and local government level, to maintain strong alignment between policy, enforcement, and operational realities. This mix of expertise will help Safe Food Victoria balance technical rigor, industry practicality, and training needs, creating a governance structure that supports a risk-based, responsive, and future-ready food safety system.

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

If consultative committees were established, they should focus on areas that address emerging risks and evolving industry needs. One key committee should examine new processes, trends, and novel foods, assessing potential hazards, determining appropriate controls, and ensuring legislation remains fit for purpose. This group could also play a vital role in providing education and advice to regulators, industry, and consumers about these innovations.

Another critical area is training and competency standards, particularly reviewing the content of *Food Safety Supervisor* and *Food Safety Handler* courses. These programs must reflect current business needs and trends in food preparation practices with a strong emphasis on allergen management and safe handling practices to reduce the risk of food-related incidents.

By covering these areas, consultative committees would help maintain a proactive, informed, and adaptable food safety system.

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

Consultative committees supporting the board of Safe Food Victoria should be structured using best-practice principles drawn from Australian governance models to ensure the board receives timely, expert, and balanced advice. Committees should have clear terms of reference, outlining their advisory role, scope, and reporting obligations to avoid confusion between advisory and decision-making functions. Membership should be diverse and skills-based, including representatives from key food industry sectors (manufacturing, retail, auditing, and quality assurance), regulators at both state and local levels, and RTOs to reflect workforce development and recruitment pipeline needs.

Committees should operate under a formal governance framework with documented processes for meeting frequency, agenda setting, and escalation pathways. Best practice recommends rotating membership terms to maintain fresh perspectives while preserving continuity. Each committee should appoint an independent chair to ensure impartiality and foster constructive dialogue. To maximise effectiveness, committees should provide structured reports and recommendations to the board, supported by evidence and risk analysis, and maintain

transparency through published communiqués or summaries.

Finally, committees should be aligned with strategic priorities, such as emerging food technologies, allergen management, and training standards, and include mechanisms for cross-sector collaboration, similar to models used by FSANZ and the ACCC, which rely on stakeholder forums and technical advisory groups to inform regulatory decisions. This structure ensures Safe Food Victoria benefits from expert input while maintaining accountability and efficiency in governance.

Recommendations: Governance

To ensure Safe Food Victoria operates with strong accountability and expert input, the governance model should incorporate:

4. Skills-Based Board Composition

The board should include members with broad food industry experience across manufacturing, retail, auditing, and quality assurance, alongside representation from Registered Training Organisations (RTOs) delivering hospitality and food safety training, with representation from both state and local government levels held to maintain alignment between policy and enforcement.

5. Structured Consultative Committees

Committees should operate under clear terms of reference, with diverse membership, independent chairs, and formal reporting processes to provide evidence-based advice to the board that focuses on strategic areas such as emerging food trends and technologies, allergen management, and training standards.

6. Best-Practice Governance Principles

Committees should adopt rotating membership for fresh perspectives, transparent communication through published summaries, and structured reporting aligned with board priorities, allowing them to remain responsive, risk-based, and future-ready.

In summary a governance structure combining a skills-based board and well-designed consultative committees will deliver expert advice, stakeholder confidence, and a robust food safety system for Victoria

FUNDING

Victoria's food safety regulatory system is currently funded through cost recovery from regulated businesses, meaning fees for registration, licensing, audits, and penalties cover the cost of delivering regulatory services. Independent authorities such as PrimeSafe and Dairy Food Safety Victoria (DFSV) fully recover costs and manage their own revenue, while functions within the Department of Health and Agriculture Victoria are partly cost-recovered and partly government-funded.

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

When determining regulatory fees and charges, several factors should be considered to ensure fairness, transparency, and sustainability. Fees should reflect the risk profile and complexity of the business activity, rather than applying a one-size-fits-all approach. For example, businesses handling high-risk foods or operating across multiple sites may warrant higher fees than those with minimal food safety hazards.

Business size and scale should also be considered, as larger operations typically require more regulatory oversight. However, before finalising any fee structure, further consultation is essential once Stage 1 reforms are complete, to clarify how the new regulatory system will function and whether fees will apply solely to businesses regulated by Safe Food Victoria or also involve Local Governments.

This staged approach will ensure fees are proportionate, transparent, and aligned with the objectives of a modernised food safety framework.

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

When designing a funding model for a financially independent regulator, several risks, benefits, and considerations must be addressed. A key benefit of financial independence is greater flexibility and responsiveness, allowing the regulator to allocate resources based on emerging risks rather than fixed government budgets.

However, this model introduces risks such as over-reliance on industry fees, which could create perceptions of bias or reduce affordability for small businesses. To mitigate this, the funding framework should incorporate transparency,

accountability, and proportionality principles, ensuring fees reflect risk, scale, and complexity rather than being a flat charge. High-risk businesses should contribute more than low-risk operators, avoiding a flat-fee approach that disadvantages small or low-risk enterprises

Best-practice examples in Australia include FSANZ (Food Standards Australia New Zealand) and ACCC (Australian Competition and Consumer Commission), which operate under hybrid funding models combining government appropriations with cost-recovery for specific services.

These models maintain independence while safeguarding public interest through clear fee-setting guidelines, stakeholder consultation, and periodic reviews.

Similarly, EPA Victoria uses a risk-based levy system tied to environmental impact, demonstrating how charges can align with regulatory objectives without disadvantaging low-risk operators.

Other considerations include:

- **Equity and fairness:** Fees should not disproportionately burden small or regional businesses.
- **Predictability and stability:** Multi-year funding cycles or capped increases help businesses plan.
- **Transparency and engagement:** Ongoing consultation with industry and Local Governments ensures trust and compliance.
- **Performance monitoring:** Independent audits and public reporting maintain confidence in the regulator's impartiality.

In summary, Safe Food Victoria's funding model should adopt a risk-based, transparent, and consultative approach, drawing on proven frameworks from FSANZ, ACCC, and EPA Victoria to balance independence with accountability.

Recommendations: Funding

To ensure Safe Food Victoria operates as a financially independent regulator while maintaining fairness and accountability, the following recommendations should guide the funding model:

7. Adopt a Risk-Based Fee Structure

Fees and charges should be proportionate to the risk profile, business activity, and scale of operations.

8. Stage Further Consultation Post-Reform

To ensure transparency and stakeholder confidence, before finalising the fee structure additional consultation, after Stage 1 reforms, should be held to clarify whether fees apply solely to businesses regulated by Safe Food Victoria or also involve Local Governments.

9. Embed Best-Practice Governance and Accountability

Draw on proven models from [FSANZ](#), [ACCC](#), and [EPA Victoria](#), which combine cost recovery with government oversight supported by independent audits, public reporting, and periodic reviews to maintain impartiality and trust.

10. Ensure Predictability and Equity

Fees should be equitable and not disproportionately burden regional or small operators, introduce measures such as multi-year funding cycles and capped fee increases to provide stability for businesses.

In summary a transparent, risk-based, and consultative funding model—supported by strong accountability mechanisms—will enable Safe Food Victoria to remain financially independent while safeguarding public interest.

ROLE OF LOCAL COUNCIL

Local Government currently play a critical role in Victoria's food safety system as the primary regulators for thousands of food businesses under the *Food Act 1984*. Their responsibilities include registering and classifying food premises, conducting inspections, enforcing compliance for businesses such as restaurants, cafes, and community food providers and conducting investigations related to community complaints and outbreaks. Local Government also manages notifications for low-risk Class 4 businesses and provide education to operators. This decentralised model ensures local oversight but has led to inconsistencies in compliance and enforcement, as Local Governments vary in resources, expertise, and capacity.

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

One of the most effective elements of the current food safety regulation system that should be retained is the local knowledge and integrated risk assessment provided by

Local Governments and Environmental Health Officers (EHOs).

Local Government has a unique ability to understand the full context of food businesses within their communities, including their networks, supply chains, and associated public health risks. For example, Local Governments often manage clusters of interlinked businesses, such as a group of Class 1 facilities including hospitals, aged-care homes, and manufacturers as well as other linked Class 2-4 businesses, where food safety risks cannot be fully understood without tracing the entire food chain. This level of insight is only possible through local oversight and continuity of engagement.

EHOs also bring expertise beyond food safety, such as assessing compliance under the *Public Health and Wellbeing Act 2008* for businesses that combine food services with beauty or accommodation, and evaluating environmental risks for premises not connected to reticulated sewer systems. These broader responsibilities allow EHOs to identify overlapping risks and ensure holistic public health protection.

Another strength is the information-sharing and collaboration facilitated by regional and special interest groups, such as those coordinated by the Department of Health or Environmental Health Professionals Australia (EHPA).

Groups like the former North-West Food Sampling Group provided a platform for Local Governments and the Department to share intelligence, address emerging issues, and ensure consistent interpretation of legislation. These forums also help regulators and industry respond to latest trends and novel foods, while promoting education and best practice.

Finally, the on-the-ground presence of Local Government ensures that food safety assessments and registration activities are informed by real-world conditions rather than remote oversight.

This local engagement builds trust with businesses and enables regulators to verify compliance through direct observation and contextual understanding. Retaining these mechanisms within the future model will ensure Safe Food Victoria benefits from local intelligence, integrated risk management, and strong connections between food safety, public health, and environmental regulation.

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

One of the key weaknesses of the current food safety system is the complex and confusing food classification framework, which often leads to inconsistent application and oversight. Classifications are currently based on the controls a business has in place rather than the inherent hazards of the food they handle. This approach can mask actual risk and result in inadequate regulatory attention for businesses that have expanded their operations without updating their classification. For example, many Class 4 businesses, such as bars and mobile coffee vans, do not pay an application or ongoing fee and are not subject to annual inspections. This lack of oversight means Local Governments often lack resources for proactive surveillance, creating gaps in compliance monitoring.

A previous internal audit at the City, which was conducted following regulatory changes to the definitions of Classes, assessed Class 4 business activities. The outcome of the audit showed that nearly 20% of these businesses had increased their food activities to include those of Class 2 or 3 businesses without notifying Local Government or seeking appropriate registration, and most were not complying with the Food Standards Code. This highlights a systemic issue where low-risk classifications can lead to complacency and missed risks. Additionally, businesses reclassified to Class 4 in 2022 as a response to regulatory change should be reassessed to confirm they remain genuinely low-risk, and that reduced oversight has not compromised food safety or increased public health risks.

The *Victorian Food Act 1984* does not currently allow for Local Governments to charge a fee for receiving Class 4 notifications, a process that, as well as administration time, involves evaluation by an EHO to confirm classification, educate on food safety requirements and site visits in some cases. The cost of this process to confirm classification and that food safety risks are addressed should be recouped through the ability to charge a fee to these businesses.

Addressing these issues requires a simplified, hazard-based classification system that reflects the actual risk posed by the food and processes involved, combined with mechanisms for regular review and surveillance of businesses operating under low-risk categories. This would ensure regulatory resources are targeted effectively and compliance with the Food Standards Code is maintained across all classes.

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

To enhance the way Victorian Local Governments continue their food safety role, a strong focus should be placed on statewide consistency, training, and technology integration.

Regular, funded training programs should be delivered across all Local Governments to ensure Environmental Health Officers (EHOs) maintain up-to-date skills regardless of location or resource constraints. These programs should include in-person, practical sessions supported by Safe Food Victoria, covering best practice assessment methodologies and technical topics such as HACCP, allergen management, and emerging food processes, similar to previous successful initiatives like “All About the Egg” and “Sous Vide” training.

Additionally, timely development and distribution of guidance materials for both industry and Local Governments are critical; delays in resources such as the raw meat supplement, the dehydration supplement, and vacuum-packing guidelines have led to inconsistent enforcement between Local Governments, resulting in unnecessary costs for businesses such as developing independent food safety programs and paying for annual food safety audits.

A major improvement would be the implementation of a statewide, fit-for-purpose licensing and inspection database, integrated with Local Government payment systems and designed to manage all environmental health functions, including *Victorian Food Act 1984* registrations, wastewater permits, and *Public Health and Wellbeing Act 2008* premises. This would standardise workflows, reduce inefficiencies, and ensure consistent data management across Local Governments.

Finally, exploring alternative registration models—such as Western Australia’s notification system, where businesses maintain ongoing registration and pay per inspection—could reduce administrative burden and costs for both Local Governments and businesses.

These enhancements would create a more consistent, efficient, and risk-focused food safety system while supporting Local Governments in their critical role.

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

The optimal role for Victorian Local Governments within the new food regulator system should be to remain the primary

regulator and on-the-ground contact for all food businesses within their boundaries, including responsibility for assessments, approvals, education, compliance monitoring, enforcement, food complaint and food borne-outbreak investigations.

Privatisation in food safety regulation could shift the focus from community wellbeing to profit, fragment the sector, and compromise the essential balance between education and enforcement.

Local Governments are uniquely positioned to provide a holistic view of food safety risks because of their direct engagement with businesses and their involvement in related public health functions, such as managing food-borne outbreak investigations, issuing onsite wastewater permits, and overseeing premises registered under the *Public Health and Wellbeing Act 2008*.

This local presence enables Environmental Health Officers (EHOs) to understand the interconnected nature of higher-risk businesses and their links to other food operations within the local government area.

Local Governments also maintain communication with businesses for multiple regulatory purposes, giving them insight into supply chains, ownership structures, and operational practices that state-level oversight alone cannot achieve.

Retaining Local Governments in this regulatory role ensures continuity of local intelligence, integrated risk assessment, and strong collaboration between food safety and broader public health objectives.

Recommendations: Role of Local Councils

11. Retain Local Government as On-the-Ground Regulators

Local Government should remain the primary regulators for food businesses within their boundaries, including responsibility for registration, education, assessment, compliance monitoring, enforcement and food complaint and food-borne outbreak inspections.

12. Implement Statewide Training and Support

Establish ongoing, funded training programs for Environmental Health Officers (EHOs) to ensure consistent skills and risk-based assessment methodologies by all Local Governments.

13. Develop Timely Guidance and Resources

Safe Food Victoria should prioritise the development and distribution of food safety guidance materials needed by both industry and Local Governments, to prevent inconsistent enforcement and unnecessary compliance costs for businesses.

14. Introduce a Statewide Licensing and Inspection System

Implement a single, mandatory, fit-for-purpose database for all environmental health functions, including *Victorian Food Act 1984* registrations, sampling data, complaints, and related permits that integrates with Local Government payment platforms to reduce duplication and ensure consistent workflows across Victoria.

15. Review Food Classification and Oversight

Simplify the classification system to be hazard-based rather than control-based and introduce mechanisms for regular review of Class 4 businesses. This would include introducing the ability for Local Governments to charge a fee Class 4 notifications.

16. Explore Alternative Registration Models

Investigate the feasibility of a notification-based registration system, similar to Western Australia, where businesses maintain ongoing registration and pay per inspection.

In summary this approach will address compliance gaps and ensure businesses that increase risk activities are appropriately reclassified and monitored and reduce administrative burden and costs for both Local Governments and businesses.

Noting in this approach that Local Government's local presence and integrated knowledge of public health, environmental risks, and interconnected businesses provide a holistic understanding that state-level oversight cannot replicate.

CONCLUSION

In conclusion, maintaining Local Government as the principal regulators ensures a locally informed, responsive, and efficient food safety system that balances public health priorities with business needs.

The proposed **16** recommendations are designed to streamline processes, promote consistency, and reduce administrative burdens while safeguarding community wellbeing.

The City welcomes the opportunity to provide further feedback or clarification as the regulatory framework continues to evolve and remains committed to supporting improvements in food safety across Victoria.

REFERENCES

[Regulating Food Safety | Victorian Auditor-General's Office](#)

[Food Policy - City of Greater Geelong](#)

[Statistics and data - City of Greater Geelong](#)

[Geelong Foodshare](#)

[Register a Food or Health Premise - City of Greater Geelong](#)

[Counts of Australian Businesses, including Entries and Exits, July 2021 - June 2025 | Australian Bureau of Statistics](#)

[Businesses by industry | Geelong | economy.id](#)

[Victoria to Streamline Food Safety Regulation with New Independent Body](#)

[Victoria to get new food safety agency | Food Safety News](#)

[Dairy RegTech | DAIRYSAFE](#)

[Consultative committees | ACCC](#)

[board-committees-director-tool.pdf](#)

[Committees and groups | Food Standards Australia New Zealand](#)

[Develop an effective governance structure | Australian Public Service Commission](#)

[Food Standards Australia New Zealand](#)

[ACCC](#)

[Environment Protection Authority Victoria](#)

CITY OF GREATER GEELONG

WADAWURRUNG COUNTRY

PO Box 104, Geelong VIC 3220

P: 5272 5272

E: contactus@geelongcity.vic.gov.au

www.geelongaustralia.com.au

CUSTOMER SERVICE CENTRE

Wurriki Nyal

137-149 Mercer Street, Geelong

8.00am – 5.00pm

LATEST NEWS:

 [@CityofGreaterGeelong](#)

 [@GreaterGeelong](#)

 [@CityofGreaterGeelong](#)

 [CityofGreaterGeelong](#)