

## Submission to the BRF from Darina Allen

Particular issues relating to regulation of **small food producers** include:

- Lack of understanding / training / education among health inspectors of methods and practices appropriate to small producers; application of rules designed / intended for factory settings to artisan producers without due regard for differences in context;
- Lack of clarity about which regulation / legislation is being applied when inspectors give their decisions; is the business required or recommended to comply; what is the basis of the decision;
- Lack of awareness of compliance costs among inspectors; no real assessment of benefit to cost when making decisions, sometimes leading to potentially crippling compliance costs in order to gain minor, unquantified or unspecified improvements in safety;
- Apparent inconsistency of application of regulations across different inspectors;
- Apparently indiscriminate power of inspectors to shut down production and destroy someone's livelihood;
- Lack of appropriate appeals procedure;
- Consequent lack of willingness to speak out openly among some small producers;
- Apparent lack of risk-based enforcement;
- Data to underpin a risk-based enforcement strategy appear to be lacking;
- Lobbying by some large food producers for increased health and safety regulations can sometimes be a ploy to reduce competition from small producers who will struggle with compliance costs for little or no real safety benefit.