



Aligning an Ensemble

Opportunities for tuning market-driven compliance for greater harmony

Discussion Paper

March 2026



Horticulture
Council

Foreword

The national horticulture industry has a long and justifiably proud history in responding to the emerging needs of consumers and supply chain partners, including through the establishment of new standards and certifications that deliver additional confidence in our already world-class produce.

Growers are the ultimate custodians of their produce. Motivated more than any other party to ensure markets remain strong and open.

The benefits of market-based compliance, including those standards and practices above any regulatory minimum, are manifest. Consumer confidence in the quality and safety of our produce is essential in growing demand. The costs of avoided recalls cannot be discounted. Adoption of voluntary standards have forestalled the introduction by governments of more costly mandatory versions.

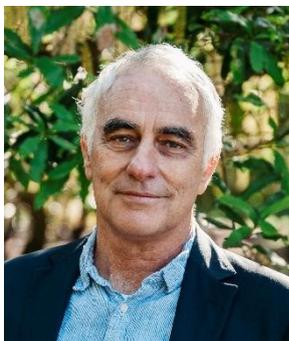
While the benefits of market-based compliance are enjoyed by each part of the supply chain, the burden is arguably unevenly distributed. The imbalance of bargaining power in our supply chains means the risks and costs of compliance are often passed down to growers.

Market-based compliance is itself becoming an increasingly complex and opaque value chain, with multiple actors delivering value at different points in the creation of confidence and trust, but with what appears from the outside, and from the grower's perspective, to be unclear accountability.

Growers across the country, of all sizes, commodities and locations have reached a breaking point, unwilling to continue carrying the can, and are demanding action.

What has become abundantly clear, in speaking with stakeholders at each point across the value chain, is that there is a deep and shared understanding of the challenges and a genuine desire to address them.

The NFF Horticulture Council (the Council) is responding to the demands growers and is grateful for the positive and encouraging conversations that we are attempting to build on. This discussion paper is our contribution to an already alive conversation that must deliver clarity and action.



Jolyon Burnett
Chair
NFF Horticulture Council

An introduction

Purpose

The purpose of this discussion paper is to examine why market-based compliance systems in horticulture have become increasingly complex, duplicative, and inefficient. While these frameworks were created to strengthen integrity, their evolution has led to overlapping standards, competing requirements, and fragmented assurance processes. Each actor in the chain—growers, certification bodies, retailers, and auditors—contributes value, yet the absence of harmonisation and clear accountability has resulted in unnecessary cost and confusion.

This paper sets out to analyse the structural and behavioural drivers behind these inefficiencies, including the proliferation of unaligned programs. It seeks to articulate the implications of these issues for growers and the broader supply chain, and to highlight the need for coordinated reform.

By presenting these root causes and their consequences, the paper aims to build momentum for a shared understanding among stakeholders and to lay the groundwork for practical solutions. The ultimate goal is to foster consensus on actions that will streamline compliance, reduce duplication, and create a system that is credible, efficient, and sustainable for all participants into the long-term.

Scope

The concept of compliance is exceedingly broad and means different things to different people. In the interests of keeping our focus narrow and ultimately enable meaningful action, we have kept the scope of our work limited to **market-driven compliance**, which are those requirements over and above regulatory or legislated minimums, imposed on growers or suppliers by buyers as a condition of doing trade, typically large supermarkets.

For clarity, the scope includes ethical sourcing standards and requirements. While these are often imposed by buyers in response to meeting their own legislative requirements, there remains significant discretion in how buyers meet their obligations.

The scope excludes all government regulation and legislation. For example, while there is now being introduced Primary Production and Processing standards for leafy greens, melons and berries, and that governments propose to recognise existing voluntary food safety certification as one option for meeting this new legislative requirement, these requirements are well below those of the voluntary certification, the holding of which is often a condition of doing trade with a supermarket.

Acknowledgements

The Council acknowledges the significant contributions that have informed this discussion paper and the broader conversation on market-based compliance. We thank the Council, its members, and the Compliance Taskforce for their leadership and insights in shaping this work. We also recognise the commitment of growers across the country who are driving change, including the more than 150 who responded to the National Horticulture Compliance Survey 2025, providing valuable perspectives from the ground.

We acknowledge the important work already undertaken by industry and government bodies, including AUSVEG through its review and report “*Horticulture compliance and regulation: reducing the burden by 2030*”, and Freshcare and Hort Innovation through their project, funded by the Australian Government, “*Improving Compliance in Australian Horticulture through RegTech*”. We also note the contribution of the Australian Competition and Consumer Commission through its Supermarket Inquiry, which has highlighted critical supply chain dynamics relevant to compliance and earlier work by Hort Innovation in its independent evaluation of HARPS.

Finally, we thank key stakeholders—including standard owners and major supermarkets—who have shared their views in recent months on the root causes of duplication, redundancy, and inefficiencies within current compliance frameworks. Their engagement is essential to building consensus and driving practical solutions that deliver a fair, efficient, and sustainable compliance system for the horticulture sector.

The window and the view

Consider all stakeholders in the same room, gathered around a single shared window onto the landscape of market-driven compliance. Yet each stands in a different position — closer or further from the window, higher or lower, off to one side or another. These differing vantage points shape what each stakeholder notices first, what appears central or peripheral, and what becomes partially obscured from view. Growers, auditors, standards owners, certification bodies, retailers and customers are looking at the same system, but their roles, responsibilities, incentives and lived experiences influence how that system is interpreted and understood.

The size of the window represents the unusual opportunity of this moment. Across the room, there is a growing recognition that duplication, inefficiency, cost and confusion have reached a level that warrants change. This shared awareness has widened the opening available to all stakeholders — a temporary moment where longstanding challenges can be examined with greater honesty and shared purpose. A window this large does not open often, and it may not remain open indefinitely. It creates the space for a collective examination of the underlying structures, behaviours and interdependencies that shape today's compliance environment.

But the window also frames the view. Even when stakeholders look through the same opening, they will naturally gravitate toward different features of the landscape — the parts most familiar to their role, or most pressing for their operational reality. Without conscious alignment, this risks fragmentation: each group focusing on a different problem or solution, despite standing in the same room. The Council's intent is to guide attention toward a shared horizon — to use the window to focus the room on a small number of strategic, longer-term opportunities where genuine system-level improvement is possible and where benefits flow across the entire ensemble.

Discussion question

1. To what extent does the 'window and the view' analogy reflect the reality of how different stakeholders experience market-driven compliance?

Value chain

Market-driven compliance in horticulture is delivered through a complex and interdependent value chain made up of growers, auditors, certification bodies, standards owners, international benchmarking and accreditation organisations, retailers and customers.

Each actor contributes distinct forms of value — from producing safe, high-quality food to verifying compliance, setting and governing standards, maintaining global recognition and shaping market expectations. Yet the way these roles intersect is neither simple nor well-understood, and the system's performance is influenced as much by the behaviours and incentives of these actors as by the formal requirements embedded in standards.

Growers

Primary producers implement compliance requirements on-farm and post-farm. They bear the cost and operational burden of meeting standards, maintaining records, and undergoing audits.

Auditors

Individual auditors conduct inspections and verify compliance against certification standards.

They are accredited by certification bodies and often contract their services back to those bodies. Auditors are the frontline in assessing whether growers meet the requirements set by standards owners. They often also need to be accredited by international bodies.

Certification bodies

Certification bodies are accredited under national or international schemes, ensuring they meet rigorous standards for impartiality and competence. They engage individual auditors—either directly or via contracting—which ensures adherence to both program-specific and general accreditation requirements.

These bodies are approved or recognised by standard owners to audit against their standard, in arrangements that can resemble a commercial licence. They are responsible for issuing the certificate to the grower.

Standards

Standards define the technical and procedural requirements that underpin certification. They set out what growers must do to demonstrate food safety, product quality, ethical employment practices, and traceability. These frameworks translate regulatory obligations and market expectations into measurable criteria, forming the basis for audits and certification.

International standards

Above these layers sit international benchmarking organisations, which recognise domestic standards and programs against global norms, and international accreditation bodies, which oversee auditor competence and impartiality. These entities provide assurance that compliance outcomes meet international expectations.

Retailers

Retailers, particularly major supermarkets, exert influence over the system. They mandate certification as a condition of supply and often impose additional requirements. They are also often members and owners of international standards, able to influence technical and procedural requirements at that level.

Customers

Consumers sit at the furthest end of the compliance value chain yet exert influence that flows all the way back to on-farm practice. Their expectations around food safety, ethical employment, environmental sustainability and product integrity shape the demands placed on retailers, who in turn translate these expectations into formal requirements embedded in standards, audits and certification programs.

Discussion questions

3. What forms of power or influence does each actor in the market-driven compliance value chain hold, and how do these powers differ?
4. Which actors hold the greatest influence over the shape, cost and operation of market-driven compliance, and how does their position in the value chain affect their ability — or willingness — to drive change?

An ensemble act with no orchestration

Market-driven compliance functions less like a coordinated system and more like an ensemble performing without a conductor. Each actor — growers, auditors, certification bodies, standards owners, retailers and international benchmarking organisations— plays their part with diligence and intention. Yet there is no common score, no agreed tempo, and no unifying leadership structure that ensures the parts come together as a coherent whole. What emerges is not the product of shared design, but of accumulated expectations, commercial incentives and overlapping mandates that have evolved piecemeal over time. The result is an ensemble in which every section is working hard but not in harmony.

In the absence of orchestration, actors take cues only from the parts of the system closest to them. Retailers respond to consumer expectations and reputational pressures. Standard owners respond to global benchmarking requirements and commercial needs. Certification bodies respond to contractual obligations and competitive dynamics. Auditors respond to interpretive guidance and the pressures of their accreditation environment. And growers — positioned at the end of the chain yet carrying the greatest operational burden — respond to all of it at once. In this structure, no single actor possesses a mandate to coordinate, and few have the incentive to relinquish influence or adjust their settings in the interests of system-wide efficiency. The governance vacuum becomes self-reinforcing: without orchestration, each actor increases their volume to ensure their part is heard.

This lack of coordination has consequences. Duplication arises not because any actor intends waste, but because each is optimising for only a portion of the system. Standards proliferate because different entities seek to solve similar problems from different vantage points. Audit requirements multiply because assurance is pursued through layers rather than alignment. And costs accumulate because every actor sees their contribution as necessary, while few see the cumulative impact on the grower. The ensemble is busy, but not cohesive; productive, but not efficient.

Yet an act with no orchestration is not without potential. The diversity of roles and perspectives across the ensemble is a strength if properly aligned. The challenge — and the opportunity — is to shift from a system where each part plays independently to one where collective purpose is visible, shared and reinforced by design. The window of opportunity identified in this paper exists precisely because many stakeholders now recognise that the current arrangement, however well-intended, is unsustainable.

The task ahead is not to predetermine the model for reform, but to open space for a genuine exploration of what forms of coordination, governance or shared accountability might enable the ensemble to perform more cohesively. These options may include strengthening informal alignment mechanisms, creating shared interpretive guidance, improving coordination between existing bodies, establishing an independent overseer or convenor, or even appointing a central authority with a clearer mandate to harmonise expectations and reduce duplication. Other possibilities may emerge that have not yet been articulated.

The intention here is not to advocate for any single approach, but to acknowledge that without some form of intentional coordination — whether light-touch or centralised — the current trajectory of complexity and inefficiency is likely to persist. This paper therefore invites stakeholders to consider the full breadth of potential solutions, including those that may feel

unfamiliar or ambitious, and to reflect on what kind of orchestration, if any, the system may require to achieve harmony in the long term.

Discussion questions

5. What degree and form of coordination does the current compliance system actually need — if any — to function more coherently?
6. Where along the spectrum of possible models — from light-touch alignment mechanisms to an independent convenor to a central authority — do stakeholders see the most potential for meaningful improvement, and why?
7. What governance, accountability or decision-making functions would any coordination model need to perform in order to genuinely improve system-wide harmony, regardless of where authority ultimately sits?

Levels of harmony

Harmonisation within market-driven compliance is commonly understood as the process of merging or aligning multiple, largely overlapping requirements — most often those imposed by major retailers — into a new more coherent standard or an extension to an existing standard. This type of harmonisation has historically focused on reducing the administrative and audit burden for growers who supply into several national supermarkets, each previously requiring its own combination of technical specifications, assurance frameworks or retailer-specific add-ons.

But harmonisation can operate at other levels. Not all standards in the horticulture compliance landscape overlap in purpose — some relate to food safety, others to quality, ethical employment, sustainability, chain of custody, environmental practice or social responsibility. Each addresses a distinct dimension of assurance, yet these standards increasingly interact in ways that shape total compliance load.

As the landscape becomes more interconnected, opportunities exist for broader forms of harmony: aligning audit cycles even when content differs, rationalising evidence requirements across disparate standards, creating shared verification tools, or merging standards where complementary objectives can be met through a single, well-designed framework.

i. Rounding up retailer requirements

The introduction of HARPS demonstrated that meaningful harmonisation is possible when retailers choose to align expectations that differ in detail but not in purpose. Prior to HARPS, growers supplying multiple supermarkets were required to meet a patchwork of retailer-specific food safety requirements, often repeating audits that assessed largely the same underlying risks. HARPS consolidated these disparate expectations into a single harmonised layer, reducing duplication while preserving the integrity of food safety assurance. Its success shows that harmonisation need not eliminate standards but can streamline the way similar requirements are imposed.

A similar pattern now exists in other emerging retail requirements — particularly those relating to ethical sourcing, labour practices, and social compliance. Although these expectations often

pursue comparable objectives, they are typically expressed through different reporting templates, evidence requirements and verification processes, creating duplication for growers and pack-houses that supply across multiple retail channels. The recent ACCC authorisation allowing retailers to collaborate for the specific purpose of exploring harmonisation in ethical sourcing marks an important shift. It recognises both the shared intent of these requirements and the regulatory constraints that previously limited coordination, opening a window for retailers to consider more unified approaches.

This moment presents an opportunity to identify which retail-driven requirements lend themselves most readily to harmonisation — whether through shared audit modules, common reporting tools, aligned evidence standards, or even the consolidation of similar ethical or social compliance expectations into unified frameworks. The discussion now required is not whether harmonisation should occur, but where it can deliver the greatest benefit without diminishing assurance. These considerations set the stage for targeted questions about which retailer requirements are most ripe for alignment and what forms that alignment could take.

Discussion questions

8. Which emerging or existing retailer-driven requirements — particularly in areas such as ethical sourcing, social compliance or sustainability — are most similar in purpose and therefore most suitable for harmonisation or shared interpretation?
9. To what extent should the individual interests of retailers in maintaining distinct or differentiated compliance requirements prevail over the broader interests of growers, certifiers and the wider supply chain in pursuing harmonisation — and what principles should guide decisions when these interests conflict?

ii. Dealing with international dissonance

Australia's market-driven compliance environment does not exist in isolation. It is increasingly shaped by global trends in food safety, ethical sourcing, sustainability reporting and labour assurance. Major retailers—many of which are multinational or part of global buying groups—look to overseas benchmarks when updating their own requirements, creating a dynamic in which domestic standards are influenced by rules, risks and expectations that originate outside the Australian context. This introduces a form of international dissonance: the misalignment between global compliance norms and the realities, capabilities and regulatory settings of Australian fresh-produce businesses.

International standards inevitably move at a different pace, and in different directions, than local frameworks. When these global shifts cascade down through supply chains with little adaptation, growers risk being asked to meet requirements designed for different legal systems, agronomic conditions, workforce structures or cultural contexts. What begins as an attempt to maintain global credibility can therefore land as friction, cost and confusion within the Australian operating environment.

The following are concrete examples of where dissonance creates friction, cost and confusion:

- **SEDEX / SMETA v7.0** - Stakeholders report that SMETA v7.0, aligned to ILO standards, expects employers to bear recruitment costs for overseas workers. In Australia, this collides with government policy settings, including under the PALM scheme, where

program architecture and approved cost-sharing arrangements differ. The result has been corrective actions for suppliers on paper, alongside advice reported informally to stakeholders, that major retailers will not enforce those specific non-conformances.

- **International auditor-certification settings** - Under the Global Food Safety Initiative (GFSI) framework, Professional Recognition Bodies (PRBs) validate the competence of food-safety auditors. These arrangements elevate PRB rules (e.g., education and competency thresholds) as de-facto prerequisites for auditors operating in GFSI-recognised programs. In practice, the requirement that auditors hold formal tertiary qualifications—irrespective of extensive practical experience—has reportedly excluded a number of highly capable Australian auditors from conducting HARPS and related audits, reducing capacity and consistency at a time when we have a shortage of auditors.
- **Freshcare unannounced audits** - To achieve and retain GFSI recognition, Freshcare FSQ4.2 introduced unannounced audits in line with benchmark expectations. Following extensive stakeholder feedback, initial plans to conduct unannounced audits once every four years for everyone were reduced to 10% of participants annually.

Navigating this tension requires deliberate choices about where alignment with international norms is necessary, where adaptation is justified, and where Australia may need to resist or reinterpret global trends to avoid unnecessary burden.

Discussion questions

10. Across the compliance value chain, who should hold responsibility for identifying, interpreting and resolving clashes between international standards and Australian law, government policy, domestic standards or consumer expectations?
11. What transparent, predictable process should exist for assessing, communicating and managing international dissonance — including how inconsistencies are flagged, who is consulted, how decisions are made, and how interim positions (e.g., non-enforcement) are communicated and final resolutions documented.

iii. One standard to rule them all

In many overseas markets, compliance expectations that would traditionally sit across multiple standards in Australia — such as food safety, environmental practice, animal welfare, worker safety or social responsibility — are consolidated into a single, multi-domain standard assessed through one audit process. These examples demonstrate that it is possible for a unified framework to deliver assurance across several domains without fragmenting requirements or increasing audit burden. They offer a useful reference point as Australia considers whether similar integration could help simplify the compliance landscape for growers.

- **GLOBALG.A.P. Integrated Farm Assurance (IFA)** – A comprehensive whole-farm standard covering multiple domains including food safety, environmental protection, worker health and safety, and animal welfare, applied across crops, livestock and aquaculture. It provides a holistic certification platform recognised globally and delivered through a single audit structure.

- **Red Tractor Assurance Scheme (United Kingdom)** – A nationally adopted, cross-sector standard covering food safety, animal welfare, hygiene and environmental protection across the entire British food chain. Red Tractor integrates these requirements under one assurance system, enabling farms to demonstrate compliance across multiple domains through a single scheme.

These international examples show that multi-domain convergence — where several types of requirements are brought together into one auditable framework — is both feasible and already well-established elsewhere. They help set the stage for discussion about whether a similar model could, or should, emerge in Australia, and what conditions or governance settings would be required for such an approach to be viable.

It is also important to recognise that Australia’s own market-driven compliance standards are already evolving toward multi-domain models. In response to emerging retail and consumer expectations — particularly around ethical sourcing, labour practices, sustainability reporting and environmental stewardship — established schemes are expanding their scope beyond original domains. This organic widening of purpose suggests that convergence across domains may be both a natural and rational progression, and that the question for the sector is not whether Australian standards will continue to grow in breadth, but how best to manage that expansion in a way that reduces, rather than compounds, complexity for growers and the wider value chain.

Discussion questions

12. Which actors, incentives and decision rights currently prevent or dilute moves toward a single, multi-domain standard — and why?
13. What non-negotiable characteristics of a singular standard would ensure all parties are demonstrably better off within 12–24 months and beyond?

Harmony but not at any cost

Harmonisation initiatives can deliver real benefits—but they also carry system-level risks if governance and accountability are not fit for purpose. The experience of the Harmonised Australian Retailer Produce Scheme (HARPS) is instructive. HARPS achieved something unprecedented in Australia: it secured strong retailer buy-in to a single, harmonised layer of food-safety requirements and demonstrably reduced duplication for multi-retailer suppliers, while giving retailers better supply-chain visibility and a common incident-response forum.

The independent evaluation of HARPS, commissioned by Hort Innovation and reporting in December 2022, identified structural governance challenges that eroded trust and created unintended consequences. Decision-making authority sat overwhelmingly with the Retailer Committee; grower representation (especially Tier 2) was limited to a technical forum with no obligation on retailers to accept its advice; governance arrangements were opaque to many participants; and audit execution often diverged from the intended “bolt-on” model, driving perceptions of duplication and inconsistent costs.

The lesson is not that collaboration is undesirable—it is that who holds the pen matters. While retailer collaboration to streamline compliance is typically treated as “pre-competition” and can deliver system benefits, enabling a majority of retailers to unilaterally and uniformly shift or lift requirements—without counterweights, clear principles, or transparent justification—can

exacerbate power imbalances, increase burden on growers, and entrench power imbalances and transfer costs downstream.

Discussion question

14. What checks, balances or design safeguards should be in place to ensure that when retailers collaborate to harmonise requirements, this does not enable a majority of them to unilaterally shift or raise expectations in ways that increase costs or operational burden for suppliers?

Accepting risk

All market-driven compliance is, at its core, an exercise in managing risk. Yet across the compliance value chain, risk-based approaches are often missing or applied unevenly. Instead of calibrating controls to the *likelihood* and *consequence* of harms, requirements can default to blanket prescriptions, layering checks and audits without regard to demonstrated risk, business size, capability, or track record. The result is a system that can be high on activity, low on proportionality—and, at times, unclear about what level of residual risk the market is prepared to accept.

In this environment, the power and influence of large retailers naturally shape the system. Retail brand risk—commercial, legal and reputational—is real and must be managed. But in practice, that risk is frequently transferred downstream, where growers and suppliers carry the operational and financial burden of controls that may exceed local risk or duplicate other assurance.

For example, the question has been asked by a number of actors along the value chain as to whether it is reasonable and lowers food safety risks enough to justify the additional costs, of asking those only supplying domestic markets to meet standards benchmarked against GFSI.

Also, while there are many examples in other fields of audit frequency or detail being informed by risk, enabling those being audited the opportunity over time to undertake fewer or lesser audits based on past performance, this is something yet to take hold in fresh produce supply chains.

Discussion questions

15. To what extent are risk-management principles—such as proportionality, likelihood–consequence assessment, and tiered controls—actually applied across the compliance value chain, and where are requirements being imposed without a clear risk-based rationale?
16. Is there a shared understanding within each compliance domain (e.g., food safety, ethical sourcing) of what level of residual risk is acceptable, and how could stakeholders more clearly articulate and agree on these thresholds to guide future requirements?
17. When new controls are introduced to reduce risk, how should responsibility for managing that risk—and the associated cost—be allocated across retailers, standards owners, certification bodies and growers, so that risk is not simply pushed downstream without consideration of capability or benefit?

The auditor marketplace

A well-functioning auditor marketplace is essential to the credibility, efficiency and long-term sustainability of market-driven compliance. Yet two interrelated challenges now shape the Australian horticulture auditing landscape: the struggle to attract and retain a sufficient pool of qualified auditors, and the limited transparency in the domestic market for audit services. Both issues affect every actor in the value chain—from growers who rely on timely, high-quality audits, to certification bodies under commercial pressure, to retailers whose assurance systems depend on consistent audit outcomes.

Attraction and retention

The first challenge is simply one of capacity. The independent HARPS evaluation found that Australia faces a declining and ageing auditor workforce, with auditor competency identified as a key industry challenge and no clear succession pathway to bring new auditors into the system. International settings compound this pressure. As a result, the system risks a shrinking pool of auditors at precisely the moment compliance expectations—and audit demand—are expanding.

Transparency and efficiency

The second challenge concerns market structure and transparency. In the current environment, growers often have limited insight into the pricing, quality and performance of audit services. The HARPS evaluation highlighted wide variability in audit execution, inconsistent integration of scheme requirements, and significant differences in audit cost across certification bodies. These inconsistencies reduce confidence in the assurance system and limit growers' ability to make informed choices. Greater transparency—on price, audit methodology, auditor qualifications, timeliness, corrective-action closure rates and customer satisfaction—could stimulate healthier competition while helping allocate auditors more efficiently across regions and seasons. A more open marketplace would not only benefit growers but would also create incentives for continuous improvement among certification bodies.

Together, these challenges point to the need for a deliberately designed auditor marketplace: one that supports recruitment and retention, raises the visibility of service quality, rewards consistency, and ensures that auditors remain an asset—not a bottleneck—within market-driven compliance. Strengthening this marketplace may require shared investment in training, clearer rules for auditor qualification and acceptance, performance benchmarks for certification bodies, and tools that allow growers to compare services with confidence. Addressing these issues collaboratively will be essential if the sector is to maintain audit integrity, reduce cost and variability, and meet future compliance demands without compromising assurance.

Discussion questions

18. Are auditor availability, consistency and competence pressing enough system risks to warrant coordinated, cross-stakeholder action?
 - a. If yes, *who* should lead, *who* should contribute, and *what* outcome measures would signal success within 12–24 months?
19. Would a deliberately designed, online marketplace for audit services be the best lever to improve allocation efficiency and audit quality—or would other mechanisms achieve the same ends with fewer costs and risks?

Conclusion

This discussion paper has made the case that market-driven compliance in horticulture has drifted into a busy but fragmented ensemble: many actors playing important parts, yet without shared orchestration, clear accountability, or proportional, risk-based design. The result is duplication, inconsistent interpretation, rising cost and—most commonly for growers—time and attention pulled away from the core business. The moment is unusually opportune: stakeholders are in the same room, looking through the same window, and increasingly agree that improvement is warranted and possible.

The pathways to improvement need not be singular. Options range from light-touch alignment to stronger governance, and from targeted harmonisation of overlapping retailer requirements to deeper, multi-domain integration modelled overseas.

Managing international dissonance, rebuilding the auditor workforce and market, and embedding transparent, risk-proportionate controls are all necessary ingredients if effort is to match risk and assurance to retain its credibility.

The intent of the Council is now practical: use this paper to focus attention on a small number of strategic, longer-term opportunities and convert interest into coordinated action. Starting with an in-person workshop in March 2026, the compliance value chain can test where there is collective will to take action.

Workshop

The NFF Horticulture Council and its members invite interested, invested partners to join an in-person workshop in Canberra on Wednesday 25 March to explore *Aligning the Ensemble: Opportunities for tuning market-driven compliance for greater harmony*. Following the release of this discussion paper, the workshop will bring together growers, industry bodies, standard owners, certifying bodies and retailers for a deeper, shared examination of the more longer-term and strategic opportunities for improving our systems of compliance.

Since the release late last year of findings from the National Horticulture Compliance Survey 2025, the Council has consulted with a wide range of stakeholders. This workshop is a deliberate next step in the Council's commitment to convening stakeholders once early consensus has begun to form. The goal is to work toward agreement on specific actions, clarify ownership, and chart a pathway forward that supports a more streamlined and balanced compliance landscape for horticulture. Your participation will play a critical role in shaping the direction and momentum of this shared effort.

Background

This background section provides additional context on the market-driven compliance standards considered significant parts of market-driven compliance, alongside information on the NFF Horticulture Council, its timebound Compliance Taskforce established in 2024 and on the National Horticulture Compliance Survey 2025.

Standards within scope

When considering market-driven compliance the Council has a degree of focus on the four market-driven compliance standards most widely used across Australian horticulture—Freshcare, HARPS, Fair Farms and SEDEX—each of which plays a distinct role in shaping the assurance landscape for food safety, ethical sourcing and labour practice, and together form the core frameworks through which growers currently experience compliance obligations.

Freshcare

Established in **2000**, Freshcare was developed as an industry-led initiative to provide a practical, HACCP-based food safety and quality assurance system tailored to Australian horticulture. Its rationale was to create a program that met domestic market requirements while being accessible to growers of all sizes. Freshcare has since expanded to include environmental and sustainability modules and, in 2020, benchmarked itself against GLOBALG.A.P. to support export market access. It remains the most widely adopted on-farm food safety certification in Australia.

HARPS

The **Harmonised Australian Retailer Produce Scheme (HARPS)** was introduced in **2012** to reduce complexity for growers supplying major grocery retailers. Prior to HARPS, each retailer imposed its own food safety requirements, forcing growers to maintain multiple certifications and audits. HARPS created a single harmonised standard overlay, requiring growers to hold a base GFSI-recognised certification (such as Freshcare, SQF, or BRCGS) and complete an annual HARPS audit.

Fair Farms

Launched in **2018**, Fair Farms was established as an industry-led program to address growing concerns about workplace relations and ethical employment practices in horticulture. Developed in collaboration with industry and government, Fair Farms provides training and independent certification aligned with Australian labour laws and the Fair Work Act. Its rationale was to strengthen social compliance and protect worker welfare, responding to increasing scrutiny from retailers and consumers on ethical sourcing.

SEDEX

SEDEX emerged in Australia during the mid-2010s as global retailers and foodservice companies increased scrutiny on ethical sourcing and labour standards. Originally developed as an international platform for sharing supply chain data, SEDEX provides a framework for auditing and reporting on workplace conditions, health and safety, environmental practices, and business ethics. Its adoption in horticulture was driven by retailer requirements for transparency and assurance on social compliance, particularly for businesses supplying into export markets or multinational buyers.

About the NFF Horticulture Council

The National Farmers' Federation (NFF) Horticulture Council is the recognised national peak body for forming policy and advocating on behalf of the Australian horticulture industry. The Council comprises 19 national commodity and state-based horticulture bodies, who together represent growers of all sizes and products including fruits, vegetables, nuts, nursery, ornamental plants and turf.

In 2024, the Council established its Compliance Taskforce, a time-bound subcommittee of the Council's primary mechanism for developing positions on government regulation and market-driven compliance, and for advancing strategies that manage and minimise compliance costs across Australian horticulture. Empowered to consult widely with Council members, industry, and external processes led by government and others, the Taskforce can undertake advocacy and engagement with retailers, standard owners, regulators and others, while keeping policy decisions anchored to Council approval. The Competition Taskforce was responsible for the development and delivery of the National Horticulture Compliance Survey.

About the National Horticulture Compliance Survey

The National Horticulture Compliance Survey 2025, undertaken the second half of 2025, drew responses from over 150 growers across all major production regions, representing a mix of small, medium, and large-scale businesses. This broad participation provided a robust snapshot of industry sentiment and operational realities, particularly around the cost and complexity of compliance.

Survey results confirmed that compliance costs remain a significant pressure, with growers reporting that meeting certification and regulatory requirements consumes between 3% and 7% of operating costs, depending on scale and market orientation. For smaller businesses, this burden is disproportionately high, often requiring substantial administrative effort and diverting resources from core production activities.

When asked about satisfaction with current standards and certifying bodies, responses were mixed. While growers acknowledged the importance of food safety and ethical compliance frameworks, many expressed frustration with duplication, audit fatigue, and inconsistent interpretations across schemes. Confidence in certifying bodies was generally moderate, with calls for greater transparency, harmonisation, and a shift toward outcome-based compliance rather than prescriptive, process-heavy requirements.

While financial cost is a clear concern, growers more often pointed to the time taken away from running or building the business as the most frequent impact (nearly 90% of respondents), followed closely by stress and frustration (about 87%) driven by perceived duplication, overlap and auditor inconsistency across standards.

Contact

We welcome feedback on this discussion paper, enquiries about the upcoming in-person workshop and any other contributions concerning the tuning of market-driven compliance for greater harmony.

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Disclaimer

This discussion paper has been prepared to facilitate industry dialogue and gather feedback on opportunities to improve market-driven compliance in Australian horticulture. The information, views and examples presented are indicative and may evolve as further insights, evidence and stakeholder contributions are received.

Nothing in this paper should be interpreted as final policy, regulatory advice, legal guidance, or an endorsed position of the NFF Horticulture Council or its members. Stakeholders should rely on their own independent advice when making operational, commercial or compliance decisions.

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