Queensland Food
Farmers' Commissioner

ANNUAL REPORT
2024–2025

DELIVERING FOR QUEENSLAND

Queensland Government

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Contact

Address:	Level 10, 275 George Street
Postal:	GPO Box 46 Brisbane Qld 4001
Telephone:	13 25 23
Email:	foodfarmers@offcq.qld.gov.au
Website:	www.offcq.qld.gov.au

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Feedback

The Office of the Queensland Food Farmers' Commissioner is committed to continuous improvement and open and accountable governance.

Readers are invited to provide feedback on this report at https://www.getinvolved.qld.gov.au/gi/

Letter of compliance

25/08/2025

The Honourable Tony Perrett MP
Minister for Primary Industries
1 William Street
Brisbane Qld 4000

Dear Minister Perrett

I am pleased to submit for presentation to the Parliament, the Annual Report 2024-2025 for the Queensland Food Farmers’ Commissioner.

This complies with the requirement under section 25 of the *Queensland Food Farmers’ Commissioner Act 2024*, that the Commissioner must prepare and give to the Minister, within 3 months after the end of each financial year, an annual report on the functions performed, and activities carried out, by the Commissioner during the financial year.

Yours sincerely

Charles Burke
Queensland Food Farmers’ Commissioner

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Message from the Queensland Food Farmers' Commissioner

I am pleased to present the Office of the Food Farmers' Commissioner Annual Report 2024-25.

In 2024-25 we set out to build relationships and develop the processes and systems that underpin long-term success for Queensland's fresh food producers. Through direct engagement, policy advocacy, relationship development and systemic reform initiatives, we have worked to amplify the voices of producers and deliver progress on the challenges they face.

In 2024–25, we embedded an effective 4-element plan to guide: listening to producers, building trusted reporting mechanisms, strengthening regulatory cooperation, and engaging retailers and supply chain participants to drive lasting change. Notably, we:

- held **14** regional visits and **15** shed meetings, ensuring we heard directly from producers in every major horticulture region of Queensland and beyond
- conducted over **85** farm visits, hearing directly from producers
- launched our website and anonymous reporting portal, offering producers a safe, secure way to report concerns and build an evidence base for action. While initial portal engagement has been lower than hoped, it is a crucial step toward achieving data-driven transparency, and increasing its use will be a core focus in the year ahead. I encourage all producers to have your say at www.offcq.qld.gov.au.
- engaged proactively with large retailers and wholesale markets, facilitating direct dialogue between producers and retailers to improve commercial outcomes
- held regular meetings with Australian Competition and Consumer Commission (ACCC) Deputy Chair to share information and provide input on Supermarkets Inquiry and Recommendations
- provided formal submissions and presentations, including a detailed response to the ACCC Supermarket Inquiry and briefings to the Primary Industries and Resources Parliamentary Committee
- launched a 12-month price transparency trial with Persimmons Australia, testing new approaches to market clarity and producer empowerment
- created and chaired the Queensland Chiefs Working Group, reinforcing collaboration between agencies on sector-wide challenges, with a view to enhance outcomes for food farmers.

Our work has consistently identified and advanced key systemic issues, particularly around market fairness, compliance burdens, limited market access, workforce challenges, payroll tax and other escalating cost pressures. These themes, highlighted repeatedly by producers and reinforced through our engagement with the ACCC and other stakeholders, form the pillar of our ongoing advocacy and process.

We reviewed the program formerly known as 'Geared Up Growers', which was completed in September of 2024. This program was delivered by Industry, and we see its ground-up approach as a vital compliment to top-down legislative reform. Many of the issues that this program sort to address continue to be relevant and any future, similar programs could address issues such as training in labour law, compliance and auditing requirements, and business cost analysis.

As always, much work remains. While progress has been made in building trust with producers and engaging constructively with retailers, the wholesale markets and government, the true test of our success lies in achieving tangible, measurable improvements to the working conditions and commercial viability of Queensland’s fresh food producers. In the coming year, we will focus on expanding producer participation in the anonymous, secure reporting portal, deepening collaboration with retailers and advocating for practical reforms that reflect the realities of farm businesses.

While this report rightly focuses on the systemic challenges facing producers, it is also important to recognise that there are many individuals and organisations across the supply chain working to improve outcomes. We have met wholesalers who strive to offer transparent, timely information; retailers willing to engage openly on reform; and producers, agents, logistics providers and peak bodies committed to building better systems and fairer practices. These efforts, often unheralded, show that meaningful change is not only possible but already underway in parts of the sector.

I thank the producers, industry groups, retailers, government colleagues and my Office for their partnership and commitment. Together, we are building the frameworks necessary for a fairer, more transparent and more resilient fresh food sector in Queensland.

Charles Burke
Queensland Food Farmers’ Commissioner

About us

The Queensland Food Farmers' Commissioner (QFFC) is a committed and experienced advocate for Queensland's food farmers. The QFFC refers to the collective of the Commissioner and the supporting office.

The Commissioner is an independent Office established under the *Queensland Food Farmers' Commissioner Act 2024*, representing the State of Queensland as part of the Department of Primary Industries. It includes the Food Farmers' Commissioner and supporting office.

What we do

This initiative follows the Queensland Parliament Supermarket Pricing Select Committee's recommendation to establish a Commissioner to:

- improve price transparency with dealings related to food supply chains and pricing of products
- address power imbalances in the food supply chain
- advocate for the state's food farmers to support sustainability and stability of the food supply chain in Queensland.

The Commissioner is dedicated to fostering fairness and transparency in the fresh food supply chain, ensuring that Queensland farmers are supported and empowered to thrive in a competitive market. The QFFC's work will contribute to a sustainable agricultural sector and promote consumer confidence in Queensland's food industry.

Workplan

A 4-element plan was devised to perform the role.

This included:

1. Meet extensively with producers and producer groups across horticulture regions to seek input and develop key and consistent themes and issues.
2. Explore the existence or creation of a platform to capture farmers' issues and concerns, and ensure as a key component, the ideal of anonymity.
3. Liaise with ACCC to establish areas of commonality and establish a co-operative relationship to share information where possible and seek remedy, where applicable.
4. Establish a respectful and workable relationship with supermarkets and other stakeholders such as wholesale markets to begin conversations and commitments for potential systemic change and rectification of poor behaviour.

Oversight of the Queensland Food Farmers' Commissioner

Oversight of the Queensland Food Farmers' Commissioner is the direct responsibility of the Minister for Primary Industries, as well as the Primary Industries and Resources (PIRC), Queensland Parliamentary Committee.

Under the *Standing Rules and Orders of the Legislative Assembly* (Queensland) (SO 194A), the committee's functions are:

- to monitor and review the performance by the entity of the entity's functions
- to report to the Legislative Assembly on any matter concerning the entity, the entity's functions or the performance of the entity's functions that the committee considers should be drawn to the Legislative Assembly's attention
- to examine the annual report of the entity tabled in the Legislative Assembly and, if appropriate, to comment on any aspect of the report
- to report to the Legislative Assembly any changes to the functions, structures and procedures of the entity that the committee considers desirable for the more effective operation of the entity or the Act which establishes the entity.

Our commitments

- Providing leadership in promoting understanding of, and assisting producers in navigating, the existing arrangements governing the relationships between supermarkets and their suppliers.
- Establishing and maintaining effective relationships with institutions, such as the ACCC and supermarket Code Arbiters, to facilitate the confidential referral of disputes.
- Monitoring and providing high-quality advice to the Queensland Government on developments in national frameworks governing supermarket-supplier relationships.
- Delivering strategic leadership in reporting behaviours and business practices that adversely affect Queensland farmers and consumers.
- Offering high-quality strategic advice to the Queensland Government, in consultation with stakeholders, on policy initiatives related to scope, functions and governance.

2024–25 Snapshot: Our Impact and Reach

In 2024–25, the Queensland Food Farmers' Commissioner sharpened its focus on systemic change and practical support for fresh food producers across Queensland. Our targeted, high-value engagements covered regional Queensland and major national platforms, ensuring producers' voices were amplified at every opportunity.

The QFFC delivered tangible outcomes through:

- **14** regional visits to understand local issues firsthand
- more than **85** farm visits
- **15** shed meetings with producers across Bundaberg, Bowen, Lockyer Valley, Cairns, Mareeba, Atherton, Granite Belt, Stanthorpe and the Fassifern Valley
- attendance at **4** major conferences, including as a Panel Member at ABARES Outlook (Canberra), EvokeAG, Hort Connections and as a speaker at the AgForce Industry Conference (2024)
- proactively engaging with the **2** major supermarket retailers to ensure fresh food producers' concerns were raised and addressed. This included touring the Woolworths Distribution Centre and Quality Assurance Facility
- regular meetings with wholesalers at the Brisbane Markets to discuss pricing and transparency
- developing and launching the Commissioner's new website and anonymous reporting portal, providing producers a secure, anonymous channel to report concerns –an important foundation for systemic data collection and future advocacy
- presenting to the Primary Industries and Resources Parliamentary Committee on the systemic issues affecting fresh food producers
- coordinating joint advocacy with State and Commonwealth bodies, contributing to the ACCC Inquiry into Supermarket Conduct and broader market fairness initiatives
- creating and chairing the Queensland Chiefs Working Group, improving collaboration between government agencies on producer issues and identifying areas for mutual benefit.

In addition:

- Identified key systemic issues that shape the future of Queensland's fresh food industry.
- We reviewed the program formerly known as 'Geared Up Growers', which was completed March 2024. This was a program delivered by Queensland Fruit and Vegetable Growers (QFVG), with funding provided by the Queensland Government.
- Initiated a pilot with Persimmons Australia to trial a 12-month price transparency and market update platform, aiming to assess its impact and explore broader rollout across sectors.
- Provided formal policy advice to the Minister for Primary Industries on payroll tax and its application and impact on horticulture producers; and freight subsidies to support producers during adverse events. In particular, following major rain events in North Queensland.

Website and anonymous reporting portal

A key milestone for the Commissioner this year was the development and launch of our website and anonymous reporting portal.

Developed and launched on 18 February 2025, this platform provides producers across Queensland with:

- easy access to information about the Commissioner's work and advocacy priorities
- a secure, anonymous portal to capture concerns or experiences regarding market conditions, retailer dealings and other industry pressures.

The portal is an integral tool for building data-driven advocacy. Our long-term goal is to aggregate and analyse reports to identify emerging issues, geographic trends and patterns. Heatmaps of concern areas will then be generated to share directly with retailers and other stakeholders for action.

While initial engagement has been slower than anticipated, the portal remains a critical enabler for systemic change. Retailers have committed to working on issues identified through the portal and the QFFC continues to encourage producers to use this channel. Expanding its uptake will be a key focus in 2025-26 and would benefit from a minimum 12 additional months of the Commissioner's involvement alongside broader producer education and trust-building initiatives.

A focus on more receiving more submissions will form part of the Commissioner's workplan for 2025-26.

As at 30 June 2025, the portal received seven submissions.

- **42%** of reports raised concerns about compliance burden, particularly the inefficiencies and overlap between QA systems and audits.
- **42%** of respondents flagged non-binding supply arrangements or vague forecasts as major issues.
- **38%** reported challenges navigating labour laws and workforce regulations.
- **25%** identified issues with payment terms, logistics or packaging, pointing to market access inefficiencies.
- **25%** raised concerns about retailer financial practices, such as rebates or price manipulation.
- **13%** of reports highlighted exclusionary tactics that restrict participation in key supply chains.

Note: Respondents could nominate multiple concerns in each submission. Percentages reflect total reports that mentioned each issue.

These insights, albeit low, reinforce the key themes explored throughout this report. They also demonstrate the portal's potential to capture patterns that may not be visible through traditional consultation alone. Continued growth in portal use will enhance the evidence base for policy and advocacy moving forward.

Key themes/findings

A fundamental reality underpins all the challenges discussed in this report: fresh food producers are price takers in a concentrated market. Unlike many other businesses in the supply chain, transporters, wholesalers, and retailers, producers cannot simply increase prices when their own costs rise. When wages, compliance costs, fuel, fertiliser or packaging costs go up, these increases cut directly into producers' margins because they cannot pass them on to the customer. The price paid to them is largely set by buyers with greater market power, leaving little room for negotiation.

This power imbalance is compounded by the perishability of fresh produce. Fruit and vegetables cannot be stored indefinitely or waited out for better prices. They must be sold quickly or they spoil. Buyers know this and use it as leverage, knowing producers cannot risk holding unsold stock, nor do they have capacity to do so.

Weather variability further complicates the business model. For example, a cyclone, a single week of unseasonal rain and flooding, hail or extreme heat can destroy or downgrade entire crops, undermining months of planning and investment with little recourse. Unlike many industries that can manage output smoothly, farming remains subject to forces outside the producer's control.

Market concentration is another defining feature. While there may be multiple buyers on paper, agents, merchants, wholesalers, retailers; most of the volume flows to supermarket chains. This means producers across Queensland, and Australia more broadly, are competing every day to access the same few sales channels, intensifying competition and reducing bargaining power.

Compounding this is poor price transparency. Producers regularly do not know the actual price that their produce will receive once it leaves their farm gate, making it difficult to benchmark, negotiate effectively or plan for future investment.

These structural realities do not reflect poor decisions by individual producers. They are part of the conditions every producer must navigate. This unavoidable commercial context explains why so many of the challenges described in this report persist.

Throughout 2024–25, the QFFC identified a set of core challenges consistently raised by producers, industry groups, and government. These themes were reinforced through engagement activities, shed meetings and policy development, and broadly align with national findings, including the ACCC's final report. The recurring nature of these issues highlights the structural imbalance within the fresh food supply chain and reinforces the importance of continued reform and advocacy.

Unfair supermarket and retailer practices

The power imbalance between producers and retailers remains a significant imbalance in the fresh food supply chain. While retailer engagement with the Commissioner has been respectful and, at times, constructive, the structure of the market overwhelmingly favours those who control access to the shelf.

At the heart of this imbalance is a stark reality: Australia produces more than double the fresh produce it presently consumes. Regular oversupply results in low prices and waste. When domestic supply consistently exceeds demand and market access is concentrated in the hands of a few major retailers, it creates a scenario where producers compete not only on quality or cost, but on a take it or leave it basis.

This dynamic turns producers into price takers, often forced to move perishable produce without any guarantee of sale. It is routine, though flawed, that producers will invest in planting, irrigation, fertilising, harvesting, fuel, wages, infrastructure, capital investments, chilling, picking, and packing, only to result in produce that has no price guarantee or supply quantity.

Even reforms proposed by the ACCC, such as Recommendation 18 of the Supermarkets Inquiry Final Report, which suggests suppliers should be permitted to apply their own branding to fresh produce, have been met by some producers with pragmatic indifference, prioritising sales outcomes over branding control.

There is little faith among producers that retailers hold themselves to the same standards they enforce. While producers must meet stringent quality assurance programs, logistics timelines and reporting requirements, retailers are not subject to meaningful reciprocal accountability.

Such issues are exacerbated during periods of disruption. In the wake of Ex-Tropical Cyclone Jasper, it was reported that fresh produce valued in the tens of millions of dollars was either stranded on the Bruce Highway or destroyed by floodwaters. Yet supermarket prices barely shifted. Even with visible shortages and widespread crop loss, producers saw no price relief. The message was clear: market signals do not reflect production realities and producers are rarely the beneficiaries of scarcity.

Until structural reform mechanisms, as outlined in the ACCC report, are put in place to rebalance commercial relationships and share risk fairly (price transparency), many producers will remain vulnerable to a system that has them bear all the cost and risks.

The Queensland Food Farmers' Commissioner will ensure that a revised workplan for 2025-26 will focus on doing what is possible, so that a continued focus on these necessary, as proposed by the ACCC, reforms.

Unrealistic compliance demands and auditing

Queensland producers strongly support a safe, traceable, and accountable food system. There is no resistance to having a regulatory baseline that protects consumers and underpins Australia's quality reputation. The concern lies not with the presence of compliance, but with the complexity, cost, and duplication created by a fragmented and misaligned system.

Rather than a unified industry standard, retailers apply their own combinations and interpretations of existing compliance programs. Although these frameworks frequently overlap in content and intent, they are not interchangeable. Producers may be deemed non-compliant under one scheme and compliant under another, despite no change in practice.

Private audit systems also diverge from Australian workplace law. Accreditation through an audit program does not provide assurance against legal action, and producers may face penalties from Fair Work Australia despite recent audit approval. These systems add cost and administrative burden without reducing exposure.

Retailers retain the discretion to override compliance requirements in periods of supply shortage, indicating that food safety and labour standards can be flexible when commercial interests take precedence.

A significant portion of audit activity focuses on data capture. Retailers work with audit companies to access detailed information about farm operations, including production volumes, planted acreage, and yield trends. This data extends beyond food safety and provides retailers with strategic insights. However, producers do not receive equivalent visibility into demand forecasts or planning, reinforcing a systemic information asymmetry.

Compliance can be used, by buyers, as a tool to barrier market access. Larger or more resourced producers may benefit commercially from meeting these requirements (paying for multiple QA systems), while smaller operators are increasingly excluded. This dynamic reflects a broader market failure: compliance functions not solely as a safety mechanism, but as a tool for shaping supply chain participation.

Further complexity arises from the use of overseas standards that do not reflect Australian conditions. This leads to confusion, audit friction, and compliance misalignment. Notably, when serious breaches occur, such as foodborne illness or environmental contamination, it is government agencies, not private auditors, that conduct investigations. This raises questions about the role, scope, and accountability of third-party compliance providers. Audit scheduling is also a challenge. Many audits are conducted during peak operational periods, requiring producers to divert labour and pause harvest activities, adding to cost and operational disruption.

Despite these inefficiencies, most producers continue to comply, either due to retailer requirements or in pursuit of long-term market access. However, the current system disproportionately places cost and liability on producers while offering limited protections or benefits in return.

This complex and escalating issue requires significant focus and coordination to explore options for improvement and consolidation. A revised workplan for 2025-26 will have a significant focus on this issue, which will may include features such as, an independent stocktake of all compliance programs and negotiations with relevant industry stakeholders to begin a process of reform.

Structural limits to market access

Despite Queensland's role as a major producer of fresh horticulture, growers face structural barriers in accessing sustainable markets. Perishability, limited export viability, buyer concentration, and weakening secondary markets contribute to an environment in which producers have limited commercial control and face persistent volatility.

Australia produces more fresh produce than it consumes. In theory, this surplus should create opportunities for export. In practice, the short shelf life of horticultural products, combined with biosecurity protocols, expensive cold chain logistics and high air freight costs, makes large-scale export commercially unviable. Producers cannot rely on overseas markets to absorb domestic oversupply, leaving them exposed to fluctuations in local demand.

Domestically, producers appear to have options, agents, wholesalers, merchants and retailers; but most volume ultimately flows to supermarket chains. Even where intermediaries are used, the end destination is often the same. This concentration limits market diversity and diminishes negotiating power. The illusion of choice masks a highly centralised system in which pricing, standards and access are controlled by a few dominant buyers.

Wholesale markets, once a key mechanism for price discovery and competition, are no longer performing that role effectively. Producers report opaque pricing practices, delayed payments, and limited feedback. These experiences reduce trust and make strategic planning difficult.

The perishability of fresh produce compounds the risk. Without scalable infrastructure to store, process or divert excess supply, seasonal gluts can lead to waste and depressed prices. Producers are often encouraged to increase output based on speculative forecasts but lack the means to manage oversupply. In a system with little price transparency or coordinated planning, producers are forced to sell quickly, placing them in a reactive, price-taking position.

Queensland's geography and climate present additional vulnerabilities. Cyclones, floods and road closures can cut off supply chains without warning. With minimal infrastructure redundancy and limited access to alternative markets, a single weather event can erase a season's returns.

While some producers have explored niche markets, online subscriptions or direct-to-consumer sales, these remain supplementary channels. Most lack the scale, reach and administrative capacity to support commercial operations. Similarly, there is limited public investment in regional food hubs or local processing facilities that could enable more diversified supply chains.

In this constrained commercial ecosystem, even the most efficient producers struggle to influence pricing or sales strategy. Perishability, buyer concentration and non-functioning secondary markets create a structural imbalance that limits resilience and sustainability.

Without intervention, through greater transparency, investment in alternative distribution models, and fairer pricing mechanisms, producers will continue to carry the burden of market inefficiencies beyond their control. Addressing these constraints is critical to securing the long-term viability of Queensland's fresh food sector.

Workforce constraints

Queensland's fresh food producers continue to face persistent workforce challenges shaped by geography, industry structure, and regulatory complexity. Unlike metropolitan businesses with access to large labour pools, horticulture producers must recruit, house and manage staff in regional and remote areas, often hours from population centres.

Distance and isolation significantly impact workforce availability. Recruiting staff in locations such as Bundaberg, Mareeba or Atherton typically requires relocation from urban areas. Even where roles are available, the physical demands of farm work, combined with harsh climate conditions and limited access to services or amenities, contribute to retention difficulties.

Seasonality remains a defining constraint. Many harvest roles are tied to short seasonal windows, creating inconsistent employment and disincentivising workers seeking reliable, long-term jobs. As a result, many roles are filled by transient workers, including those on short-term visas, contributing to high turnover and ongoing training demands.

While schemes such as the Pacific Australia Labour Mobility (PALM) program provide support, producers report that navigating associated regulatory and administrative requirements can be challenging, particularly for smaller businesses. COVID-19 further disrupted established international worker pathways, and rebuilding these networks has proven slow and difficult.

Industrial relations obligations also contribute to complexity. Minimum guaranteed hours, overtime thresholds, and rostering rules can impose significant risks for producers whose operations are dictated by weather and crop conditions. For example, a farm may be required to guarantee 30 hours of work during a rain-affected week where harvesting is not possible. Conversely, overtime penalties may render longer catch-up shifts economically unviable. Some producers mitigate this risk by maintaining multiple crews, increasing administrative burden and cost.

In addition, quality assurance and audit schemes frequently require producers to provide and maintain compliant worker accommodation. This extends beyond welfare considerations: access to certain markets may depend on passing audits that assess housing conditions. These responsibilities, often unique to primary producers, carry operational and financial implications.

Producers support fair wages and safe working conditions. However, most are unable to pass on increasing labour costs. This price-taking position leaves little margin to absorb rising wage and compliance costs.

The above illustrates that labour constraints in horticulture are not incidental, they are embedded in the operating conditions of the sector. Addressing these challenges will require coordinated efforts across industry and government to ensure workforce, compliance and industrial relations systems better align with the operational realities of fresh food production in Queensland.

Case studies

Market transparency trial (Persimmons Australia)

Price transparency remains a critical issue for fresh food producers, particularly those who sell through agents and merchants where pricing information can be delayed, incomplete or deliberately withheld. Without reliable and timely data, producers struggle to benchmark their returns, evaluate market performance, plan production or run their business. To help address this, the Commissioner is supporting a 12-month pilot project in partnership with Persimmons Australia, a national industry body. The project trial is designed to improve real-time market visibility and empower producers with practical pricing insights.

The digital tool enables participating producers to log sale prices weekly via a short online form (3–5 minutes). The data is aggregated and displayed in a confidential dashboard that shows average regional sale prices for persimmons. Individual data points are not disclosed; all information is anonymised and managed independently by the industry body to ensure trust and confidentiality.

In the current environment, producers often depend on agents and merchants to provide post-sale data, yet many delay, refuse or claim they don’t have systems to track the information. These claims are increasingly seen as unjustified. The technology exists. Spreadsheets and cloud-based sales tools are commonplace in most industries. When produce is sold, producers deserve to know the price, immediately and reliably. This trial is already yielding insights:

- Producers are reporting inconsistencies in how and when they receive post-sale data.
- Some agents and merchants appear reluctant to provide transparent pricing, despite the legal obligation under the Horticulture Code.
- Without clarity on what their produce is selling for, producers cannot make sound commercial decisions or assess their return on investment.

This pilot offers a low-cost, low-burden solution that can be scaled across other fruit and vegetable categories. It shows that:

- producers will engage with data tools if they are fast, confidential, affordable and easy to use
- trust can be built through industry-led delivery rather than top-down enforcement
- aggregated pricing visibility helps level the playing field. Producers know where they stand and can enter negotiations with confidence.

The Commissioner will continue supporting the current trial and work with industry groups to explore broader application across other commodities.

Additional Activity

‘Geared Up Growers’

The ‘*Geared Up Growers’* pilot was a targeted education and capacity-building program for fresh produce producers. Delivered by the Queensland Fruit and Vegetable Growers (QFVG) and funded by the Queensland Government, the initiative aimed to lift the commercial confidence of producers by demystifying core elements of supply chain negotiation, pricing dynamics and market positioning.

The QFFC observed this pilot closely, recognising its alignment with the broader need for producers to become more informed, assertive participants in the supply chain. Rather than relying solely on regulatory levers, this ground-up approach aims to level the playing field by equipping producers with the knowledge and skills needed to operate strategically.

Key deliverables and outcomes:

- The program was tailored to producers’ practical needs, with real-world case studies, interactive sessions and jargon-free delivery.
- Participants reported greater clarity in dealing with agents, understanding terms and preparing for supply negotiations.
- The pilot highlighted that many producers, especially smaller operators, remain unfamiliar with critical topics such as contract law, payment terms and risk mitigation strategies.
- Across regions, demand exceeded availability. Several participants noted they would recommend the course to others or attend again with new team members.

The program complemented existing regulatory and policy mechanisms by building commercial literacy at the source, which is particularly critical in the current environment. Any future programs that seek to help producers to make informed decisions, reduce reliance on external factors and fosters a more resilient and capable farming sector will assist in addressing many of the issues outlined in this report.

Payroll Tax

Throughout 2024–25, payroll tax was a recurring concern raised by horticulture producers during regional engagement across Queensland. While few growers are directly liable for the tax, those who are often described it as an added cost they cannot pass on, particularly in an industry where farmgate prices are set externally.

Key issues raised included:

- Threshold erosion (bracket creep): Wage inflation and cost increases have pushed some employers above the payroll tax threshold, even when their productivity and margins remain unchanged.
- Arbitrary regional boundaries: Some producers qualify for payroll tax relief based on their location, while others, often just outside the defined zone, do not, despite operating in similar conditions and facing the same cost pressures.
- Rising labour costs: Increases to award wages, hourly rates and minimum guarantees have driven payroll costs higher, with some employers facing substantial tax liabilities despite slim or negative profit margins.

These concerns were explored in a dedicated paper produced by the Office in 2024–25, with input from industry. While broader tax settings remain the domain of government, the issue reflects a wider theme: escalating costs in horticulture are often borne by producers who cannot influence the prices they receive.

The Office will continue to examine options and support conversations aimed at ensuring cost structures remain sustainable for growers. Payroll tax will remain a focus in 2025–26.

ACCC Supermarkets Inquiry

In response to concerns over rising grocery prices and the market dominance of major supermarket chains, the Australian Government directed the Australian Competition and Consumer Commission on 1 February 2024 to conduct a comprehensive inquiry into the nation's supermarket sector. This initiative aimed to scrutinise pricing practices, assess competition levels, and evaluate the relationships between suppliers, wholesalers, and retailers within the industry. The inquiry was prompted by public apprehension regarding the transparency of pricing strategies and the potential impact on consumers and suppliers alike. Over the course of a year, the ACCC gathered data through public hearings, consumer surveys, and industry submissions, culminating in the release of a final report on 21 March 2025. The report outlined 20 recommendations designed to enhance transparency, promote fair trading practices, and improve outcomes for both consumers and suppliers in the supermarket sector.

Of particular interest to the Queensland's Food Farmers' Commissioner was the work on fresh produce suppliers. This inquiry's findings highlight significant market power imbalances in dealings between Coles and Woolworths and fresh food suppliers. The ACCC found that retailers wield a form of monopsony power (buyer dominance) in fresh produce procurement, which poses long term risks to supplier viability and market efficiency.

Key ACCC Supermarket Inquiry Final Report 2025 recommendations relevant to fresh produce supplier relations (notably Recommendations 11–20) include the following:

Rec.	Name	Description
11	Streamline Audits	Harmonise supermarket supplier audit and accreditation requirements to reduce duplication and cost.
12	Improve Forecasting	Require supermarkets to share detailed, ongoing supply forecasts with fresh produce suppliers.
13	Pricing Transparency	Increase transparency in supermarket weekly price and volume tender processes.
14	Publish Wholesale Prices	Mandate public reporting of weighted average wholesale prices to inform market negotiations.
15	Prevent Unilateral Changes	Prohibit supermarkets from unilaterally changing agreed prices or volumes after confirming orders.
16	Clarify Trader Practices	Require intermediaries to disclose sale prices, buyer identities, and affiliations to growers.
17	Early Order Confirmation	Ensure fresh produce suppliers receive confirmed supermarket orders 14 days in advance.
18	Supplier Branding	Allow growers to apply their own branding to fresh produce sold in supermarkets.
19	Disclose Rebates and Charges	Require supermarkets to itemise all invoice deductions and rebates annually.
20	Retailer Media Transparency	Ensure transparency in how retailers use supplier funds for in-house media programs.

Table 1: ACCC Supermarket Inquiry Final Report 2025 Recommendations 11-20

For my Office, these findings are not a surprise and reflect many of the issues we have heard in our dealings with producers during the year.

The report details how supermarkets' superior bargaining position enables practices that can suppress farmgate prices, shift costs and risks onto producers, and threaten the sustainability of the fresh produce sector. Recommendations (notably Recommendations 11–20 of the report) aim to rebalance trading terms, enhance transparency, strengthen supplier protections, and improve code of-conduct enforcement in the grocery supply chain.

The ACCC's final report delivers a clear message: the imbalance of power in fresh produce supply chains is a concern that requires corrective action. The inquiry concluded that Coles and Woolworths' dominance as buyers has allowed practices that undermine the sustainability of the fresh produce sector, and that without intervention, these practices could lead to long-term inefficiencies, higher consumer prices, and reduced innovation in farming.

Engagement

A vital component of the Commissioner's function is engagement. This engagement is at all levels of the supply chain from producers to retail, including horticulture, dairy, red meat, prawn, seafood and other protein industries. As this engagement across the 2024-25 financial year has been extensive, this report will highlight the key touch points of the campaign.

In 2024-25 we completed:

- 85 farms visits.
- Multiple retailer meetings in Brisbane and their respective head offices, at industry conferences, and other events such as field days and producer gatherings.
- Visit to the Woolworths Queensland Distribution Centre, largest in Australia, servicing 256 retail outlets between Rockhampton and Grafton.
- Regional visits including Bundaberg, Cairns, Mareeba, Gatton, Stanthorpe, Kalbar, Dimbula, Kilcoy, Wamuran, Bowen, Ayr, Gumlu, Beaudesert, Boonah, Glen Aplin, Townsville and Atherton.

Summary

Producer	
Farm visits	85
Shed meetings	15
Regional visits/trips	14
Retailer	
Meetings with major retailers	6
Visit to Woolworths, Queensland distribution centre	1
Retailer QA/standards meetings	2
Wholesale/ Central markets	
Meetings with Brismark at Brisbane Markets	3
Meetings with Wholesalers at the Brisbane Markets	4
Engagement with wholesale market operators outside Queensland	3

Industry	
Industry conferences attended	4
Speaking engagements or panels (AgForce and ABARES)	2
Organisations met	16
Government	
Briefings to Parliamentary Committee	1
Formal policy submissions	2
Regular meetings with ACCC Deputy Chair	-
Participation in State or Commonwealth working groups	4
Coordination and Chair of the Queensland Chiefs Working Group	2
Stakeholder and cross-sector	
Engagement with dairy, red meat, seafood and other industries	-
Meetings with industry peak bodies and regional councils	15
Communications and outreach	
Website launched	18 February 2025
Anonymous reporting portal launched	18 February 2025
Newsletters sent / email updates	6
Multiple media appearances and interviews	-
Policy and advocacy	
Policy recommendations provided	5
Informal advice provided to the Minister via regular meetings	-
Responses to inquiries (ACCC Supermarket Inquiry)	2

Table 2: QFFC Engagement 2024-25