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To: submissions
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Subject: Dairy Industry Submission to FSANZ Proposal P1005 - Primary Production and Processing Standard for Meat and Meat Products 1st Assessment Report

Categories: Purple Category

Australian Dairy Industry Council (ADIC) and Dairy Australia (DA) Submission to FSANZ Proposal P1005 – Primary Production and Processing Standard for Meat and Meat Products

1st Assessment Report

The Australian Dairy Industry Council (ADIC) is the peak policy organisation that provides whole of industry policy for the dairy industry. Its two members are the Australian Dairy Products Federation (ADPF) and the Australian Dairy Farmers (ADF), the peak policy bodies for Australian dairy manufacturers and Australian dairy farmers respectively. Dairy Australia is the dairy industry's owned service company, limited by guarantee, whose members are farmers and industry bodies, including the ADF and ADPF.

The ADIC and DA support Option 3 outlined in FSANZ Proposal P1005 – ie that there be through chain food safety management consisting of regulatory elements for primary production and processing of meat. Option 3 would enable a consistent national approach to meat safety. This submission focuses on the primary production elements of meat safety.

DA agrees with the FSANZ Risk Assessment for meat production prefarm gate, where it is noted that food safety risks are managed by existing provisions. However, they are not uniformly managed across all states and species. This creates costs and trade implications for various groups of producers and can hinder the ability for producers to rationalise their on farm risk management plans to cover a variety of risks. Whilst taking account of the existing industry codes and practices, inclusion of provisions for prefarm gate in the Primary Production and Processing Standard for Meat and Meat Products would facilitate the engagement and contribution of all responsible parties in the development and revision of the food safety requirements.

Dairy producers supply approximately 20% of the beef production. The dairy industry has a Dairy Primary Production and Processing Standard in place, whereby the food safety elements of dairy production are mandated under a national standard, implemented by the State Food Safety Authorities. AQIS also accepts the onfarm dairy food safety standards, and the verification and compliance measures in place through the states. This enables harmonisation of regulatory requirements across the dairy supply chain for both domestic and international markets. It also provides an opportunity for rationalisation of some of the commercial verification requirements through third party auditors.

The Livestock Production Assurance (LPA) program is the meat industry's voluntary food safety program for red meat production. It covers the essential components of food safety and accredited producers are subject to audit by AUS-MEAT, the owners of the program. Dairy producers are currently subject to the verification requirements of both dairy and meat food safety requirements. Although there is a large overlap in the aspects covered by both programs, there is currently little ability to rationalise the verification and compliance process. In the absence of an onfarm meat food safety standard, AQIS requires processors to source animals from properties that have food safety programs in place. The development of a meat primary production food safety standard would enhance the ability to rationalise the dairy and meat common elements of food safety – namely animal identification for trace back and trace forward,

animal health requirements and control of agricultural and veterinary chemicals. It would also ensure a consistent national approach to these elements for meat and dairy. Currently, States are responsible for aspects of these elements – and without a national standard, consistent implementation is difficult. This may mean that a dairy producer providing milk in one state and meat into another state, may have different requirements for the same food safety elements.

The inconsistent application of standards across states is particularly relevant for bobby calves. Most calf processors are in Victoria, and subject to Victorian standards. Calves are sourced from Victoria, SA and NSW for the calf supply chain. Producers in different states can be potentially disadvantaged when one state requires different standards to be met.

Option 3 is unlikely to have any additional costs associated with the implementation as the move to national standards at farm level would mean most producers would continue to operate as they do currently to meet the requirements of LPA and export abattoirs.

Regards

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