

13 November 2009

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**Assistant Section Manager**  
**Food Safety**  
**FSANZ**

**Re: Primary Production & Processing Standards for Meat and Meat Products**

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The Stock Feed Manufacturers' Council of Australia (SFMCA) is the peak industry body representing Australian feed manufacturers. SFMCA members manufacture over 5.5MMT of animal feeds annually.

This letter provides comments from the SFMCA relating to the Primary Production & Processing Standards for Meat and Meat Products. The SFMCA supports the introduction of these standards. Within the document provided, we would ask that you consider changing the following section.

**ASSESSMENT OF MICROBIOLOGICAL HAZARDS ASSOCIATED WITH THE FOUR MAIN MEAT SPECIES**

**Pig Production**

**2.3 Feeds**

**(Including grains, meal, pellets, supplements)**

**Issue:** Feeds including grain, meal, pellets and supplements may be contaminated with pathogens, which may result in a pathogen transmission to animals.

**Notes:** Pigs are omnivores and therefore consume a wide range of feeds. Some studies indicate an association between pathogen infection and the feeding of particular ingredients, such as animal origin ingredients and by product meal.

**Notes:** The form in which the feed is presented may play a significant role in the pathogen prevalence in pigs.

- *Salmonella* has been reported in stockfeed. Serovars and prevalence reported differ depending on type of feed.
- **A higher *Salmonella* sero prevalence has been associated with feeding pelleted rations to finishers** and feeding whey.

The SFMCA challenges the last sentence within this statement. We are not aware of research showing a higher *Salmonella* sero-prevalance associated with feeding pelleted rations to finishers. This statement does not provide any information defining what pelleted rations are compared against. We assume this statement compares pelleted rations to non-pelleted mash or meal feeds. If this is the case, the statement is incorrect as research around the globe has clearly

demonstrated the benefits of pelleting in reducing microbial presence. Heat applied through steam results in pelleting temperatures in Australia feed mills exceeding 85°C, sufficient to kill *Salmonella*. In overseas markets, such as Europe, feed heat processing is required to control salmonella and the feeding of mash (non-pelleted) rations is accepted as presenting greater microbial risk.

The SFMCA contends that the included statement needs to be either removed or replaced with an accurate statement such as “Ration pelleting results in reduced microbial presences compared to mash feeds”. We believe if left unchanged, the statement conveys an incorrect message that feeding non-heat treated feeds presents lower risk than rations having been subject to heat processing.

Yours sincerely

A black rectangular redaction box covering the signature of John Spragg.

John Spragg  
Executive Officer  
SFMCA