



14 November 2009

Standards Management Officer  
Food Standards Australia New Zealand  
PO Box 7186  
Canberra BC ACT 2610

Dear Sir / Madam

**Submission – Proposal P1005 – Primary Production and Processing Standard for Meat and Meat Products**

I have read the First Assessment Report on the above and wish to provide comment as follows.

I note:

- on page ii of the Report *“FSANZ’s evaluation of the hazards and current management practices in Australia indicates that there are no unmanaged food safety risks for the major meat sectors (cattle, sheep, goats, pigs) i.e. controls are provided to protect public health and safety. The evaluation found no significant gaps that warrant further chemical or microbiological risk assessments”*;
- on page 15 of the Report that *“a significant body of evidence exists for the Australian domestic meat industry indicating that domestically-reared red meat (cattle, sheep and goats) and pigs present a low risk to public health”*; and
- on page 16 of the Report *“Further, considerable data is available to support the safety of meat and meat products produced from beef, sheep and pork in Australia. The evidence suggests that Australian meat from these species has a low microbial load and generally low prevalence of pathogens. Many of the pathogens listed in this assessment occur infrequently or not at all on Australian meat.”*

I also note between January 2003 and June 2008 (a period of 5½ years) there were only 66 reported outbreaks of food-borne illness associated with meat products in Australia. Then I note that the occurrence of outbreaks usually was due to dishes containing a meat product and undercooking and temperature abuse post-cooking were the major factors contributing to the outbreaks. Accordingly I would suggest this has little to do with production and processing.

At the same time and over the 5½ years previously referred to, millions of sheep, cattle, goats and pigs were processed in Australia for human consumption.

Where is the evidence that would suggest the system is in need of an overhaul?

I then note on page 38 of the Report *“The Ministerial Council Overarching Policy Guideline on Primary Production and Processing Standards specifies a number of high order principles that must be considered where a standard is developed. These principles state that standards will be outcomes-based, address food safety across the entire food chain where appropriate, ensure the cost of the overall system should be commensurate with the assessed level of risk and provide a regulatory framework that only applies to the extent justified by market failure.”*

Meat and meat products currently have a multitude of legislative and non legislative measures in place which ensures a safe product.

If there is an intention to further impose additional measures on the production and processing of meat and meat products there needs to be a comprehensive breakdown of the costs associated with such additional changes and the direct and indirect benefits. This is particularly the case since the Report does not indicate there is a problem which requires fixing.

This is further highlighted:

- on page 35 of the Report which states relative to the issue of legislation to prevent and control diseases in livestock on-farm: *"there does not appear to be evidence that this approach is not working"*; and
- on page 36 of the Report which states relative
  - (i) to the issue of animal welfare legislation: *"Again, there does not appear to be evidence that this approach is not working"*;
  - (ii) to the issue of legislation that controls the production and use of agricultural and veterinary chemicals: *"Standards in the Code manage residues in meat for sale. This approach is effective"*;
  - (iii) to the issue of industry schemes: These *"appear to adequately address safety and suitability and focus on traceability, chemical issues and fitness for travel i.e. do not specifically cover microbiological issues. Industry is supportive of broadening the schemes to address any gaps in microbiological issues."*
  - (iv) to the issue of animal acceptance by processors: *"A key driver for producers is that animals will not be accepted if the processor cannot fulfil its obligations under AS 4696-2007. There is no clear set of legislated food safety responsibilities on producers. However, our analysis concluded that the current systems are effective."*

*This is also the case for transporters and saleyard operators."*

In regard to processing, I note on page 36 of the Report it states *"the overall approach appears to be managing hazards at processing."*

The Report also states on page 36 *"Ensuring skills and knowledge through training programs appears reasonably well covered at processing through AS 4696-2007 and industry programs to meet this requirement. Industry programs for primary production include training."*

*Industry schemes have considerable requirements for traceability and actively promote the importance of this tool."*

In view of the above, I am far from convinced that there is a need for any significant change to the current system. If anything I see the need to supplement the existing approach which involves industry guidelines or codes of practice with incentive and education programs to maximise industry adoption of quality assurance programs and commitment to food safety practices. In regard to processing, the existing state and territory meat safety requirements, embodied in AS 4696-2007 would be implemented through a national outcome-based standard, and this would be incorporated in the Australia New Zealand Food Standards Code.

Accordingly I support Option 2.



Greg Bachmann  
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