

18 November 2009

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**AMIC submission to FSANZ proposal p1005: Primary Production & Processing Standard for Meat & Meat Products, 1st assessment report**

**To whom it may concern**

Thank you for the opportunity to make comment on FSANZ's 1st assessment report of the proposed Primary Production & Processing Standard for Meat & Meat Products.

Australian Meat Industry Council (AMIC) is the recognized peak industry body representing over 3,000 domestic and export meat processors, retailers and small good manufacturers nationally.

I write to you under my capacity as Chairman of the Australian Processor Council and on behalf of domestic and export meat processor sector members of the Australian Meat Industry Council (AMIC).

It is AMIC's understanding that the new Primary Production and Processing Standard for Meat and Meat Products will ultimately replace the Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption (AS 4696-2007).

Of particular concern however is the possibility that the new Standard may not extend to matters such as on-farm food safety and animal identification unless the Office of Best Practice Regulation can be persuaded that these are necessary factors in the design and delivery of meat hygiene programs.

The decision not to include reference to non-processing and on-farm matters would mean that there is no longer a single point of reference for such matters and therefore these matters may not automatically be incorporated into individual state / territory legislation or into domestic meat inspection service delivery requirements.

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This has potentially serious implications in meeting the public health, animal health and market access objectives of the animal identification and traceability systems, and has the potential to seriously undermine the significant investment in development and implementation of these systems from both Government and Industry. Further, the red meat processing sector has major capital investments that are dependent on on-farm food safety systems delivering product integrity from paddock to plate.

AMIC is of the view that the PPPS process delivers a very real opportunity to further enshrine Australia's food safety systems into the Australian production and processing sectors, which will ultimately deliver reduced food safety risks for consumers.

Consequently AMIC supports *"Option 3 - Through-chain food safety management consisting of regulatory elements for primary production and processing"*.

Furthermore, without nominating the type and nature of any on-farm food safety system adopted by State and Federal jurisdictions, AMIC believes that there are only two choices going forward, which are either:

1. legislate basic on-farm food safety/ animal husbandry requirements; or
2. leave the on-farm food safety/ animal husbandry system voluntary but legislate that livestock not reared under an approved on-farm food safety system be refused access to the human food chain.

If you require further clarification please do not hesitate to contact John Dorian, Veterinary Council, AMIC at [jdorian@amic.org.au](mailto:jdorian@amic.org.au) or on Mobile 0419 242 817.

Yours sincerely

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Chair  
Australian Processor Council  
Australian Meat Industry Council

SUBMISSION TO

**Food Standards Australia New Zealand (FSANZ)**

IN RESPONSE TO

**FSANZ PROPOSAL P1005:**

**PRIMARY PRODUCTION & PROCESSING STANDARD FOR  
MEAT & MEAT PRODUCTS**

**1st ASSESSMENT REPORT**

November 2009



## **PREFACE**

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The red meat sector is now Australia's No.1 agricultural enterprise. The Australian Meat Industry Council (AMIC) is the only employer association and recognised Peak Council in Australia, representing the commercial export and domestic processing industry.

AMIC is also the Peak Council representing the post-farm gate sector including smallgoods manufacturers, wholesalers, distributors, boning rooms and independent retail butchers – in total, close to 3,000 member companies representing over 55,000 workers directly employed in meat processing, exporting, wholesaling and retailing in Australia.

In addition, there is conservatively at least the same number again of Australian's involved in the road transport, shipping, carton and equipment manufacture, insurance, banking, laboratories and other ancillary industries – all dependent on the red meat processing and export sector for a proportion of their livelihood – an industry worth an estimated A\$15 billion to the Australian economy in total.

AMIC provides services and support to members that improves their working environment and is focused on achieving the best outcomes for the industry and its members as part of one voice on issues critical to their business.



## **PROPOSAL P1005: PRIMARY PRODUCTION & PROCESSING STANDARD FOR MEAT & MEAT PRODUCTS 1st ASSESSMENT REPORT**

### **Purpose**

FSANZ has reported to stakeholders involved in the Standards Development Committees (SDC) and informed them that the 1st Assessment Report for the public consultation process has begun. This report investigates the development of food safety measures for the Australian meat industry.

This submission conveys the Australian Meat Industry Council's processing sector views on FSANZ's Proposal P1005: Primary Production & Processing Standard For Meat & Meat Products, 1<sup>st</sup> Assessment Report.

### **Introduction**

The government guidelines on the development of standards for primary production and processing specify that FSANZ must take into consideration the following objectives when considering whether or not to develop standards:

- provide controls to protect public health and safety;
- reduce the regulatory burden on the food sector, governments and consumers; and
- recognise the responsibility that food safety involves all levels of government and a variety of agencies within the governments.

### **The Issue**

At question is whether the Code should include a primary production and processing standard for meat and meat products. The assessment of whether a standard is required involves an analysis of public health and safety risks, economic and social factors, and current regulatory and industry practices.

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), and that therefore controls are provided to protect public health and safety. The evaluation found no significant gaps that warrant further chemical or microbiological risk assessments. In regard to



primary production, industry schemes appear to adequately address safety and suitability.

In addition to this, all States and Territories have legislation to:

- prevent and control diseases in livestock on-farm;
- control welfare that also addresses hazards arising from injury and stress; and
- control the use of agricultural and veterinary chemicals.

This legislation, developed by other government agencies, differs to varying degrees in States and Territories.

The processing of meat and meat products for human consumption is currently regulated in all jurisdictions through the *Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption* (AS 4696-2007).

AS 4696-2007 was prepared by the Meat Standards Committee and that Committee was responsible for maintaining the standard until it was disbanded in 2007. The future maintenance of the standard was transferred to a working group of the Primary Industries Ministerial Council (PIMC).

To achieve the objectives of the PIMC and maintain the safety of the food chain it will be necessary to implement one or both of the recommendations put forward by this paper.

## **Objective**

The objective of government action is to ensure food safety is addressed throughout all parts of the meat supply chain (i.e. from paddock to plate) and, in the case of regulation, is within the government's food standard setting framework (to ensure mechanisms are available to ensure regulation remains relevant and effective over time) and meets the government guidelines.

## **Options**

In order to determine the most effective and efficient approach for achieving the objectives, FSANZ must consider various risk management options.





The options identified, by FSANZ, for Proposal P1005 are:

Option 1 – Status quo

*This retains the current situation i.e. FSANZ would not make any changes to the Code or propose any other regulatory changes. This current situation is a combination of self regulation of meat safety (and current legislation in place managing animal disease control, animal welfare, animal traceability, use of agriculture and veterinary chemicals and environmental issues) for the primary production sector and regulation for the processing sector.*

Option 2 – Through-chain food safety management consisting of non-regulatory and regulatory elements

*The current self-regulatory approach with primary production businesses implementing and self-enforcing (e.g. through quality assurance programs) industry guidelines or codes of practice aimed at improving the safety of their product would be supplemented with incentive and education programs to maximise industry adoption of these quality assurance programs and commitment to food safety practices. For processing, the existing state and territory meat safety requirements, embodied in AS4696-2007, would be implemented through a national outcome-based standard, which is not overly-prescriptive, incorporated into the Code.*

Option 3 – Through-chain food safety management consisting of regulatory elements for primary production and processing

*This approach involves the development of food regulatory measures in the Code which would apply to the primary production and processing sectors. A primary production and processing standard is a set of food safety obligations specifying requirements from animal production to the processing of meat animals, meat carcasses and meat products for human consumption. The standards may include the implementation of measures to control the food safety hazards and the responsibility to demonstrate compliance.*

For the red meat processing industry these options can be read as:

- Option 1      – status quo
- Option 2      – status quo + education, extension, and incentivisation
- Option 3      – actively managing risk within the production sector to ensure AS compliance



## **Discussion**

The Australian Red Meat Processing Industry understands and acknowledges that the most rational place to confirm products suitability for the human food chain is at the processor's facility.

The logic of this position applies to all food commodities where an aggregation and sorting activity is concentrated.

The industry is appreciative that investigative work by FSANZ has identified risks in this sector as "controlled".

However the corollary that there is therefore no need for any further regulatory input is misplaced and misunderstands the true nature of the situation.

Although the primary production sector is subject to regulatory input by both State and Federal jurisdictions the communication, to the processor, of the outcomes of this regulatory input is purely voluntary.

For processors, compliance with AS 4696-2007 largely occurs via the sourcing of livestock that:

- 1) Meet basic on farm food safety standards such as the voluntary on-farm food safety Livestock Production Assurance program;
- 2) Are accompanied by voluntary documentation, being the National Vendor Declaration system; and
- 3) Are traceable under the legislated National Livestock Identification System.

In the export sector AQIS requires <sup>1</sup>that processors source animals from properties having accreditation in a suitable on-farm quality program and have sufficient controls in place to ensure that those programs allow the establishment to comply with the requirements of the Australian Standard and EC(MMP)O. Documentation is routinely checked and audited by both AQIS and overseas auditors of the Australian system.

Further, AQIS in their Meat Notice 2009 / 07 have provided guidance material on what elements of on-farm system constitutes an effective on-farm food safety program.

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<sup>1</sup> AQIS MEAT Notice 2009 / 07 NSFS Ref 16, 17)





When sourcing stock from systems that meet these elements processors are deemed to be complying with the expectations of the AS 4696-2007 with regard to sourcing of animals and fitness for purpose.

For the domestic industry many animals are reared under the same criteria and so similarly allow the processor full compliance with the AS 4696-2007.

However AMIC knows of only one State Meat Authority in Australia that stipulates on the processing sector similar requirements to AQIS regarding the sourcing of livestock.

Furthermore, as on-farm food safety systems are voluntary there is a significant gap for all those animals reared that do not meet basic on-farm food safety systems. When these animals are presented for slaughter the processor has no mechanism beyond personal knowledge of the producer to verify that the animals are fit for purpose.

This gap in the system has evolved from promotion of a 'voluntary' on-farm food safety system where producers are 'strongly encouraged' to operate in accordance with the system and back up their claims through documentation when presenting livestock for processing.

Depending on the location, and the style of operation undertaken, the number of animals in the "non on-farm food safety" category can be significant and represents a weakness in the Australian system.

This results in unnecessary exposure of the Australian public to food safety issues that buyers of Australian meat in export destination countries do not face.

The processor is willing and able to eliminate this gap in our food production systems but must be given the resources (tools) to enable this vital task to be effectively managed.

## **RECOMMENDATION**

AMIC is of the view that the PPPS process delivers a very real opportunity to further enshrine Australia's food safety systems into the Australian production and processing sectors, which will ultimately deliver reduced food safety risks for consumers.

Consequently AMIC supports "Option 3 - *Through-chain food safety management consisting of regulatory elements for primary production and processing*".



Furthermore, without nominating the type and nature of any on-farm food safety system adopted by State and Federal jurisdictions, AMIC believes that there are only two choices going forward, which are either:

3. legislate basic on-farm food safety/animal husbandry requirements; or
4. leave the on-farm food safety/animal husbandry system voluntary but legislate that livestock not reared under an approved on-farm food safety system be refused access to the human food chain.

The Australian Red Meat Processors believe that any less action leaves the Australian consumer unnecessarily exposed to food safety risk.

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