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File Ref: QCHO/5081

29 November 2013

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

Dear Sir / Madam

**Submission – Proposal P1014 – Primary Production and Processing Standard for Meat and Meat Products**

Thank you for the opportunity to provide a submission on the Call for Submissions for Proposal P1014.

This submission provides technical advice and comments related to this issue. It was prepared with the advice of officers from Safe Food Production Queensland and the Queensland Department of Agriculture, Fisheries and Forestry. The submission does not represent a Queensland Government position, which will be a matter for the Queensland Government when notification is made by the FSANZ Board to the Legislative and Governance Forum on Food Regulation.

In Queensland primary production of meat is regulated by the Queensland Department of Agriculture, Fisheries and Forestry. Safe Food Production Queensland primarily regulates the food safety aspects of processing of meat and meat products and butcheries. The Queensland Department of Health's role includes legislated compositional and labelling requirements.

No objection is raised in regard to the intent of the proposed variation to the Code. However, consideration should be given to the issues raised below.

It is noted that FSANZ have concluded in the Call for Submissions that the proposed draft variation to the Australia New Zealand Food Standards Code (the Code) would 'impose little or no new costs on farmers' and that it is a 'low cost refinement which will make the regulation of meat more robust.' As such, it is understood that if meat producers are complying with existing legal requirements, they should comply with the proposed variation to the Code. Such a conclusion is considered important unless there is a clear food safety or public health imperative.

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Proposal P1025 *Code Revision* set out a number of drafting principles to improve the drafting of the Food Standards Code. While the scope of P1025 was restricted to Chapters 1 and 2 of the Code, the same principles should apply where possible to new variations that affect other parts of the Code. One of the principles was to avoid inconsistency of interpretation of words used throughout the Code and where possible to adopt a single definition. It is noted, that the proposed variation introduces a new definition of 'meat' that is different to Standard 2.2.1 and a definition of 'meat product', which is not defined anywhere else in the Code but used frequently in Chapters 1 and 2 of the Code. The opportunity exists at this stage to avoid adopting different meanings for meat and meat product.

Should you require further information in relation to this matter, please contact Food Safety Standards and Regulation, Department of Health on (07) 3328 9310 or at [foodsafety@health.qld.gov.au](mailto:foodsafety@health.qld.gov.au)

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