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Standards Management Officer  
Food Standards Australia New Zealand  
PO Box 7186  
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Dear Sir / Madam

**Submission – Proposal P1014 – Primary Production and Processing Standard for Minor Meat Species and Wild Game**

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 advice the advice of officers from other relevant Queensland Government agencies. 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 the safety of minor meat species and wild game products are currently regulated primarily by Safe Food Production Queensland (SFPQ), with the Queensland Government Department of Agriculture, Fisheries and Forestry (QDAFF), and Queensland Health also having a role.

**Safe Food Production Queensland comments**

SFPQ supports in principle the development of a primary production and processing standard (PPP Standard) for major and minor meat species that would enable industry and state regulators to operate under a single, national set of requirements for all meat species and wild game. However there are a number of issues which will require further consideration.

SFPQ currently regulate the meat industry through the Meat Food Safety Scheme (incorporated into the *Food Production (Safety) Regulation 2002*), which references a range of Australian Standards including AS4696 and AS4464. These Standards include animal welfare practices, as well as food safety matters.

As the proposed Meat and Meat Products PPP Standard will have a food safety focus only, SFPQ will not adopt the Standard until it is assured that the minimum regulatory provisions for animal

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welfare matters have been resolved. Without this matter being addressed SFPQ has strong concerns over the potential regulatory gaps that may be created regarding non-food safety matters with the development of national standards in the Code.

On a related matter, given that Australian Standards cannot be incorporated into the requirements of the proposed Standard, SFPQ strongly recommends that references to the following Australian Standards be included as editorial notes in the Standard for reference on how to comply with the requirements of a PPP meat standard:

- AS4696 Hygienic production and transport of meat and meat products for human consumption
- AS4467 Hygienic production of crocodile meat for human consumption
- AS4466 Hygienic production of rabbit meat for human consumption
- AS5010 Hygienic production of ratite meat for human consumption
- AS4464 Hygienic production of wild game meat for human consumption
- AS5011 Hygienic production of natural casings for human consumption
- AS5008 Hygienic rendering of animal products.

### **Queensland Department of Agriculture, Fisheries and Forestry comments**

QDAFF also share concern that aspects of the Australia Standards, such as welfare requirements (e.g. kangaroos to be head shot) and non-food safety issues (i.e. market access issues) need to be addressed through other mechanisms because they would not be transposed to any new standard under the Code.

The importance of drawing on the positive features of the existing systems and avoiding unnecessary regulation costs to primary producers and processors need to be considered. That is, QDAFF prefer arrangements that recognise industry voluntary best practice management systems, rather than the imposition of mandatory regulation on-farm.

QDAFF noted the abovementioned Australian Standards are no longer subject to review and updating.

The attached table provides some of the data requested in sections 3.2.1, 3.2.2 and 3.3.3 of the Call for Submissions paper.

### **Queensland Health comments**

Queensland Health is primarily responsible for investigating food-borne illness outbreaks, conducting human health risk assessments, provision of advice concerning the suitability of primary produce entering the food supply chain for human consumption, and overseeing and administering the recall of food.

FSANZ needs to consider minimum requirements for traceability of minor meat species and wild game products to assist with food borne illness investigations and the recall of food. Traceability requirements may also assist with the investigation of the use of non-permitted agricultural chemicals and chemical residue issues.

Food Safety Policy and Regulation Unit  
Environmental Health Branch  
Queensland Health



## Call for submissions – Proposal P1014

### Primary Production & Standard for Minor Meat Species & Wild Game

(Information mostly provided by Animal Industries, Queensland Department of Agriculture, Fisheries and Forestry)

For the purposes of P1014, the following minor species are being assessed: emu, ostrich, crocodile, rabbit, deer, camel and buffalo. Wild game included in the assessment are wild boar, mutton birds, wallaby and kangaroo.

Issue	Response to Issues
<p><b>Analysis of production and processing activities. (Page 6 – Call for Submissions)</b></p> <p>FSANZ welcomes information in submissions on industry production and processing practices relevant to the minor meat and wild game species being assessed.</p> <p>FSANZ particularly welcomes information relating to:</p> <p>(a) microbiological data including the level, frequency and type of microbiological contamination that may be associated with minor meat and wild game meat</p> <p>(b) food borne illness associated with minor meat or game meat</p> <p>(c) consumption information.</p>	<p>(a) No comment in relation to microbiological data.</p> <p>(b) In Queensland, Food Safety Management Plans are developed to minimise risk from food borne illness.</p> <p>(c) Consumption information - There are no readily available statistics on consumption of the following:</p> <p><b>Emu:</b> small amounts sold at selected retail outlets and consumed at selected restaurants from the Cherbourg Emu Farm. Indigenous consumption unknown.</p> <p><b>Ostrich:</b> generally not available in Queensland.</p> <p><b>Crocodile:</b> available at selected retail outlets including butchers, restaurants, crocodile farms and is available on request. Indigenous consumption unknown.</p> <p><b>Rabbit:</b> available in selected retail outlets and restaurant.</p> <p><b>Deer:</b> available in selected retail outlets and restaurant and for private use</p> <p><b>Camel:</b> not readily available, but there is increased interest especially by people with middle-eastern background</p> <p><b>Buffalo:</b> available but not generally consumed in Queensland</p> <p><b>Wild boar:</b> generally not available in Queensland</p> <p><b>Mutton birds:</b> generally not available in Queensland</p> <p><b>Wallaby:</b> generally not available in Queensland</p> <p><b>Kangaroo:</b> readily available in retail outlets and selected restaurants. Kangaroo meat for domestic consumption is produced in South Australia. Kangaroo is consumed in many indigenous communities but the amount is unknown.</p>

<p><b>Analysis of non-regulatory and regulatory requirements. (Page 7 – Call for Submissions)</b></p> <p>FSANZ welcomes information in submissions on industry requirements and measures relevant to:</p> <ul style="list-style-type: none"> <li>(a) the primary production of minor species</li> <li>(b) the harvesting of wild game</li> <li>(c) the processing of minor species and wild game.</li> </ul> <p>(d) FSANZ is particularly seeking information on industry and/or government requirements around traceability and managing inputs (e.g. feed, veterinary residues) on-farm for minor species and during harvesting of wild game.</p>	<p>Industry to comment on (a), (b) and (c)</p> <p>(d) Current requirements in Queensland in relation to the FSANZ information sought include:</p> <ul style="list-style-type: none"> <li>• Memorandum of Understanding with the National Residue Survey – (Department Agriculture Fisheries and Forestry) provides for detections of violative residues of agricultural or veterinary chemicals or contaminants in minor animal species or wild game are subject to traceback and investigation for potential chemical misuse or other cause.</li> <li>• Veterinary chemicals usage in animal production systems is subject to state control of use legislation, and must only be used in accordance with label, instructions or as approved under permit or if permitted for single animals by veterinarian prescription.</li> <li>• Other requirements are under the <i>Food Production (Safety) Regulation 2002</i> (Meat Food Safety Scheme) - <a href="http://www.legislation.qld.gov.au/LEGISLTN/CURRENT/F/FoodProdSafR02.pdf">http://www.legislation.qld.gov.au/LEGISLTN/CURRENT/F/FoodProdSafR02.pdf</a>.</li> </ul>
<p><b>Impact analysis and affected parties (Pages 9 and 10 – Call for Submissions)</b></p> <p>FSANZ seeks the following information in order to develop a Regulation Impact Statement:</p> <p>(a) How accurate is the above information regarding production and export volumes and retail prices? If not reasonably accurate, could you provide/estimate the correct figures both for wholesale and retail sale?</p>	<p>(a) <b>Emu:</b> Cherbourg Emu Farm produces a small amount of emu meat. In 2010/11 exports of emu (brine/smoked/crumbed) were 72 kg valued at \$3,355 or \$46.60 per kg (AHECC: 021 09960). Exports of emu (meat and offal) in 2010/11 were 3,000 kg valued at \$8,325 or \$4.20 per kg (AHECC: 02089020)</p> <p><b>Ostrich:</b> nil production in Queensland</p> <p><b>Crocodile:</b> In 2010/11 exports of crocodile (meat and offal) were 22,445 kg valued at \$232,894 or \$10.40 per kg (AHECC: 02085005)</p> <p><b>Rabbit:</b> nil production in Queensland. Rabbits including domestic breeds are Class 2 declared pest animals under Queensland legislation and keeping or farming rabbits is prohibited.</p>



	<p><b>Deer:</b> there are a number of tourism based deer farms which produce meat. There are also accredited harvesters that intermittently harvest feral deer. A small numbers of deer are harvested by landowners for personal consumption</p> <p><b>Camel:</b> there is increased interest in farmed production of camel.</p> <p><b>Buffalo:</b> there are three buffalo farms in Queensland: two dairy farms and one for meat production. Only small amounts are produced and sold on the domestic market.</p> <p><b>Wild boar:</b> wild boar are harvested and processed in association with the kangaroo industry. Product is exported to mainly Europe however details are unavailable.</p> <p><b>Mutton birds:</b> nil production in Queensland</p> <p><b>Wallaby:</b> nil production in Queensland</p> <p><b>Kangaroo:</b> In 2010/11 exports of kangaroo (brine/smoked/crumbed) were 1,500 kg valued at \$44,165 or \$29.50 per kg (AHECC: 02109950). Exports of kangaroo (meat and offal) in 2010/11 were 1,984,292 kg valued at \$8,337,379 or \$2.80 per kg (AHECC: 02089011).</p>
<p>(b) If you are a producer/processor, what voluntary systems do you have in place currently with regard to traceability and managing inputs (e.g. feed, veterinary residues) on-farm for minor species or during harvesting of wild game? What are the costs of such systems?</p> <p>(c) Are there any changes with regard to traceability and managing inputs that could improve food safety? Can they be adopted voluntarily or should they be the subject of regulation? What are they and how much would they cost?</p> <p>(d) Will costs be different if the proposals are implemented through a voluntary industry scheme, rather than new regulation?</p> <p>(e) If such measures are adopted by industry, will they have an impact on production, sales, exports and prices?</p> <p>(f) What will be the benefits of better industry practices? Can these benefits be expressed in monetary terms? Who will benefit?</p> <p>(g) What will be the secondary costs and benefits of new practices? For example: What could be the impact on the prices/volumes of both domestic and export markets for the above meats? What, if any, could be the impact on other meat products (beef, lamb, pork and goat)?</p>	<p>Industry to comment on (b), (c), (d), (e), (f) and (g).</p>