

8 October 2013
[19-13]

Abandonment Report – Proposal P1005

Primary Production & Processing Standard for Meat & Meat Products

Food Standards Australia New Zealand (FSANZ) prepared a proposal to develop a national food safety standard covering meat and meat products from farmed cattle, pigs, sheep and goats, harvested goats and rendered products.

Pursuant to subsection 56(1) of the *Food Standards Australia New Zealand Act 1991* (the FSANZ Act), FSANZ has abandoned the Proposal. Information on the reasons for FSANZ's decision is contained in this Report.

Information about rights for a review of this decision is provided in this report and in Part 6 of the FSANZ Act.

Table of Contents

1. EXECUTIVE SUMMARY	2
2. INTRODUCTION.....	3
2.1 THE PROPOSAL.....	3
2.2 THE CURRENT STANDARD.....	3
2.3 REASONS FOR PREPARING THE PROPOSAL	3
2.5 PROCEDURE FOR ASSESSMENT	3
2.6 DECISION.....	3
3. SUMMARY OF THE FINDINGS	4
3.1 RISK ASSESSMENT.....	4
3.2 RISK MANAGEMENT.....	4
3.2.1 <i>Summary of submissions</i>	4
3.3 RISK COMMUNICATION	5
4. REASONS FOR DECISION	5
4.1 ADDRESSING FSANZ'S OBJECTIVES FOR STANDARDS SETTING.....	6
4.1.1 <i>Protection of public health and safety</i>	6
4.1.2 <i>The provision of adequate information relating to food to enable consumers to make informed choices</i>	6
4.1.3 <i>The prevention of misleading or deceptive conduct</i>	6
4.1.4 <i>Subsection 18(2) considerations</i>	6

1. Executive summary

FSANZ began evaluating food safety management in the meat supply chain in 2009, with the first stage of work undertaken through Proposal P1005, considering meat and meat products from farmed cattle, pigs, sheep and goats using extensive and intensive farming, and harvested goats and rendered products for human consumption. The 1st Assessment Report was released in September 2009 for public consultation.

Following discussion with the Meat Standard Development Committee (SDC), FSANZ prepared Proposal P1014 in 2011 to consider risk management measures for those animals not covered under Proposal P1005, including wild game.

In consultation with the SDC, it was agreed to align the two proposals following the first round of consultation on P1014 so that the final round of consultation would occur at the same time. Consequently, FSANZ has abandoned P1005 as the subject matter was incorporated into the remaining Proposal, P1014. This avoids confusion with public consultation on two separate reports and one draft standard.

FSANZ progressed Proposal P1005 (covering major meat species) and Proposal P1014 (covering other animals and wild game) as one proposal— Proposal P1014.

2. Introduction

2.1 The Proposal

In accordance with the *Overarching Policy Guideline on Primary Production and Processing Standards* (Ministerial Guidelines)¹, Food Standards Australia New Zealand (FSANZ) has considered risk management measures for the meat industry for all animal species.

FSANZ began evaluating food safety management in the meat supply chain in 2009, with the first stage of work undertaken through Proposal P1005, considering meat and meat products from farmed cattle, pigs, sheep and goats using extensive and intensive farming, and harvested goats and rendered products for human consumption.

Following discussion with the Meat Standard Development Committee (SDC), FSANZ prepared Proposal 1014 in 2011 to consider risk management measures for those animals not covered under Proposal 1005, including wild game.

2.2 The current Standard

The current Production and Processing Standard for Meat in Chapter 4 of the *Australia New Zealand Food Standards Code* (Standard 4.2.3) includes requirements for producing ready-to-eat meat only and does not include primary production requirements.

All states and territories have separate legislation requiring businesses operating abattoirs/meat slaughtering facilities to be licensed or accredited and to operate in accordance with approved systems to manage meat safety and suitability. The legislation requires the businesses to comply with specific Australian Standards.

2.3 Reasons for preparing the Proposal

The safety of meat and meat products in Australia is currently implemented largely through reference to Australian Standards.²

In the Australian Standards, there are obligations relating to on-farm activities imposed on processors but there are no corresponding obligations on producers. The Australian Standards were prepared and maintained by the Meat Standards Committee until it was disbanded in 2007. The on-going maintenance of these Australian Standards was highlighted as an issue during the early stages of this work.

2.5 Procedure for assessment

The Major Procedure applied to the Proposal.

2.6 Decision

The Proposal has been abandoned.

¹ The Ministerial Guidelines are available at <http://www.foodstandards.gov.au/foodstandards/legislativeandgovernanceforumonfoodregulation/policyguidelines.cfm>

² Productivity Commission Research Report December 2009. Performance Benchmarking of Australian and New Zealand Business Regulation: Food Safety.

The 2nd call for submissions for P1014 considered meat and meat products from all meat species (including those species considered under P1005) and wild game and consults on a draft national standard for meat and meat products.

Under P1014, FSANZ addressed meat and meat products from major and minor meat species (e.g. cattle, sheep, goats, pigs, buffalo, camels, alpacas, llamas, deer, horses, donkeys, rabbits, crocodiles, ostrich and emu) and wild game. P1014 also considered rendered products for human consumption and natural casings. As such, all of the matters examined under P1005, including the issues raised during the first round of public consultation, were included under P1014. This avoided confusion during the second round of public consultation with two separate reports (P1005 and P1014) and one draft standard.

3. Summary of the findings

3.1 Risk assessment

FSANZ identified hazards that may be found in meat, where in the meat supply chain they may be introduced into the animal or the meat and where in the supply chain they may be controlled. FSANZ's amended *Assessment of Microbiological Hazards Associated with the Four Main Meat Species* is at SD2 of the 2nd call for submissions for P1014. The chemical risk profile of meat and meat products is at SD4 of the 2nd call for submissions for P1014.

All documents relating to P1014 are available on the FSANZ website at <http://www.foodstandards.gov.au/code/proposals/Pages/proposalp1014primary5331.aspx>.

3.2 Risk management

An analysis of existing regulatory and non-regulatory measures to manage hazards associated with the major meat species is at SD5 of the 2nd call for submissions for P1014.

3.2.1 Summary of submissions

Consultation is a key part of FSANZ's standards development process. FSANZ acknowledges the time taken by individuals and organisations to make submissions on this Proposal.

Every submission on an application or proposal is reviewed by FSANZ staff, who examine the issues identified and prepare a response to those issues. While not all comments can be taken on board during the process, they are valued and all contribute to the rigour of our assessment.

A SDC advised FSANZ on this work. Members included major industry associations for the cattle, sheep, goat and pig industries, meat processors, the rendering industry, feedlot industry, stock feed manufacturers, the Australian Government Department of Agriculture, Fisheries and Forestry, state and territory meat regulators and the Country Women's Association of Australia. The membership is detailed in SD1 of the 2nd call for submissions report for P1014.

The 1st Assessment Report for P1005 was released for public comment from 23 September to 11 November 2009. Twenty-two submissions were received. Copies of all submissions are available at <http://www.foodstandards.gov.au/code/proposals/Pages/proposalp1005primary4220.aspx>.

Issues raised by submitters included:

- Broadening the scope to cover all meat for human consumption as developing standards over time for major and minor meat species could lead to unintended gaps and overlaps between standards
- Support for a standard to reflect the obligations that farmers supplying animals for slaughter for human consumption must be able to meet (e.g. managing inputs, traceability)
- The need for a mechanism to review existing Australian Standards
- The need for traceability requirements.

These issues are addressed in the 2nd call for submissions for P1014.

3.3 Risk communication

FSANZ developed a communication strategy for P1005 and has prepared material to communicate the decision to create one proposal for P1005 and P1014. Decisions about standards are communicated using social media, publications, the FSANZ website and direct email communication with interested stakeholders.

The process by which FSANZ considers standard matters is open, accountable, consultative and transparent. All Proposal documents are placed on the FSANZ website. Public submissions are called to obtain the views of interested parties and all public comments received are reviewed and considered before approval of variations to the Code by the FSANZ Board.

4. Reasons for decision

In reaching its decision to abandon the Proposal, FSANZ had regard to the same criteria that would apply to an assessment of a proposal. These are outlined below.

- whether costs that would arise from a food regulatory measure developed or varied as a result of the Proposal outweighed the direct and indirect benefits to the community, Government or industry that would arise from the development or variation of the food regulatory measure

A regulation impact statement (RIS) is at SD7 of the 2nd call for submissions for P1014.

- whether other measures (whether available to FSANZ or not) would be more cost-effective than a food regulatory measure developed or varied as a result of the Proposal

This was addressed under SD7 of the 2nd Call for Submissions report for P1014.

- any relevant New Zealand standards

Primary production and processing standards do not apply in New Zealand.

- any other relevant matters.

Other relevant matters were considered in the 2nd call for submissions for P1014. In this instance, it is considered appropriate to abandon P1005 as all of the matters examined under P1005, including the issues raised during the first round of public consultation, are now included under P1014.

4.1 Addressing FSANZ’s objectives for standards setting

FSANZ has considered the three objectives in subsection 18(1) of the FSANZ Act in making its decision.

4.1.1 Protection of public health and safety

Microbiological and chemical hazards associated with the major meat species are controlled by current meat processing requirements.

4.1.2 The provision of adequate information relating to food to enable consumers to make informed choices

The provision of adequate information relating to food to enable consumers to make informed choices is not relevant to the Proposal or the decision.

4.1.3 The prevention of misleading or deceptive conduct

The prevention of misleading or deceptive conduct is not relevant to the Proposal or the decision.

4.1.4 Subsection 18(2) considerations

FSANZ also had regard to the objectives set out in subsection 18(2):

- the need for standards to be based on risk analysis using the best available scientific evidence

FSANZ’s risk analysis relied on the best available scientific evidence. This is provided in the supporting documents in the 2nd call for submissions for P1014.

- the promotion of consistency between domestic and international food standards

There are relevant international standards e.g. the *Codex Code of Hygienic Practice for Meat* (CAC/RCP 58-2005) which was considered in the 2nd Call for Submissions report for P1014.

- the desirability of an efficient and internationally competitive food industry

The preferred option under P1014 integrates the producer and processor providing a national “whole of chain” approach to food safety regulation.

- the promotion of fair trading in food

This was not applicable.

- any written policy guidelines formulated by the Ministerial Council.

The *Overarching Policy Guideline on Primary Production and Processing Standards* specifies a number of high order principles that must be considered when a standard is developed. These will now apply in relation to P1014.

4.2 Rights of review

Section 143 of the FSANZ Act provides that a person whose interests are affected by the decision to abandon P1005 may apply to the Administrative Appeals Tribunal for review of the decision.