8 October 2013
[19-13]

Call for submissions – Proposal P1014

Primary Production & Processing Standard for Meat & Meat Products

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Pursuant to section 61 of the *Food Standards Australia New Zealand Act 1991* (FSANZ Act), FSANZ now calls for submissions to assist FSANZ's consideration of the draft food regulatory measure it has prepared arising from proposals to examine food safety management during primary production and processing of meat and meat products.

For information about making a submission, visit the FSANZ website at information for submitters.

All submissions on applications and proposals will be published on our website. We will not publish material that is provided in-confidence, but will record that such information is held. In-confidence submissions may be subject to release under the provisions of the *Freedom of Information Act 1991*. Submissions will be published as soon as possible after the end of the public comment period. Where large numbers of documents are involved, FSANZ will make these available on CD, rather than on the website.

Under section 114 of the FSANZ Act, some information provided to FSANZ cannot be disclosed. More information about the disclosure of confidential commercial information is available on the FSANZ website at information for submitters.

Submissions should be made in writing; be marked clearly with the word 'Submission' and quote the correct project number and name. While FSANZ accepts submissions in hard copy to our offices, it is more convenient and quicker to receive submissions electronically through the FSANZ website via the link on documents for public comment. You can also email your submission directly to submissions@foodstandards.gov.au.

There is no need to send a hard copy of your submission if you have submitted it by email or via the FSANZ website. FSANZ endeavours to formally acknowledge receipt of submissions within 3 business days.

DEADLINE FOR SUBMISSIONS: 6pm (Canberra time) 3 December 2013

Submissions received after this date will not be considered unless an extension had been given before the closing date. Extensions will only be granted due to extraordinary circumstances during the submission period. Any agreed extension will be notified on the FSANZ website and will apply to all submitters.

Questions about making submissions or the application process can be sent to standards.management@foodstandards.gov.au.

Hard copy submissions may be sent to one of the following addresses:

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Table of Contents

Supporting documents

The following documents which informed the assessment of this Proposal are available on the FSANZ website at
http://www.foodstandards.gov.au/code/proposals/Pages/proposalp1014primary5331.aspx

SD1 Membership of Meat Advisory Committees
SD2 *Assessment of Microbiological Hazards Associated with the Four Main Meat Species*
SD3 *Assessment of the Microbiological Hazards Associated with the Minor and Wild Game Meat Species*
SD4 *A Chemical Risk Profile of Meat and Meat Products*
SD5 Food Safety Management in the Meat Industry
SD6 Regulation Impact Statement
SD7 Compliance Plan for the Primary Production and Processing Standard for Meat and Meat Products

1. Executive summary

FSANZ is examining food safety management in the primary production and processing stages of the meat supply chain. During the first round of consultation, FSANZ progressed the work under two separate proposals, P1005 (covering cattle, sheep, goats, pigs) and P1014 (covering other animals and wild game). These two Proposals are now consolidated into the one Proposal, P1014.

Under P1014, FSANZ is addressing 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 is also considering rendered products for human consumption and natural casings.

Current risk management framework

The safety of meat and meat products in Australia is currently implemented through reference to Australian Standards under various state and territory Acts and Regulations.

The *Australia New Zealand Food Standard Code* (the Code) currently does not contain requirements that address hazards and traceability during primary production[1] for the major and minor meat species. Managing inputs, such as the use of agricultural and veterinary chemicals (including in feed and water) and animal/property identification are, however, controlled under various state and territory Acts and Regulations.

The harvesting and primary processing of wild game animals is addressed by the Australian Standard AS 4464-2007 *Hygienic Production of Wild Game Meat for Human Consumption* and has requirements for field harvesters regarding sourcing and identifying wild game animals.

State and territory legislation further manages meat processing activities through Australian Standards, a well-recognised benchmark that is supported by industry. These arrangements will be retained under the preferred option.

Assessment outcomes

FSANZ concluded that microbiological and chemical hazards associated with major and minor meat species and wild game are controlled by current meat processing requirements. The Australian Standards impose obligations relating to on-farm activities on processors but there are no corresponding obligations on producers.

Risk management

FSANZ has considered the issues raised during consultation and the advice provided by the Meat Standard Development Committee and the Minor Meat Species and Wild Game Working Group in deciding to prepare a draft variation to Standard 4.2.3. The draft variation includes primary production requirements for traceability, inputs and management of waste for the major and minor meat species e.g. cattle, sheep, goats, pigs, buffalo, camels, alpacas, llamas, deer, horses, donkeys, rabbits, crocodiles, ostrich and emu. These primary production requirements do not apply to wild game animals. An editorial note has been included to explain that state and territory laws require people involved in the slaughter and processing of animals for human consumption, to comply with the Australian Standards.

FSANZ has decided to prepare a draft variation for the following reasons:

[1] Primary production includes the rearing of animals for human consumption, feedlots, saleyards and transporters of animals (to saleyards, between properties, and to the abattoir).

- Including minimum primary production requirements for managing inputs and waste and traceability into Standard 4.2.3 reflects current practices, would assist meat processors in complying with the requirements under the Australian Standard, and improve the application of corrective actions at the appropriate point in the supply chain, particularly in the event of a food safety incident at primary production.

- The draft variation imposes little or no new costs on farmers as the requirements covered in the proposed amended standard are already covered by voluntary schemes and legislation. Farmers should already be in compliance with these requirements.

- Preparing a draft variation was supported by regulators and the meat industry during consultation.

- Consistent with the principles articulated in the *Overarching Policy Guideline on Primary Production and Processing Standards*[2].

- The draft variation:

  - enables management of hazards through the entire meat supply chain by establishing a set of food safety requirements that all businesses must meet i.e. integrates the producer and processor providing a national "whole of chain" approach to food safety regulation
  - the regulatory option is a low cost refinement which will make the regulation of meat more robust. More stringent regulatory options have not been considered because risks are well managed.
  - will provide the public and industry with assurance that the regulator can investigate, where appropriate, food safety matters at any point in the meat supply chain.
  - is consistent with the principles of meat hygiene applying to primary production articulated in the *Codex Code of Hygienic Practice for Meat* (CAC/RCP 58-2005).

[2] The policy guideline is available at http://www.health.gov.au/internet/main/publishing.nsf/Content/foodsecretariat-policy-guidelines

2. Introduction

At the request of the Council of Australian Governments (COAG) Legislative and Governance Forum on Food Regulation[3], Food Standards Australia New Zealand (FSANZ) is considering food safety throughout all parts of the food supply chain for all industry sectors. In accordance with the *Overarching Policy Guideline on Primary Production and Processing Standards* (Ministerial Guidelines)[4], FSANZ is examining food safety management in the primary production and processing stages of the meat supply chain. During the first round of consultation, FSANZ progressed the work under two separate Proposals, P1005 (covering cattle, sheep, goats, pigs) and P1014 (covering other animals and wild game). These two Proposals have been consolidated into one Proposal, P1014.

Under P1014, FSANZ is addressing 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 is also considering rendered products for human consumption and natural casings.

2.1 Major and minor meat species and wild game

FSANZ commenced its evaluation of food safety management in the meat supply chain in 2009. The first stage of work undertaken through Proposal P1005 considered meat and meat products from farmed cattle, pigs, sheep and goats using extensive and intensive farming, rangeland goats and rendered products for human consumption. The 1st Assessment Report, released in September 2009 for public consultation, is available at http://www.foodstandards.gov.au/code/proposals/pages/proposalp1005primary4220.aspx.

A Standard Development Committee is advising FSANZ on this work. Members include major industry associations for the cattle, sheep, goat and pig industries, meat processors, the rendering industry, feedlot industry, stock feed manufacturers, Department of Agriculture, Fisheries and Forestry, state and territory meat regulators and the Country Women's Association of Australia.

Following discussion with the SDC, FSANZ prepared Proposal 1014 in 2011 to consider risk management measures for those animals not covered under Proposal 1005, including wild game. The 1st call for submissions and related assessment summary is available at http://www.foodstandards.gov.au/code/proposals/pages/proposalp1014primary5331.aspx.

The Meat Minor Species and Wild Game Working Group (Working Group) is advising FSANZ on the minor species and wild game work. Members include producers and processors of minor meat species and wild game e.g. crocodile, buffalo, camel, rabbit, deer, ostrich, kangaroo and emu, state and territory meat regulators. The membership of both committees is detailed in SD1.

Following consolidation of both proposals, this 2nd call for submissions and assessment summary for P1014 considers meat and meat products from all meat species and wild game and consults on a draft national standard for meat and meat products.

2.2 The Proposal

Under P1014, FSANZ is addressing meat and meat products from:

[3] Formerly known as the Australia and New Zealand Food Regulation Ministerial Council
[4] The Ministerial Guidelines are available at http://www.foodstandards.gov.au/foodstandards/legislativeandgovernanceforumonfoodregulation/policyguidelines.cfm

- major and minor meat species e.g. cattle, sheep, goats, pigs, buffalo, camels, alpacas, llamas, deer, horses, donkeys[5], rabbits[6], crocodiles[7], ostrich and emu[8]
- wild game[9].

P1014 is also considering:

- rendered products for human consumption[10]
- natural casings[11].

Rendering is a by-products industry providing additional value from the animal above the value of the meat. This industry enables those parts of meat animals that are not used for human consumption as meat or offal to be used for human consumption (tallow, oils), for animal food (tallow, pet food, meat and bone meal etc) or for non-food industries (pharmaceuticals).

Natural casings, made from the sub-mucosal layer of intestines obtained from intestines emptied of ingesta ('green runners') after cleaning, may be used for sausages and some smallgoods. The intestines are obtained from sheep, goats, pigs and cattle.

There are specific Australian Standards for these products; AS 5011- 2001*: Hygienic Production of Natural Casings for Human Consumption* and AS 5008 - 2007*: Hygienic Rendering of Animal Products.*

2.3 The current Standard

SD4 provides greater detail on the current regulatory framework for the primary production and processing stages of the meat supply chain.

2.3.1 Primary production

Primary production includes the rearing of animals for human consumption, feedlots, saleyards and transporters of animals (to saleyards, between properties, and to the abattoir).

There are no requirements in the *Australia New Zealand Food Standards Code* (the Code) applying to on-farm production of meat animals but there are requirements applying to dairy cows through the measures to ensure safe dairy products under Standard 4.2.4 – Primary Production and Processing Standard for Dairy Products.

The current Production and Processing Standard for Meat in Chapter 4 (Standard 4.2.3) includes requirements for producing ready-to-eat meat only and does not include primary production requirements.

2.3.2 Processing

Processing includes the admission of animals for slaughter, slaughter, dressing, boning, packing and production of meat and meat products.

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[5] All of the species within the scope of AS4696-2007 *Hygienic Production and Transportation of Meat and Meat Products for Human Consumption*
[6] Species covered under AS 4466-1998 *Hygienic Production of Rabbit Meat for Human Consumption*
[7] Species covered under AS 4467-1998 *Hygienic Production of Crocodile Meat for Human Consumption*
[8] Species covered under AS5010 – 2001 *Hygienic Production of Ratite Meat for Human Consumption*
[9] Wild game is that as defined under AS 4464-2007 *Hygienic Production of Wild Game Meat for Human Consumption*
[10] As defined in AS 5008 - 2007*: Hygienic Rendering of Animal Products.*
[11] As defined in the scope of AS 5011- 2001*: Hygienic Production of Natural Casings for Human Consumption*

The safety of meat and meat products in Australia is currently implemented through reference to Australian Standards. All states and territories have legislation that requires 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 processing of the major and minor meat species is covered by the following Australian Standards:

- AS 4696-2007 *Hygienic Production and Transportation of Meat and Meat Products for Human Consumption*
- AS 4466 - 1998 *Hygienic Production of Rabbit Meat for Human Consumption*
- AS 4467-1998 *Hygienic Production of Crocodile Meat for Human Consumption*
- AS 5010 – 2001 *Hygienic Production of Ratite Meat for Human Consumption*.

Process control is achieved by applying hazard analysis critical control point (HACCP) methodology.

The harvesting and primary processing of wild game animals is addressed by a specific Australian Standard:

- AS 4464-2007 *Hygienic Production of Wild Game Meat for Human Consumption*.

This standard includes the harvesting of wild game animals and holding of carcases at field depots[12] within its scope. Harvesting includes the killing of wild game animals, their identification, bleeding, field dressing, cooling, hygienic storage and transport up to the point of their presentation for inspection at a wild game meat processing premises.
AS 4464-2007 requires only healthy wild game animals to be harvested, identification of the field harvester and place of harvest, measures to reduce contamination of the carcase, carcase parts

Harvesters and field depots are also required to have an effective waste disposal program for the storage, handling and removal of waste that does not jeopardise the wholesomeness of wild game animal carcases[13].

2.4 Reasons for preparing the Proposal

The Australian Standards impose obligations on processors relating to on-farm activities but there are no corresponding obligations on producers in food safety legislation. The Food Standards Code currently does not contain requirements that address hazards and traceability during primary production for the major and minor meat species. The Inter-Governmental Food Regulation Agreement seeks to have a national “whole of chain” approach to food safety regulation i.e. responsibility for food safety is shared between producer and processor with corrective actions applied at the appropriate point in the supply chain.

In the event of a food safety incident, regulators do not currently have the ability under the current arrangements to investigate food safety matters through the entire meat supply chain (e.g. the operation of feedlots and saleyards are not covered by food legislation). Consequently regulators are limited in accessing databases to monitor traceability compliance and access in times of an incident. A jurisdictional gap in food regulatory coverage has been identified for agencies with public health functions in the event of a food safety incident that warrants follow up at the primary production stage.

[12] This is defined in AS4464-2007 as a depot approved by the controlling authority (or any other authority as required under state or territory legislation) in which wild game animal carcases are held temporarily under refrigeration, pending transport to a wild game meat processing premises.
[13] means an undressed or field dressed body of a wild game animal that is being or is intended to be dressed or prepared in a wild game meat processing premises and includes any associated organs.

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 first round of consultation on this work.

2.5 Procedure for assessment

The Proposal is being assessed under the Major Procedure.

3. Summary of the assessment

3.1 Hazards and control measures

FSANZ's amended *Assessment of Microbiological Hazards Associated with the Four Main Meat Species* is at SD2. The *Assessment of the Microbiological Hazards Associated with the Minor and Wild Game Meat Species* is at SD3. *A Chemical Risk Profile of Meat and Meat Products* is at SD4. An analysis of regulatory and non-regulatory requirements that apply to the major and minor meat species and wild game is outlined in SD5.

3.1.1 Microbiological hazards

3.1.1.1 Major species (cattle, sheep, goats, pigs)

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.

SD2 identifies hazards (both identified and potential) that may be associated with meat from the four main meat species (cattle, sheep, goats and pigs), and lists pathogenic microorganisms that, if unmanaged, present or may potentially present a risk to public health. The information has been derived from industry data, microbiological analyses and published scientific data. The document does not attempt to document the severity of illness presented by these hazards, nor does it determine the likelihood of their occurrence in the final meat product or characterise the risk they may present. The report does, however, review meat associated foodborne disease evidence in Australia.

A range of potential hazards have been identified along the production and primary processing chain. Limited, if any, prevalence and incidence data is available for these hazards in meat. Given the lack of epidemiological evidence also available, it would suggest that the likelihood of these hazards causing illness from consumption of meat is quite low.

The principal microbiological hazards associated with the four main animal species are:

Animal	Principal microbiological hazard
Cattle	Pathogenic *Escherichia coli*, *Salmonella* spp., *Campylobacter jejuni* and *C. coli*,
Sheep	Pathogenic *Escherichia coli* and *Salmonella* spp.
Goats	Pathogenic *Escherichia coli* and *Salmonella* spp.
Pigs	*Salmonella* spp., *Yersinia enterocolitica* and *Y. pseudotuberculosis*, *Toxoplasma gondii*, *Campylobacter jejuni* and *C. coli*.

During the animal production phase, there are a number of key inputs and activities which influence the manner in which hazards may be introduced or amplified. They are summarised below.

Input and/ or activity	Comment	Step in chain where control may be applied
Animal Health	Pathogens may exist in the animal with or without exhibiting clinical signs	Animals with clinical signs of disease or illness are identified and managed at: • dispatch from farm/saleyard • arrival at abattoir • ante-mortem inspection. Without clinical signs, potential hazards may be identified and managed at: • slaughter to minimise contamination from external surfaces or internal spillage. • post-mortem inspection.
Stress	Animals may be more susceptible to infection and/or have increased faecal shedding. Pathogens colonise the gut	Minimise exposure of animals to stress during: • transport • lairage.
Feed	Feed has the potential to introduce pathogens into the gut or environment	Manage input of manure and fertiliser onto pasture Control supplements Oversight of ensilage operations
Water	Contributes to internal and external contamination	Access of animals to suitable drinking water
Environment and management of biosecurity	Pathogens may contaminate external surfaces of animal, or can lead to ingestion or infection of the animal	Pasture management Vermin and pest control Good agricultural practices Sound animal husbandry

During the primary processing stage, there are two main sources of contamination to the meat carcass:

- external contamination: from the animal (hide, skin, fleece, hooves, faeces etc) and the environment (including personnel), and
- internal contamination: during evisceration and dressing operations and where the spillage of gastrointestinal tract contents occurs.

The burden of illness that may be attributed to meat and meat products was assessed by evaluating OzFoodNet outbreak data. Sixty-six outbreaks of foodborne illness associated with meat products in Australia were reported to OzFoodNet between January 2003 and June 2008. More recent data drawn from published OzFoodNet reports[1] indicate 42 meat-associated outbreaks were reported between June 2008 and December 2011. While the data demonstrates the occurrence of outbreaks involving meat, they are usually due to dishes containing a meat product. Attribution to a specific meat source is either limited or difficult to establish with any confidence. Where meat products have been implicated in foodborne illness, generally these were further processed products and the most common causative microorganisms were *Salmonella* serotypes, *Clostridium perfringens* and *Staphylococcus aureus*. The undercooking of meat and temperature abuse after cooking were the major causes of meat-associated outbreaks.

[1] OzFoodNet Annual (2008, 2009, 2010) and Quarterly (2011) reports available at: http://www.ozfoodnet.gov.au/internet/ozfoodnet/publishing.nsf/Content/reports-1

The findings of this assessment are consistent with the significant body of evidence that exists for the Australian domestic meat industry indicating that domestically-reared red meat (cattle, sheep, goats) and pigs, processed under existing standards, present a low risk to public health. Also evidenced is that industry personnel are mature in their knowledge and manage food safety risks.

Considerable data are 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.

3.1.1.2 Minor species and wild game

The objective of SD3 was to evaluate any key gaps or inconsistencies in production and processing risk factors between major meat species (cattle, sheep, pig and goat) and minor and wild game meat species, which may necessitate different risk management measures to control relevant microbiological hazards. Minor species assessed were: deer, camel, buffalo, emu, ostrich, crocodile and rabbit, with wild game species: wild boar, mutton birds, wallaby and kangaroo (note: a brief description of these industries is also provided in Attachment 1 of SD5).

In addressing this objective, and within the context of the assessment, the following question was considered:

- Are there differences in risk factors associated with different production and processing requirements for minor and wild game species (ie rabbit, ratite etc.) compared to major meat species?

This assessment outlined key risk factors, including inputs and stages of production and processing of minor and wild game species, compared to the major meat species. The report also evaluated published and unpublished microbiological and epidemiological data from Australian and international sources (where available).

The evaluation of production factors for the minor meat species against those employed for cattle showed very little differences. Some differences were evident for wild game species as they are not subject to husbandry practices, and source food and water from their surroundings. However, there was no evidence to suggest these differences had a major influence on the microbiological quality of the raw meat.

Abattoir and slaughtering operations are currently mandated under Australian Standards to ensure that meat produced for human consumption is wholesome and safe. Regardless of the type of animal, or husbandry practices employed to rear or harvest the animal, once the animal is received at the abattoir gate and enters lairage, slaughtering operations are undertaken using very similar processing steps. Minor differences exist depending on the plant's capabilities and design but the main steps remain the same.

Limited data are available on the type, prevalence and levels of microorganisms present on animals before slaughter, or on carcasses post-processing from the minor and wild game meat species. This is particularly evident in the Australian context. Where evidence is available, the domestic and international data indicate the same pathogenic microorganisms are associated with minor and wild game animals as other meat producing animals. Further, little evidence exists, either domestically or internationally, that foodborne illness is associated with consuming meat from minor and wild game species.

No substantial differences exist in the production and processing risk factors for minor and wild game meats compared to those of the major meat species. Microbiological hazards associated with minor and wild game species are consistent with those identified for other meat animals commonly consumed in Australia and are controlled by current meat processing requirements.

3.1.2 Chemical risk profile of meat and meat products

The chemical risk profile of meat and meat products was undertaken to gather the following information:

- identify the chemicals associated with the Australian meat production and processing chain which may potentially impact on public health and safety
- assess the potential public health and safety risks associated with these chemicals, in the context of the current regulatory system
- identify any areas in the current regulatory system which require further attention in relation to addressing potential public health and safety risks associated with chemicals in meat and meat products.

SD4 identifies and examines where chemicals may enter the meat supply chain from meat production through to retail of meat and meat products. It also considers the relevant inputs into the meat primary production and processing chain. The chemical risk profile considered the following:

- agricultural and veterinary chemicals used in primary production
- environmental contaminants, including heavy metals and organic contaminants
- natural chemicals found in plants, fungi or bacteria associated with plants
- food processing by-products
- food additives, processing aids and chemicals that may migrate from packaging.

The key findings from the risk profile in respect to chemical hazards are:

- there are extensive regulatory and non-regulatory measures in place along the meat industry primary production chain resulting in minimal public health and safety concerns regarding the use or presence of chemicals in meat and meat products
- extensive monitoring of chemical residues in meat over many years has demonstrated a high level of compliance with the regulations
- continuation of the current management practices, particularly monitoring programs for chemicals along the primary production chain, will ensure that the meat industry continues to maintain a high standard of public health and safety
- there are a number of areas where further research or monitoring of potential chemical hazards would assist in providing further reassurance that the public health and safety risk is low.

3.1.3 Food safety management in the meat industry

An analysis of existing regulatory and non-regulatory measures to manage hazards is at SD5. All species are currently bound by Australian Standards at processing, with some species also having coverage at the primary production level e.g. game meat.

Incidents will still occur that warrant follow up back to the primary production level. In the event of such an incident, a jurisdictional gap in food regulatory coverage back to the primary production level for agencies with public health functions under the Food Act has been identified. The issue of this gap is addressed in section 3.2.11.

3.1.4 Conclusion

FSANZ's evaluation of the hazards and current management practices in Australia indicates that there are no identified unmanaged food safety risks for the meat sectors.

3.2 Risk management

3.2.1 Risk management options

When assessing this Proposal and the subsequent development of a food regulatory measure, FSANZ has had regard to the following matters in section 59 of the FSANZ Act:

- whether costs that would arise from a food regulatory measure developed or varied as a result of the proposal outweigh 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 summary of the regulation impact statement (RIS) is at section 3.2.5. The RIS suggests that the proposed measure imposes little or no new costs on farmers as the requirements covered in the proposed amended standard are already covered by voluntary schemes and legislation

- 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

  See section 3.2.5.

- any relevant New Zealand standards

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

- any other relevant matters.

  The objectives of standard-setting, which are set out in subsection 18(1) of the FSANZ Act and a list of matters that FSANZ is to have regard to in subsection 18(2), provide an indication of the scope of 'other relevant matters'. The section 18 objectives and matters are addressed below.

For the 1st call for submissions for P1005 (cattle, sheep, goats and pigs), three options were proposed:

- Option 1 – s*tatus quo* i.e. FSANZ would not make any changes to the Code
- Option 2 – the current self-regulatory approach for primary production and the existing meat safety requirements for processing in the Australian Standards being incorporated into the Code
- Option 3 – development of food safety requirements for primary production and the existing meat safety requirements for processing in the Australian Standards being incorporated into the Code.

Generally speaking, producers favoured retaining self-regulation on-farm because the food safety risk is being managed. They did not support additional regulatory requirements for primary production because of the unnecessary regulatory burdens and associated compliance costs to the primary production sector. The cost-benefit analysis is at section 3.2.5.

The submissions supporting additional regulatory requirements for primary production did not disagree that the current system manages risk or that industry programs are effective, however they identified an opportunity to improve the system such as integrating producer and processor.

For the minor meat species and wild game, FSANZ proposed two options for the 1st call for submissions:

- Option 1 – develop a draft national standard containing minimal primary production requirements, where relevant, for traceability, inputs and managing waste; and transfer of the processing controls in the Australian Standards into the Code
- Option 2 – abandon the Proposal after considering submissions received from the first round of public comment.

There was support for the first option in principle, provided potential regulatory gaps for animal welfare were addressed before the primary production and processing is implemented. Regulatory oversight of animal welfare practice in abattoirs is currently enabled via animal welfare provisions in the Australian Standards. Animal welfare issues are outside the scope of the primary production and processing standard.

In the early stages of this work, FSANZ acknowledged the role the Australian Standards for processing have played in ensuring the safety of meat in Australia, but considered that with the disbandment of the Meat Standards Committee in 2007, there was no longer a mechanism to update or review the current standards in the meat processing sector. This issue is being resolved and therefore the food safety elements in the Australian Standards do not need to be incorporated into the primary production and processing standard for meat and meat products in the Code. These documents, and therefore the animal welfare provisions, will be retained under state and territory legislation.

Following consideration of the submissions received from the first round of public comment, FSANZ has prepared a draft variation to Standard 4.2.3. In doing so, FSANZ considered the two options available under section 60 of the FSANZ Act:

- Option 1 involved preparing a draft variation to Standard 4.2.3 to include primary production requirements, where relevant, for traceability, inputs and managing waste. The requirements in the current Australian Standards for processing would not be duplicated or incorporated into the Code (i.e. no additional meat processing requirements would be included in Standard 4.2.3) but Standard 4.2.3 would include an editorial note stating that processors are required under state/territory law to comply with specified Australian Standards . The Note also lists the relevant standards.

- Option 2 involved retaining the current situation and abandoning the Proposal. That is, FSANZ would not make any changes to the Code or propose any other regulatory changes.

3.2.1.1 Option 1 – requirements on primary producers for managing inputs and waste and traceability

This option enables management of hazards through the entire meat supply chain by establishing a set of food safety requirements that all businesses must meet.

The requirements to address potential hazards on-farm, at the saleyards and during transport[14] for the major and minor meat species animals e.g. cattle, sheep, goats, pigs, buffalo, camels, alpacas, llamas, deer, horses, donkeys, rabbits, crocodiles, ostrich and emu are:

- ensuring that inputs do not adversely affect the safety or suitability of meat or meat products
- storing, handling and disposing of waste in a manner that will not adversely affect the safety or suitability of meat or meat products
- having a system in place that can identify the persons from whom the meat producer received an animal and to whom the meat producer supplied an animal.

Clause 6.2 of AS 4696-2007 requires that meat processors source animals only from a holding that has a system in place that is capable of reliably providing a list of the place of production or the saleyards of the animals in the consignment, or the place of production of each animal or the areas from which the animals in the consignment were captured. States and territories require evidence at the point the animal is received, in the form of National Vendor Declarations (NVDs) or equivalent documentation recording management of feed and waste and animal traceability as proof or assurance that the animals have been raised in accordance with the above good husbandry practices and are traceable. However some regulators have advised of situations where processors are faced with incomplete or incorrect documentation regarding matters that should be addressed by producers (i.e. at the farm level).

As identified during the consultation on this work, inputs such as the use of agricultural and veterinary chemical products have the potential to cause contamination of meat and significantly affect consumer confidence in meat safety. These inputs e.g. animal feed (such as pasture, grains, silage and concentrate supplements), water (including recycled water), chemicals or other substances used in connection with the primary production activities are more easily controlled at the primary production stage, rather than applying costly monitoring at the processor level and the cost in traceback and corrective action.

For animals slaughtered in the wild similar controls for animal production, feed, water or the environment are not appropriate. Requirements for sourcing and identifying wild game animals and determining their health status before slaughter are legislated in all states and territories by reference to the Australian Standard for the *Hygienic Production of Wild Game Meat for Human Consumption* (AS 4464-2007). These have been detailed in section 2.1.2.

The benefits of preparing a draft variation to Standard 4.2.3 are:

- There will be legislative requirements on producers to provide compete and correct documentation to processors regarding on-farm matters. This is fundamental in enabling meat processors or abattoirs to comply with their requirements.

- Food safety regulators will have the legislative backing to investigate, on an incident response basis, food safety matters throughout the entire meat supply chain. This ability does not exist for all states under current primary production regulations (e.g. operating of feedlots, saleyards are not within the remit of legislation).

- Agencies with public health functions will be able to follow up issues on-farm, at feedlots and saleyards in the event of a food safety incident (currently cannot do this).

[14] There are requirements applying to dairy cows through the measures to ensure safe dairy products under Standard 4.2.4 – Primary Production and Processing Standard for Dairy Products

- Jurisdictions will have justification for accessing databases to monitor traceability compliance and access to farms, saleyards and feedlots to investigate and respond in times of an incident. Resources would determine these situations and jurisdictions have indicated that actions would only be on a reactive basis.

- jurisdictions will be working within a clear regulatory framework ensuring timely investigation and response providing the public and industry with assurance that the regulator can investigate, where appropriate, food safety matters at any point in the meat supply chain

As raised in submissions, it is ineffective and costly to manage a number of hazards during processing as the options for remedial action are limited (i.e. disposal of product is usually the only option available to the processor with consequent costs).

3.2.1.2 Option 2 – Abandon the Proposal

FSANZ decided not to abandon the Proposals for the following reasons:

- inconsistent with the principles articulated in the *Overarching Policy Guideline on Primary Production and Processing Standards* that standards address food safety across the entire food chain where appropriate and deliver a consistent regulatory approach across the primary production and processing standards.

- the current situation of obligations relating to on-farm activities on processors in the Australian Standards without any corresponding obligations on producers would be retained.

For example, AS4696-2007 *Hygienic Production and Transportation of Meat and Meat Products for Human Consumption* AS 4696-2007 requires processors to only accept animals that are sourced from holdings where animals are raised according to good husbandry practices and are not fed feedstuffs that could jeopardise the wholesomeness of meat and meat products derived from the animals. The holding must also have a system for identifying disease, abnormality or treatment of animals that could affect their fitness for slaughter. The importance of managing potential hazards at the appropriate stage of the meat supply chain was highlighted during the consultation on this work.

State and territory laws control inputs such as the use of agricultural and veterinary chemicals (including in feed and water), the ruminant feed ban and controls on grazing. Animal/property identification is mandated in legislation and state and territory governments are progressively extending the scope of animals that must be identified. However, there are currently no requirements for traceability during primary production in the Food Standards Code. During consultation, the issue of state and territories having different regulatory approaches with regards to animal traceability was raised. Submissions also stressed the importance of starting traceability on farm to allow processing traceability systems to be effective and to ensure effective trace back and incident response.

As with other industries where FSANZ has developed primary production and processing standards i.e. seafood, eggs, poultry and dairy, many hazards for meat can be more practically managed during the primary production stages.

3.2.2 Preparation of a draft variation

FSANZ has considered the issues raised during consultation (section 3.3.2) and the advice provided by the Meat Standard Development Committee and the Minor Meat Species and Wild Game Working Group in deciding to prepare a draft variation to Standard 4.2.3.

The draft variation includes minimal primary production requirements for traceability, inputs and management of waste for the major and minor meat species. These primary production requirements don't apply to wild game animals. The AS 4464-2007 *Hygienic Production of Wild Game Meat for Human Consumption* already has requirements on field harvesters regarding sourcing and identification of wild game animals.

Standard 4.2.3 would not duplicate or incorporate the Australian Standards for processing (i.e. no additional meat processing requirements would be included in Standard 4.2.3) but include an editorial note stating that processors are required to comply with specified Australian Standards under state/territory law and list the relevant standards.

As outlined in section 3.1, Standard 4.2.3 (Division 3) contains requirements for the production of ready-to-eat meat. As advised by the Meat Standard Development Committee, the current requirements in Standard 4.2.3 for ready-to eat-meat and additional requirements for uncooked comminuted fermented meat are retained.

3.2.3 Natural casings

Under the state and territory legislation, businesses are required to comply with AS 5011-2001*: Hygienic Production of Natural Casings for Human Consumption*. This standard contains the minimum requirements for preparing and processing natural casings from the intestines of cattle, sheep, goats and pigs. The businesses are also required under AS 5011-2001 to comply with AS 4696-2007 *Hygienic Production and Transportation of Meat and Meat Products for Human Consumption*. The removal of intestines and preparation of runners at the abattoir and the preparation of casings at a separate location (whether or not the same business) are covered by AS 4696-2007. Under AS 5011-2001, the intestines can only be obtained after post mortem inspection (so the dispositions in AS 4696-2007 would apply).

The requirements in these standards manage any microbiological and chemical hazards associated with the production and processing of natural casings. The on-going maintenance of the Australian Standard following the disbandment of the Meat Standards Committee is being resolved and there is no need to duplicate or incorporate the Australian Standards requirements into the Code.

3.2.4 Rendered product for human consumption

There are two Australian Standards relevant to renderers; AS 4696-2007 *Hygienic Production and Transportation of Meat and Meat Products for Human Consumption* and the AS 5008-2007 *Hygienic Rendering of Animal Products*. There is also a Code of Practice for Hygienic Rendering of Animal Products 2007 produced by the Australian Renderers Association Inc.

The AS 5008-2007 *Hygienic Rendering of Animal Products* contains requirements for the production of safe rendered product by ensuring the hygienic rendering of biological materials from animals. Under state and territory food legislation it is an offence to sell food that is unsuitable which includes food that is the product of a diseased animal or animals killed otherwise than slaughter. The requirements for further processing of products in AS 4696-2007 *Hygienic Production and Transportation of Meat and Meat Products for Human Consumption* specify that the rendering of meat and meat products must achieve the destruction of target micro-organisms in the rendered product and must ensure viable *Clostridium perfringens* spores are not present in the rendered product immediately on completion of rendering. *Clostridium perfringens* is used as an indicator of the effectiveness of the heat treatment.

The AS 5008-2007 requires annual validation and validation whenever the process changes or is modified. Laboratory results must indicate that *Clostridium perfringens* is <10/g of each of 10 consecutive days of operation. If *C. perfringens* is detected the heat process must be adjusted and further samples taken to 'validate' the process.

For post processing contamination, the business is required to 'effectively manage the risk of *Salmonella* spp. contamination in all processed animal protein', sample to verify this is occurring and, should a sample be positive, review hygiene procedures, take corrective action and verify the action through sampling.

The requirements in these standards manage any microbiological and chemical hazards associated with the production and processing of rendered products for human consumption. The on-going maintenance of the Australian Standard following the disbandment of the Meat Standards Committee is being resolved and there is no need to duplicate or incorporate the Australian Standards requirements into the Code.

3.2.5 Regulation impact statement

Meat production is a large high value industry in Australia which is intensely and extensively monitored and regulated. In 2011, Meat and Livestock Australia (MLA) estimated that the value of the industry was $16 billion per year.

FSANZ is presently considering amending Standard 4.2.3 of the Code to include minimal primary production requirements for traceability, inputs and management of waste for farmed animals. These changes will not apply to wild game animals.

The Australian Standards presently impose obligations on processors relating to on-farm activities but there are no corresponding obligations on producers in food safety legislation. This means that in many States and Territories there is an inability to investigate food safety issues in the primary production sector without activating emergency powers under their respective Food Acts. Consequently, a range of issues are not being investigated and managed that do not meet the definition of an emergency but, if left, could cause issues in the long term. An example could be the suspected repeated incorrect filling out of documentation provided to an abattoir.

These changes will not alter the regulatory costs for the vast majority of farmers nor substantially reduce risks as the meat industry is already managing risk well. However, they are seen as valuable as they will give food safety regulators improved capacity to regulate the industry more holistically across the entire production chain. Incidents will still occur in the future that will warrant follow up at the primary production level. Resources would determine these situations and jurisdictions have indicated that actions would only be on a reactive basis.

Recent research conducted for FSANZ on the cost of major food safety incidents found that FSANZ may have considered costs too narrowly in past and they may, in fact, be much larger than we have previously thought. The research suggests that the cost of averting behaviour and potential macroeconomic effects should be taken into account. This wider conception of costs supports the value of seeking to achieve further, albeit small reductions in risk, providing the cost is likewise small.

This analysis considers two options—the status quo and a regulatory approach.

The regulatory option is the FSANZ preferred option detailed above. The regulatory option imposes little or no new costs on farmers as the requirements covered in the proposed amended standard are already covered by legislation. Farmers should already be in compliance with these requirements.

The regulatory option is a low cost refinement which will make the regulation of meat more robust. Consultation to date indicates this change is supported by regulators and the meat industry**.** More stringent regulatory options have not been considered because risks are well managed.

The Primary Production and Processing Standard will provide State and Territory regulators with the ability to investigate primary production food safety matters with a view to facilitating industry compliance on an educative basis. Punitive measures may only require consideration once clear evidence of unacceptable practice is established. Moreover, the minor adjustment to the regulatory arrangements that would be delivered through this Standard would improve the capacity of food safety regulators to regulate across the entire meat supply chain and maximise the opportunity to avert potential significant economic consequences for industry and the broader Australian community that may arise from food safety incidents associated with meat.

FSANZ invites comments on this Consultation RIS (SD6).

3.2.6 Addressing FSANZ's objectives for standards-setting

FSANZ has also considered the three objectives in subsection 18(1) of the FSANZ Act during the assessment.

3.2.6.1 Protection of public health and safety

As identified in SD2, SD3, SD4 and SD5, microbiological and chemical hazards associated with major and minor meat species and wild game species are controlled by current meat processing requirements.

3.2.6.2 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 assessment of P1014.

3.2.6.3 The prevention of misleading or deceptive conduct

The prevention of misleading or deceptive conduct is not relevant to the assessment of P1014.

3.2.6.4 Subsection 18(2) considerations

FSANZ has also had regard to the following matters listed 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. See the supporting documents.

- the promotion of consistency between domestic and international food standards

  There are relevant international standards. However, the preferred option is consistent with the principles of meat hygiene applying to primary production articulated in the *Codex Code of Hygienic Practice for Meat* (CAC/RCP 58-2005). Therefore it is unlikely to have a significant effect on international trade.

- the desirability of an efficient and internationally competitive food industry

  The preferred option enables management of hazards through the entire meat supply chain by establishing a set of food safety requirements that all businesses must meet. This option integrates the producer and processor providing a national "whole of chain" approach to food safety regulation.

- the promotion of fair trading in food

  This is not applicable.

- any written policy guidelines formulated by the Ministerial Council[15].

  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. The objective of this Proposal is to ensure an efficient and competitive food industry by providing a national "whole of food chain" approach to food safety. The preferred option is consistent with the principles articulated in the *Overarching Policy Guideline on Primary Production and Processing Standards* that standards address food safety across the entire food chain where appropriate and deliver a consistent regulatory approach across the primary production and processing standards.

3.3. Risk communication

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

3.3.1 Consultation

The FSANZ process is consultative and transparent and seeks to engage with the industry concerned, state and territory government agencies, and consumers. To assist in developing standards, FSANZ established the Meat Standard Development Committee and the Meat Minor Species and Wild Game Working Group to provide scientific, technical, regulatory/enforcement, benefit and cost analysis or other relevant input.

Parties identified as being affected by this Proposal include:

- producers of major and minor meat species
- wild game harvesters and field depots
- transporters of animals and meat products
- processors of minor species and wild game
- Industry councils and associations including:
  - The Cattle Council of Australia
  - The Sheepmeat Council of Australia
  - Australian Dairy Farmers Limited
  - Australian Lot Feeders Association
  - Meat and Livestock Australia Limited
  - Australian Meat Industry Council
  - Australian Pork Limited

[15] Now known as the COAG Legislative and Governance Forum on Food Regulation

- Australian Renderers Association
- Australian Stockfeed Manufacturers
- Goat Industry Council of Australia
- Kangaroo Industry Association of Australia
- The Australian Buffalo Industry Council representing all buffalo producers (domesticated and wild)
- The Deer Industry Association of Australia which represents 60% of farmers, plus processors, and transporters associated with the farmed deer industry
- The Australian Camel Industry Association
- The Farmed Rabbit Industries of Australia Ltd
- The Australian Ostrich Association represents all commercial producers
- The Emu Industry Federation of Australia which represents approximately 80% of the commercial farmers as well as processors and transporters
- Queensland Crocodile Industry Group
- Crocodile Farmers Association of the Northern Territory

- state and territory governments, particularly agencies or bodies with responsibility for implementing and enforcing food regulatory measures for primary production
- consumers

FSANZ has undertaken a number of industry visits to better understand the current production and processing practices for the animals being assessed and to identify any specific issues with this Proposal particularly for the minor meat species and wild game industries.

3.3.2 Summary of submissions received from the 1st call for submissions

The 1st Assessment Report for the major meat species was released for public comment from 23 September 2009 to 11 November 2009. Twenty-two submissions were received from:

- The Victorian Government
- The Board of Safe Food Production, Queensland
- Health Protection Directorate, Queensland Health as the lead agency for the Queensland Government (food regulation policy)
- Department of Health Western Australia
- New South Wales Food Authority
- Australian Quarantine and Inspection Service (AQIS)
- Department of Agriculture, Fisheries and Forestry- Food Regulation Policy Branch
- New Zealand Food Safety Authority
- AMIC - Australian Processor Council on behalf of domestic and export meat processor sectors of AMIC
- Australian Meat Industry Council –independent and meat retailing and smallgoods manufacturing sectors of AMIC
- Food Technology Association of Australia
- Australian Pork Limited
- Australian Lot Feeders' Association
- Stock Feed Manufacturers' Council of Australia
- New South Wales Farmers' Association
- Cattle Council of Australia and Sheepmeat Council of Australia
- Professional Food and Pharmaceutical Services
- Meat and Livestock Australia
- Tasmanian Farmers & Graziers Association
- Greg Bachmann, Jemalong Pastoral Company, Queensland

- Australian Dairy Industry Council and Dairy Australia
- SAFEMEAT

The 1st call for submissions for the minor meat species and wild game was from 26 March 2012 to 4 June 2012. Eleven submissions were received from:

- South Australia Health
- New South Wales Farmers' Association
- Queensland Health
- NSW Food Authority
- Australian Crocodile Traders
- Tasmanian Farmers & Graziers Association
- New Zealand Ministry for Primary Industries
- Crocodile Farmers Association of Northern Territory
- Wildflower Alpacas
- Food Technology Association of Australia
- Deer Industry Association of Australia

Where relevant, the submissions and responses have been discussed in the body of this report and a summary of all the submissions and the response to these submissions is provided in Table 1.

Two key issues raised related to the scope of animals covered in this work and the relationship with requirements for meat in other standards in the Food Standards Code. The response is outlined below.

The issue is the scope of animals covered in this work and:

- the wider list of minor species and wild game which are permitted to contain certain agricultural and veterinary chemicals (Standard 1.4.2, Schedule 4 under "Mammalian Meats)
- the relationship to the definition of meat in Standard 2.2.1.

3.3.2.1 Species covered by the proposed Standard

P1014 includes animals listed in Schedule 4 of Standard 1.4.2. The meat commodities listed in that Schedule are buffalo meat; camel meat; cattle meat; deer meat; donkey meat; goat meat; hare meat; horse meat; kangaroo meat; pig meat; possum meat; rabbit meat; sheep meat; and wallaby meat.

Existing Australian Standards cover each animal referred to in Schedule 4 of Standard 1.4.2. Possums are protected in all Australian jurisdictions under state and territory law. Only one Australian jurisdiction, Tasmania, allows possums to be harvested for human consumption (for export). This activity is regulated by Tasmanian law. Possums are shot in Tasmania for skins and meats under a crop protection permit. Any person harvesting for human consumption or pet food must complete the National Game Harvester skill set (MTM11) before being granted a commercial wallaby/possum licence by the Game Management Branch, Department of Primary Industries, Parks, Water and Environment. Skin and fur harvesters must sign a statutory declaration stating that they will only harvest possum for fur and skins before being granted the Commercial possum licence.[16] Possums processed for human consumption in Tasmania are covered by the *Australian Standard for the Hygienic Production of Wild Game Meat for Human Consumption* (AS4464-2007).

[16] Information provided by the Department of Primary Industries, Parks, Water and Environment, Tasmania.

3.3.2.2 Definition of 'meat'

Standard 2.2.1 imposes compositional and labelling requirements for 'meat' and meat products.

Clause 1 of that Standard provides that the term 'meat' as used in that Standard means "the whole or part of the carcass of":

(a) any of the following animals slaughtered other than in a wild state: buffalo, camel, cattle, deer, goat, hare, pig, poultry, rabbit or sheep:

(b) *any other animal* that is permitted for human consumption under a law of a State, Territory or New Zealand. (emphasis added)

Clause 1 also provides that 'meat' does not include avian eggs, foetuses or part of foetuses.

On this basis, the whole or part of the carcass of any llama, alpacas, crocodile, ostrich, emu, horse, donkey constitutes 'meat' for the purposes of Standard 2.2.1 if it is permitted for human consumption under a law of a state, territory or New Zealand. The above definition would also include:

(a) animals covered under P1014 (e.g. deer, camel, buffalo, emu, ostrich, crocodile, rabbit horse)
(b) wild game that is permitted for human consumption under and in accordance with a law of a state, territory or New Zealand.

The proposed amendments to Standard 4.2.3 will provide that, for the purposes of Division 2 of that Standard only, the term *meat* means 'any part of a slaughtered animal for human consumption'. That is, of an animal that:

(a) is a member of a species listed the table to proposed clause 2 in that Standard; and
(b) has been slaughtered for human consumption; and
(c) has not been slaughtered in the wild.

The proposed amendments to Standard 4.2.3 will apply to meat producers. That is, to 'a business, enterprise or activity that involves the growing, supply or transportation of animals for human consumption'. The amendments make clear that the obligations imposed by Division 2 of the Standard will not apply to the retail sale activities of meat producers.

Division 3 of Standard 4.2.3 currently applies to 'producers of ready to eat meats'. That is, to a food business that undertakes prescribed activities relating to 'ready to eat meat'. The term "ready to eat meat" means a "meat product" intended to be consumed without further heating or cooking. Division 3 of Standard 4.2.3 requires 'producers of ready to eat meats' to implement food safety systems that identify, evaluate and control food safety hazards and which comply with criteria prescribed by that standard. Additional requirements are imposed for uncooked comminuted fermented meat.

Ready to eat meat producers who also engage in retail sale activities would be subject to the compositional and labelling requirements in Standard 2.2.1.

Table 1: Summary of issues

Issue	Issue raised	FSANZ Response
Scope of the Standard	The scope should be broadened to cover all meat for human consumption, other than wild game. Developing standards over time for major and minor meat species is undesirable as such an ad hoc approach could lead to unintended gaps and overlaps between standards. Quality and animal welfare should be included, in addition to food safety, into any standard.	The work on the major species (cattle, sheep, goats and pigs) was put on hold while work commenced in 2011 on the remaining meat species and wild game. These two proposals have been combined so that the 2nd Call for Submissions report for P1014 will consider meat and meat products from all meat species and wild game and consult on a draft national standard for meat and meat products. Animal welfare is not within FSANZ's legislative responsibilities. States and territories have legislation that enables welfare standards to be either adopted by reference or included in regulations. Quality attributes or specific production methodologies that do not relate to food safety will, in general, be handled through industry mechanisms and not a primary production and processing standard.
Inclusion of primary production requirements for major meat producers	The use of agricultural, chemicals and veterinary medicines, herd health and animal traceability are adequately addressed by requirements in existing legislation. Supported that the standard reflect the obligations that farmers supplying animals for slaughter for human consumption must be able to meet (e.g. managing inputs, traceability).	FSANZ's evaluation of hazards and current management practices in Australia indicates there are no identified unmanaged food safety risks for the major meat sectors (cattle, sheep, goats, pigs) the Meat Standard Development Committee supported a draft primary production standard requiring traceability, control of inputs (e.g. feed, water, supplements, agricultural and veterinary chemicals) and managing waste to underpin the current systems in place and to provide uniformity and certainty in the food safety requirements on primary producers.

Issue	Issue raised	FSANZ Response
Cost-benefit analysis	Current controls along the meat supply chain are working well and questioned the cost-benefit of introducing additional regulatory measures for producers and processors. The potential increase in regulatory burden and impact on the viability of the kangaroo meat industry was raised noting that there are existing regulatory requirements for processing.	The preferred option proposes no additional regulatory requirements for processing i.e. retain the current Australian Standard. In regard to kangaroos, the existing Australian Standard AS 4464:2007 - *Hygienic Production of Wild Game Meat for Human Consumption* contains requirements for managing inputs and traceability at the primary production stage such as the sourcing of wild game animals and identification of field harvester and place of harvest. Section 3.2.5 addresses the cost-benefit analysis.
Mechanism to review Existing Australian Standards	Supported a mechanism for review and to ensure currency of the existing Australian Standards for processing.	The jurisdictions are progressing this issue.
Maintenance of non-food safety issues in the existing Australian Standards	The on-going maintenance of animal welfare and quality aspects in the existing Australian Standards.	These are addressed in the current Australian Standards for processing. The preferred option is to retain these Australian Standards for processing.
Traceability	The need for minimum requirements for traceability of minor meat species and wild game products to assist with foodborne illness investigations and the recall of food.	The *Australian Standard for the Hygienic Production of Wild Game Meat for Human Consumption* (AS4464-2007) contains requirements for ensuring carcases have approved tags and accurate records kept of product received (Clauses 9.2 – 9.3); maintaining identification system and records to identify product to the processing premise (Clause 11.12) and that wild game meat businesses have a documented system that provides for the accurate identification, and the ability to trace and recall meat and meat products (Clauses 12.1 – 12.9).

Issue	Issue raised	FSANZ Response
		In regard to the minor species, the relevant Australian Standard contains requirements for meat businesses to have a documented system that provides for the accurate identification, and the ability to trace and recall meat and meat products. FSANZ is proposing minimal primary production requirements covering traceability, inputs and managing waste for major and minor species. The traceability requirement is intended to trace animal movement one step back and one step forward. This will enable animals to be traced in the event of a food safety problem.
Inconsistent requirements	The absence of a national standard covering the entire meat supply chain could lead to inconsistency in regulatory requirements.	The preferred option is a draft national standard containing minimal primary production requirement for traceability, inputs and managing waste. The existing Australian Standards for processing would remain in state and territory legislation.
Potential chemical contamination of wild deer	The potential chemical contamination of wild deer as they are not subject to the National Residue Survey.	The *Australian Standard for the Hygienic Production of Wild Game Meat for Human Consumption* (AS4464-2007) states that wild game animals shall not be harvested from areas where the presence of potentially harmful substances such as pesticides, fungicides, heavy metals or poisons could lead to unacceptable levels of such substances in the wild game meat.

Issue	Issue raised	FSANZ Response
Inclusion of crocodiles	Concerns over the inclusion of crocodiles in the grouping of minor meat species as defined under P1014 and the subsequent regulatory and financial impacts if they are classified as meat. These submitters stated that the current regulatory standard for the processing of crocodiles for human consumption, AS 4467-1998 *Hygienic Production of Crocodile Meat for Human Consumption,* is adequate.	FSANZ acknowledges that crocodile meat is processed under an existing Australian Standard. The preferred option proposes no additional regulatory requirements for processing i.e. retain the current Australian Standard. As such, the Department of Agriculture, Fisheries and Forestry has advised there will not be a change to the current processing requirements and approved arrangements.

3.3.3 World Trade Organization (WTO)

As members of the World Trade Organization (WTO), Australia is obliged to notify WTO member nations where proposed mandatory regulatory measures are inconsistent with any existing or imminent international standards and the proposed measure may have a significant effect on trade.

There are relevant international standards and amending the Code to include primary production requirements for traceability, inputs and managing waste is unlikely to have a significant effect on international trade as this is consistent with the principles of meat hygiene applying to primary production articulated in the *Codex Code of Hygienic Practice for Meat* (CAC/RCP 58-2005). Therefore, a notification to the WTO under Australia's obligations under the WTO Sanitary and Phytosanitary Measures Agreement was not considered necessary.

4. Draft variation

Currently regulatory food safety measures are only applied to the processing of meat and meat products by legislation referencing the Australian Standards. Variations have now been developed to amend Standard 4.2.3 to include obligations on primary producers in relation to traceability and managing inputs and waste.

There are three requirements for the primary production of meat:

- A meat producer must take all reasonable measures to ensure that inputs do not adversely affect the safety or suitability of meat or meat products

- A meat producer must store, handle and dispose of waste in a manner that will not adversely affect the safety or suitability of meat or meat products

- A meat producer must have a system to identify the persons –

    (a) from whom animals were received; and
    (b) to whom animals were supplied.

A meat producer is defined as a business, enterprise or activity that involves the growing, supply or transportation of animals for human consumption. This definition is intended to encompass businesses, enterprises and activities involved: in the rearing of animals for human consumption; the operation of feedlots and sale yards for such animals; and the transportation of such animals to and from sale yards, between properties, or to an abattoir.

The animals covered by these requirements are listed in the table in the standard and include cattle, sheep, goats, pigs, buffalo, antelope, camels, alpacas, llamas, deer, horses, donkeys, rabbits, crocodiles, ostrich and emu. These animals are the same as those covered under the existing Australian Standards.

These requirements do not apply to animal slaughtered in the wild.

Division 2 contains an editorial note to explain that state and territory laws require people involved in the slaughter and processing of animals for human consumption, including of animals in the wild, and in the preparation, packing, transportation or storage of meat or meat products to comply with the Australian Standards listed in the editorial note. These are:

- AS 4696-2007 *Hygienic Production and Transportation of Meat and Meat Products for Human Consumption*
- AS 4466 - 1998 *Hygienic Production of Rabbit Meat for Human Consumption*
- AS 4467-1998 *Hygienic Production of Crocodile Meat for Human Consumption*
- AS 5010 – 2001 *Hygienic Production of Ratite Meat for Human Consumption*
- AS 4464-2007 *Hygienic Production of Wild Game Meat for Human Consumption*
- AS 5011- 2001 *Hygienic Production of Natural Casings for Human Consumption*
- AS 5008 - 2007 *Hygienic Rendering of Animal Products.*

The draft variation is at Attachment A.

4.1 Implementation and review

These requirements for the primary production of meat come into effect twelve months after the date of gazettal.

State and territory regulatory agencies and the Department of Agriculture, Fisheries and Forestry are responsible for implementing the standard. The Meat Implementation Working Group, a national working group with membership from these agencies, has developed a national compliance plan for the draft variation to Standard 4.2.3. The key principle underpinning the compliance arrangements for the Standard is that if businesses are currently complying with existing legal requirements, and continue to do so, they will comply with the future meat standard. The compliance plan is at SD7.

Attachments

A. Draft variation to the *Australia New Zealand Food Standards Code*
B. Draft Explanatory Statement

Attachment A – Draft variation to the *Australia New Zealand Food Standards Code*

Food Standards (Proposal P1014 – Primary Production and Processing Standard for Meat and Meat Products) Variation

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The Board of Food Standards Australia New Zealand gives notice of the making of this variation under section 92 of the *Food Standards Australia New Zealand Act 1991*. The Standard commences on the date specified in clause 3 of this variation.

Dated [To be completed by Standards Management Officer]

Standards Management Officer
Delegate of the Board of Food Standards Australia New Zealand

Note:

This variation will be published in the Commonwealth of Australia Gazette No. FSC XX on XX Month 20XX. This means that this date is the gazettal date for the purposes of clause 3 of the variation.

1 Name

This instrument is the *Food Standards (Proposal P1005 – Primary Production and Processing Standard for Meat and Meat Products) Variation*.

2 Variation to Standards in the *Australia New Zealand Food Standards Code*

The Schedule varies the Standards in the *Australia New Zealand Food Standards Code*.

3 Commencement

The variation commences on a date 12 months after the date of gazettal.

SCHEDULE

1. **Standard 1.6.2** is varied by omitting clause 6

2. **Standard 4.2.3** is varied by

[2.1] omitting Divisions 1 and 2, substituting

"

Division 1 – Preliminary

1 Interpretation

(1) In this Standard –

meat product means a food containing no less than 300 g/kg of meat.

(2) Unless the contrary intention appears, the definitions in Chapter 3 of this Code apply for the purposes of this Standard.

Division 2 – Primary production of meat

2 Definitions

In this Division –

meat means any part of a slaughtered animal for human consumption.

meat producer means a business, enterprise or activity that involves the growing, supply or transportation of animals for human consumption.

2A Animals covered by this Division

(1) In this Division, a reference to an animal means an animal of a species listed in Column 2 of the Table.

(2) However, a reference to an animal does not include an animal of a species listed in Column 2 of the Table if that animal was slaughtered in the wild.

Table to clause

Column 1	Column 2
Item	**Species**
1	Bovine
2	Caprine
3	Ovine
4	Porcine
5	Bubaline
6	Camelidae
7	Cervidae
8	Crocodylidae
9	Lagomorph
10	Ratite
11	Soliped

2B Application of Division to retail sale activities

This Division does not apply to the retail sale activities of a meat producer.

2C Inputs

A meat producer must take all reasonable measures to ensure that inputs do not adversely affect the safety or suitability of meat or meat products.

2D Waste disposal

A meat producer must store, handle and dispose of waste in a manner that will not adversely affect the safety or suitability of meat or meat products.

2E Traceability

A meat producer must have a system to identify the persons –

(a) from whom animals were received; and
(b) to whom animals were supplied.

Editorial Note:

State and Territory laws govern the slaughter and processing of animals for human consumption, including of animals in the wild, and the preparation, packing, transportation or storage of meat or meat products. These laws require persons involved in such activities to comply with the following Australian Standards:

AS 4464:2007 -- *Hygienic Production of Wild Game Meat for Human Consumption*
AS 4466:1998 -- *Hygienic Production of Rabbit Meat for Human Consumption*
AS 4467:1998 -- *Hygienic Production of Crocodile Meat for Human Consumption*
AS 4696: 2007 -- *Hygienic Production and Transportation of Meat and Meat Products for Human Consumption*
AS 5008: 2007 -- *Hygienic rendering of animal products*
AS 5010: 2001 -- *Hygienic Production of Ratite Meat for Human Consumption*
AS 5011: 2011 -- *Hygienic productions of natural casings for human consumption*.

"

[2.2] updating the Table of Provisions to reflect these variations.

Attachment B – Draft Explanatory Statement

1. Authority

Section 13 of the *Food Standards Australia New Zealand Act 1991* (the FSANZ Act) provides that the functions of Food Standards Australia New Zealand (the Authority) include the development of standards and variations of standards for inclusion in the *Australia New Zealand Food Standards Code* (the Code).

Division 2 of Part 3 of the FSANZ Act specifies that the Authority may prepare a proposal for the development or variation of food regulatory measures, including standards. This Division also stipulates the procedure for considering a proposal for the development or variation of food regulatory measures.

FSANZ prepared Proposal P1014 to develop an Australia only primary production and processing standard for meat and meat products from minor species and wild game to provide a nationally consistent approach to the management of meat safety. The development of a standard for the farmed major species (cattle, sheep, pigs and goats) undertaken under Proposal P1005, has been incorporated into P1014.

The Authority considered the Proposal in accordance with Division 2 of Part 3 and has approved a draft Standard.

2. Purpose

The Authority developed Standard 4.2.3 to ensure food safety is addressed throughout all parts of the meat supply chain (i.e. from paddock to plate). Currently regulatory food safety measures are only applied to the processing of meat and meat products. Variations have now been developed to amend Standard 4.2.3 to include obligations on primary producers in relation to traceability and managing inputs and waste.

3. Documents incorporated by reference

The variations to food regulatory measures do not incorporate any documents by reference.

4. Consultation

In accordance with the procedure in Division 2 of Part 3 of the FSANZ Act, the Authority's consideration of Proposal P1014 will include two rounds of public comment following an assessment and the preparation of a draft Standard and associated reports.

A Standards Development Committee (SDC) was established with representatives from the industry sector, the Department of Agriculture, Fisheries and Forestry, the relevant State and Territory government agencies and consumer organisations to provide ongoing advice to the Authority throughout the standard development process. The SDC contributed a broad spectrum of knowledge and expertise covering industry, government, research and consumers. A Working Group was also established with representatives from the relevant minor meat species and wild game industry sectors and State and Territory government agencies to provide ongoing advice to the Authority throughout the standard development process.

5. Statement of compatibility with human rights

This instrument is exempt from the requirements for a statement of compatibility with human rights as it is a non-disallowable instrument under section 94 of the FSANZ Act.

6. Variation

6.1 Standard 1.6.2.

Item [1] omits clause 6 from Standard 1.6.2.

6.2 Standard 4.2.3

Item [2] varies Standard 4.2.3 by omitting Divisions 1 and 2 and replacing them with a new Division 1 and 2.

Division 1

Clause 1 defines the term 'meat product' for the purposes of Standard 4.2.3. The clause also provides that the definitions in Chapter 3 of the Code apply to the Standard subject to any contrary intention.

Division 2

Clause 2 defines the following terms for the purposes of Division 2 of Standard 4.2.3: meat; and meat producer

Clause 2 defines the term 'meat producer' to mean a business, enterprise or activity that involves the growing, supply or transportation of animals for human consumption. This definition is intended to encompass businesses, enterprises and activities involved: in the rearing of animals for human consumption; the operation of feedlots and sale yards for such animals; and the transportation of such animals to and from sale yards, between properties, or to an abattoir. This definition of 'meat producer' applies only to Division 2 of Standard 4.2.3.

Clause 2 also defines the term 'meat' to mean any part of a slaughtered animal for human consumption. This definition applies only to Division 2 of Standard 4.2.3.

Clause 2A provides that a reference to an animal in Division 2 of Standard 4.2.3 is only to an animal of a species that is listed in Column 2 of the Table in that clause and which is not slaughtered in the wild. The clause's restriction relating to animals slaughtered in the wild does not to apply Division 3 of Standard 4.2.3 and to producers of ready-to-eat meats subject to that Division.

Clause 2B provides that Division 2 of Standard 4.2.3 does not apply to retail sale activities of a meat producer. These activities are covered by Chapter 3 of the Code.

Clause 2C requires a meat producer to take all reasonable measures to ensure that inputs do not adversely affect the safety or suitability of meat or meat products. Inputs can include animal feed (such as pasture, grains, silage and concentrate supplements), water (including recycled water), chemicals or other substances used in connection with the primary production activities.

Clause 2D requires a meat producer to store, handle and dispose of waste in a manner that will not adversely affect the safety or suitability of meat or meat products. This requirement is intended to prevent the transmission to animals of pathogens from environmental sources. For example, the clause would require meat producers to ensure that the safety or suitability of meat or meat products is not adversely affected by waste contaminating the relevant animals' water supply or feed. The term 'waste' as used in clause 2D is intended to include: solid or liquid waste; animal carcasses; garbage; chemical residues; and seepage or runoff from drains, septic systems or manure pits.

Clause 2E requires a meat producer to have a system in place that can identify the persons from whom the meat producer received an animal and to whom the meat producer supplied an animal. This requirement is intended to ensure that an animal can be traced in the event of a food safety problem.

Division 2 contains an editorial note to explain that State and Territory laws require persons involved in the slaughter and processing of animals for human consumption, including of animals in the wild, and in the preparation, packing, transportation or storage of meat or meat products to comply with the Australian Standards listed in the editorial note.

Item [2.2] updates the Table of Provisions in Standard 4.2.3 to reflect the above variations.