



Meat & Livestock Australia

submission

to

Food Standards Australia New Zealand

on

Proposal P1005

**Primary Production & Processing Standard for Meat &
Meat Products**

1st Assessment Report

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Contact:

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MLA welcomes the opportunity to comment on this assessment report for the major meat species to be covered by the Primary Production & Processing Standard (PPPS) for Meat & Meat Products.

Meat & Livestock Australia

Meat & Livestock Australia Ltd. (MLA) is owned by Australia's livestock producers - and offers support to the cattle, sheep and goat industries. The company also provides services to other industry sectors, such as meat processors and live animal exporters.

The overriding mission of Meat and Livestock Australia (MLA) is to deliver world-class services and solutions in partnership with the red meat industry and government.

MLA contributes to the development of services and solutions by undertaking research and development (R&D), promoting positive consumer attitudes of red meat, disseminating information and ensuring market access, both in Australia and overseas.

MLA provides services to producers and other sectors such as meat processors, exporters and retailers by:

- striving to keep Australian industry at the forefront of new technology;
- working with the government and industry to open up, develop and protect our overseas markets;
- working with the commercial sector to promote red meat sales;
- helping our industry enhance the natural resource base, and;
- communicating the social benefits of our industry to the wider community.

Our concern

The PPPS needs to provide a clear statement of the food safety outcomes required at all stages of the supply chain. Existing standards and voluntary schemes do not necessarily explicitly state the outcome being achieved. It is important that the PPPS provides a clear outcomes-based statement of food safety in the red meat supply chain:

- to ensure that domestic consumers continue to be protected, keeping in mind the extent to which the PPPS and associated documentation will define the acceptable level of protection (ALOP). This will become an issue if a notification is made to the WTO (section 8.1 of the Assessment Report) or if a country wishes to gain access to the Australian market for their product; and,
- to demonstrate to our trading partners the high domestic production and processing standards existing in Australia, that together form the basis for approaches taken for exported product (whether or not the PPPS becomes a basis for export standards).

Major issues

1. We support the conclusion that there are no unmanaged food safety risks for cattle, sheep and goats due to the existing controls to protect public health and safety (section 4.7.4).

This conclusion is a recognition that the industry and its regulators have systematically assessed risks^{1,2} and have taken risk management actions where appropriate.

2. Industry-generated programs, such as Livestock Production Assurance, have made a significant improvement in the control of hazards on-farm.

The commitment of livestock producers to the five elements of the Livestock Production Assurance (LPA), the attestation of meeting these requirements through the National Vendor Declaration and auditing of these arrangements at industry's expense has ensured that the identified hazards² are being controlled. It needs to be recognised, however, that while there are commercial drivers for compliance, there is no legislative underpinning for some of these elements and without a food safety outcome being stated in the *Food Standards Code*, the scheme could fail, and the assurance being provided currently might become less certain.

3. The potential microbiological hazards are not well defined (document SD1).

The document is somewhat inconvenient in that it does not set out a full list of hazards or potential hazards that may be transmitted to humans through meat. This list can be discerned by working through the document, by species and supply chain. An overview would be useful, because the point that a hazard may enter the supply chain does not always need to be defined accurately. A list would also be convenient for any system that wishes to demonstrate achievement of an equivalent outcome to the current Australian system.

It is not easy to understand why some hazards are listed, for example,

- *Giardia lamblia*, which is not recognized as a meat-borne pathogen
- *Clostridium botulinum* in feeds, which is a hazard to live animals, not to meat

The 'issues' described in the document are not always linked to a hazard or an increase in risk. For example issues about pathogens in recycled water or the effect of stress on animals are not clearly linked to a specific hazard or to an increase in risk.

It is not clear how this document (SD1) leads to the conclusion that all risks are adequately managed. The summary tables (p.41 of SD1) aren't easily linked to the analysis on previous pages, and therefore, hazard identification and appropriate controls are not easily identified.

4. Chemical hazards are not well defined. (document SD2)

It is not clear what chemical hazards may be considered to require control in meat and meat products, and the systems in place that successfully control these hazards. The document does not set out a full list of chemical hazards that may be transmitted to humans through food.

It is not clear why a recommendation is made for further research and monitoring of chemical risks is made, what research is contemplated or how that can be equated with there being no uncontrolled risks.

¹ A. Pointon, I. Jenson, D. Jordan, P. Vanderlinde, J. Slade, J. Sumner (2006) A risk profile of the Australian red meat industry: approach and management. Food Control 17:712-718

² P. M. Horchner, D. Brett, B. Gormley, I. Jenson, A. M. Pointon (2006) HACCP-based approach to the derivation of an on-farm food safety program for the Australian red meat industry. Food Control 17:497-510.

5. Current regulation through AS 4696-2007 does provide opportunity for innovation

The current Australian Standard for the hygienic production and transportation of meat and meat products for human consumption (AS4696-2007) does offer opportunity for innovation and alternative ways of complying with the standard.

The statement of Equivalence in the Preface to the Standard provides that:

“Where a meat business proposes a technique different from the one detailed in this Australian Standard the assessment of equivalence is to be determined by the relevant controlling authority. This committee will establish methodology for determining the equivalence of benchmarks or standards. The proposer of the alternative technique is to supply sufficient supporting information to validate the procedure to the relevant controlling authority who will advise the Meat Standards Committee. The submission must include a HACCP plan that ensures equivalence is maintained. Where the Meat Standards Committee cannot reach agreement on the approval of an alternative technique the final decision shall be made by the relevant Ministerial Council.”

FSANZ has correctly identified that the Standard is based on prescription, rather than achievement of outcome. The provision in the Standard for equivalence needs to be further enabled in the PPPS by providing for more flexibility by the industry, and a less burdensome means of demonstrating equivalence. FSANZ should develop guidelines to provide for the demonstration of equivalent outcomes within the context of a meat PPPS.

Minor issues

p. 6 and 8 – Statements are made that feedlot animals are ‘exposed to greater environmental influences (i.e. environmental conditions including heat)’ but it is not clear how these influences might affect the safety of meat processed from these animals.

p. 14 – It is not clear why *C. perfringens* listed as a primary processing stage hazard? It is usually only considered to be a hazard in processed meats. The source of this organism is more likely to be other ingredients than coming from raw meat.

p. 17 – We are not aware of the risk to food safety that would be controlled by the microbiological status of feed being certified. We note that no mention is made here about the importance of not feeding ruminant material (RAM- restricted animal material to ruminants).

p. 19 – It is not clear how ‘preventing hazards that could occur while in lairage such as injury and stress’ will affect food safety outcomes

p. 19 – The suggestion that some animals, which are not fit for human consumption would be knowingly consigned to saleyards, is disputed. Obviously, diseased or downer animals would not be consigned because they would not be accepted. Animals without obvious defects, which may still lead to condemnation of the carcass, are usually not known by the producer.

p. 30 – The inspection system for exported products meets the requirements of the countries to whom Australia exports product. The system may have some scientific basis, and is effective in controlling both real and perceived risks, as well as controlling aspects of concern to other countries. I don’t think it is safe to assume that if a system were being developed today on scientific principles alone, that we would develop a

system that has the same components, or operate in the same way, as the current one. That is, it is simplistic and misleading to assert that we have a 'scientifically-based meat inspection system'.

p. 30 – The *Export Control (Meat and Meat products) Orders* 2005 reference the 2002 version of AS 4696. The 2007 version of AS4696 replaced only the 2002 version of that Standard.

p. 31 – It is incorrect to imply, in the last paragraph, that compliance with traceability requirements for domestic consumption does not comply with AS 4696-2007. However, it would be correct to say that there is increasing awareness, by producers, that they are producing food that needs to meet the increasingly exacting specifications of customers.

p. 32- The animal welfare standards developed for livestock processing establishments is in the process of being revised and reissued.

p. 33- It would be more accurate to state that MINTRAC is “also funded to conduct research and development projects through the Australian Meat Processors Corporation, matched with Australian Government funds through Meat & Livestock Australia”

p. 33- The use of rumen (“stomach”) boluses for animal identification are being phased out.

p.34- MLA administers NLIS on behalf of industry, including the database, through NLIS Ltd. a wholly owned subsidiary of MLA.

p. 44 – The Livestock Production Assurance scheme currently covers the following number of properties:

- Total numbers - 220,000
- Accredited - 178,000
- Not Accredited - 35,000
- Redundant - 7,000

The accredited properties are broken down by species and production systems as follows:

- Cattle - 192,000
- Sheep - 80,000
- Goats - 9,000
- Bobby Calves - 17,500
- EU accredited - 2,500