

4 November 2009

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

By email: submissions@foodstandards.gov.au

Dear Sir

Submission Proposal 1005
Primary Production and Processing Standard for Meat and Meat Products

The Australian Meat Industry Council (AMIC) is the Peak Council representing the post farm gate meat industry. AMIC has 2,500 members engaged in abattoirs, boning rooms, smallgoods manufacturing and independent meat retailing.

This submission is made on behalf of the independent meat retailing and smallgoods manufacturing sectors of AMIC.

It is noted that development and application of primary production and processing standards to industry sectors is dependent on an analysis of the public health and safety risks, economic and social factors and current regulatory and industry practices.

Further, the government guidelines on the development of standards for primary production and processing specify the objectives that FSANZ must have regard to the following objectives when considering whether or not to develop standards:

- providing controls to protect public health and safety;
- reducing the regulatory burden on the food sector, governments and consumers;
- recognising the responsibility for food safety involves all levels of government and a variety of agencies within the governments.

The First Assessment Report states that FSANZ's evaluation of the hazards and current management practices in Australia indicates that there are no unmanaged food safety risks for the major meat sectors (cattle, sheep, goats, pigs) i.e. controls are provided to protect public health and safety. The evaluation found no significant gaps that warrant further chemical or microbiological risk assessments. In regard to primary production, industry schemes appear to adequately address safety and suitability.

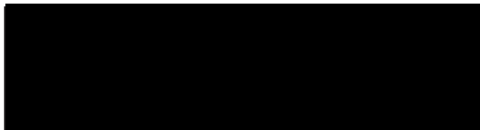
On the basis of the above the National Retail Council and National Smallgoods Council of AMIC have resolved to support Option 1 – Status Quo:

- Option 1 – *Status quo.*

This retains the current situation i.e. FSANZ would not make any changes to the Code or propose any other regulatory changes. This current situation is a combination of self regulation of meat safety (and current legislation in place managing animal disease control, animal welfare, animal traceability, use of agriculture and veterinary chemicals and environmental issues) for the primary production sector and regulation for the processing sector.

On the matter of the *Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption (AS 4696-2007)* AMIC does have a concern that the Meat Standards Committee has been disbanded and that the only mechanism for the future maintenance of the standard has transferred to a working group of the Primary Industries Ministerial Council where the meat industry does not have representation. AMIC supports AS 4696-2007 but recognizes that changes will be required from time to time and these should be with full industry consultation.

Yours faithfully

A large black rectangular box redacting the signature of Kevin Cottrill.

Kevin Cottrill
Chief Executive Officer