

**SUBMISSION TO FOOD STANDARDS AUSTRALIA NEW ZEALAND
PROPOSAL P1005
FIRST ASSESSMENT REPORT
PRIMARY PRODUCTION AND PROCESSING STANDARD FOR MEAT
AND MEAT PRODUCTS**

The Victorian Government provides the following comments in response to the First Assessment Report for a Primary Production and Processing (PPP) Standard for Meat and Meat Products. It includes the views of the Department of Primary Industries (DPI) and the Department of Health (DoH).

1. General Comments

Victoria supports the development of a national meat and meat product standard to ensure consistency and to protect public health and safety. Victoria also recognises the importance of these standards in assuring both domestic and export markets of the safety of our products. Regulatory measures should also be the minimum required to deliver these outcomes. Victoria recognises that there are currently no unmanaged food safety risks for the major meat sectors considered in this assessment and does not, therefore, support the introduction of any *additional* regulatory requirements on these sectors.

Current risk management controls practised in the primary production and processing of meat and meat products is underpinned by State and Territory legislation, industry schemes and codes of practice, mandatory compliance across Australia with AS 4696-2007 and Chapter 3 in the Food Standards Code. Victoria recognises the need for the development of a contemporary meat processing and meat product standard to be included in the Food Standards Code consistent with processing requirements for other sectors. This should build on existing standards and systems that have been adopted nationally. Victoria does not however, support the inclusion of primary production within this standard for the reasons outlined below.

2. Management of hazards

Management On-farm

There are additional drivers in primary production that manage the major hazards on-farm (chemical and microbiological) that contribute to the protection of public health and safety. These are:

- safe and responsible use of agricultural and veterinary chemicals as regulated through state “control of use” legislation;
- national animal welfare codes of practice, including transporting animals that have been agreed to be mandatory under the Primary Industries Ministerial Council; In Victoria these codes will be implemented under the proposed Livestock Management Act, which should accordingly be referred to in Table 3, page 22;
- livestock disease control legislation in all states: and
- National Livestock Identification System that supports trace-back to farm for product that may be found to be in breach of standards (eg MRLs).

These regulatory requirements are further supported by industry quality assurance schemes.

Victoria is therefore satisfied with the requirements in existing Victorian and other state legislation and industry schemes for the control of hazards on-farm, at saleyards and during transport.

Management in processing

Victoria is also satisfied with the mandated provisions of AS 4696-2007 and Chapter 3 Standards in the Code for the management of hazards in meat processing. However, Victoria acknowledges that the level of specification of AS 4696-2007 may prevent the meat industry from implementing the most cost-effective measures to achieve acceptable food safety outcomes. Industry could benefit from the development of an outcomes-based standard for inclusion in the Code, where this may relieve industry from meeting overly prescriptive requirements. This could also provide a mechanism via which the risk management requirements for meat processing can be reviewed.

Victoria notes that a review of the chemical risk profile of meat “*identified a number of areas where further research or monitoring would assist in providing further reassurances that the public health and safety risk is low*” (page 16). FSANZ may wish to clarify whether further work on the chemical risk profile will be undertaken and whether this is likely to reveal any areas of concern.

3. Options

Victoria supports the objective of considering options for through-chain food safety management, while recognising that there are currently no unmanaged food safety risks for the major meat sectors considered in this assessment.

In considering Option 2, the management approach for primary production needs to be clarified. While the assessment refers to legislation that underpins risk management throughout the production stage, this is not reflected in the term ‘self regulation’ (section 6.2.1, page 39). This should be specified to ensure that Option 2 accurately reflects the underpinning legislative risk management requirements on-farm, at saleyards and during transport.

4. Affected Parties

Victoria is satisfied with the information provided in relation to parties that may be affected by this Proposal.

5. Options – Costs and Benefits

Victoria currently has no further information in relation to the costs and benefits of the proposed risk management options.