

**26 March 2012**  
**[7-12]**

## **Call for submissions – Proposal P1014**

### **Primary Production & Processing Standard for Minor Meat Species & Wild Game**

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FSANZ has assessed a Proposal prepared to develop an Australia only primary production and processing standard for meat and meat products from minor species and wild game. Pursuant to section 72 of the *Food Standards Australia New Zealand Act 1991* (FSANZ Act), FSANZ now calls for submissions to assist FSANZ's further consideration.

For information about making a submission, visit the FSANZ website at [information for submitters](#).

Under the Information Publication Scheme, all submissions on applications and proposals will be published on our website. We will not publish any material provided in-confidence. 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](mailto: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) 21 May 2012**

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](mailto:standards.management@foodstandards.gov.au).

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

Food Standards Australia New Zealand  
PO Box 7186  
Canberra BC ACT 2610  
AUSTRALIA  
Tel +61 2 6271 2222

Food Standards Australia New Zealand  
PO Box 10559  
The Terrace WELLINGTON 6143  
NEW ZEALAND  
Tel +64 4 978 5630

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### Supporting documents

The following documents which informed the assessment of this Proposal are available on the FSANZ website at

<http://www.foodstandards.gov.au/foodstandards/proposals/proposalp1014primary5331.cfm>

- SD1 Meat Minor Species and Wild Game Working Group
- SD2 Animals and Products covered under Existing Australian Standards
- SD3 Current Regulatory Requirements for Meat Safety
- SD4 A Brief Description of the Industries being Assessed

# 1. Executive summary

At the request of the Council of Australian Governments (COAG) Legislative and Governance Forum on Food Regulation<sup>1</sup> (Forum), FSANZ is considering food safety throughout all parts of the food supply chain for all industry sectors.

The first stage of meat work, undertaken through Proposal P1005<sup>2</sup> – Primary Production & Processing Standard for Meat & Meat Products, covers meat and meat products from farmed cattle, pigs, sheep and goats using extensive and intensive farming, harvested goats and rendered products for human consumption. P1014 has been prepared to consider the remaining meat species and wild game in Australia only.

The existing regulatory system does not recognise responsibilities of both producers and processors to produce safe food, or offer flexibility for providing a food safety outcome. The safety of meat and meat products in Australia is currently regulated largely through prescriptive requirements for processors contained in Australian Standards. There is no longer a way to review, update or change these Standards.

Rendered products for human consumption and natural casings will be considered in the next stage of the assessment.

## Regulatory Options

FSANZ is considering two options. Option 1 would involve developing a draft national standard containing minimal primary production requirements, where relevant (e.g. for traceability, inputs and managing waste) and transfer of the processing controls currently in place under existing state and territory legislation (i.e. Australian Standards). This reflects the proposed option for the major meat species that will be presented to the FSANZ Board in September 2012. This proposed approach provides for industry and regulators to operate under a single, national set of requirements for all meat species and wild game.

Option 2 would involve retaining the current situation and abandoning the Proposal following consideration of the submissions received from the first round of public comment. That is, FSANZ would not make any changes to the *Australia New Zealand Food Standards Code* (the Code) or propose any other regulatory changes. The current situation is a combination of self-regulation of meat safety for the primary production sector and regulation for the processing sector. Under this option, the elements of the existing Australian Standards would not be incorporated into the Code.

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<sup>1</sup> Formerly known as the Australia and New Zealand Food Regulation Ministerial Council

<sup>2</sup> Documents relating to Proposal P1005 – Primary Production & Processing Standard for Meat & Meat Products are available at <http://www.foodstandards.gov.au/foodstandards/proposals/proposalp1005primary4220.cfm>

## 2. Introduction

In accordance with the *Overarching Policy Guideline on Primary Production and Processing Standards* (Ministerial Guidelines)<sup>3</sup>, FSANZ is considering risk management measures for the meat industry. The first stage of meat work, undertaken through Proposal P1005, covers meat and meat products from farmed cattle, pigs, sheep and goats using extensive and intensive farming, harvested goats and rendered products for human consumption.

P1014 is considering the remaining meat species and wild game. The Meat Minor Species and Wild Game Working Group provides scientific, technical, regulatory/enforcement, and benefit and cost analysis input and expertise into the Proposal.. The membership of the Working Group is listed in SD1.

### 2.1 Status of P1005 and relationship with this Proposal

FSANZ is developing a draft Australia only Standard for inclusion in the Code for the major meat species (cattle, sheep, goats and pigs). The 1<sup>st</sup> Assessment Report for P1005 is available on the FSANZ website.

A Standard Development Committee (SDC) is advising FSANZ on the P1005 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.

In light of assessment work completed for major meat species, and following consultation with the industry, a draft primary production standard for traceability, control of inputs (e.g. feed, water, supplements, agricultural and veterinary chemicals) and managing waste is a proposed option to underpin the current systems in place and to provide uniformity and certainty in the food safety requirements on primary producers. Traceability is an important tool for enabling the source and distribution of produce to be identified at each stage throughout the chain. When something does go wrong, an effective traceability system allows corrective actions to be implemented quickly and can minimise any negative impact.

In addition, the current processing requirements in the Australian Standard AS4696-2007 (*Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption*) is proposed to be transferred into outcomes-based requirements in the Code to give businesses flexibility in determining how they will comply.

It is expected these same principles will be proposed, where relevant, as an option for the minor species and wild game.

P1005 is currently on hold while this new Proposal is progressed. If decisions are made to prepare draft Standards for both Proposals, the second calls for submissions, containing draft standards and implementation details for both P1005 and P1014 will then be released at the same time i.e. anticipated to be September 2012.

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<sup>3</sup> The Ministerial Guidelines are available at <http://www.foodstandards.gov.au/foodstandards/legislativeandgovernanceforumonfoodregulation/policyguidelines.cfm>

## 2.2 The Proposal

P1014 will cover the remaining species not covered under Proposal P1005, including:

- the remaining species under AS4696-2007 *Hygienic Production and Transportation of Meat and Meat Products for Human Consumption* (buffalo, antelope, camels, alpacas, llamas, deer, horses, donkeys)
- the species covered under AS 4466 - 1998 *Hygienic Production of Rabbit Meat for Human Consumption*
- AS 4467-1998 *Hygienic Production of Crocodile Meat for Human Consumption*
- AS5010 – 2001 *Hygienic Production of Ratite Meat for Human Consumption* (ostrich/emu)
- AS 4464-2007 *Hygienic Production of Wild Game Meat for Human Consumption*.

For the purpose of P1014, minor species are those animals currently defined under existing Australian Standards (excluding AS4464-2007 and cattle, sheep, goats, pigs) i.e. buffalo, antelope, camels, alpacas, llamas, deer, horses, donkeys, rabbits, crocodiles, ostrich, emu. For the purpose of P1014, wild game is defined by AS4464-2007. The animals and products covered under the existing Australian Standards are summarised in Supporting Document 2.

As advised in the P1005 1<sup>st</sup> Assessment Report, rendered products for human consumption and natural casings have been considered as meat products and not examined specifically.

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 'green runners' (intestines emptied of ingesta) 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*. These requirements will be considered in detail in the 2<sup>nd</sup> Assessment Reports for P1005 and P1014.

## 2.3 The current Standard

There are no requirements in 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. This is now being addressed under P1005 for cattle, sheep, goats and pigs.

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

The export of meat is regulated by the Australian Government Department of Agriculture, Fisheries and Forestry under the *Export Control Act 1992* and specific Export Control Orders.

These requirements are summarised in Supporting Document 3. Table 1 of Supporting Document 3 summarises the main Australian Standards currently relating to meat for human consumption in Australia.

## **2.4 Reasons for preparing the Proposal**

The safety of meat and meat products in Australia is currently implemented largely through reference to Australian Standards.<sup>4</sup>

In the Australian Standards, there are obligations relating to on-farm activities imposed on processors but there are no corresponding obligations on producers. The existing regulatory system is deficient in that the Inter-Governmental Food Regulation Agreement seeks to have a national “whole of chain” approach to food safety regulation. Ensuring responsibility for food safety is shared between producer and processor will improve the application of corrective actions at the appropriate point in the supply chain.

The Australian Standards were prepared and maintained by the Meat Standards Committee until it was disbanded in 2007. There is no longer a way to review, update or change these Standards.

The Australian Standards are quite specific about the procedures a processor must follow, or criteria it must meet, to comply with the outcomes. This approach to regulation may assist some processors but it is inflexible for businesses that may wish to use other means to achieve safe and suitable meat. This degree of specification, rather than requiring an outcome, is not consistent with Ministerial Guidelines.

## **2.5 Procedure for assessment**

The Proposal is being assessed under the Major Procedure.

## **3. The assessment approach**

FSANZ will evaluate whether the requirements currently being proposed for the major species (traceability, management of inputs and waste) are appropriate for minor meat species and wild game. For example, FSANZ will examine whether there are any gaps and/or inconsistencies with respect to the minor species and wild game); and whether the requirements proposed for major meat species are feasible to apply (e.g. applicability of primary production requirements for wild game). If a decision to prepare a draft variation to the Code is made, this analysis will be detailed for the next call for submissions for P1014.

The following information is provided to outline the work that will be progressed.

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<sup>4</sup> Productivity Commission Research Report December 2009. Performance Benchmarking of Australian and New Zealand Business Regulation: Food Safety.

### **3.1 Conclusions from P1005**

P1005 reviewed the range of factors<sup>5</sup> in the meat supply chain<sup>6</sup> and identified hazards and control measures associated with those factors to identify gaps in food safety management and areas for specific risk assessment work. Considerable data and information exists for primary production and processing steps relating to potential hazards, control measures and industry and government schemes and programs for the major meat species.

FSANZ's *Assessment of Microbiological Hazards Associated with the Four Main Meat Species* 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. This report is SD1 for the 1<sup>st</sup> Assessment Report for P1005.

The chemical risk profile identified and examined where chemicals may enter the meat supply chain from meat production through to retail sale of meat product. It also considered relevant inputs into the meat primary production and processing chain. The risk profile is SD2 for the 1<sup>st</sup> Assessment Report for P1005.

The risk profile concluded there are extensive regulatory and non-regulatory measures in place to ensure chemicals used or present in meat and meat products present a very low public health and safety risk. The regulations and control measures currently in place along the meat primary production chain have resulted in minimal public health and safety concerns about 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.

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) i.e. controls are provided to protect public health and safety. The evaluation found no significant gaps warranting further chemical or microbiological risk assessments.

### **3.2 Assessment for P1014**

#### **3.2.1 Analysis of production and processing activities**

Like the approach for the major meat species, assessment work for this Proposal will include an overview of the production and processing practices, including associated inputs and key stages of the meat supply chain for the minor and wild game meat species. The meat supply chain consists of:

- production of animals (primary production)
- transport to saleyards, between properties and to the abattoir (primary production)
- processing – lairage, slaughter and dressing (and boning) (processing)
- further processing into products such as natural casings and rendered products (processing).

The assessment will be structured to reflect the relevant processing standards (ie: AS 4696-2007, AS4464-1998 and the remaining Australian Standards) to allow identification of any inconsistencies and/or gaps which may need addressing.

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<sup>5</sup> Factors include inputs, practices, environment, handling, animal health etc.

<sup>6</sup> The meat supply chain includes all activities at primary production and processing levels.

FSANZ recognises that many of the species covered under the Australian Standards will have minimal, if any, data available to indicate the level, frequency and type of microbiological contamination, any associated foodborne illness or production and consumption information. Advice was obtained from the Minor Meat and Wild Game Working Group on those species where data may be available and could therefore be included in the assessment. For the purposes of P1014, the following minor species are being assessed: emu, ostrich, crocodile, rabbit, deer, camel and buffalo. Wild game included in the assessment are wild boar, mutton birds, wallaby and kangaroo<sup>7</sup>.

A brief summary of each of these industries is provided in Supporting Document 4.

FSANZ welcomes information in submissions on industry production and processing practices relevant to the minor meat and wild game species being assessed.

FSANZ particularly welcomes information relating to:

- microbiological data including the level, frequency and type of microbiological contamination that may be associated with minor meat and wild game meat
- foodborne illness associated with minor meat or game meat
- consumption information.

### **3.2.2 Analysis of non-regulatory and regulatory requirements**

An analysis of the requirements in AS4696-2007 *Hygienic Production and Transportation of Meat and Meat Products for Human Consumption* was included in SD3 for the P1005 1<sup>st</sup> Assessment Report.

FSANZ is working with the Minor Species and Wild Game Working Group to identify industry guidelines and requirements. For example, the Australian Ratite Industry On-Farm Surveillance plan requires traceability of ratites between farms and to abattoirs (animal tagging and documentation of each ratite kept on farms).

If FSANZ decides to prepare a draft variation to the Code, a detailed analysis of regulatory and non-regulatory requirements applicable to the minor meat species and wild game will be detailed in the second call for submissions for this Proposal.

FSANZ welcomes information in submissions on industry requirements and measures relevant to:

- the primary production of minor species
- the harvesting of wild game
- the processing of minor species and wild game.

FSANZ is particularly seeking information on industry and/or government requirements around traceability and managing inputs (e.g. feed, veterinary residues) on-farm for minor species and during harvesting of wild game.

### **3.3 Regulatory options and impacts**

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

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<sup>7</sup> Some wild deer is harvested and processed for human consumption in South Australia.

- 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
- there are no other measures that would be more cost-effective than a variation to Standard that could achieve the same end
- any relevant New Zealand standards
- any other relevant matters.

FSANZ must consider various risk management options including the status quo (the situation if no action is taken) as a comparative measure against appropriate regulatory (government) and non-regulatory (industry) approaches.

### **3.3.1 Risk management options**

#### ***3.3.1.1 Option 1 – National regulatory requirements***

This option involves developing a draft national standard containing minimal primary production requirements, where relevant (e.g. for traceability, inputs and management of waste) and incorporating the processing controls currently in place under existing state and territory legislation (i.e. Australian Standards). This reflects the proposed option being considered for the major meat species enabling industry and regulators to operate under a single, national set of requirements for all meat species and wild game.

#### ***3.3.1.2 Option 2 – Abandon the proposal***

The option would retain 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 for the primary production sector and regulation for the processing sector. Under this option, the elements of the existing Australian Standards would not be incorporated into the Code.

### **3.3.2 Addressing FSANZ's objectives for standards-setting**

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

#### ***3.3.2.1 Protection of public health and safety***

This Proposal examines food safety management in the minor meat and wild game industry. The assessment will look at production and processing practices and examine whether controls are provided to protect public health and safety.

#### ***3.3.2.2 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.

#### ***3.3.2.3 The prevention of misleading or deceptive conduct***

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

### 3.3.2.4 Subsection 18(2) considerations

FSANZ has also had regard to the matters listed in subsection 18(2):

- the need for standards to be based on risk analysis using the best available scientific evidence
- the promotion of consistency between domestic and international food standards
- the desirability of an efficient and internationally competitive food industry
- the promotion of fair trading in food
- any written policy guidelines formulated by the Ministerial Council.

The objective of this Proposal is to ensure an efficient and competitive food industry by providing a national “whole of food chain” approach to address existing regulatory inefficiency and inconsistency. The existing regulatory system does not recognise the responsibilities of both producers and processors to produce safe food and does not offer flexibility for providing a food safety outcome as they are prescriptive requirements.

#### *Policy Guidelines*

The *Overarching Policy Guideline on Primary Production and Processing Standards* specifies a number of high order principles that must be considered when a standard is developed. These principles state that standards will be outcomes-based, address food safety across the entire food chain where appropriate, ensure the cost of the overall system should be commensurate with the assessed level of risk and provide a regulatory framework that only applies to the extent justified by market failure.

### 3.3.3 Impact analysis and affected parties

The assessment reports on this Proposal will provide information to comply with the COAG requirements for regulatory impact analysis. FSANZ will continue to consult with the Australian Government’s Office of Best Practice Regulation (OBPR) on meeting these requirements.

The OBPR requires FSANZ to identify, and determine the cost of impacts to industry, government and consumers, resulting from regulation. If a draft amendment to the Code is developed, a cost-benefit analysis in the form of a Regulation Impact Statement will be developed for consultation as part of the call for submissions at the next stage of the assessment. Information on industry structure, existing industry and government requirements, production volumes and product value will also be sought from the Meat Minor Species and Wild Game Working Group to develop the cost-benefit analysis.

Preliminary data provided by industry on approximate volume of meat from minor species and wild game produced annually and indicative value is summarised in Table 2.

**Table 2: Production Volume and Indicative Value**

| Meat Species | Total production (tonnes) | Export volume (tonnes) | Domestic volume (tonnes) | Retail value/Kg   |
|--------------|---------------------------|------------------------|--------------------------|-------------------|
| Kangaroo     | 21,000 (human)            | 15,000                 | 6,000                    |                   |
| Rabbit       | 260                       | 0                      | 260                      | \$14.50           |
| Deer         | 288                       | 200                    | 88                       | \$35.00 - \$65.00 |

| Meat Species            | Total production (tonnes) | Export volume (tonnes) | Domestic volume (tonnes) | Retail value/Kg  |
|-------------------------|---------------------------|------------------------|--------------------------|--|
| Ostrich                 | 30                        | 29.3                   | 0.3                      | Ex-processing value<br>\$16.50<br>\$30.00(premium fillets -<br>\$8.00(trim)  |
| Buffalo                 | 35                        | 8                      | 27                       | \$2.70 (manufacturing carcass)<br>\$3.60 - \$4.00 (restaurant trade carcass) |
| Camel (annual estimate) | 250                       | 250                    |                          |  |
| Crocodile               | 100                       | 60                     | 40                       | \$10.00 - \$20.00  |
| Emu                     | 88.7 (2007)               | 18.6 ( 2007)           |                          |  |

FSANZ is currently seeking data for wild boar, wallabies and mutton birds.

FSANZ seeks the following information in order to develop a Regulation Impact Statement:

- How accurate is the above information regarding production and export volumes and retail prices? If not reasonably accurate, could you provide/estimate the correct figures both for wholesale and retail sale?
- If you are a producer/processor, what voluntary systems do you have in place currently with regard to traceability and managing inputs (e.g. feed, veterinary residues) on-farm for minor species or during harvesting of wild game? What are the costs of such systems?
- Are there any changes with regard to traceability and managing inputs that could improve food safety? Can they be adopted voluntarily or should they be the subject of regulation? What are they and how much would they cost?
- Will costs be different if the proposals are implemented through a voluntary industry scheme, rather than new regulation?
- If such measures are adopted by industry, will they have an impact on production, sales, exports and prices?
- What will be the benefits of better industry practices? Can these benefits be expressed in monetary terms? Who will benefit?
- What will be the secondary costs and benefits of new practices? For example: What could be the impact on the prices/volumes of both domestic and export markets for the above meats? What, if any, could be the impact on other meat products (beef, lamb, pork and goat)?

### 3.4. Risk communication

#### 3.4.1 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 establishes committees to provide scientific, technical, regulatory/enforcement, benefit and cost analysis or other relevant input.

The Meat Minor Species and Wild Game Working Group will provide this expertise with the next stage of the meat standard.

FSANZ will be continuing industry visits to better understand the current production and processing practices for the animals being assessed and additional targeted consultations will be undertaken as required.

Consultation is an important part of this process. Parties identified as being affected by this Proposal include:

- producers of minor 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 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 (FRIA)
  - The Australian Ostrich Association represents all commercial producers
  - The Emu Federation of Australia which represents approximately 80% of the commercial farmers as well as processors and transporters.
- state and territory governments, particularly agencies or bodies with responsibility for implementing and enforcing food regulatory measures for primary production
- consumers.

FSANZ welcomes information in submissions on additional stakeholders who may be affected by this Proposal.

FSANZ will work with the SDC and the *Meat Minor Species and Wild Game Working Group* to develop key messages as the standard development progresses. FSANZ has been advised to:

- use existing industry communication channels
- communicate at a range of different levels – regulators, industry and consumers
- focus on impacts and not on the process
- develop, in consultation with industry, single-page sheets focusing on the impacts for each sector, i.e. identifying 'what the standard means'
- develop concise, plain English messages to enable associations to effectively communicate with their members.

FSANZ intends to rely on the peak industry bodies and jurisdictional channels to communicate to individual producers and processors.

As the assessment of P1014 proceeds, FSANZ will report its progress on the website at <http://www.foodstandards.gov.au/foodstandards/primaryproductionprocessingstandardsaustraliaonly/>.

### **3.4.2 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.

This issue will be fully considered at the next stage of the assessment and, if necessary, notification will be made in accordance with Australia's obligations under either the WTO Technical Barriers to Trade (TBT) or Sanitary and Phytosanitary Measures (SPS) Agreements. This will enable other WTO member countries to comment on any proposed amendments.