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AUSTRALIAN LOT FEEDERS' ASSOCIATION

11th November 2009

Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610

Via e-mail: submissions@foodstandards.gov.au

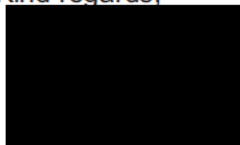
Re; Submission in response to Proposal P1005 - Primary Production & Processing Standard for Meat & Meat Products 1st Assessment report

The Australian Lot Feeders' Association (ALFA) is writing in response to the Primary Production & Processing Standard for Meat & Meat Products 1st Assessment report.

In addition to previous comments lodged in August, ALFA would like to raise the following points;

- ALFA supports the implementation of Option 2 – *Through-chain food safety management consisting of non-regulatory and regulatory elements*. ALFA concurs with FSANZ's assessment that the food safety risks within the meat supply chain are minimal and are being appropriately managed through industry self regulatory measures. Accordingly, ALFA believes that the imposition of additional Standard regulatory requirements through to an on-farm level is currently unwarranted. Nonetheless, ALFA supports the usage of incentives and education programs under Option 2 to maximise industry adoption of industry quality assurance programs and commitment to food safety practices.
- National Feedlot Accreditation Scheme page 26. The following two sentences; *'It is an industry funded and managed quality assurance scheme that includes compliance with food safety and integrity legislation. Under the program, beef feedlots can demonstrate they are operating in accordance with requirements in relation to animal welfare, environment, meat quality and food safety'* should be abbreviated into once sentence to minimise confusion. The sentence should instead read; *'It is an industry funded and managed quality assurance scheme that requires compliance with food safety, product integrity, environment and animal welfare legislation'*. It should also be noted that NFAS requires that all cattle purchased must be from LPA accredited properties.
- National Feedlot Accreditation Scheme page 26. The sentence *'Therefore, the larger feedlots which produce cattle intended for the export markets are accredited'* should be replaced with; *'Therefore, all feedlots which produce cattle intended for the export markets are accredited'*.
- National Feedlot Accreditation Scheme page 26. The sentence *'Cattle supplied to the domestic market are produced under this accreditation as a proportion, about a third, of these feedlot cattle are supplied to the domestic market'* should be replaced with; *'Whilst accreditation is not compulsory for grain fed beef directed towards the domestic market, the vast majority of domestic beef is sourced from larger accredited feedlots given that 30% of feedlots produce 90% of grain fed cattle'*.
- ALFA believes that given the jurisdictional limitations of FSANZ, issues such as animal identification and traceability are best addressed via the Primary Industry Standards Committee or Food Regulation Standing Committee and not the Primary Production & Processing Standard for Meat & Meat Products.

Kind regards,



Dougal Gordon
Executive Director