

AUSTRALIAN PORK LIMITED

# SUBMISSION

Primary Production & Processing  
Standard for Meat & Meat Products  
(Proposal P1014)

3 December 2013

Australian Pork Limited (APL) is the peak national representative body for Australian pig producers. It is a producer-owned not-for-profit company combining marketing, export development, research and innovation and strategic policy development to assist in securing a profitable and sustainable future for the Australian pork industry. The Australian pork industry employs more than 20,000 people in Australia and contributes \$2.8 billion in gross domestic product to the Australian economy. The pork industry contributes approximately 2.13% of total Australian farm production with roughly 1500 pig producers producing around 4.7 million pigs annually.

2 APL welcomes the opportunity to comment on the proposed Primary Production & Processing Standard for Meat & Meat Products. APL participated in the writing group which developed these proposed standards, and is supportive of the inclusion of the three primary production requirements in Standard 4.2.3 of the Food Standards Code.

3 However, APL has a number of specific concerns with the “Hazard Identification” section of the Supporting document 2, Assessment of Microbiological Hazards Associated with the four main meat species”. These are outlined below.

### **Hazard Identification**

4 APL disagrees that *Yersinia enterocolitica*, *Campylobacter* spp. (*C. jejuni*, *C. coli*), and *Clostridium perfringens* are foodborne pathogens more commonly associated with pig meat.

5 The *Food safety risk-based Profile of Pork production in Australia* (2010) noted that there is no Australian foodborne surveillance to support *Campylobacter* spp. as a hazard originating from consumption of pork products.

6 *C. perfringens* is ubiquitous and it is conceivable that soils could be a major reservoir for *C. perfringens* type A causing food poisoning, with foods becoming contaminated at processing plants via direct contact with soil or soil-containing dust. Outbreaks in Australia are typically associated with ingestion of meat containing meals which have been prepared (cooked) in advance and allowed to cool slowly or been maintained at a warm temperature for a long period of time (Bates & Bodnaruk, 2003).

7 APL recommends that these be removed from the relevant list of hazards found in the gastrointestinal tract and exterior surfaces of pigs (see Chapter 4, Table a).

8 APL also disagrees that *Toxoplasma gondii* is a microbiological hazard, and, in the absence of evidence that this is the case, recommends that all references to it as such be removed. *Toxoplasma gondii* is a foodborne hazard, and may be spread through ingestion of infected pork. The proposed standard suggests that this may be spread through faecal leakage, which APL does not agree with.

9 Therefore, APL requests that the references to *Toxoplasma gondii* as a potentially hazardous bacteria at the bunging and evisceration activities of slaughtering operations (found in Chapter 4, Table b) be removed.

10 Figure 4 identifies a “range of production systems ... employed in the pig industry”. Listed are indoor extensive production systems, semi-indoor extensive systems, and free range production (outdoor). APL recommends that this be changed to include

- Indoor (intensive) production systems
  - a. Conventional piggeries
  - b. Deep litter piggeries
- Outdoor (extensive) production systems
  - c. Rotational outdoor piggeries
  - d. Feedlot outdoor piggeries

This will ensure that the standard remains in line with common industry descriptors for production systems, and create an opportunity for a more robust risk assessment of microbiological hazards (outlined below).

### **General comments**

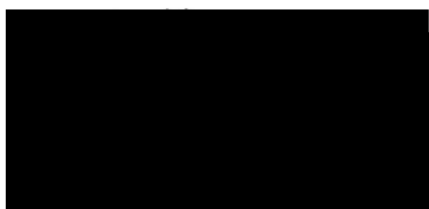
11 The Supporting Document 2 does not assess microbiological hazards as much as list potential microbiological hazards. APL feels that this section of the proposed standards would benefit from a risk assessment which took into account the likelihood of the hazard occurring and its expected severity, in line with conventional risk assessments.

12 Such an assessment should consider microbiological hazards by production type. For instance, livestock in extensive production systems will encounter different microbiological hazards to livestock in intensive production systems.

### **Conclusion**

13 APL supports the proposed Primary Production & Processing Standard for Meat & Meat Products. However, as to be expected with such a broad-ranging standards document, APL has specific recommendations for changes which are outlined in this submission. Document 2 ought to follow a more conventional risk assessment approach.

Yours sincerely,

A large black rectangular box redacting the signature of the Policy Analyst.

Policy Analyst  
Australian Pork Limited