

CATTLE COUNCIL OF AUSTRALIA

16 March 2021

Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604
Via email: submissions@foodstandards.gov.au

Re: Submission – Proposal M1018 Residue Limits (2020)

Cattle Council of Australia (Cattle Council) is the peak industry organisation representing Australia's grass-fed cattle producers. Established in 1979, CCA brings together all state-based farming organisations representing cattle producers in their jurisdiction, associate member organisations with close connections to the cattle industry, and individual cattle producers.

Cattle Council have long held concerns regarding the veterinary chemical Ractopamine for use in Australian cattle and would like to make specific comment in this submission regarding establishing a maximum residue limit (MRL) for use in Australian cattle for this product.

Following consultation with our members and broader stakeholder groups, we are categorically opposed to aligning a MRL for Ractopamine under the Australia New Zealand Food Standards Code with the MRLs established by Codex and other trading partner standards due to the immense trade risk that it poses to some of our key markets. Cattle Council have provided similar submissions to the APVMA in the past ([Attachment A](#)).

International market access is of the highest priority to the Australian beef industry and a significant contributor to the broader economy. The industry's heavy and increasing reliance on access to international markets is paramount to the continued sustainability and responsible growth of the industry.

Australia contributes only three per cent of global beef production, but accounts for around 17 per cent of world trade, being one of the top-three largest exporters for over seven decades. In 2019, Australian beef exports totalled 1.23 million tonnes, up 9 per cent year-on-year, valued at over A\$10.8 billion. The export of live cattle was worth an additional A\$1.6 billion¹. Our contribution to food security both within Australia and importing countries cannot be overstated.

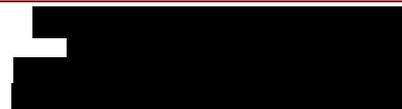
With over 72 per cent of all Australian cattle production exported (to over 78 countries), it is vital that Australian beef producers have unencumbered access to domestic and international markets. It is the potential impacts on these markets and the reputation of the Australian beef industry as a supplier of safe, quality food, upon which this submission focuses.

Our major concerns include:

Trade sensitivity

Ractopamine is a trade-sensitive product in key Australian export markets for live cattle, beef, offal and rendered products. Advice from the Department of Agriculture, Water and the Environment indicates that

¹ MLA 2020, *2020 State of the Industry Report – The Australian Red Meat Industry*. Meat & Livestock Australia.



34 per cent of Australia's current trading destinations oppose the use of Ractopamine and have zero-tolerance levels for any residue. These destinations include the critical Australian export markets (rated in the top ten in both value and volume) listed below:

- China
- EU and related countries (e.g. Bosnia-Herzegovina, Norway, Switzerland)
- Russian Federation and related countries in the EEC (Armenia, Belarus, Kazakhstan, Kyrgyzstan)
- Egypt
- Indonesia
- Taiwan
- Vietnam
- Thailand
- Turkey

It is important to recognise that for the countries listed above the issue is not about meeting MRLs; the expectation is that beef, offal, rendered products and live animals have not been treated with Ractopamine at any stage of the production process. The potential introduction of Ractopamine for use on Australian cattle will have significant detrimental effects on our ability to seamlessly trade into these key markets.

Consumer perception

Consumer sentiment research has consistently indicated that the highest priority of international consumers of Australian beef is eating quality. Other high priorities include '100% Natural', 'Anti-biotic free', 'No added hormones', 'No preservatives' and 'Non-GMO' (i.e. not genetically modified). International consumers, especially China, are very sensitised to the use of Ractopamine in meat due to a massive domestic food safety scandal in 2011 involving Ractopamine detected in pork.

Eating quality

Meat & Livestock Australia (MLA) commissioned a report in 2014 that reviewed the effect of Zilpaterol and Ractopamine on cattle² (report found [here](#)). This report confirmed these risks and noted that 'it is possible that the profound effect of these agents on repartitioning of nutrients is associated with increased death rates reported for cattle treated with ZH [Zilpaterol]...".

The report further found that there was an inverse correlation between increases in carcass weight from the feeding of Ractopamine and marbling, leading to a reduction in eating quality. Given that many producers are paid based upon carcass quality as well as carcass weight, the effects of Ractopamine are not likely to lead to increases in production sector profitability through the supply chain.

Ractopamine is not approved for use in Australian cattle and sheep production. This is a position that we strongly support and believe that any move to introduce an MRL for Ractopamine use in Australian cattle poses a significant threat to Australia's market access.

Please do not hesitate to contact the CCA office on 1300 653 038, or at cca@cattlecouncil.com.au if you would like to discuss this further.

Yours sincerely



² Lean IJ, Thompson JM, and Dunshea Fr (2014). A Meta-Analysis of Zilpaterol and Ractopamine Effects on Feedlot Performance, Carcass Traits and Shear Strength of Meat in Cattle.