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The Standards Development Committee  
Food Standards Australia and New Zealand  
PO Box 7186  
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**Monday 9<sup>th</sup> November 2009**

**The Standards Development Committee,**

**Australian Pork Limited's Submission to the First Assessment Report for the Primary Production and Processing Standard (PPPS) for Meat and Meat Products (Proposal P1005).**

Australian Pork Limited (APL) would like to thank Food Standards Australia New Zealand for the opportunity to comment on the First Assessment Report for the PPPS for Meat and Meat Products. Australian Pork Limited is the national peak body representing and supporting Australia's pork producers.

APL has taken this opportunity to provide information about the current food safety arrangements in the pork industry and our future requirements in terms of the three (3) proposed options. Our preferred option for implementation of the PPPS is option 1.

Please find enclosed Australian Pork Limited's submission.

Yours sincerely,

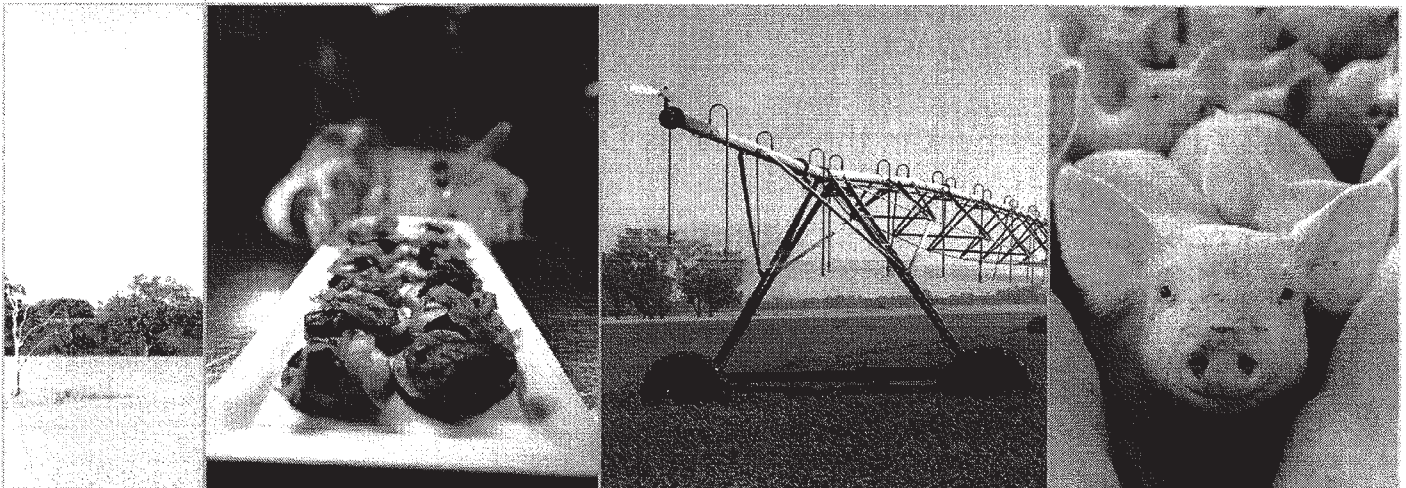
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General Manager Policy

**Food Standards Australia and New Zealand (FSANZ)  
Primary Production & Processing Standard (PPPS) for  
Meat and Meat Products (Proposal P1005)**

**Australian Pork Limited's Submission to the First  
Assessment Report**

AUSTRALIAN PORK LIMITED



**November 2009**

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## **1. Introduction**

Australian Pork Limited (APL) welcomes the opportunity to comment on the First Assessment Report for the Primary Production and Processing Standard (PPPS) for Meat and Meat Products.

Australian Pork Limited (APL) is the national representative body for Australian pig producers. It is a producer-owned not-for-profit company combining marketing, export development, research, innovation and strategic policy development to assist in securing a profitable and sustainable future for the Australian pork industry. APL was involved in the Standards Development Committee during the evaluation process for the proposed PPPS.

Our preferred position in terms of the 3 options proposed in the First Assessment Report is option 1. In the following submission we will elaborate on this view and provide information on the current food safety arrangements in the pork industry.

## **2. APLs position on the first assessment report**

### **2.1 APL supports Option 1**

APL has taken the view that Option 1: to retain the current self-regulation for producers and regulation for the processing sector is the preferred option for development of a National Primary Production and Processing Standard for meat. This provides a through-chain food safety management system consisting of non-regulatory and regulatory elements (co-regulation). We believe this will support joint industry/government food safety initiatives, mitigate food safety risks, provide assurance to customers and trading partners and facilitate market access.

For option 1 (the co-regulatory model) to work effectively, APL supports continued federal and state agency initiatives for harmonisation of state legislation (National NLIS – Pork) and implementation of SAFEMEAT endorsement of a minimum requirement for any QA program that is specified on the National Vendor Declaration (NVD) and intended to validate the information in the NVD as follows:

- (ii) a food safety risk assessment or equivalent;

- (ii) standards or performance indicators that relate to the provisions on the NVD; and
- (iii) an approved verification arrangement, preferably including audit by a JASANZ accredited certification body.

## **2.2 APL's involvement in the Standards Development Committee**

APL's involvement in the Standards Development Committee (SDC) endeavoured to ensure that current industry programs and projects were taken into account by the SDC to achieve appropriate, practical, cost effective and auditable standards for the benefit of all parties. Specifically, APL's aim was to make certain the new PPPS will provide industry with risk-based standards that ensure both domestically produced and imported products meets equivalent public health and safety standards, and also provide industry with a set of internationally compliant (risk-based) arrangements that meet our export market standards.

## **2.3 Food Safety arrangements for the pork industry**

The Australian pork industry has been proactive and has implemented a comprehensive set of programs and projects to address food safety and biosecurity risk and align industry QA program standards with legislative requirements. The first review of pork meat safety was commissioned by PRDC in the early 1990's and research in the food safety area has been ongoing since then. More recent projects have taken an added sophisticated approach and moved away from simply considering carcass quality to focusing on benchmarking hazards in different end-use pathways to better understand potential risk and evaluating prospective interventions.

APL agrees that where there are perceived weaknesses, a review of the current systems would add strength and rigor. This should be done in any case because as the environment and technology systems change and as new production systems are developed. As new science becomes available then on-farm food safety programs should be reviewed and modified accordingly to utilise updated information.

APL administered on-farm QA programs include APIQ and PigPass QA. These programs address key food safety risks. The APIQ program also addresses biosecurity and animal welfare

standards. Approximately 93% of all the Australian pig breeding herd is covered by APIQ and PigPass QA with about 85% of all domestically raised pigs being slaughtered in export approved abattoirs. In addition the industry has implemented the PigPass National Vendor Declaration (NVD) program under the APL coordinated NLIS (Pork) project, funded by the Federal Department of Agriculture, Fisheries and Forestry. The on-farm QA programs are under review to update the standards, integrate the PigPass NVD and ensure consistency with legislative requirements. Federal and State authorities use the PigPass NVD/ on-farm QA program to verify compliance with legislative requirements.

The review of APIQ/PigPass QA on-farm food safety programs for pork production has been undertaken according to full CODEX HACCP principles. The use of Good Agricultural Practice (GAP) on-farm for control of microbial, physical and chemical hazards has been identified as practical and effective, using Critical Control Points (CCPs) where justified. While the approach resulted in the identification of CCPs for selected physical and chemical residue hazards only, their implementation on-farm is scientifically justifiable, resulting in a positive outcome with regard to minimising food safety and trade-related food safety risks.

In addition, a joint APL/ Animal Health Australia paper recommending a National NLIS (Pork) as a framework for harmonisation between States on the vendor declaration (VD), pig producer registration, pig identification and PICs has been endorsed by the Animal Health Committee. This paper has been endorsed by all State Departments responsible for primary industries. Implementation of these recommendations will have the effect of requiring producers to make a declaration in respect of on-farm practices potentially impacting on food safety.

A co-regulatory approach is equally dependent on consistent regulation across state jurisdictions as it is on ensuring industry quality assurance programs, guidelines or codes of practice are robust, substantial and have wide industry coverage with members committed to food safety practices. Currently state jurisdictions have different regulatory approaches with regards to animal traceability (i.e. the use of VDs) and the role of a QA program in underpinning traceability and food safety. APL is looking to authorities in all States to support the move towards improving and developing the pork industry systems to enable the industry



to uniformly meet national livestock performance standards and to conduct effective traceback in the event of a food safety or other integrity related incident.

### **3. Conclusion**

APL would like to thank FSANZ for the opportunity to provide a submission to the First Assessment Report for the Primary Production and Processing Standard for Meat and Meat Products. APL supports Option I in the First Assessment Report as a basis for a through-chain food safety management system consisting of non-regulatory and regulatory elements as a basis for relevant authorities to verify compliance with legislative requirements. This option supports joint industry/government initiatives to mitigate food safety risks and provide assurance to customers and trading partners on the integrity of Australian. The Australian pork industry already has a comprehensive system for food safety and biosecurity in place; however APL agrees that where there are perceived weaknesses, a review of the current systems would add strength and rigor to the current system. APL is happy to assist with any further industry consultation or inquiries.