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Our Ref.: [REDACTED]

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

Dear Sir / Madam

**Submission – Proposal P1005 – Primary Production and Processing Standard for Meat and Meat Products**

Thank you for the opportunity to provide a submission on the First Assessment Report (FAR) for Proposal P1005.

This is a Queensland Government response and our approach follows consultation with other relevant Queensland Government agencies. This response is made by Queensland Health since it is the lead agency in Queensland which coordinates policy advice relative to the national policy on food regulation.

**THE REVIEW BY FSANZ**

**General comments**

The following statements in the FAR are noteworthy:

- *"a significant body of evidence exists for the Australian domestic meat industry indicating that domestically-reared red meat (cattle, sheep, and goats) and pigs present a low risk to public health." (page 15 of the FAR);*
- *"Also evidenced is that industry personnel are mature in their knowledge and management of food safety risks.  
Further, considerable data is available to support the safety of meat and meat products produced from beef, sheep and pork in Australia. The evidence suggests that Australian meat from these species has a low microbial load and generally low prevalence of*

*pathogens. Many of the pathogens listed in this assessment occur infrequently or not at all on Australian meat.*" (page 16 of the FAR); and

- *"FSANZ's evaluation of the hazards and current management practices in Australia indicates that there are no 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 that warrant further chemical or microbiological risk assessments."* (page ii of the FAR).

### **The burden of illness and number of processed animals**

We also note between January 2003 and June 2008 (a period of 5½ years) there were only 66 outbreaks of food-borne illness associated with meat products in Australia reported to OzFoodNet. While the data demonstrates the occurrence of outbreaks involving meat, they are usually due to dishes containing a meat product, with undercooking and temperature abuse post-cooking being the major contributing factors (page 15 of the FAR).

Although not specifically detailed in the FAR, it is known that the number of sheep, cattle, goats and pigs being processed in Australia in an average year is in the multi millions.

### **Cost-benefit issues**

We note the need to transparently determine if costs associated with additional changes to the current system outweigh the direct and indirect benefits to the community, Government or industry.

The statements *"The Ministerial Council Overarching Policy Guideline on Primary Production and Processing Standards specifies a number of high order principles that must be considered where 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"* on page 38 of the FAR are specifically noted.

It is also important, apart from undertaking an analysis of the meat industry and examining public health and safety risks attributable to meat and meat products in Australia, for FSANZ to take into consideration *"economic and social factor and current regulatory and industry practices"* (page 37 of the FAR).

We also note the number of requirements (both legislative and non legislative) which currently apply to meat and meat products.

## **QUEENSLAND'S POSITION AND COMMENTS ON OPTIONS**

Queensland considers that it is imperative that a review of evidence is undertaken to suggest whether the current system is in need of an overhaul. Queensland submits that any evidence to suggest there is a problem with the current system needs to be analysed and presented for consideration by stakeholders. If there are perceived gaps in the system, it is requested that they are clearly articulated and assessed for the need to address those gaps through regulatory mechanisms.

Queensland does not consider that the FAR presents content and options that are convincing and palatable to support and therefore does not support any particular option at this point in time.

Should a standard be progressed for development, it should address a number of key matters:

- Any standard needs to be through-chain as failure to recognise and control hazards early in the production stages leads to costly monitoring, detection and corrective actions that can be

avoided. Whilst the following arguments are not directed towards any particular option proposed in the FAR, they are applicable for through-chain food safety management systems and could be addressed through a range of approaches:

- It is ineffective and costly to manage a number of hazards during processing as the options for remedial action to address the hazards are limited during processing (i.e. dispose of product is usually the only option available to a processor, with consequent costs);
- Traceability must start on farm to allow processing traceability systems to be effective and to ensure effective trace back and effective incident response. Incident response systems must provide for through-chain ability to with-hold non-compliant product and to further test product;
- There would be no benefit in developing a national standard for meat and meat products if it was only applying the existing requirements for processing meat, as distinct from additional requirements for safely producing meat (i.e. offers no advantage over the current arrangements, whilst imposing additional costs);
- Recognition that environmental factors are having an increasing impact on all primary production and any future food safety standards must prepare the way for these factors to be more effectively managed;
- The risk assessment with the FAR asserts hazards are being managed at the processing stage. A more accurate depiction is that the hazards are being detected at the processing stage at cost borne by the processor, and to a lesser extent due to surveillance arrangements managed by regulators. Yet these hazards emanate from the farm and should be controlled on farm; and
- Intensive farming and lot feeding (possibly with growth promotants) is common place. However, levels are tested in the meat during processing rather than at the lot feed stage on farm. This approach is nonsensical and does not support effective through-chain safety management;
- Any standard should deal with managing the unmanaged food safety hazards, not simply the perceived risks;
- Any standard should specify the outcomes required for all meat for human consumption, other than wild game. The scope should cover the production, receipt and slaughter of animals, the dressing of carcasses, and the processing (including further processing), packing, handling and storage of meat or meat products. By developing standards over time as each major and minor meat species is assessed is undesirable as such an ad hoc approach to standard development could potentially lead to unintended gaps and overlaps between standards; and
- Any standard must meet the objectives of the *Ministerial Council Overarching Policy Guideline on Primary Production and Processing Standards*.

The following comments are submitted with respect to the options proposed:

### ***Option 1***

Should evidence not exist of a problem with the current system, then option 1 confirms that the arrangements in place are working effectively and should not be changed. The implementation by all jurisdictions of AS4696:2007 provisions has facilitated effective market access and ensured food safety and provided an acceptable level of national consistency.

### ***Option 2***

Whilst it is acknowledged that option 2 would provide the perception of consistency, it is argued that evidence is required to support whether consistency does not currently exist. It is further acknowledged that option 2 would require significant resources to simply translate the food safety

elements of current AS4696:2007 into the Food Standards Code, when all jurisdictions have already fully implemented AS4696:2007 in State and Territory legislation. In addition, it must be noted that from an industry perspective, there are elements of AS4696:2007 that are not food safety related but must exist in a form somewhere. Finally, adoption of this option could diminish the currently held view that Australia has a highly respected beef export industry.

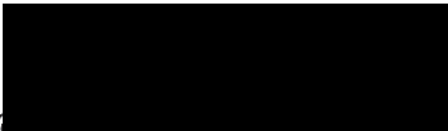
### *Option 3*

This option should only be adopted if significant problems are identified in the current system which cannot be resolved through other means. A detailed cost-benefit analysis would be required if this option was further considered. Most importantly the objectives of the *Ministerial Council Overarching Policy Guideline on Primary Production and Processing Standards* would need to be met.

### **ADDITIONAL ISSUE**

Please also find attached comments prepared by Biosecurity Queensland with respect to chemical risks that may be of interest to FSANZ in any further consideration (Attachment 1).

Yours sincerely



Director  
Food Safety Policy and Regulation Unit  
Environmental Health Branch



**PROPOSAL P1005 PRIMARY PRODUCTION AND PROCESSING STANDARD  
FOR MEAT AND MEAT PRODUCTS - FIRST ASSESSMENT REPORT**

**CHEMICAL RISKS - COMMENTS FROM THE DEPARTMENT OF EMPLOYMENT,  
ECONOMIC DEVELOPMENT AND INNOVATION – BIOSECURITY QUEENSLAND**

**1. Definition of Meat and use of terms when discussing chemical risks.** The *Chemical Risk Profile of Meat and Meat Products* (SD2) provided as part of the *First Assessment Report on P1005* risk profile is not sufficiently clear in its definitions of meat. In particular, the document uses the term 'meat' in a general way and appears to include offal and fat, which contrasts with the definition of meat from schedule 2 of the Food Standards Code. Note that offal and fat can become significant repositories for chemical residues and contaminants

**2. Agricultural and Veterinary Chemicals.** In the Chemical Risk Profile and elsewhere in the First Assessment Report, fertilisers and contaminants are discussed inclusively under agricultural and veterinary chemicals when the Agvet Codes excludes them. The use of the general term 'chemical' is lacking in exactitude and this could detract from the report's credibility.

**3. APVMA Regulation etc.** The Chemical Risk Profile document is correct in that biological and chemical substances that meet the definition of an agricultural and veterinary chemical are regulated by the APVMA. However, those same substances if used for an industrial purpose have been known to ultimately end up in feed and in this context are not regulated by the APVMA. For example, antibiotics used in the production of distiller's grain are not managed by the APVMA.

Work is underway on development of a National Feed Standard and it may attempt to address these issues, however the appropriate regulation of uses of such substances is problematic. The current absence of a National Feed Standard and lack of appropriate import legislation also allows the importation of products containing contaminants that can enter the red meat production system. Note that some of these contaminants (such as chloramphenicol in fish meal) would be considered residues if used in Australia and regulated by the APVMA.

**4. Fertiliser and stockfeed contamination.** The Chemical Risk Profile provides scant reference to fertilisers and the risks of contaminants in fertilisers. Both the Fertiliser Working Group that reports to Product Safety and Integrity Committee and the Animal Feed Control Working Group that reports to Primary Industries Health Committee are charged with producing national standards. However, once the standards are finalised there is no planned capacity to assess risks from new contaminants, products or uses. The Animal Feed Control Working Group intends to put the onus of risk assessment for new contaminants, products and uses back on the manufacturer and user, which is an unsatisfactory approach.

**5. Environmental contamination.** The Chemical Risk Profile does not acknowledge the contribution made by the National Industrial Chemicals Notification and Assessment Scheme (NICNAS). NICNAS conducts environmental assessment of industrial chemicals. Prevention of contamination of the environment with industrial chemicals prevents them from being uptaken by plants and animals.

**6. Natural toxins.** The comments in the Chemical Risk Profile about natural toxins indicate that NVDs help to manage the risk. For the most part, this is not correct because suppliers (with the exception of the peanut industry) don't test for natural toxins, and the growers don't know they are present (so how could they possibly declare their presence or absence).

The comment that pyrrolizidine alkaloids are rapidly excreted is misleading. Pyrrolizidine alkaloids and their N-oxides are not excreted rapidly, they are transformed in the liver to alkylating pyrroles that adduct to anything capable of being alkylated which includes thiols such as glutathione; and DNA. These adducted pyrroles are extremely persistent. The report comments, *for some of these toxins, the levels found in meat are extremely low and consequently of negligible risk to human health, while for others there are minimal or no data on whether the toxins are distributed to edible tissue.* Again this is misleading, because the risk is a product of the hazard and the exposure.

It is not possible to determine the risk because in most cases the hazard is not known. It is suggested that for the most part the risk from natural toxins in red meat is largely unknown.

**7. Role of States and Territories in managing residues contaminants.** The role of States and Territories in managing residues contaminants is not well explained in the document. For contaminants, most agricultural departments rely on the presence of MLs in the Food Standards Code to be a regulatory trigger that a risk needs to be managed. Food regulators have other powers about the wholesomeness of food to rely on, but primary industries departments do not, probably because they do not have public health risk assessment capability.

As a result the MLs help manage risk where there is an ongoing risk but do not help manage the risks in specific significant incidents where no ML has been set. For instance, if an agricultural department became aware of high inorganic arsenic levels in meat or offal of cattle there are no regulatory powers to intervene because no ML has been set. Certainly food regulatory agencies could intervene at slaughter using e.g. wholesomeness provisions, but experience shows that such incidents are not notified because there is no ML to indicate a risk. It is possible that when the Food Standards Code was re-evaluated based on risk, the role of standards in the regulation of incident based risks was not considered.

**8. Hormone Growth Promotants** A comprehensive overview on page 1 and 2 of the Chemical Risk Profile appears to be provided for chemicals intentionally used in the production stage. There is no mention of the use of hormone growth promotants HGP's in the production system and hence no assessment of any risk.