

18 November 2009

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

Via e-mail: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

**RE: Submission regarding the Primary Production and Processing Standard for Meat and Meat Products – 1<sup>st</sup> Assessment Report**

Cattle Council of Australia (CCA) and Sheepmeat Council of Australia (SCA) support FSANZ proposed Option 2 – *Through-chain food safety management consisting of non-regulatory and regulatory elements*. This option is supported because current industry owned food safety systems such as LPA Level 1 adequately manage food safety risks and impose minimal regulatory burden on cattle and sheep producers.

CCA and SCA are supportive of industry working jointly with Government to develop educational programs aimed at producers that encourage the adoption of, and commitment to, industry owned systems to manage food safety risks. Industry recognises that these systems are fundamental to build and maintain food safety, consumer confidence and market access. CCA and SCA also agree with the determination of the 1<sup>st</sup> Assessment Report that there are no unmanaged food safety risks for the cattle and sheep meat industries. This can be attributed to the current programs in place and industry's ongoing commitment to them.

FSANZ Option 2 seeks to incorporate existing state and territory meat safety requirements for the processing sector into a non prescriptive, outcomes based national code. CCA and SCA believe this is a preferable to FSANZ Option 1 (being the status quo) which can potentially lead to inconsistencies between State and Territory jurisdictions. We recognise the need for a mechanism to ensure currency and national consistency of standards for the processing sector.

FSANZ's evaluation in the 1<sup>st</sup> Assessment Report identified that there are no unmanaged food safety risks for the cattle and sheep sectors. The current industry systems have the ability to be amended to address any future risks to food safety if they arise. Hence CCA and SCA oppose FSANZ Option 3 because of the imposition of unnecessary regulatory burdens and associated compliance costs to the primary production sector.

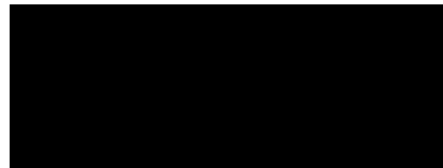
CCA and SCA request that FSANZ, in their second assessment report consider an appropriate mechanism (outside of the FSANZ PPPS) to maintain aspects of the existing Australian Standard 4696-2007 that do not directly relate to food safety such as animal identification and traceability. This is important for maintaining currency and national consistency.

Please contact either the Cattle Council or Sheepmeat Council office if you require further information.

Yours sincerely



**Kate Joseph**  
President  
Sheepmeat Council of Australia



**Greg Brown**  
President  
Cattle Council of Australia