



Australian Government

Department of Agriculture, Fisheries and Forestry

Food Standards Australia New Zealand
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SUBMISSION TO THE

PRIMARY PRODUCTION AND PROCESSING STANDARD FOR MEAT AND MEAT PRODUCTS FIRST ASSESSMENT REPORT (PROPOSAL P1005)

The Australian Government Department of Agriculture, Fisheries and Forestry (DAFF) is pleased to provide comments on the First Assessment Report of FSANZ Proposal P1005 – Primary Production and Processing Standard for Meat and Meat Products.

DAFF is the Australian Government Department with responsibility for industries that span the food supply chain, from agriculture to food processing. DAFF jointly shares responsibility with the Department of Health and Ageing for food regulatory policy within the Australian Government.

DAFF supports the development of primary production and processing (PPP) standards within the appropriate *Australia New Zealand Food Regulation Ministerial Council - Overarching Policy Guidelines on Primary Production and Processing Standards*. These guidelines outline the need for a nationally coordinated approach to food regulation and national standards covering the entire food supply chain. They also state that the development of PPP standards should take into account the objectives of the Council of Australian Governments Food Regulation Agreement. Of these, DAFF considers the harmonisation of Australia's domestic and export food standards and harmonisation with international standards are significant in the development of this standard.

DAFF notes that the First Assessment Report does not discuss overseas approaches to the regulation of meat and meat products and recommends that FSANZ consider other relevant international standards, including the Codex Code of Hygienic Practice for Meat (CAC/RCP 58-2005), to facilitate harmonisation where possible.

In addition, in developing options for ensuring the ongoing safety of meat and meat products, FSANZ should identify the current safeguards in place in Australia that have helped to prevent major meat related foodborne illness outbreaks such as those that have been reported overseas.

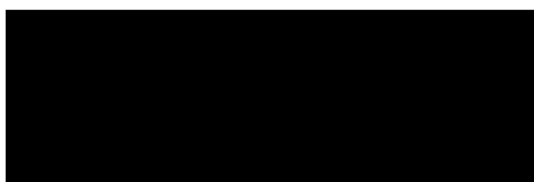
In the absence of a national standard covering the entire meat supply chain there is potential for inconsistency in regulatory requirements. Notwithstanding current jurisdictional frameworks for the regulation of meat and meat products, a national standard should outline minimum effective regulatory requirements to maintain meat safety. FSANZ may wish to consider the observations of the Productivity Commission Draft Research Report on *Performance Benchmarking of Australian*

and New Zealand Business Regulation: Food Safety (October 2009) on the lower level of regulatory harmonisation of the PPP end of the food chain.

In respect of the options currently proposed DAFF notes that *Option 2 – through-chain food safety management consisting of non-regulatory and regulatory elements* relies upon voluntary industry schemes and existing individual State and Territory animal health and welfare legislation to manage meat safety on-farm. In order to consider the effectiveness of this approach as an option for managing meat safety on farm, DAFF recommends that the impact analysis identify the agencies responsible for encouraging industry scheme uptake and implementation and the costs arising from this.

Thank you for providing DAFF the opportunity to comment on this report.

Yours sincerely



A/g General Manager
Food Regulation Policy

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