

02 December 2013

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

To whom it may concern

**Re: Proposal P1014 – Primary Production & Processing Standard for Meat & Meat Products**

Woolworths Limited welcomes the opportunity to comment on the consultation paper *Proposal P1014 Primary Production & Processing Standard for Meat & Meat Products*. Woolworths understands the purpose of this proposal is to examine food safety management in the primary production and processing stages of the meat supply chain.

The Woolworths business is focused on providing our customers with great choice, low prices and excellent quality products every day. As Australia's leading retailer, food safety and quality are integral part of our customer's expectations. Since 1996, Woolworths has operated its own, independently third party audited Quality Assurance Standard.

All Woolworths Trade Partners must meet the stringent quality requirements set within our Woolworths Quality Assurance (WQA) Standard, as part of our WQA Certification programme. This ensures only products of the highest quality and food safety standards are packaged under any of our Woolworths brands. The WQA Certification programme is aligned with Global Food Safety Standards and International retailing best practice. It encompasses third party independent audits, which cover a wide range of criteria from raw material supply to product manufacture. The WQA Certification ensures that microbiological and chemical analysis occurs, contaminants and heavy metals are tested for, hygienic manufacturing practices are in place, process control is implemented at all times and foreign object detection is being used, just to name a few.

The WQA Standard requirements around inputs and management of waste are above and beyond what is outlined by Proposal P1014. Woolworths supports the management of hazards through the entire meat supply chain, which integrates the producer and the processor in food safety regulation. Woolworths supports the inclusion of primary production requirements for meat into the Food Standards Code, and believes this will facilitate corrective actions being managed at the appropriate point in the supply chain in the event of a food safety incident at primary production.

Woolworths also supports the inclusion of traceability requirements on primary producers into Standard 4.2.3. As part of our WQA Standard, all Woolworths Trade Partners are required to develop, document and implement procedures which ensure all material and inputs are traceable through all stages of production, from raw materials to end products. Traceability systems are audited annually, to test systems both forwards and backwards. Woolworths own meat producers are currently required to have systems in place to identify from whom animals are received and to whom they are supplied, and the requirements of P1014 do not present any new issues for our business.

### ***Summary***

In summary, Woolworths welcomes the move by FSANZ to amend the current Standard 4.2.3 to include primary production requirements for traceability, inputs and management of waste for major and minor species (excluding wild game).

Once again, thank you for the opportunity to comment on Proposal P1014. Should you have any additional questions please do not hesitate to contact [REDACTED] Government Relations Manager, on 02 8885 4900 [REDACTED]

Yours sincerely

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**Government Relations Manager  
Woolworths Limited**