

Proposal - P1014

Primary Production & Processing Standard for Minor Meat Species & Wild Game

Major Procedure

Summary

The NSW Food Authority supports Option 1 in principle, for the development of a primary production and processing standard (PPP standard) for minor meat species and wild game.

However, NSW has strong concerns over the potential regulatory gaps that may be created regarding non-food safety matters (eg animal welfare), with the development of a PPP standard in the Code and simultaneous abolishment of the existing Australian meat standards (eg AS 4696, AS4464). NSW believes these concerns must be addressed prior to the implementation of a PPP meat standard in the Code to provide surety to the meat industry, state regulators and consumers that these areas will be addressed into the future.

Specific Issues

NSW re-iterates its support for a PPP meat standard in the Code, as included in our submission to P1005 and therefore supports Option 1 in the submission report. NSW supports the development of a PPP meat standard in the Code that would include requirements for the minor meat species and wild game meat. This would result in a PPP meat standard in the Code that would cover the scope of meat primary production and processing which would be practical to implement, as opposed to a standard that was limited in scope to just the major meat species (as covered under P1005).

Were a PPP meat standard only to cover the major meat species, then the state regulators may be forced to maintain the existing Australian meat standards for minor meat species (eg rabbit, ratite) and wild game meat. In a practical sense this may mean that an abattoir that processed both major and minor meat species would have to operate under two different standards.

NSW supports the proposed approach for industry and state regulators to operate under a single, national set of requirements for all meat species and wild game. However, in the process of developing of a PPP meat standard by FSANZ, NSW has strong concerns that non-food safety elements currently included in the Australian meat standards may be lost.

This is particularly important for issues such as animal welfare which has become a more prominent issue in the media and public consciousness in recent years. In the past 18 months alone, two state regulators have used the requirements of *Section 7 – Animal welfare* of AS4696 to initiate action against processors that were mistreating animals prior to slaughter. Furthermore animal welfare is a significant component of current requirements in the game meat sector, particularly the macropod industry.

Although it is acknowledged that FSANZ's remit is limited to addressing the protection of public health and safety and provision of correct information, a PPP meat standard cannot be developed in isolation where the requirements for non food safety issues such as animal welfare are allowed to lapse. This would be considered an unsatisfactory outcome by the industry, regulators and consumers alike.

As a result of the animal welfare breaches that have occurred at domestic abattoirs in Victoria and New South Wales, animal welfare has been the subject of discussion at food regulatory and primary industries standing committees. This culminated in the Standing Council on Primary Industries Council requesting that the Primary Industries Standing Committee expedite progress with animal welfare system improvements. Therefore NSW strongly suggests that work on the Meat PPPS, including minor species, only be finalised pending satisfactory resolution of the matters being dealt with through the PISC forum.

NSW further suggests there is also merit to include reference to the existing Australian meat standards in an editorial note for reference on how to comply with the requirements of a PPP meat standard and as an example of a food safety management system that a relevant authority may recognise.

To this end, there already exists precedents in the Code, where reference to external documents are included as editorial notes or included within the requirements of the Code itself. Examples include:

- Standard 3.2.2, references in an editorial note 'The 2004 *Australian Drinking Water Guidelines* (ADWG) are available from the National Health and Medical Research Council (NHMRC)'.
- Standard 4.2.1, which actually requires harvesters of bivalve molluscs to comply with the requirements of the Australian Shellfish Quality Assurance Program (ASQAP) Operations Manual
- Standard 4.2.3, references in an editorial note the Commonwealth Export Control (Meat and Meat Products) Orders 2005 or the Australian Standard AS4696-as 'Examples of a food safety management system that a relevant authority may recognise'
- And reference to various Australian standards, such as:
 - AS 4674-2004 Design, Construction and Fit-out of Food Premises
 - the AS/NZS 1766 Food Microbiology methods standards
 - AS/NZS 4659 equivalence standards
 - AS 4276 Methods for Water Microbiology

ENDS

The views expressed in this submission may or may not accord with those of other NSW Government agencies. The NSW Food Authority has a policy which encourages the full range of NSW agency views to be submitted during the standards development stages before final assessment. Other relevant NSW Government agencies are aware of and agree with this policy.