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Mr Mick Burns
Chairman
NT Crocodile Farmers Assoc



20 May 2012

Dear Sir/Madam.

RE: Proposal P1005 - Primary Production & Processing Standards for Meat and Meat Products

On behalf of the Crocodile Farmers Association of the Northern Territory (CFANT), I offer the following comments in response to the consultation paper currently seeking public comment.

As you would be aware, Saltwater Crocodiles are an important part of the Northern Territory's natural environment. Uncontrolled hunting up until 1971 resulted in populations becoming seriously depressed. A key factor in the recovery of the species since 1971 has been the positive incentive that is generated through the commercial value gained by retaining crocodiles in the landscape. The maintenance of a viable and economic crocodile farming industry and the consequential positive benefits is recognised as a key driver in the current *Management Program for the Saltwater Crocodile in the Northern Territory of Australia 2009-2013*.

As we all know, the NT Crocodile Farming Industry has a significant role to play in the on-going conservation and sustainable economic development of crocodiles. In late 2009, the NT Crocodile Farmers met to discuss the formation of an NT Crocodile Farmers Association. Four of the six existing farms (Crocodylus Park, Lagoon, Porosus and Coolibah) agreed to work together, with the resulting Crocodile Farmers Association of the Northern Territory (CFANT) officially being registered as an incorporated Association on 18 August 2011.

The objectives and purpose of the association are as follows:

- To represent members on issues that affect the NT's ability to grow and sustain economically and biologically an NT farming industry; and
- To cooperate fully with the Northern territory Government to ensure the NT crocodile farming industry is based on uses of the wild population that are legal, sustainable and verifiable.

General comments about proposal to consider the development of a draft national standard for all minor meat species and wild game.

The following comments relate to the proposal in general, and the CFANT seek further explanation relating to the issues raised below:

Inclusion of crocodiles in the P1014 has no justification:

The CFANT does not support the development of a national standard to be applied to all minor meat species and wild game, including crocodile, as defined in the Proposal P1014. Crocodile meat is currently governed by AS 4467-1998 *Hygienic Production of Crocodile Meat for Human Consumption*.

The original “standards” derived for processing crocodile meat came from Queensland and were originally based on fish processing standards. Those derived in the NT went further, but were still well short of those required for warm-blooded animals in standard abattoirs. The models followed in Australia came from Louisiana, where they process for human consumption some 400,000 farm raised and 40,000 wild caught alligators a year. At the last IUCN-SSC Crocodile Specialist Group meeting in Brazil, the new processing requirements were outlined. Once again they are based more on fish processing procedures than their standard warm-blooded abattoir requirements.

The inclusion of crocodiles in the grouping of minor meat species as defined under P1014 does not make sense, and no biological basis or justification has been provided by FSANZ for this inclusion (*i.e. “For the purpose of P1014, minor species are those animals currently defined under existing Australian Standards (excluding AS4464-2007 and cattle, sheep, goats, pigs) i.e. buffalo, antelope, camels, alpacas, llamas, deer, horses, donkeys, rabbits, crocodiles, ostrich, emu. For the purpose of P1014, wild game is defined by AS4464-2007”*). If crocodiles are to be included in this grouping, then why not fish and other forms of freshwater and marine seafoods also included? A primary reason is that all the other animals listed are “warm-blooded” animals, with a series of problems unique to that physiological reality. Crocodiles, like turtles and fish, are not warm-blooded.

No reported health problems relating to the consumption of crocodile meat:

One of the members of the CFANT, Professor Grahame Webb, presides as the Chairman of the of the IUCN-SSC Crocodile Specialist Group, with 450 members in over 60 countries, states, “I am yet to hear of human health problems as a consequence of eating crocodile meat – wild or captive raised. Where is the evidence?” Aboriginal Australians have been eating crocodile meat and eggs for some 40,000 years and still do it, and still share meat within and between communities. I know of no traditional knowledge indicating extreme caution is needed to avoid health problems from the food.

Current standards are more than adequate:

The standards we have in place are already stricter than any other country that we know of, so why would we want to make them more strict. On what basis? It is illogical to say that the basis is that only a small amount of meat is produced. What has that got to do with health?

Introducing stricter controls will compromise crocodile conservation and management programs:

Of most concern, the whole logic behind the crocodile conservation and management program in the NT is to maximise the value landowners get for crocodiles taken from their lands. The original standards were created with a view to allowing landowners to transport dead crocodiles at cool room temperatures to an abattoir so that the skin and meat could be processed so that the value the landowner got would be maximised. The “incentive-driven conservation” program depends totally on this simple fact.

Summary:

Crocodile should simply not be included with the other small animals, and as far as I can see, there is no evidence base suggesting ANY CHANGES are needed. Indeed, we appear to be the only country whose ability to export crocodile meat products (feet, legs, hands, organs) is constrained not by CITES, but by standards that exceed those needed to safeguard human health.

The following comments/points (over page) relate to specific sections relating to P1014:

FSANZ welcomes information in submissions on industry production and processing practices relevant to the minor meat and wild game species being assessed.

Summary of Crocodile Industry (as providing in Supporting Document 4):

Crocodile

Commercial crocodile farming began in Australia in the 1980s and the main species farmed is the saltwater crocodile (*Crocodylus porosus*). The industry currently comprises 14 farms situated in Queensland, the Northern Territory and Western Australia. The main products are skins and a small quantity of meat.

The Australia New Zealand Food Standards Code only permits meat for human consumption to be derived from farmed animals. Crocodiles are processed under the Australian Standard for the *Hygienic Production of Crocodile Meat for Human Consumption (AS 4467:1998)* and the Code of Practice on the Humane Treatment of Wild and Farmed Australian Crocodiles.

It is estimated that 100 tonnes of meat is processed annually with 60% being exported to Japan, Malaysia, Hong Kong and Taiwan. The remaining 40% is consumed domestically through restaurants and caterers with very little retailed through supermarkets. The retail value for crocodile meat ranges from \$10 per kilogram (boned-in meat) to \$20 per kilogram (high quality cuts e.g. tail fillet, tenderloin and strip loin). Industry advice confirmed that all product is sold frozen and vacuum packing is common.

The CFANT believes that these figures are not a true representation of the quantity of crocodile meat processed in Australia for domestic and international markets. Based on anecdotal information and a good working knowledge of the crocodile meat industry, the CFANT estimates that a more accurate processing figure would be approximately 125-150 tonnes each year, of which relatively little is exported (estimated to be less than 20%).

FSANZ welcomes information in submissions on industry requirements and measures relevant to:

- the primary production of minor species
- the harvesting of wild game
- the processing of minor species and wild game

Wild caught animals should be able to be used for consumption purposes:

It is unclear who decided that no wild crocodiles would be allowed to be used for human consumption, meaning that all avenues for pursuing “incentive driven conservation” were abolished. Where is the evidence upon which this was based? All the crocodiles killed for human consumption in Brazil are wild caught. Why would Australia reject wild caught animals? Who made this decision and on what scientific basis?

Controls on imported crocodile meat into Australia:

Crocodile meat from PNG and even Africa is currently imported into Australia, undermining our local meat sales. Where are the Australian safeguards here? There is no labelling of imported meats. Most Australian meat is labelled? Australian meat is subjected to strict requirements regarding the use of antibiotics for instance, but no measures are in place to monitor the same requirement in meat imported into Australia. Unless imports are to cease, then any additional restrictive requirements

will further disadvantage the Australian produced crocodile meat within our own domestic market, and also in the export markets.

FSANZ seeks the following information in order to develop a Regulation Impact Statement:

- How accurate is the above information regarding production and export volumes and retail prices? If not reasonably accurate, could you provide/estimate the correct figures both for wholesale and retail sale?
- If you are a producer/processor, what voluntary systems do you have in place currently with regard to traceability and managing inputs (e.g. feed, veterinary residues) on-farm for minor species or during harvesting of wild game? What are the costs of such systems?

Table 2: Production Volume and Indicative Value

Meat Species	Total production (tonnes)	Export volume (tonnes)	Domestic volume (tonnes)	Retail value/Kg
Crocodile	100	60	40	\$10.00 - \$20.00

We produce about 30,000 crocs in Australia, with about 5-8 kg of meat per croc, so estimated to be about 150 tonnes of boned meat. If we are exporting 60 tonnes, it should all be covered by CITES certificates, and hence should be able to be checked through the appropriate authorities (Australian Department of SEWPAC). The CFANT believes that this is an overestimation of the proportion of meat produced being exported.

All crocodile farms are required to comply with existing NT and National Code of Practices determining the use of antibiotics, animal welfare issues etc.

- Are there any changes with regard to traceability and managing inputs that could improve food safety? Can they be adopted voluntarily or should they be the subject of regulation? What are they and how much would they cost?

The CFANT believes that there is no need to improve safety. The assumption we need to improve it is based on what? We already have standards that are far stricter than the major producers. So if there are no problems to date, then why, after 30 years of operation, is there a need to ramp up the safeguards. They are more than adequate.

- Will costs be different if the proposals are implemented through a voluntary industry scheme, rather than new regulation?

Of course they will be different. Past experience tells us that any new tiers of oversight cost money.

- If such measures are adopted by industry, will they have an impact on production, sales, exports and prices?

Crocodile farms are currently finding it difficult to find suitable markets into which meat can be sold at competitive prices. It is already hard to sell meat now at competitive prices. Export value of crocodile meat from Africa, USA and South America and Asia is currently much lower than our prices, with far less production controls ... we cannot compete.

If you require any further information, please let me know.

Yours sincerely,



On behalf of Mr. Mick Burns
Chairman, CFANT