



Chief Executive Officer
Food Standards Australia New Zealand
GPO Box 7186
CANBERRA BC ACT 2610

I am writing to you at the request of my Board, regarding Proposal P1005 – Primary Production and Processing Standard of Meat and Meat Products.

At the Board Meeting on 22 October 2009, a brief was provided to the Board on the proposed Primary Production and Processing Standard for Meat and Meat Products.

The Board has requested that I write to FSANZ and outline the concerns raised by the Board members.

The first matter was that the scope of the proposed Standard was narrow and should be broadened to specify the outcomes required for all meat for human consumption, other than wild game.

In relation to the proposed options in the First Assessment Report the Board requested that the following matters be brought to your attention:

- Option 1: reflects the current Queensland Government position as demonstrated through implementation of the Meat Food Safety Scheme into the *Food Production (Safety) Regulations 2002*.
- Option 2: as articulated would in the Board opinion be a diminution of current Queensland Governments Regulations and runs contrary to industry practice and view. In the Board's opinion the implementation of this option would have significant impacts on both the Queensland meat industry and SFPQ resourcing.
- Option 3: It is the Board's view that this option if pursued must be a through chain approach and should be similar to the recent Primary Production and Processing Standard developed by FSANZ, namely dairy, eggs and poultry meat. The Board support the recent template which has been developed during the egg and poultry meat Standards development.

For your consideration I have also attached some further particulars in relation to the matters raised above.

Should you wish to gain further clarification on the matters raised, please contact Mr Phil Pond General Manager – Strategy, Policy and Development on 07 3253 9802.

Yours sincerely

Geoff Gorrie
Chair
Safe Food Production Queensland Board

PO Box 440
Spring Hill Q 4004

• T 1800 300 815
F 07 3253 9810

info@safefood.qld.gov.au
www.safefood.qld.gov.au



Meat and Meat Products

Hazard Management

As with eggs, poultry and dairy situations, many hazards for meat can be more practically managed during the production stages. Inputs such as the use of chemical products have the potential for contaminants that effect confidence in both food safety and public health outcome from consumption of meat and meat products. These inputs may not have been addressed as hazards, but they can become risks if the hazards are not adequately managed. Failure to recognise and control hazards early in the production stages leads to costly monitoring, detection and corrective actions that can be avoided. The following arguments are applicable for applying food safety management systems to the production stage of meat that is 'on farm':

- preventing and minimising food safety hazards being food safety risks
- consistency with other primary produce production
- need to ensure all hazards that significantly influence food safety are adequately managed effectively as early in the primary production stages as possible.
- ineffective and costly to manage a number of hazards during processing as the options for remedial action to address the hazards are limited during processing (i.e. dispose of product is the only option with consequent costs).
- traceability must start on farm to allow processing traceability systems to be effective and to ensure effective trace back and incident response.
- There would be no benefit in developing a national standard for meat and meat product if it was only applying the existing requirements for processing meat, as distinct from additional requirements for producing meat. i.e. no advantage over current arrangements but imposes additional costs.
- Recognise that environmental factors are having an increasing role on all primary production and standards must prepare the way for these to be more effectively managed.

NSW and QLD combined make up for around 65% of meat production.

Key on farm food safety concerns are traceability and residues.

Traceability

Traceability at the processing stage can only be properly done via supporting documentation coming off farm.

Although NLIS is mandated food safety agencies cannot access this information. Hence, for example, in the case of a BSE outbreak food safety agencies would be unable to trace back.

Food safety agencies need to be able to manage a response and have powers to go back on farm if necessary.

Hobby farms, agistment arrangements and phantom properties – all have implications for tracing back.

Residues

In NSW there have been instances of residue detection (at the processing stage) – e.g antibiotics.

In QLD there have been copper levels detected in meat from cattle grazed near old copper mines following heavy rains.

The risk assessment asserts these hazards are being managed at the processing stage. A more accurate depiction is that the hazards are being detected at the processing stage at a cost borne by the processor. Yet these hazards emanate from the farm and should be controlled on farm.

Intensive farming and lot feeding with growth promotants is common place. However, levels are tested in the meat during processing rather than at the lot feed stage on farm. This approach is nonsensical.

Offal from the animal is tested at the slaughterhouse for levels, however, by then it is too late, the animal is already slaughtered and processed (and in the case of many smaller operators, already out the door).

Ultimately

The standard should concern managing the hazards, not the risks. The benefit of managing the hazards (at the farm stage and through processing) is the avoidance of losing a huge export market. The cost to the community would be enormous if this export market was lost through a failure to detect a problem at the processing stage, where it could have been managed at the farm stage.

This is a matter FSANZ can legitimately consider as it is required to have regard to the desirability of an efficient and internationally competitive food industry – paragraph 18(2)(c).