

7 June 2013

Department of Agriculture, Fisheries and Forestry

Via email: [iar@daff.gov.au](mailto:iar@daff.gov.au)

### **Submission regarding the Processing of Imported Uncooked Pig Meat Compliance Agreement Scheme**

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Australian Pork Limited (APL) is the peak national representative body for Australian pig producers. It is a producer-owned not-for-profit company combining marketing, export development, research and innovation and strategic policy development to assist in securing a profitable and sustainable future for the Australian pork industry. The Australian pork industry employs more than 20,000 people in Australia and contributes \$2.8 billion in gross domestic product to the Australian economy. The pork industry contributes approximately 2.13% of total Australian farm production with roughly 1500 pig producers producing around 4.7 million pigs annually.

2 APL welcomes the opportunity to comment on the processing of imported uncooked pig meat Compliance Agreement Scheme, an important framework central to enforcing rigorous biosecurity protocols which protect Australia's pig herd from a variety of exotic diseases.

3 The proposals include many practical recommendations which APL appreciates will provide efficiency in both implementation and monitoring. However, APL has concerns in relation to four areas, as follows:

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***Removed requirement for onsite cold store to be a QAP. Requirement no longer applies to processors who process all product received onsite.***

Document: Schedule (Section 5 – Prerequisites)

APL would support this amendment if the entire premise remained a QAP facility, resulting in no biosecurity risk increase. If the entire premises were not a QAP facility, then APL cannot support this proposal due to the significant risk increase.

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***Removal of the requirement that imported pig meat must not be transported by road or rail interstate.***

Document: Processes and Outcomes Document (POD) Section 5: Processes and Outcomes

APL continues its opposition to this proposal, which significantly increases the potential biosecurity risk as originally raised in APL's email correspondence to Dr Andrew Cupit on this matter dated 14 December 2012. APL requests to review the evidence used by DAFF in proposing this change.

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***Removal of the prescription for secure containment during transport and/or storage.***

Document: POD Section 5: Processes and Outcomes

As currently written, the proposal appears to remove the requirement for secure containment during both transport and/or storage. However, this appears to conflict with POD 5.3.2 and 5.3.3 which both require 'secure containerised vehicles' for transport. APL requests clarification as to which takes precedence, the Standards or the Proposal.

The substitution of storing imported pig meat 'segregated' from cooked and domestic pig meat, (POD 5.7.1) as opposed to the concept of 'secure containment,' is totally unacceptable. The removal of this requirement unnecessarily increases the risk of contamination of cooked and domestic pig meat by imported pig meat.

APL requires further clarification on these points in order to make an assessment of the increased risk. APL cannot support this proposal, and requests to review the evidence used by DAFF in proposing this change.

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***Clarification of the requirement for imported uncooked pig meat to be transported separately from domestic pig meat***

Document: POD Section 5: Processes and Outcomes

This clarification appears to conflict with Standard 5.3.4 which states that:

5.3.4 Imported pig meat is permitted to be transported concurrently with domestic pig meat where:

- a) segregation is maintained
- b) the imported product is not stacked above domestic product.

APL requires further clarification on this point in order to make an assessment on the potential for increased risk.

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The majority of the changes proposed to the Compliance Agreement Scheme are reasonable. However, APL strongly opposes the above points at this time due to the *prima facie* and unjustified increase in biosecurity risk.

APL stands ready to consult with DAFF to review the evidence on which the above points were proposed, prior to these changes being implemented.



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