

1 February 2006

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

By email: slo@foodstandards.gov.au

To Whom It May Concern

Re: **Draft Assessment Report**
Proposal P282
Primary Production and Processing Standard for Poultry Meat

The NSW Farmers' Association Contract Poultry Group (CPG) welcomes the opportunity to provide comment on the Draft Assessment Report for Primary Production and Processing Standard for Poultry Meat. Furthermore the CPG endorses the recommendation which is contained in the draft report to "require poultry growers to control food safety hazards and obligate poultry processors to ensure growers supplying them are meeting this requirement".

The members of the Association's CPG agree with the need to regulate food safety "on-farm" operations, which includes breeding and rearing farms and transport. They perceive this strategy will have economic benefits for the industry. It will ensure Australian produced poultry meat can be differentiated and marketed as a quality product either domestically or overseas. It also reduces the variability in chick and feed quality and the quality of the growing and transport environments, thus minimising fluctuations in costs and efficiency for both processors and contracted growers making poultry meat a cheaper option for the consumer.

The only constraint envisaged by contracted growers is the increase in the cost of production across the industry which, if using other industry scenarios, is unlikely to be recouped from the consumer.

The existing use, in NSW, of written contracts provide an efficient and acceptable vehicle to regulate food safety, as both the contracted grower (who manages the rearing environment) and the processor (who manages chick quality, feed quality and transport of chicks and marketable live poultry) can be mutually obligated to meet protocols for quality assurance. In NSW, the Poultry Meat Industry Act has the capacity to regulate elements within contracts providing an opportunity for food safety clauses to be required within written contracts.

The auditing by third parties of processors activities in monitoring for breach of contract by growers is the most cost effective way of ensuring compliance of growers in the management of food safety as processors currently on a routine basis assess growers for breach of contract.

To assess the processor managed operations of chick and feed quality and transport of chicks and pick up of marketable live poultry, processor HACCP programs may need to be expanded if these areas are not covered and likewise third party auditing of these additional areas. Transport and feed milling, in some processing companies, is carried out by contracted parties therefore a similar auditing mechanism by processors for breach of contract could occur.

The question is raised however, whether legislation and agencies in NSW have the capacity to cover auditing of breeding farms, feed millers and transporters for a quality assured product or service against food borne illness under either food safety legislation or stock disease legislation.

The evidence presented in the Draft Assessment Report of multiple partial depopulation from one growing cycle increasing the risk of contamination is a major concern to growers as it doesn't appear to have been adequately addressed by risk management. The statement of "keeping partial depopulation to a minimum" will have to be developed into a quantified standard in addition to observance of biosecurity principles for people, plant and equipment entering sheds.

If you require any further information regarding the content of this letter, please do not hesitate to contact the Association's Senior Analyst Jane Littlejohn ph (02) 8251 1872.

Yours sincerely



Gary Ekert
Chairman
NSW Farmers' Association Contract Poultry Group