

Issue

On 20 October 2009, the Australian Government announced a change in Australia's BSE food safety policy for imported beef and beef products which sets new requirements for countries that wish to export beef and beef products to Australia. The new policy will come into effect on 1 March 2010.

Background

Bovine spongiform encephalopathy (BSE), commonly known as mad-cow disease (MCD) is a fatal, neurodegenerative disease in cattle that causes a spongy degeneration in the brain and spinal cord. It is caused by feeding meat and bone meal (MBM) of bovine origin as a food supplement to cattle. It is believed that humans can contract a similar degenerative neurological disease Variant Creutzfeldt–Jakob disease (vCJD) through consuming BSE-contaminated food.

BSE was first recognised and defined in the United Kingdom in November 1986. The epidemic grew rapidly reaching its peak in 1992, when 37,280 cases were confirmed in the United Kingdom. Since then it has shown a steady decline with only 12 cases reported in the United Kingdom in 2009.

Countries in Europe, United States, Japan, Canada and Israel have also reported cases of BSE. Canada has had 18 cases in the last 7 years and the US had 1 case in 2005 and 1 in 2006. In 2009 there were 57 reported cases in the world.

In 1988, following the identification of BSE in the United Kingdom, Australia suspended imports of live cattle from the UK and Ireland. In 1991, Australia extended the restrictions on live cattle to include France and Switzerland following outbreaks in these countries. In 1996, to minimise the risk of BSE in Australia, the livestock industry introduced a voluntary ban on the feeding of MBM of ruminant origin to Australian cattle. In 2001 Australia introduced legislation to prohibit the feeding of all mammalian material to ruminants. In addition, a national surveillance strategy was implemented to monitor approximately 9 million cattle annually.

Current Australian BSE trading requirements

Similar to a number of other countries, Australia introduced trading protocols for cattle and beef products from BSE infected countries. The original protocol introduced in March 1999 and subsequent revision in October 2002 only allowed the importation of cattle and beef products from BSE free countries or countries declared provisionally free from BSE

Under standard 2.2.1, clause 11 of the Australia New Zealand Food Standards Code only those bovine meat and meat products derived from animals free from BSE can be sold on the Australian domestic market. Food ingredients and products that are exempt from these requirements are;

- collagen sourced from bovine skins and hides (including sausage casings produced from this type of collagen);
- gelatine sourced from bovine skins and hides;
- a minor ingredient of a processed product when that ingredient comprises bovine fat and/or bovine tallow at no more than 300 g/kg of the food; and
- dairy products sourced from bovines.

New BSE Food Safety Policy

On the 20th October 2009, the Federal Government announced a change to Australia's BSE policy.

Changes to be introduced on 1 March 2010 will utilise the World Organisation for Animal Health (OIE) risk assessment methodology to undertake a risk assessment to determine whether beef and beef products from a country represent a risk to the health of Australian consumers.⁴ This assessment will replace the current ban on beef and beef products from countries with a recorded

case of BSE. Note this change relates to beef and beef products and does not relate to the importation of cattle.

The current OIE risk assessment methodology specifies the following for consideration.

1. The outcome of a risk assessment
 - including assessing the likelihood that the BSE agent has either been introduced into the country or is already present in the country
 - if this identifies a risk factor then assessment should be made on the likelihood of cattle being exposed to the BSE agent
2. On-going awareness programme for veterinarians, farmers, and workers involved in transportation, marketing and slaughter of cattle to encourage reporting of all cases showing clinical signs consistent with BSE in target sub-populations
3. The compulsory notification and investigation of all cattle showing clinical signs consistent with BSE;
4. The examination carried out in accordance with the Terrestrial Manual in a laboratory of brain or other tissues collected within the framework of the aforementioned surveillance and monitoring system.

In addition, FSANZ have identified traceability and cross contamination of muscled meat as extra assessment criteria.

Under this policy, countries will have to apply and be assessed by Australian authorities as being able to demonstrate they have in place, and appropriately monitor, controls necessary to ensure that beef and beef products exported to Australia are derived from animals free of BSE (ie. conformance with Standard 2.2.1, Clause 11 of the Food Standards Code).

Rationale for the policy change

The rationale being put forward for the policy change has been cited as follows;

- MLA indicates that the Government has been requested by overseas countries to review its BSE food safety policy in light of new, internationally accepted science around BSE. The threat of trade action against Australia has brought the matter to a head.
- The Federal government have stated that under our World Trade Organization obligations, if there were a case of BSE in any part of Australia the current policy would require all Australian beef to be removed from the shelves.
- Passive and active surveillance, carried out in accordance with OIE guidelines and legislation around the world, indicate that the incidence of BSE has declined significantly over time.
- Two scientific reports prepared by interdepartmental committees over the past five years have concluded that the absolute risk from any future importation of beef products from 'BSE controlled risk' countries to the Australian population is likely to be negligible. Accordingly, the risk of BSE incursion into Australia as a result of this policy change is small.
- A review of the *Scientific Evidence to Inform Australian Policy on Transmissible Spongiform Encephalopathies* (TSEs) concluded that the "the risk of future food-borne transmissions leading to human vCJD is very small, if not negligible, even in the UK."
- Australia's previous BSE policy could have led to retaliatory action by countries which also imported our beef. Given that 65% of our product is exported and trade barriers are a regular imposition on Australia's beef exports, this concern was a very real possibility.
- As a nation we have strongly supported international trading rules being science-based, particularly when arguing for greater beef access into regions such as the EU and SE Asia. However the previous 'zero risk' policy made it difficult to justify our stance when BSE science has progressed significantly since the policy was implemented in 2001. With the exception of the minor trading nations of Norway, Iceland and Turkey, Australia was the only 'free' ('negligible risk') country with the old policy still in place.

RMACs current position

The Red Meat Advisory Council (RMAC) comprises a membership of five Peak Industry Councils: Cattle Council of Australia, Sheepmeat Council of Australia, Australian Lot Feeders' Association, Australian Livestock Exporters' Council and Australian Meat Industry Council. It has taken a leading role in this matter.

RMAC has supported the Government's intention to modernise the rules governing beef imports from countries that have experienced BSE. Its support for the implementation of these new rules will be conditional upon the protocols requiring 'outcomes equivalency' regarding traceability of livestock used for sourcing the product to be exported. RMAC is of the view that in-country inspections by relevant Australian authorities are essential to ensure compliance with Australia's requirements before any licence to export is granted, and that periodic inspections be carried out. RMAC is focusing on defining outcomes-based parameters that are in line with Australia (e.g. 24/48hrs for full traceability of cattle and cohorts), and the degree of scrutiny expected from authorities who will be reviewing future applications for access.

RMAC and its member bodies have written to and met with Government authorities and the Minister to convey the conditions under which they would support the implementation of the new policy. These conditions are that the exporting country be required to:

1. comply with international rules regarding removal of specified risk materials, age of cattle, etc.
2. provide guaranteed 'equivalency of outcomes' in respect of cattle traceability, and
3. accept Australia's right for in-country inspection as part of a rigorous science based risk assessment.

RMAC has been assured by Food Standards Australia New Zealand (FSANZ) that:

1. industry will be consulted;
2. 'equivalency of outcomes' as requested by RMAC for traceability will be included; and
3. in-country inspections will be undertaken, where necessary, to validate exporting country claims as part of the approval process.

Association policy

01 Feb GC *That in relation to the threat of BSE in livestock products for human consumption the Association supports:*

- (a) *The removal of exemptions for the use of equine and porcine meal for feeding to ruminants, effectively banning its use;*
- (b) *The continued exemption of tallow for use as feed in feedlots (provided it is grown and processed in Australia and has an acceptable level of insoluble impurities); and*
- (c) *The continued exemption of poultry and fishmeal for use as livestock feed, (provided they are grown and processed in Australia).*

06 Oct EC *That the Association require NFF to have policy that ensures under no circumstances are Australia's quarantine standards compromised in order to facilitate trade.*

AC 03 *That the Association seek:*

- (a) *to protect Australia's scientifically founded sanitary and phyto-sanitary protection measures in any bilateral or multilateral trade agreement negotiation.*