

RESPONSE SHEET

Industry Forum 2024 OOS11  
Response due COB AEDT 31/1/2025

## Approval of the AUSVETPLAN *Response strategy: African swine fever*

### RESPONSE

1. The Australian Meat Industry Council (AMIC):
  - a. **NOTES** that a part review of the AUSVETPLAN *Response strategy: African swine fever (Attachment A)* has been completed by Australian Pork Limited (APL), in consultation with the AUSVETPLAN writing group and the AUSVETPLAN Technical Review Group (TRG) following non-endorsement by Animal Health Committee of Section 6.1.1 *Recommended movement controls for live pigs*.
  - b. **NOTES** that following AHC non-endorsement, APL requested a rework of Section 6.1.4 *Recommended movement controls for meat and meat products of domestic animals from abattoirs*.
  - c. **PROVIDES COMMENTS ON** and/or **APPROVES** the revised AUSVETPLAN *Response strategy: African swine fever v5.3 (Attachment A)* for submission to Animal Health Committee for final endorsement.

### COMMENTS

#### Background

2. AMIC is the peak industry body representing the post-farm gate red meat industry. Our members include meat processors, smallgoods manufacturers, boning rooms, cold stores, wholesalers, distributors, exporters, and independent retail butchers. This response underscores our commitment to food safety, regulatory clarity, and innovation within the food industry, supported by sound science and evidence to inform robust decision-making.
3. Australia's smallgoods sector is a vital contributor to the economy, representing a market worth over \$4 billion annually. However, the domestic pork industry is unable to supply sufficient pork to meet this demand. As a result, the majority of processed ham and bacon consumed in Australia is made from pigs grown overseas. These imported pork products meet strict biosecurity requirements set under Australian legislation, ensuring their safety and compliance with Australia's high food standards throughout the entire supply chain—from importation and transport to processing .
4. Imported pig meat is processed in highly controlled environments designed to mitigate any biosecurity risks. These facilities operate under strict, government-approved protocols, including:
  - a. Segregation of imported products from domestic pig meat and other goods to prevent cross-contamination. Facilities are required to ensure that imported pig meat is physically separated from other products during storage, handling, and transport. This

- includes maintaining clear identification and traceability of imported pig meat to prevent any cross-contamination.
- b. Implementation of a biosecurity-approved food safety program. Facilities must comply with HACCP-based systems or equivalent programs to identify, manage and control food safety and biosecurity hazards related to imported pig meat. These systems meet the strict standards required under Australian biosecurity legislation and are reinforced by regular audits and inspections conducted by government authorities to ensure compliance.
  - c. Comprehensive waste management to maintain biosecurity integrity. Waste generated from imported pig meat, including trimmings, packaging, exudate, and other materials, is handled under strict biosecurity protocols. These protocols include traceability back to the original quarantine container to ensure accountability. Approved waste management methods, such as heat treatment, incineration, and deep burial, eliminate biosecurity risks and protect the Australian environment.
5. While the potential for an ASF outbreak in Australia poses a significant threat to the pork industry, the movement and processing of imported pig meat pose a negligible biosecurity risk due to strict import controls and robust handling protocols. Facilities processing imported pig meat handle exclusively frozen products and maintain strict physical and operational separation from live pigs and domestic fresh pig meat. These controls, supported by internationally recognised risk assessment frameworks and independent audits, ensure an extremely low risk of ASF contamination.

**Issue**

6. The AUSVETPLAN response strategy for ASF applies to meat and meat products originating from pigs raised in Australia. However, it does not explicitly clarify whether these movement controls could also apply to imported pig meat, creating ambiguity and the potential for unnecessary regulatory burdens on establishments that pose minimal biosecurity risk. This lack of clarity increases the risk of inconsistent interpretations and the misapplication of movement restrictions across jurisdictions.
7. Other AUSVETPLAN documents—such as the African Swine Fever Response Operational Guidelines for Pig Abattoirs, Meat Processing, Tracing and Product Recall from Export-Certified Abattoirs Affected by African Swine Fever, and Movement Controls— also lack clear provisions regarding the movement of imported pig meat during a potential ASF outbreak.
8. Without clear differentiation, there is a risk that imported pig meat could be subject to measures designed for facilities handling Australian pigs and pork products. These measures may not only be unnecessary for imported pig meat processors, given the negligible biosecurity risk posed by imported products, but could also result in:
  - a. Supply chain disruptions, affecting the availability of essential smallgoods products;
  - b. Costly regulatory burdens and compliance obligations that are disproportionate to the actual risk; and
  - c. Operational inefficiencies that could undermine the resilience of the smallgoods supply chain.

**Request**

9. In addition to the existing information stating that this manual is not applicable to policies for imported animals or animal products, **AMIC strongly recommends the AUSVETPLAN explicitly clarify that movement controls for pig meat and meat products do not extend to imported pig meat that is subject to the DAFF's rigorous risk analysis process, quarantine protocols and approved arrangements.** This clarification is essential for the following reasons:
- Imported pig meat has no contact with live pigs in Australia.
  - Biosecurity protocols for processing imported pig meat are stringent, highly effective, and subject to strict government oversight. These protocols are established under the Biosecurity Act 2015 (Cth) and enforced through DAFF's regulatory framework, ensuring compliance with Australia's biosecurity standards. Independent evaluations confirm that these measures meet Australia's Appropriate Level of Protection (ALOP) against ASF and other biosecurity threats.
  - These protocols ensure negligible risk of ASF contamination or cross-contamination with the Australian pig industry.
10. By providing this clarification, the AUSVETPLAN will remain focused on addressing genuine biosecurity risks, while ensuring that Australia's smallgoods industry—highly reliant on imported pig meat—can continue operating without unnecessary regulatory impediments. This will promote regulatory consistency across jurisdictions, reduce the risk of misinterpretation during an ASF outbreak, and help maintain the resilience of Australia's food supply chain.

**Reference**

Approved Arrangements for class 2.5 – Temperature Controlled Storage. Department of Agriculture, Fisheries and Forestry. Version 4.0.

Approved Arrangements for class 2.5.2 – Temperature Controlled Storage of Imported Pig Meat Conditions. Department of Agriculture, Fisheries and Forestry. Version 3.2.

Approved Arrangements for class 2.8—Temporary Storage of Containerised Refrigerated Pig Meat. Department of Agriculture, Fisheries and Forestry. Version 3.0.

Approved Arrangements for class 3.2 – Imported Pig Meat Processing Conditions. Department of Agriculture, Fisheries and Forestry. Version 6.0.

Biosecurity Act 2015, Australian Government.

The Effectiveness of Controls for Imported Uncooked, Cooked, and Cured Pig Meat – Interim Inspector-General of Biosecurity Audit Report. June 2013.

Generic Import Risk Analysis (IRA) for Pig Meat – Final Import Risk Analysis Report. Australian Government Department of Agriculture, Fisheries and Forestry. February 2004.