

RESPONSE SHEET

Industry Forum 2025 OOS01
Response due COB AEDT 12/2/2025

Approval of the AUSVETPLAN *Operational manual: Disposal*

RESPONSE

1. The Australian Meat Industry Council (AMIC):
 - a. **NOTES** that a major review of the AUSVETPLAN *Operational manual: Disposal* has been completed by the writing group (Attachment A).
 - b. **NOTES** that the AUSVETPLAN *Operational manual: Disposal* was provided to members of the Animal Health Committee 3D¹ Task Group for review concurrent to TRG.
 - c. **PROVIDES COMMENTS ON and/or APPROVES** the revised AUSVETPLAN *Operational manual: Disposal* for submission to Animal Health Committee for final endorsement.

COMMENTS

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. Our response underscores our commitment to food safety, regulatory clarity, and innovation within the food industry, and is based on sound science and evidence to support robust decision-making.

Background

Section 4.7.5. Use of Processors

3. The addition of this section expands the role of meat processing plants in the disposal process during an EAD outbreak. The revised manual states that processing establishments may be considered as part of the disposal response if they can safely destroy and dispose of affected animals, animal products, and by-products.
4. AMIC acknowledges the important role that meat processors play in EAD outbreak management, particularly given their capacity to support emergency response efforts through infrastructure, logistics, and biosecurity protocols. This includes processors with rendering capabilities, which may provide effective solutions for the safe disposal of animal products when appropriately managed.
5. However, despite this relevance, the inclusion of processors in disposal activities raises several concerns that need to be carefully considered to ensure operational continuity, market access, and biosecurity integrity:
 - Operational impacts: involvement in the destruction, transport and disposal of animals, animal products and animal waste could require significant biosecurity measures, facility

¹ Destruction, disposal, decontamination

adaptations, and contingency planning, which may disrupt regular operations and impose additional costs.

- Trade impacts: involvement of export-accredited abattoirs in the disposal of EAD-affected animals would likely present a risk to market access for these plants, as handling EAD-affected materials may lead to knee-jerk reactions by trading partners who choose to impose trade restrictions or impact the establishment's ability to meet specific disease-related importing country requirements. Consideration of negatively impacting or exacerbating loss of market access should be a consideration of processor involvement in disposal.
 - Selection process: the manual lacks clarity on the criteria and procedures for selecting processors and the conditions under which they would be involved. It is also unclear whether participation would be voluntary or could be mandated, creating uncertainty for processors about their roles, obligations, and decision-making authority during an outbreak.
6. Given the potential critical role of processors in an EAD response, it is essential that their involvement in disposal activities is clearly defined, with consideration of the operational, market access, and biosecurity factors that may be impacted. This requires more detailed discussion and explicit guidance within the manual to ensure consistent and effective implementation during outbreak situations.

Section 4.4. Rendering

7. In the current version of the operational manual (2021), rendering is listed with a disadvantage stating: *'Likely imposition of trading restrictions because many rendering facilities are attached to an abattoir.'*
8. This statement has been removed in the proposed revision, raising concerns not only for abattoirs with integrated rendering facilities but also for all rendering plants, as they are all linked to the supply chain and could be subject to market access impacts. The removal of this point does not eliminate the underlying risk. AMIC is concerned that the absence of reference to market access risks may result in incomplete risk assessments during outbreak responses, potentially overlooking the commercial and regulatory implications for both integrated processing-rendering sites and the broader rendering sector.

Request

9. In light of the issues identified, AMIC requests the following amendments to the AUSVETPLAN Operational manual: Disposal to ensure clarity, consistency, and effective implementation during an EAD response:
- a. **Clarification of the consultation process for meat processors:** clearly specify that processors, including abattoirs, will be formally consulted before being designated as part of an EAD response, with participation being voluntary and based on the facility's operational capacity, biosecurity readiness, potential risks to a plant's market access and commercial considerations.
 - b. **Reinstatement of the trade-related disadvantage for rendering:** reintroduce the previously listed disadvantage concerning potential trade restrictions for both integrated

processing-rendering sites and the broader rendering sector to ensure these risks are explicitly acknowledged in disposal planning and appropriately considered in risk assessments.

10. These amendments will strengthen the manual's alignment with industry practices, enhance biosecurity outcomes, and mitigate potential trade and operational risks during EAD responses.