

Peter Barnard  
Advisory Group Chair  
SAFEMEAT



3 June 2025

**Re: National Feed Standards**

Dear Peter,

The Australian Meat Industry Council (AMIC) welcomes the opportunity to provide feedback on the draft National Feed Standards (NFS) for food producing animals. As the peak industry body representing the post-farm gate red meat sector, AMIC's submission reflects our commitment to a science-based, risk-managed regulatory framework that ensures food safety, maintains market access, and supports long-term industry sustainability.

Given that more than 70% of Australia's red meat production is exported, regulatory decisions relating to animal feed must take into account the potential implications for international market access. Export markets operate under varying regulatory frameworks, and some may impose restrictions on products derived from animals fed with ingredients not yet widely recognised or authorised within their jurisdictions.

While we acknowledge that section 3.12 refers to the evaluation of feed additives and ingredients for safety and potential trade impacts, we note with particular concern the provision in the draft relating to the use of processed industrial hemp and its derivatives in animal feed.

We recognise the growing domestic interest in alternative feed inputs; however, industrial hemp is not currently permitted for use in animal feed in key export markets, including the United States and Japan. The use of such ingredients, even if approved domestically, could raise concerns with trading partners and pose risks to export certification or market access.

Disruptions to international market access can result in prolonged and complex resolution processes, often requiring sustained regulatory engagement and negotiation. Proactive identification and management of these risks is essential to preserving Australia's reputation as a trusted exporter and ensuring continuity in trade.

It is therefore critical that the NFS clearly incorporates a principle recognising the importance of assessing trade risk alongside food safety and biosecurity considerations. Doing so will help ensure that the inclusion of new feed ingredients does not inadvertently jeopardise existing market access arrangements.

We strongly encourage the SAFEMEAT Advisory Group to ensure that trade sensitivity is embedded as a core consideration in the development and implementation of these standards, particularly in relation to novel or emerging feed materials.

AMIC values the opportunity to contribute to this important initiative and remains committed to working collaboratively to ensure that national standards continue to support industry innovation while safeguarding Australia's strong reputation in global markets

Should you require any additional information or further input, please contact Sue Viana, AMIC's Manager, Animal Welfare & Integrity Systems at [sviana@amic.org.au](mailto:sviana@amic.org.au).

Yours sincerely,

Tim Ryan  
CEO  
Australian Meat Industry Council