

**SUBMISSION: INQUIRY INTO ANIMAL CRUELTY IN THE MANAGEMENT OF RETIRED
THOROUGHBRED AND STANDARD BRED HORSES IN QUEENSLAND**

Safe Food Production Queensland

Safe Food Production Queensland ('Safe Food') is a statutory body established by the *Food Production (Safety) Act 2000* ('the Act'), with functions that include:

- regulating, under food safety schemes, the production of primary produce to ensure it is safe for human and animal consumption, and
- monitoring compliance with national standards and the requirements of the Act and the *Food Production (Safety) Regulation 2014* ('Regulation').

For the processing of red meat, the *Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption* (AS4696:2007) is applied in all Australian jurisdictions and the Australian Government Department of Agriculture (DoA) as a regulatory tool for domestic and export purposes. AS4696:2007 is applicable to a range of animal species including cattle, sheep, pigs and horses and includes provisions on animal welfare.

Safe Food uses a range of regulatory tools to monitor compliance including food safety audits, food safety assessments and data analysis relating to food production systems.

Abattoirs are required to hold an accreditation issued under the Act and must operate in accordance with their approved food safety program and conditions of accreditation. Under the Regulation, accreditation holders are also required to notify Safe Food of failure, or suspected failure, to comply with requirements applying to the production of primary produce.

Export registered facilities

Accredited businesses that intend to export red meat must also be registered with DoA. Under export arrangements, export registered red meat abattoirs operate under either Tier 1 or Tier 2 arrangements, depending on the relevant importing country's requirements.

Under Tier 1 arrangements, products are prepared in accordance with the relevant Australian Standard, with regulatory oversight by a state regulatory authority. Tier 2 arrangements apply to red meat abattoirs that export to countries that require oversight to be undertaken by the Australian government. Under these arrangements, red meat abattoirs are required to retain a DoA on-plant veterinarian officer (OPV).

Letter of Exchange

In order to reduce the regulatory burden on accredited businesses that hold an export registration, Safe Food and DoA enter into Letters of Exchange (LoE), which are renewed annually. The LoEs are based on the principle that for establishments registered for export and accredited with Safe Food only one agency will provide regulatory oversight.

Under the current LoE Safe Food provides regulatory oversight for Tier 1 abattoirs and DoA provide regulatory oversight for Tier 2 abattoirs. For Tier 2 abattoirs, Safe Food relies on the observations and advice of the OPV and DoA Area Technical Manager (ATM) to ensure compliance with domestic and export food safety requirements. However, DoA must notify Safe Food as soon as possible, and within three working days, of any critical findings that relate to non-compliance to the applicable legislation and standards.

In instances where DoA plan to undertake a critical incident response audit of an abattoir accredited by Safe Food, it is usual practice for DoA to request the attendance of a Safe Food officer to contribute to the audit as a technical expert.

Animal welfare

Monitoring adherence to animal welfare requirements is not a legislative function of Safe Food. However, as aspects of animal welfare are included in Chapter 7 *Animal Welfare* of AS4696:2007, many Safe Food officers have animal welfare training and operational experience.

Until recent years, when Safe Food officers identified non-conformances with Chapter 7 of AS4696:2007 during monitoring and enforcement activities, Safe Food instigated compliance or enforcement action. These actions ranged from the issuing of corrective action requests aimed at rectifying the non-conformances, to issuing show cause notices for which the accreditation holder must show why their accreditation should not be suspended or cancelled.

Since late 2017, following advice from the Department of Agriculture and Fisheries (DAF), Safe Food has promptly referred any concerns regarding animal welfare to DAF for any necessary action under the *Animal Care and Protection Act 2001*. This includes animal welfare concerns identified by Safe Food officers during food safety monitoring activities and notifications received by accredited businesses and DoA officers.