

Submission to the SAFEMEAT Advisory Group

Draft Australian Feed Standard for Food Producing Animals (Version D – 2022C)

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Summary

Australian Dairy Farmers and Dairy Australia recommend:

- Differentiating between commercial feed mills and on-farm feed production to ensure that regulatory requirements are proportionate to the scale and risk of feed manufacturing activities undertaken by dairy farmers. Dairy farmers already operate under rigorous frameworks such as the Livestock Production Assurance (LPA) program and state-based dairy food safety schemes.
- Ensuring that on-farm sampling and testing requirements are risk-based and proportionate and can be satisfied through existing quality assurance systems rather than duplicative or impractical new protocols.
- Clarifying the treatment of methane-reducing feed additives under the Standard, including whether additives used for environmental purposes (such as Bovaer) are in scope, particularly where they may not be registered under the Agvet Code but are used under specific permits or trial conditions.
- Aligning on-farm obligations more closely with existing standards, such as the Livestock Production Assurance (LPA) program and relevant state-based dairy food safety assurance schemes, and dairy processor assurance programs, which already provide robust oversight of feed-related risks. These existing frameworks negate the need for additional requirements under the new Standard.
- Strengthening the language in the standard to require that feed suppliers must provide vendor declarations confirming compliance with relevant contamination standards.
- Reassessing the scope of labelling exemptions, with particular attention to products that could pose compliance or biosecurity risks such as animal protein meals.

Introduction

Australian Dairy Farmers (ADF) and Dairy Australia welcome the opportunity to provide feedback on the Draft Australian Feed Standard for Food Producing Animals. The Australian dairy industry supports efforts to maintain and improve feed safety, which is critical for the integrity of Australia's dairy supply chain, animal welfare, and public confidence in the quality of animal-derived food products, and continued access to its valuable export markets.

ADF is a not-for-profit organisation recognised as the national Peak Industry Representative Body (IRB) for dairy farmers from all dairy-producing states across Australia. ADF's mission is to provide strong leadership and representation to allow for the continued growth of internationally competitive, innovative and sustainable dairy farm businesses.

ADF's membership base includes State Dairy Farming Organisations (SDFOs) and direct farmer members. ADF has formal representative functions with Dairy Australia, Animal Health Australia, SAFEMEAT, and is the dairy representative member of National Farmers Federation.

Dairy Australia is the national services body for dairy farmers and the industry. Its role is to help farmers adapt to a changing operating environment, and achieve a profitable, sustainable dairy industry. As the industry's Research and Development Corporation, it is the 'investment arm' of the industry, investing in projects that cannot be done efficiently by individual farmers or companies.

The dairy industry is the third largest rural industry in Australia and is a key sector of the agricultural economy, employing 13,500 people on farm and over 31,300 across the whole supply chain. Dairy generated \$6.2 billion in farmgate value in the 2023-24 financial year with the sectors exports totalling \$3.6 billion for the same period. Australia is a significant exporter of dairy products, exporting approximately 30 per cent of milk produced. It ranks fifth in terms of world dairy trade, with a five per cent market share behind New Zealand, the European Union (EU), United Kingdom, and the United States (US).

This submission provides specific feedback on the draft Standard's application to the dairy industry, particularly regarding compliance feasibility and alignment with existing quality assurance frameworks. A recent report by Marsden Jacobs and Associates, Fiona Smith and Farmanco, Dairy Industry Competitiveness, illustrates that the capacity to produce homegrown feed is a key driver of productivity for dairy farmers in several Australian regions. It is therefore essential that the Standard does not hinder farmers' ability to maintain or improve this practice.

Feedback

1. Scope and application to Methane-Reducing Feed Additives

Clause 3.16 requires that feed additives comply with the Agvet Code and relevant jurisdictional legislation. However, we seek clarification as to whether the Standard applies to emerging methane-reducing feed additives, for example, Bovaer (3-NOP), which is not registered under the Agvet Code or may be used under specific trial permits or off-label directions.

We recommend:

- *Including a clarifying note in Section 3.16 or the Definitions that this Standard does not extend to feed additives used solely for environmental purposes (e.g., methane reduction), where compliance with the Agvet Code may not be feasible or required for safety reasons.*

2. Burden of equipment testing requirements on dairy farmers

Sections 3.48 to 3.53 prescribe detailed equipment performance, calibration, and record-keeping requirements for feed manufacturing equipment such as scales, mixers, and metering devices.

While these are appropriate for commercial feed manufacturers, we are concerned that:

- These requirements may be excessively prescriptive and burdensome for dairy farmers conducting low-volume or non-commercial on-farm feed mixing.
- This could impose compliance costs and administrative complexity disproportionate to the risk, particularly for smaller operators or those using pre-mixed or commercially sourced feed.

We recommend:

- *Revising these clauses to differentiate between commercial feed mills and on-farm producers; or*

- *Introducing an exemption or modified requirements for smaller operators where compliance costs are disproportionate to risk; and*
- *Aligning on-farm obligations more closely with existing standards such as the Livestock Production Assurance (LPA) program and relevant state-based dairy food safety assurance schemes, already provide robust oversight of feed-related risks. These standards negate the need for additional requirements under the new Standard.*

3. Practicality of sampling and testing protocols for on-farm use

Sections 3.23, 3.24, and 3.56 require on-farm feed manufacturers to follow ISO-standard sampling protocols and use NATA-accredited laboratories for regulatory testing.

We note that:

- These provisions appear to go beyond current LPA or state-based dairy food safety requirements, which focus on vendor declarations, contamination risk management, and documentation.
- Dairy farmers are unlikely to have the capacity or need to conduct such sampling routinely, unless under exceptional circumstances or if they are not sure of the chemical residue status of stockfeed, as required under the LPA program.

We recommend:

- *Revising these clauses to differentiate between commercial feed mills and on-farm producers or making these clauses a guideline; and*
- *Ensuring that on-farm sampling expectations are risk-based and proportionate and can be met through existing QA frameworks.*

4. Vendor declarations

Section 3.14 states that vendor declarations should be obtained for all additives and ingredients and that appropriate assurances on compliance with contaminant levels should be specified.

We note that:

- The current wording lacks enforceability and places insufficient responsibility on suppliers to provide these declarations.
- Dairy farmers are frequently caught out during audits due to not receiving vendor declarations, even when they have requested them from suppliers.

We recommend:

- *Strengthening the language to require that suppliers must provide vendor declarations confirming compliance with relevant contaminant standards; and*

- *Clarifying that the responsibility for supplying a valid vendor declaration rests with the supplier, to ensure buyers are not unfairly penalised.*

5. Labelling of Feeds

Schedule 3 outlines minimum labelling requirements for manufactured feeds, but exempts a number of feed types from these requirements, including own-use feeds, single or mixed grains, roughages (like hay and silage), protein meals, by-products, and liquid feeds such as molasses and oils.

We note that:

- The rationale for these exemptions appears to be based on practicality, perceived low risk, or the assumption that users are familiar with the products or receive information through other means.
- However, the lack of labelling or mandatory documentation poses risks, particularly for animal protein meals that may contain restricted animal material (RAM). Without clear labelling or declarations, farmers cannot confidently verify compliance with RAM restrictions and are likely to assume that unlabelled products are compliant, which is inherently risky.

We recommend:

- *Reassessing the scope of the labelling exemptions, with particular attention to products that could pose compliance or biosecurity risks such as animal protein meals.*
- *Requiring at minimum a vendor declaration or documentation for exempt feed types where relevant, particularly in relation to RAM status and contaminant compliance.*
- *Ensuring feed users have access to the information needed to manage risks and meet audit and regulatory obligations under existing industry and national frameworks.*

Conclusion

ADF and Dairy Australia appreciates the opportunity to provide this input and supports the intent of the Draft Feed Standard to safeguard feed and food safety. We strongly encourage the SAFEMEAT Advisory Group to adopt a risk-based, scalable approach that recognises the unique operating context of dairy farms and the robust QA frameworks already in place across the industry.

Please contact us if any further clarification or discussion would be helpful.