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Food Standards Australia New Zealand (FSANZ)

By email only: standards.management@foodstandards.gov.au

Re: Review of Standard 4.2.5 – Primary production and processing standard for eggs and egg product

Thank you for the opportunity to provide comments on the Review of Standard 4.2.5 – Primary production and processing standard for eggs and egg product.

Animal Medicines Australia (AMA) is the peak industry body representing the leaders of the animal medicines industry in Australia. Our members companies are the innovators, manufacturers, formulators and registrants of a broad range of veterinary medicine products to protect and treat animal illness, disease and injury, and support animal welfare across the livestock, equine and companion animal sectors. AMA members range from local businesses to the local divisions of global companies and includes companies who manufacture in Australia for global export markets. AMA members represent more than 90% of Australian sales of registered veterinary products.

Veterinary medicinal products are essential tools for veterinarians and farmers to promote and protect animal health and welfare, food safety, public health, environmental health, agricultural production, sustainability, innovation and investment. Animal health is the foundation of animal welfare and supports the sustainable production of safe, high-quality food and fibre derived from animals.

The evidence presented in this consultation indicates that the greatest risks of salmonella infection related to eggs and egg products are associated with the following:

- Food prepared by commercial food providers (rather than food prepared in private residences);
- Consumption of raw and undercooked eggs and egg products;
- Consumption of eggs with cracked shells; and
- Consumption of eggs and egg products that were not stored at the correct temperature.

Animal Medicines Australia would recommend that measures intended to reduce the incidence of salmonella infection should target these specific areas. However, Animal Medicines Australia would like to offer the following comments on food safety from the animal health perspective.

Food safety begins at the point of origin with a foundation of good animal health. Veterinary medicines and biosecurity practices are critical tools to prevent and control zoonotic infections such as *Salmonella sp.*. Keeping animals healthy is essential to minimise the risks of zoonotic illnesses passing to humans during production, or via consumption, of animal-derived food products.

Animal health is integral to sustainable food production. Veterinary medicines reduce the threat of disease to both animals and people by eliminating animal diseases (where possible), increasing disease resistance, supporting early and accurate disease diagnosis, and providing accurate and effective treatments. Veterinary medicines are carefully tested and heavily regulated to ensure that there are no risks to human health from the consumption of animal-derived products when the animal was treated with a veterinary medicine during its lifetime. Healthy animals produce greater food and fibre with fewer resources, and every animal lost to preventable disease must be replaced elsewhere in the production system.

Egg producers have a very limited range of veterinary medicines which can be used in layer hens. It is important that any proposed changes to production and processing standards do not inappropriately limit the use of registered veterinary medicines used to protect the health of layer hens, as this would pose unacceptable risks of adverse impacts on poultry health and welfare, as well as pose risks to the health of people producing and consuming eggs and egg products.

Biosecurity is integral to daily farm operations to protect animal health and welfare by minimising the risk of pathogen transport and spread within and between farms. As noted by this consultation, the movement of people, eggs and equipment was likely to have spread *Salmonella enteritidis* (SE) between farms during the 2018-19 outbreak. Commercial egg production sites also have animal health monitoring programs in place to enable rapid disease detection, and strict measures in place to respond quickly when disease is found, including isolation and treatment protocols, limitations on the movement of people, hens, eggs, supplies and equipment, strict quarantine procedures, decontamination of infection sites, depopulation of infected and in-contact poultry (where necessary) and tracing and surveillance to monitor the extent of infection.

Commercial egg production systems are heavily regulated and carefully monitored to minimise the risk of zoonotic infection transmission via the food chain. However the popular practice of keeping a small number of layer hens in the backyard could pose a threat to human health, especially if the chickens originated from infected stock. This would be a particular problem for pathogens with asymptomatic carriage, such as *Salmonella enteritidis* carriage in the ovaries of chickens and then being transmitted to the egg. Backyard chicken owners are not required to test their birds regularly for disease, learn safe ways to wash and store their eggs, nor participate in industry accreditation programs that protect public health. Specific action in this area would help to reduce the likelihood of foodborne illness originating from domestic animals.

In summary, Animal Medicines Australia suggests that actions targeted at the incidence of salmonella outbreaks from eggs and egg products would be most effectively addressed by focussing on the points of greatest risk as identified in this consultation, rather than through amendments to Standard 4.2.5.

If we can provide any further information, please feel free to contact me.

Yours Sincerely,

Dr Charmian Bennett

Director Science and Policy

(unsigned for electronic submission)