

A business guide to managing the biosecurity risks of food recycling in Australia

Consumer demand and a sense of corporate responsibility have seen a number of restaurants and food stores overseas and in Australia develop programs designed to minimise food waste. These programs sometimes include food recycling, or farmer programs, where food waste is provided to farmers for stock feed or composting.

The reduction of food waste is important both for environmental and other reasons, but this must be balanced with the **potential risks to animal health posed by recycling certain types of food**.

Why do food retailers and restaurants need to manage risks around food recycling and disposal?

Certain foods sourced through recycling programs can pose a risk of the introduction of certain exotic animal diseases. Exotic diseases are diseases that are not present in Australia such as foot-and-mouth disease, and classical and African swine fever. Some recycled foods can be a source of exotic disease if fed to pigs or ruminants (e.g. cattle, sheep, goats and deer).

The introduction of exotic animal diseases are a significant animal welfare issue due to the impact to the health and welfare of livestock. Exotic animal diseases could also cause significant reputational and other damage to Australian agricultural industries, as well as major disruptions to food supply chains and the availability of certain types of food. For example, the cost of a large foot-and-mouth disease outbreak in Australia could be more than \$50 billion over 10 years. Some exotic diseases may also pose risks to human health.

Australia has very strict quarantine laws to reduce the risk of exotic diseases becoming established in our livestock populations. Illegally imported animal product has, in the past, been seized through border protection activities, but there remains a risk that illegally imported product may enter Australia undetected.

What is swill and what is swill feeding?

Swill is all products derived from mammals, including meat, or any food product that has been in contact with products from mammals. Swill includes, any dairy food not originating in Australia (imported dairy foods) is considered swill.

Swill feeding is the practice of feeding swill to pigs. Swill feeding is prohibited and therefore illegal in Australia as it can cause outbreaks of serious animal diseases.

Swill feeding includes the feeding of people's meal scraps to small "backyard" pig herds or pet pigs. Feeding pigs 'savoury' bakery products such as mini pizzas and buns containing bacon and ham falls under the definition of 'swill'. Any food that **has had contact with meat** is also swill.

Many people believe that food processing eliminates the risk of transmission of animal viruses. It is important to note that this may not always be the case. Some viruses responsible for exotic animal diseases can survive the processing of food products (e.g. freezing, heating or curing).

In addition to biosecurity import controls, Australian laws exist to restrict the feeding of certain food types that could transmit disease to pigs and ruminants (e.g. swill feeding to pigs and the feeding of **restricted animal material** to ruminants).

Restricted animal material includes animal products derived from mammals, fish and birds (but **excludes** tallow, gelatin, milk and milk products or oils). The Australian ruminant feed ban helps to prevent the establishment of a range of diseases, including foot-and-mouth disease and bovine spongiform encephalopathy (also known as mad cow disease) in Australia.

The national ban on swill feeding to pigs is a vital measure to prevent potentially infected swill from coming into contact with and being eaten by susceptible animals (see the 'What is swill feeding?' insert for further information).

Those responsible for managing food recycling programs should recognise their role in reducing the risk that participants in such programs might feed prohibited foods to livestock.

There is no food ban limiting what can be fed to cats and dogs. Food waste may be fed to poultry in all jurisdictions, except Queensland. In Queensland swill must not be fed to either pigs or poultry. Note however that certain food donations may not be suitable as feed for animals (because they have adverse effects on animals but not humans). Applicants (for food waste) are responsible for checking with a veterinarian what foods they can safely feed to livestock or pets, or consulting online sources of information such as that [provided by the RSPCA](#).

What are the risks?

If a person supplies swill through a food recycling program which is fed to pigs (or restricted animal material that is fed to ruminants) that person may be prosecuted in most states and territories. Stores engaging in food recycling programs are responsible for demonstrating that they made applicants aware of the national ruminant and swill feeding bans, and that they took steps to manage the risks (e.g. kept records of applications which screened for owners of pigs or ruminants and the use of food waste, and did not supply applicants with food waste prohibited to be fed to pigs or ruminants).

How are the swill-feeding and ruminant feed bans enforced?

Government officers in each state and territory undertake inspections where they contact livestock owners and visit farms and other livestock businesses. Where the feeding of swill or restricted animal material is suspected, they will ask questions to identify the source (provider) of the swill or restricted animal material.

What does the government do to enforce the swill feeding and ruminant feed bans?

To manage risks to public and animal health, and trade, governments and livestock industries regulate (through legislation and inspections) and provide education (as do veterinarians) to promote compliance with the ruminant feed and swill feeding bans.

How can this guide assist you?

This guide is intended to help managers and staff of retailers participating in food recycling programs to implement control measures that will help their applicants comply with legislation, and not potentially cause a livestock disease outbreak (which may also pose a risk to human health). The important steps are to: **KNOW, PLAN, TRAIN and COMMUNICATE.**

KNOW

- **KNOW** how much and what kind of risk is involved in recycling each type of food waste and how to manage that risk (see the coloured table for additional guidance).
- **KNOW** that staff and applicants are aware of the swill feeding and ruminant feed bans, understand the reason for them, and how they apply to food recycling.
- **KNOW** who your applicants are, what they do with the food waste and whether they own pigs or ruminants by having applicants provide written details. See the example form for this purpose at the end of this document.
- For peri-urban and rural stores, **KNOW** that pigs are likely to be kept in your area, which increases the risk that food waste may be fed to pigs.
- **KNOW** that procedures are being adhered to by, for example, conducting spot checks of food waste bins, records or waste storage.
- **KNOW** the law and the risks to your business.

If you determine that there are pigs in your area, or you find it difficult to verify whether applicants may own or feed pigs, you will need to reduce the risk to your business by controlling swill even more rigorously. That means having a 'swill-proof' plan for the disposal of meat (and products which have had contact with meat) by, for example, directing waste meat to specialised meat recyclers or general organics recyclers who accept meat.

Because it is so difficult to ensure that certain foods are not fed to ruminants and pigs, the best approach is to only offer produce and bakery goods that are neither swill nor restricted animal matter for recycling. If a store does supply high risk waste foods containing animal products, it is their responsibility to ensure that these products will not be used to feed pigs or ruminants. This can be done by questioning people asking for food waste about what they would use it for, ensuring that applicants are aware of the swill feeding and ruminant feed bans, and by obtaining applicants' written agreement not to feed the supplied waste to pigs or ruminants.

PLAN

Create a food recycling plan that controls identified risks associated with recycling or disposing of food waste by:

1. Clearly outlining what types of food waste (see the Quick Guide in this document) can and cannot be donated to pig or ruminant owners, or those intending to feed pigs or ruminants.
2. Providing specific instruction on storage and collection (see the end of this section for an example).
3. Keeping a register (see examples at the end of this document) to serve as a record of written agreement for approved produce and bakery donations.
4. Identifying staff members responsible for approving donations of produce to applicants. These people should be fully trained in applying the control measures outlined in the plan.

5. Adhering to a process for applications to be granted or rejected based on risk (see the example at the end of this document).
6. Familiarise staff with your procedures and plan through regular training (and introduce the plan during induction training).
7. Keep a copy of applications on file, and consider creating a database of applicants and participants in the program.
8. Review your procedures and plan annually to identify any improvements that could be made to further reduce risk.

What is best practice food recycling storage and collection?

1. Approved applicants supply their own food recycling bins (wheelie bin suppliers can be found online).
2. The size and number of bins required will vary depending on the specific store's agreement with the applicant, but bins will be used on a rotational basis, which means that the participant will be required to provide twice the number of bins in a store at any one time.
3. Bins are to be clean and undamaged (have no cracks, holes or dents in them) to ensure easy cleaning and to avoid residual contamination. All bins must be clean with no residual waste matter or odours. Stores must not accept dirty and/or damaged bins.
4. Bins must have a burgundy lid (according to the [Australian Bin Standards](#)) and have wheels for handling purposes.
5. Bins stickers should be used for identification purposes (so that the wrong bins are not inadvertently provided to farmers/livestock owners).
6. Bins must be covered at all times, including while in-store waiting for collection and during transportation on public roads (to prevent meat or animal products from being added to bins provided for farmers).
7. Store managers should ensure store staff and participants understand these requirements. Managers should satisfy themselves that bins are compliant with these requirements while the bins are held in-store.

TRAIN

Identify the staff to be responsible for food recycling activities and train them in your food recycling risk management procedures.

Training for those involved in the store's food recycling program should familiarise them with processes that reduce business risk, which include:

1. A storage and collection process that prevents contact between meat and dairy and other waste, and the misidentification of waste intended for recycling.
2. An application process that screens applicants on the basis of how they intend to use food waste (i.e. what type of food waste they want, whether it will be fed to pigs or ruminants, or whether livestock have access to it, or whether it might be redistributed to those who own or feed livestock.)
3. A record keeping process that reduces risk to the business by providing evidence of efforts made to reduce the likelihood of waste food being used by applicants in ways that are not compliant with the national swill feeding and ruminant feed bans.

The identified staff should also:

1. Know the ban on swill feeding and the relevant legislation in their state or territory, and understand the business risk involved in food recycling (because of the ban) and how to mitigate it.
2. Know and understand the ruminant feed ban and understand the business risk involved in food recycling (because of the ban) and how to mitigate it.
3. Be able to explain the purpose of the swill feeding and ruminant feed bans to others (such as program applicants) and the implications of the bans for the store's food recycling program.

What does a best practice approval process look like?

The following approval process is designed to help manage the risks associated with a food recycling program, and to ensure that those who apply for food waste understand their obligations.

1. All requests for food waste must be made to the staff member identified as responsible for assessing applications.
2. The responsible staff member provides an application form/agreement (a sample form is provided at the end of this document) to the person making the request. The application form should include a schedule of products for donation, a declaration area stating whether they own pigs or ruminants, and whether they intend to feed the product to pigs or ruminants, and information about the swill feeding and ruminant feed ban.
3. The applicant must complete the form and return it to the responsible staff member for processing.
4. The responsible staff member (trained in the store's process for food recycling and aware of the relevant risks and legislation) assesses the application form to ensure all details are correct and (if acceptable) provide approval. They should take note of whether food waste will be fed to pigs or ruminants. Any application that requests swill for feeding pigs, or restricted animal material to feed ruminants, should be denied with reference to the relevant ban. The staff member has the right to deny any application if information or supporting documentation is not complete.
5. If the application is approved, the responsible staff member contacts the applicant to commence collections and places their application on file.
6. If an application is denied, a staff member will inform the applicant and provide reasons.
7. Ensure that applicants understand their obligations to provide their own collection bins and their other responsibilities (see Donation form), including servicing their bins in a timely and correct manner as per the schedule.
8. The responsible staff member should reject collections bins (provided by applicants) that are considered not fit for purpose (i.e. have cracks, holes or dents in them, and/or residual waste matter or odours).

COMMUNICATE

More than one staff member should receive training about your food recycling risk management procedures, and be responsible for food recycling activities. This will ensure that procedures are followed in the absence of the other trained staff member.

Those staff not involved in food recycling should (as a minimum) know that the business has a food recycling risk control plan and/or understand why the business carefully controls the distribution of food waste. Introducing the plan as part of staff inductions and ongoing training is a reliable way to

ensure the plan is communicated to staff, as is making copies of the plan readily available or posting notices about their location and use.

In addition, staff should be involved in the regular review of risk control procedures as they may be able to identify improvements that could be made to further reduce risk.

Sharing existing resources on swill feeding and the ruminant feed ban as part of a food recycling program is a low-cost way to raise applicant awareness about these (and to explain the reason for food recycling program policies). Such resources are indicated below.

Additional resources

A range of general resources on recycling are available at the Australian Government Department of the Environment's web pages under "National Waste Policy publications and resources" at www.environment.gov.au/protection/national-waste-policy/publications

Food waste is classified as **organic waste**. Planet Ark's *Recycling Near You* website may help to identify organic recyclers in an area: www.recyclingnearyou.com.au

Swill feeding

For more information on swill feeding read Australian Pork Limited's [fact sheet](#), or the Australian Veterinary Association's [fact sheet](#). For additional information, or information specific to your state or territory, you can contact your relevant DPI.

The ruminant feed ban

For more information about the ruminant feed ban and resources, visit the Animal Health Australia website page at: www.animalhealthaustralia.com.au/what-we-do/disease-surveillance/tse-freedom-assurance-program/australian-ruminant-feed-ban/

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Cannot be fed to ruminants (goats, cows, deer, sheep) or camelids (alpacas, camels or llamas)



- Fish
- Refrigerated bakery foods (including meat pies, sausage rolls, cakes and products with fresh cream).
- Shelf-stable bakery products that contain meat (including cheese and bacon rolls).
- Meat or products derived from meat (e.g. sausages or offal) or meat processing by-products (feathers, blood).

Cannot be fed to pigs



- Cream, cheese, milk, butter and other dairy products imported from other countries.
- Food products which have had contact with meat
- Refrigerated bakery foods (including meat pies, sausage rolls, cakes and products with fresh cream).
- Shelf-stable bakery products that contain meat (including cheese and bacon rolls)
- Meat or products derived from meat (e.g. sausages or offal) or meat processing by-products (feathers, blood).

Agreement – Food Recycling Program

[Name of store] has a fruit and vegetable and/or bakery donations (“Food Recycling”) program where certain products are donated to approved applicants.

By signing this letter, you acknowledge and agree to the following:

- (i) You have provided [Name of store] with an application form to collect the donations and confirm that all details on the application form are accurate, complete and not misleading. You have confirmed that you have all the necessary licences, approvals and consents for the use and disposal of the products donated.
- (ii) You understand that there are risks associated with the collection, transportation, use, storage and disposal of the donations. To the fullest extent permitted by law, [Name of store] cannot be responsible for the food donations including your collection, transportation, use, storage and disposal of donations.
- (iii) You are responsible for inspecting the donations at pick up time and shall only accept the donations if it is to your satisfaction. To the fullest extent permitted by law, [Name of store] does not make any representations or warranties as to the fitness or quality of the donations.
- (iv) [Name of store] has not made any attempt to determine whether the donations are suitable for use as animal feed. You are responsible for determining whether the donations are suitable for use as a feed.
- (v) You understand that feeding ‘swill’ (as defined on page one) to pigs is illegal in all states and territories, and you will check your compliance prior to feeding pigs.
- (vi) You understand that feeding any animal products (meat, fish or dairy) to ruminants (which include cattle, goats, sheep and deer) is illegal in all states and territories, and you will check your compliance prior to feeding ruminants. In addition you understand that the onward supply of such products to someone else to feed to pigs/ruminants is also an offence in most states and territories.
- (vii) You will not cause or permit donated products to be consumed by any person after any "use-by" date marked on the products. If the products are not marked with a "use-by" date, then you warrant that you will not cause or permit donated products to be consumed after 24 hours of being supplied by [Name of store] to you.
- (viii) You must comply with all applicable Commonwealth, state and local laws or regulations (for example, not using the donations for baiting, poisoning, human consumption, sale or illegal disposal of waste).
- (ix) In return for [Name of store] supplying the donations, you irrevocably indemnify [Name of store] on demand from and against any cost, loss, expense or claims arising directly or indirectly from you or your employee’s, agent’s or contractor’s collection, use, storage, transportation or disposal of the food donations. This indemnity is a continuing obligation and survives termination of this agreement.
- (xi) You warrant that you use the food supplied at your own risk and that the supplier bears no responsibility.
- (xii) If you are a hobbyist and aren’t engaged in a commercial venture [Name of store] will require confirmation of home contents insurance cover containing liability cover.

(xii) [Name of store] can terminate this agreement at any time after providing four weeks of notice.

(xiii) You understand that this Agreement may be terminated immediately by [Name of store] if you breach any term of this Agreement or if there is a change of legislation.

Yours faithfully
[Name of store]

I (PLEASE PRINT),
....., hereby
accept and agree to the terms of this Food Donations Agreement from [Name of store]

Signature.....

Date.....

OFFICE USE ONLY		
	Store Manager	State Administration Manager (if applicable)
Signature		
Print Name		
Date		
Reason if Denied		

Quick guide

Appropriate foods for recycling

- Fruit
- Vegetables
- Bread
- Products without meat
- Food which has NOT had any contact with meat
- Dairy products made in Australia from Australian ingredients.

Food recycling controls:

KNOW there are restrictions about feeding meat and animal products to pigs and ruminants.

KNOW who your applicants are and what they do with the food waste.

KNOW that procedures are being adhered to.

KNOW the high-risk food products (meat, dairy not of Australian origin, and food which has had contact with either).

PLAN how to manage food recycling risks and keep records as evidence of risk management.

TRAIN staff in your food recycling risk management procedures.

COMMUNICATE swill-feeding and ruminant feed ban risks and penalties to staff and program applicants, along with their responsibilities.

The Law

- **Swill feeding** (the feeding of meat and other prohibited substances to pigs) has been banned in all Australian states and territories.
- It is an offence in most states and territories even **just to provide swill**.
- Penalties apply for feeding swill, allowing pigs access to swill, storing swill at a pig facility, or **collecting/supplying swill intended to be fed to pigs**.
- Feeding any animal products (meat, fish or dairy) to ruminants (which include cattle, goats, sheep and deer) is illegal. The national ban is called the [Ruminant Feed Ban](#).