

BUSINESS GUIDE TO MANAGING BIOSECURITY RISKS OF FOOD RECYCLING IN AUSTRALIA

Consumer demand and a sense of corporate responsibility have seen several food retailers and restaurants 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 for environmental, sustainability 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 emergency animal diseases (EADs). EADs such as foot-and-mouth disease (FMD) and classical and African swine fever are not presently found in Australia. Some recycled foods could be a source of EADs if fed to pigs or ruminants (e.g. cattle, sheep, goats and deer).



WHAT IS SWILL FEEDING?

Swill, the traditional name for all prohibited pig feed, is food waste containing meat or any other mammalian products or by-products, excluding Australian milk. This also includes imported dairy products and any foods that have been in contact with meat.

Swill feeding is the practise of feeding swill to pigs, including small 'backyard' pig herds or pet pigs.

Swill feeding is illegal in Australia as it can cause outbreaks of serious animal diseases. The national ban on swill feeding to pigs is a vital measure to prevent potentially contaminated swill from being eaten by susceptible animals.

For more information on swill feeding read Australian Pork Limited's fact sheet (www.australianpork.com.au/swillfeedingfactsheet). For additional information, or information specific to your state or territory, you can contact your relevant state department.

The introduction of EADs into Australia would pose a significant risk due to the impacts on the health and welfare of livestock. EADs 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 FMD outbreak in Australia could be more than \$50 billion over 10 years. Some EADs may also pose risks to human health.

Australia has strict quarantine laws to reduce the risk of EADs becoming established in our livestock populations. Illegally imported animal product has been seized in the past, through border protection activities, but the risk remains that illegally imported product may enter Australia undetected. Many people believe that food processing eliminates the risk of

WHAT IS THE AUSTRALIAN RUMINANT FEED BAN?

The ruminant feed ban (RFB) helps to prevent the establishment of a range of diseases, such as bovine spongiform encephalopathy (BSE, also known as mad cow disease), in Australia. The ban means that you as a food vendor cannot provide restricted animal material (RAM) to livestock producers or livestock.

RAM is defined as any material taken from a vertebrate animal other than tallow, gelatin, Australian milk products or oils. It includes rendered products, such as blood meal, meat meal, meat and bone meal, fish meal, poultry meal and feather meal, and compounded feeds made from these products. Significant penalties may apply to anyone found guilty of supplying RAM for use as ruminant feed.

For more information about the ruminant feed ban and resources, visit:

www.animalhealthaustralia.com.au/australian-ruminant-feed-ban.

transmission of animal viruses. It is important to note that this may not always be the case. Some viruses responsible for EADs 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 pathogens to pigs and ruminants (e.g. swill feeding to pigs and the feeding of RAM to ruminants).

The national ban on swill feeding to pigs is a vital measure to prevent potentially contaminated swill from being eaten by susceptible animals.

These food bans do not apply to cats and dogs, and food waste can be fed to poultry in all jurisdictions except Queensland. In Queensland, the swill feeding definition includes material derived from a bird (including eggs) or that has come into contact with bird carcasses or material and must not be fed to either pigs or poultry.

It is important to note that certain food donations may not be suitable as feed for animals (because of the adverse effects on animal health). It is the recipient's responsibility to check with a veterinarian to determine what foods they can safely feed to livestock or pets or consult online sources of information such as provided by the [RSPCA](#). 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.

What are the risks to my business?

If a person supplies swill through a food recycling program which is fed to pigs (or poultry in Queensland or RAM that is fed to ruminants) that person may be prosecuted. Food retailers and restaurants engaging in food recycling programs are responsible for demonstrating that they made applicants aware of the national RFB and swill feeding bans under jurisdictional legislation, 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 or poultry in Queensland).

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 RAM is suspected, they will ask questions to identify the source (provider) of the swill or RAM.

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 food retailers or restaurants 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 what food types cannot be fed to ruminants and pigs.
- Know that staff and applicants are aware of the swill feeding and RFBs, 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 come into contact with meat) by, for example, directing waste meat to specialised meat recyclers or general organics recyclers who accept meat.

Due to the difficulty in ensuring that certain foods are not fed to ruminants and pigs, the best approach is to only provide produce and bakery goods that are neither swill nor RAM for recycling. If a store supplies high-risk food waste containing animal products, it is their responsibility to ensure 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 RFBs, and by obtaining applicants' written agreement not to feed, or supply the feed to others for feeding, to pigs or ruminants.

PLAN

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

- clearly outlining what types of food waste (see the Quick Guide at the end of this document) can and cannot be donated to pig or ruminant owners, or those intending to feed pigs or ruminants
- providing specific instruction on storage and collection (see the end of this section for an example)
- keeping a register to serve as a record of written agreement for approved produce and bakery donations
- 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
- adhering to a process for applications to be granted or rejected based on risk

- keep a copy of applications on file and consider creating a database of applicants and participants in the program
- review your procedures and plan annually to identify any improvements that could be made to further reduce risk.

TRAIN

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

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

- a storage and collection process that prevents contact between meat, dairy and other waste, and the misidentification of waste intended for recycling
- 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 poultry in Queensland) or ruminants, whether livestock have access to it or whether it might be redistributed to those who own or feed livestock
- a record keeping process that reduces risk to the business by providing evidence of efforts made to reduce the likelihood of food waste being used by applicants in ways that are not compliant with the national ruminant feed bans and jurisdictional swill feeding legislations.

The identified staff should also:

- be familiar with the procedures and plan related to your business and receive regular refresher training
- 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

- know and understand the RFB and understand the business risk involved in food recycling (because of the ban) and how to mitigate it
- be able to explain the purpose of the swill feeding and RFBs to others (such as program applicants) and the implications of the bans for the store's food recycling program.

What is best practice food recycling storage and collection?

- Approved applicants supply their own clean and disinfected food recycling bins (wheelie bin suppliers can be found online).
- The size and number of bins required will vary depending on the specific food retailers or restaurant'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.
- 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 and disinfected with no residual waste matter or odours. Stores must not accept dirty and/or damaged bins.
- Bins must have a burgundy lid (according to the Australian Bin Standards) and have wheels for handling purposes.
- Bins stickers should be used for identification purposes (so that the wrong bins are not inadvertently provided to farmers/livestock owners).
- Bins must always be covered, 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).
- Store managers should ensure staff and participants understand these requirements. Managers should satisfy themselves that bins are compliant with these requirements while the bins are held in-store.

What does a best practice approval process look like?

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

- All requests for food waste must be made to the staff member identified as responsible for assessing applications.
- The responsible staff member provides an application form/agreement 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 RFB.
- The applicant must complete the form and return it to the responsible staff member for processing.
- 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.
- If the application is approved, the responsible staff member contacts the applicant to commence collections and places their application on file.
- If an application is denied, a staff member will inform the applicant and provide reasons.
- Ensure that applicants understand their obligations to provide their own collection bins and their other responsibilities (see Agreement form), including servicing their bins in a timely and correct manner as per the schedule.
- The responsible staff member should reject

collection 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

Staff that are 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. Additionally, 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.

This document was produced by the Australian Swill Feeding Working Group, which comprises members of the federal and state jurisdictions and Australian Pork Limited. It was developed in collaboration with the Farm Biosecurity Program. The Farm Biosecurity Program is a national awareness program that provides information for livestock and crop producers about on-farm biosecurity, and how to prevent diseases, pests and weeds from impacting their business.

The program is a joint initiative of Animal Health Australia and Plant Health Australia. It encourages producers to identify risks to their livestock and plant products and minimise these risks by incorporating on-farm biosecurity measures into their everyday operations. Learn more at www.farmbiosecurity.com.au.

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



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

CAN NOT be fed to pigs



- Cream, cheese, milk, butter and other dairy products imported from other countries
- Food products which have had contact with meat
- Bakery goods (including meat pies and sausage rolls)
- 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 (blood)

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 (and poultry in Queensland).

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, controls 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 (or poultry in Queensland).
- Feeding any animal products (meat, fish or dairy) to ruminants (which include cattle, goats, sheep deer and camelids) is illegal. The national ban is called the Ruminant Feed Ban.