

**From:** s. 22(1)(a)(ii)  
**Sent:** Tuesday, 26 August 2025 3:35 PM  
**To:** s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii) ; s. 22(1)(a)(ii)  
**Subject:** FW: A few questions re pet food [SEC=OFFICIAL]

### OFFICIAL

Hi s. 22(1)(a)(ii)

Am working through this now.

But if you want something now, as indicated the insect based feed question is quite straight-forward as we recently worked this up.

See below

**Insect meal/protein.** Globally this is becoming more relevant to the pet food sector and from a member's experience, not easy when you want to either import or export. I would like to better understand the biosecurity concerns when importing insect meal/protein as the ingredient. This is slowly becoming more popular as production volumes increase globally, consumers are more accepting, and pricing is more competitive.

Note that the department has interpreted this query (and responded accordingly) to relate to the import of bulk quantities of insect meals. Conditions for insect-based pet food in small packages for retail sale have evolved based on case-by case assessments for these very discrete scenarios deemed low biosecurity risk. However larger (bulk) quantities of insect-based feeds have not been subject to formal biosecurity risk analyses other than possibly by the European Union (EU). However, the available scientific literature often reports the lack of specific information to inform conclusions about risk for insect-based feeds, and that more research is needed.

A primary issue of biosecurity concern is the substrate the insects are raised on. Insects may be raised on a substrate of organic material (plant and/or animal). The substrate could be contaminated with pathogens of biosecurity concern (including prions, the agents responsible for the transmissible spongiform encephalopathies such as bovine spongiform encephalopathy [BSE], scrapie and chronic wasting disease [CWD]), and it is possible that these pathogens may persist in the digestive tract of the insects. The prions are extremely resistant to the normal

|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p>manufacturing processes that mitigate the risks caused by other pathogens such as bacteria and viruses. Manufacturers may state that insect larvae are grown only on plant material. However, the larvae of many of the commercially significant species can be effectively grown on any organic matter and animal material cannot be ruled out as an ingredient or contaminant of the substrate without adequate assurances. Potential contamination of the substrate or insect protein with animal material during the production process is likely to lead to critical issues in the risk assessment.</p> <p>Until proven otherwise to the department's satisfaction, our current position is that animal material could be an ingredient or contaminant of the substrate, and this could include material of ruminant origin. This remains a key consideration for risk assessment and risk management.</p> |
|--|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

OFFICIAL

OFFICIAL

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**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Sent:** Monday, 25 August 2025 3:10 PM  
**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>  
**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Subject:** RE: A few questions re pet food [SEC=OFFICIAL]

OFFICIAL

Anything you've got would be good.

OFFICIAL

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**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Sent:** Monday, 25 August 2025 3:09 PM  
**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Subject:** RE: A few questions re pet food [SEC=OFFICIAL]

OFFICIAL

Speak of the Devil! I was just texting <sup>s. 22(1)(a)(ii)</sup> that I had to make this a priority in front of his risk assessment.  
 We've certainly started. I will look into it tomorrow and revert then.  
 s. 22(1)(a)(ii)

OFFICIAL

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**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Sent:** Monday, 25 August 2025 3:08 PM  
**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>  
**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Subject:** RE: A few questions re pet food [SEC=OFFICIAL]

OFFICIAL

Hi <sup>s. 22(1)(a)(ii)</sup>,

Did you get a chance to throw together anything for s. 47F(1)?

s. 22(1)(a)(ii)

OFFICIAL

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**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Sent:** Friday, 1 August 2025 12:05 PM  
**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>  
**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Subject:** RE: A few questions re pet food [SEC=OFFICIAL]

OFFICIAL

Sure.  
 Fortunately, a couple we have already considered.  
 For example – imported bulk insect based pet food – Fine as long as regulators are confident there is no diversion to stockfeed. The old thorny issue raises its head again.

Extrusion and 100/30 – I believe there is a s. 47F(1) advice related from a few years back but we will have to refresh. Guidelines on extrusion are probably still largely current.

NZ stuff – way before our time. But there is guideline material of course. And time permitting a dig in the files could also assist.

I haven't had scope to review her email today , other than a scan.

We will all have to revisit the prioritisation against each job going forward next couple of weeks. Something for the Directors in conjunction with relevant staff. I assume that will come up in the discussion on 'how we might handle it'.

I know s. 47F(1) reasonably well from previous contacts. She was asking similar questions and wanting comprehensive advice on 100/30 and ASF some years back – which we provided and she gratefully acknowledged.

Regards

s. 22(1)(a)(ii)

OFFICIAL

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**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>

**Sent:** Friday, 1 August 2025 11:14 AM

**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>

**Subject:** Re: A few questions re pet food [SEC=OFFICIAL]

OFFICIAL

Hi s. 22(1)(a)(ii) ,

s. 47F(1) has phrased those questions very specifically to make them as challenging as possible. Which she knows. Not looking for answers or solutions next week just a discussion on how we might handle it.

Cheers

s. 22(1)(a)(ii)

OFFICIAL

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**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>

**Sent:** Friday, August 1, 2025 11:09:46 AM

**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Subject:** FW: A few questions re pet food [SEC=OFFICIAL]



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There may be a fair bit of work to prepare for those questions.

Late Aug may be ok.

I'll put it on the job list. Or <sup>s. 22(1)(a)(ii)</sup> will, on his return Monday.

Unlikely to have answers to all (that is sensible preliminary advice /comments) I for <sup>s. 22(1)(a)(ii)</sup> next week, but depends on how freed up we become.

OFFICIAL

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**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>

**Sent:** Friday, 1 August 2025 10:20 AM

**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>;  
s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii)  
<s. 22(1)(a)(ii) @aff.gov.au>

**Subject:** FW: A few questions re pet food [SEC=OFFICIAL]

OFFICIAL

Hi <sup>s. 22(1)(i)</sup>,

See below from s. 47F(1)

Can we catch up next week maybe to have a chat about the various issues.

Cheers

<sup>s. 22(1)(a)(ii)</sup>

OFFICIAL

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**From:** s. 47F(1) <s. 47F(1) @aigroup.com.au>

**Sent:** Thursday, 31 July 2025 4:21 PM

**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>

**Subject:** A few questions re pet food

You don't often get email from **s. 47F(1)** [@aigroup.com.au](mailto:s. 47F(1)@aigroup.com.au). [Learn why this is important](#)  
Hi **s. 22(1)(a)(ii)**,

**s. 22(1)(a)(ii)**

**s. 47G(1)(b)**

**s. 22(1)(a)(ii)**

# s. 22(1)(a)(ii)

s. 47F(1)

Kind regards,



**s. 47F(1)**

**PFIAA Executive Officer**

**Postal Address:** s. 47G(1)(b)

**Address:** s. 47G(1)(b)

**E:** s. 47F(1) [@aigroup.com.au](mailto:s.47F(1)@aigroup.com.au)

**M:** s. 47F(1)

**Website:** [www.pfiaa.com.au](http://www.pfiaa.com.au)

s. 22(1)(a)(ii)

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**From:** s. 22(1)(a)(ii)  
**Sent:** Wednesday, 11 September 2024 12:08 PM  
**To:** s. 22(1)(a)(ii) ; s. 22(1)(a)(ii); s. 22(1)(a)(ii) ; s. 22(1)(a)(ii); s. 22(1)(a)(ii);  
s. 22(1)(a)(ii); s. 22(1)(a)(ii); s. 22(1)(a)(ii); s. 22(1)(a)(ii) ; s. 22(1)(a)(ii); s. 22(1)(a)(ii)  
; s. 22(1)(a)(ii); s. 22(1)(a)(ii); s. 22(1)(a)(ii); s. 22(1)(a)(ii) ; s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii)  
**Subject:** Upcoming discussion - management of imported bulk food ingredients being repurposed as animal feeds [SEC=OFFICIAL]

OFFICIAL

Dear all

Following recent representations by the s. 47(1)(b), s. 47(1)(b) and s. 47(1)(b) I would like to have an open discussion with key BAD/OCVO officers concerning the longstanding challenges around how we manage imported bulk food ingredients that are repurposed for animal feeds.

The purpose of the discussion will be to help develop a paper outlining some options on how we could respond to this issue. The paper will be given to BADDIES to consider. Some general questions that come to mind are below, but very happy to amend or add to these before we have the discussion - please send through any feedback ASAP.

We will send around an invite shortly. I'd be grateful for your input; I know this is a complex and potentially contentious issue but its important that we come up with the best way forward for the division and department.

Thanks

s. 22(1)(a)(ii)

## Issue

It has become apparent that it is common practice within the domestic food manufacturing industry to repurpose imported bulk food ingredients as animal feeds. s. 22(1)(a)(ii)

## Potential Questions for Discussion

- Is our existing regulatory framework for these goods effective and enforceable?
  - Is our process of 'in vivo approvals' for already imported product good regulatory practice?
  - Do we communicate the requirements clearly to all relevant stakeholders?
  - Where do our regulatory powers lie across the biosecurity continuum and have we got the mix of these correct?
- Are our existing policy settings aligned with biosecurity risk and the concept of ALOP?
  - What is the appropriate level of protection for bulk food ingredients?
  - Does this align with our current risk posture?

- Are there categories of product that are lower and high risk, and what work would need to happen to ascertain this?
- Do we have access to adequate data and information to be able to fully understand the current situation?
  - What types of ingredients are being imported, by whom and where do they originate?
  - Do we (and can we) get a full picture of what domestic food manufacturer practices are for downgrading bulk food ingredients?
- What are the department's options for the future management of these imported goods?

**s. 22(1)(a)(ii)**

A/g Assistant Secretary | Animal & Biological Imports Branch | s. 22(1)(a)(ii) | s. 22(1)(a)(ii)

Department of Agriculture, Fisheries and Forestry  
Animal Division  
Agriculture House, 70 Northbourne Avenue, Canberra 2601, Australia  
GPO Box 858 Canberra ACT 2601, Australia  
[agriculture.gov.au](http://agriculture.gov.au)



The department acknowledges the Traditional Custodians of Australia and their continuing connection to land, sea environment, water and community. We pay our respect to the Traditional Custodians, their culture, and elders both past and present.

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s. 22(1)(a)(ii)

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**From:** s. 22(1)(a)(ii)  
**Sent:** Wednesday, 25 September 2024 4:41 PM  
**To:** s. 22(1)(a)(ii) ; s. 22(1)(a)(ii); s. 22(1)(a)(ii); s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii); s. 22(1)(a)(ii); s. 22(1)(a)(ii)  
**Subject:** RE: Upcoming Discussion - Management of Imported Bulk Food Ingredients being repurposed as animal feeds [SEC=OFFICIAL:Sensitive]  
**Attachments:** Minute R277 - Advice to BIP - Conditions for the Use of Downgraded Imported Dairy Products for Stockfeed.pdf; s. 47(1)(b) - Change in End Use, 2020.docx

OFFICIAL: Sensitive

FYI – To give more context to our discussions this afternoon, please find attached the minute outlining current conditions under which imported human consumption dairy can be ‘downgraded’ to stockfeed.

I have also found one of the approvals issued to s. 47(1)(b) which lists components previously approved for stockfeed use. s. 47(1)(b) hold approvals for other human consumption materials, not just these. This was the risk assessment that took approx. 12 months to complete.

Regards

s. 22(1)(a)(ii) (Position number: s. 22(1)(a)(ii))  
Director, Animal and Biological Imports Branch  
Department of Agriculture, Fisheries and Forestry

[imports@aff.gov.au](mailto:imports@aff.gov.au)

☎ | 1800 900 090 | ✉ | PO Box 858, Canberra ACT 2601

[biosecurity.gov.au](https://biosecurity.gov.au)

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OFFICIAL: Sensitive

-----Original Appointment-----

**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Sent:** Wednesday, September 11, 2024 5:11 PM

**To:** s. 22(1)(a)(ii) ; s. 22(1)(a)(ii) ; s. 22(1)(a)(ii); s. 22(1)(a)(ii) ; s. 22(1)(a)(ii); s. 22(1)(a)(ii); s. 22(1)(a)(ii); s. 22(1)(a)(ii); s. 22(1)(a)(ii); s. 22(1)(a)(ii) ; s. 22(1)(a)(ii); s. 22(1)(a)(ii); s. 22(1)(a)(ii); ACT CQ2 02.022 Tiger Orchid Room (VC Unit Type 1 with IPTV)

**Cc:** s. 22(1)(a)(ii); s. 22(1)(a)(ii) ; s. 22(1)(a)(ii)

**Subject:** Upcoming Discussion - Management of Imported Bulk Food Ingredients being repurposed as animal feeds [SEC=OFFICIAL]

**When:** Wednesday, 25 September 2024 3:00 PM-4:30 PM (UTC+10:00) Canberra, Melbourne, Sydney.

**Where:** Microsoft Teams Meeting

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## APPROVAL OF A CHANGE OF END USE (STOCKFEED) OF RESTRICTED IMPORTED BIOLOGICAL MATERIAL

**APPROVAL NUMBER:** 2020/058 (page 1 of 6)  
**APPROVAL VALID FROM:** 17 September 2021 **TO:** 17 September 2023

**Contact Name:** s. 47F(1)  
**Organisation Name:** s. 47(1)(b)  
**Address:** s. 47(1)(b)

**Email:** s. 47F(1) @s. 47(1)(b)

**Approved Arrangement (AA) Site No.:** Not required

**Product Name:** Human consumption dairy products (skim milk powders, nutritional powders, whole milk powders, vitamised milk powders and non-first grade powders) manufactured by s. 47(1)(b) using Australian and imported dairy and non-dairy components. The imported components are listed in the **Composition and Treatment Prior to Importation** table below.

**Supplier:** Various

**Dept. of Agriculture, Water and the Environment Import Permit No.:** Various – see table below.

### COMPOSITION AND TREATMENT PRIOR TO IMPORTATION:

| COMPONENTS OF<br>BIOLOGICAL<br>ORIGIN                                                               | SOURCE<br>COUNTRY | SOURCE TREATMENT                                                                                                                                                                                        |
|-----------------------------------------------------------------------------------------------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Dairy Components</b> (All of the dairy components listed below are sourced from bovine animals.) |                   |                                                                                                                                                                                                         |
| Milk permeate powder<br>(112451)                                                                    | USA               | Derived from milk that has been pasteurised at 72 °C for 15 seconds. May contain citric acid. Import permit: 4885041                                                                                    |
| Lactose (101547,<br>106486)                                                                         | New Zealand       | Derived from milk that has been pasteurised at 72 °C for 15 seconds (or an equivalent treatment compliant with the Australia New Zealand Food Standards Code). Import permit: 3608049.                  |
| Whey protein<br>concentrate 80%<br>(116023, 119809)                                                 | New Zealand       | Derived from milk that has been pasteurised at 72 °C for 15 seconds. Import permit: 3780693.                                                                                                            |
| Buttermilk powder<br>(116031)                                                                       | New Zealand       | Derived from milk that was pasteurised (72°C for 15 seconds) and deemed fit for human consumption. Buttermilk powder imported under BICON case "Dairy products (including colostrum) from New Zealand". |

|                                                    |                               |                                                                                                                                                                                                         |
|----------------------------------------------------|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Skim milk powder (114170, 119168, 119727)          | New Zealand                   | Derived from milk that was pasteurised (72°C for 15 seconds) and deemed fit for human consumption. Skim milk powder imported under BICON case "Dairy products (including colostrum) from New Zealand".  |
| Whole milk powder (110754, 119547, 119234, 119715) | New Zealand                   | Derived from milk that was pasteurised (72°C for 15 seconds) and deemed fit for human consumption. Whole milk powder imported under BICON case "Dairy products (including colostrum) from New Zealand". |
| Demineralised whey powder (111129, 115317)         | Finland, Germany, and/or USA  | Derived from milk that was pasteurised (72°C for 15 seconds or UHT treatment – 135°C for 1 second) and deemed fit for human consumption. Import permit: 2166623.                                        |
| Demineralised whey powder (114514, 114856)         | United Kingdom                | Derived from milk that was pasteurised (72°C for 15 seconds or UHT treatment – 135°C for 1 second) and deemed fit for human consumption. Import permit: 4031618.                                        |
| Lactose (113878, 119872, 120390, 3101689)          | USA                           | Derived from milk that was pasteurised (72°C for 15 seconds or UHT treatment – 135°C for 1 second). Lactose imported under BICON case "Dairy – Lactose and its derivatives".                            |
| Demineralised whey powder (3101688)                | USA                           | Derived from milk that was pasteurised (72°C for 15 seconds or UHT treatment – 135°C for 1 second) and deemed fit for human consumption. Import permit: 3687688.                                        |
| Whey protein concentrate (3110861)                 | USA                           | Derived from milk that was pasteurised (72°C for 15 seconds or UHT treatment – 135°C for 1 second) and deemed fit for human consumption. Import permit: 2395306.                                        |
| Skim milk powder (3101659)                         | United Kingdom                | Derived from milk that was pasteurised (72°C for 15 seconds or UHT treatment – 135°C for 1 second) and deemed fit for human consumption. Import permit: 3569042.                                        |
| Lactose (3101353)                                  | Source countries <sup>1</sup> | Derived from milk that was pasteurised (72°C for 15 seconds) and deemed fit for human consumption. Lactose imported under BICON case "Dairy – Lactose and its derivatives".                             |
| Whole milk powder (3101350)                        | Austria                       | Derived from milk that was pasteurised (72°C for 15 seconds or UHT treatment – 135°C for 1 second) and deemed fit for human consumption. Import permit: 3826106.                                        |
| Demineralised whey powder (3101352)                | Austria                       | Derived from milk that was pasteurised (72°C for 15 seconds or UHT treatment – 135°C for 1 second) and deemed fit for human consumption. Import permit: 3826106.                                        |

**APPROVAL NUMBER: 2020/058 (page 2 of 6)**

<sup>1</sup> Austria, Belgium, Czech Republic, Denmark, Estonia, Finland, France, Germany, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Netherlands, Poland, Portugal, Slovakia, Slovenia, Sweden, Switzerland, United Kingdom



|                                     |                                     |                                                                                                                                                                                           |
|-------------------------------------|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Skim milk powder (3101351)          | Austria                             | Derived from milk that was pasteurised (72°C for 15 seconds or UHT treatment – 135°C for 1 second) and deemed fit for human consumption. Import permit: 3826106.                          |
| Demineralised whey powder (113489)  | France                              | Derived from milk that was pasteurised (72°C for 15 seconds or UHT treatment – 135°C for 1 second) and deemed fit for human consumption. Import permit: 1897762 (residual expired stock). |
| Demineralised whey powder (3110343) | Germany                             | Derived from milk that was pasteurised (72°C for 15 seconds or UHT treatment – 135°C for 1 second) and deemed fit for human consumption. Import permit: 2447855.                          |
| Lactose (3111981)                   | Germany, UK, Italy, The Netherlands | Derived from milk that was pasteurised (72°C for 15 seconds) and deemed fit for human consumption. Lactose imported under BICON case “Dairy – Lactose and its derivatives”.               |

| <b>Non-Dairy Components</b>             |                |                   |                                                                                                                                                                                                                                                                                                                                                                                           |
|-----------------------------------------|----------------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PRODUCT COMPONENTS OF BIOLOGICAL ORIGIN | SOURCE SPECIES | SOURCE COUNTRY    | SOURCE TREATMENT (e.g. autoclaving, chemical inactivation - include times, temperatures, concentrations etc.)                                                                                                                                                                                                                                                                             |
| Beta carotene (73006521)                | Plant          | Taiwan or Ireland | Beta carotene and vitamins C and E mixed with starch, sucrose, and sunflower oil. Country of origin of sunflower oil is Taiwan. Country of origin of starch is US produced using corn grown and harvested in the US.                                                                                                                                                                      |
| Vitamin E acetate (70173685)            | Plant          | Switzerland       | Synthetic vitamin E mixed with maltodextrin and starch. Maltodextrin produced in France using maize sourced from France, Romania, Bulgaria, Hungary and Croatia. Maize processed to a sufficient degree to mitigate biosecurity risks. Starch produced in France using waxy maize sourced from France and Germany. Starch processed to a sufficient degree to mitigate biosecurity risks. |
| Vitamin B12 (70173721)                  | Plant          | France            | Vitamin B12 (cyanocobalamin) is added into an aqueous solution of trisodium citrate, citric acid and maltodextrin. Maltodextrin produced in France using maize sourced from France, Romania, Bulgaria, Hungary and Croatia. Maize processed to a sufficient degree to mitigate biosecurity risks.                                                                                         |
| Vitamin K1 (70173723)                   | Plant          | Switzerland       | Synthetic vitamin emulsified into an aqueous solution of acacia gum and sucrose.                                                                                                                                                                                                                                                                                                          |

**APPROVAL NUMBER: 2020/058 (page 3 of 6)**



|                                                                             |                                                               |                                                                                                                                                         |                                                                                                                                                                                                                                                                                             |
|-----------------------------------------------------------------------------|---------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Beta carotene (72001718)                                                    | Plant                                                         | Switzerland                                                                                                                                             | Beta carotene and vitamin E mixed with sucrose, medium chain triglycerides (palm oil), acacia, maltodextrin. Maltodextrin produced in France using maize sourced from France, Romania, Bulgaria, Hungary and Croatia. Maize processed to a sufficient degree to mitigate biosecurity risks. |
| Lutein (73008894)                                                           | <i>Tagetes erecta</i> (Marigold plant)                        | France                                                                                                                                                  | Highly processed plant material. Supplied by DSM Nutritional Products Europe (Switzerland). No materials of animal origin used in manufacture.                                                                                                                                              |
| Topcithin soy lecithin AMF blend (70173660)                                 | Processed soy and bovine AMF                                  | New Zealand                                                                                                                                             | Derived from milk that has been pasteurised at 72 °C for 15 seconds (or an equivalent treatment compliant with the Australia New Zealand Food Standards Code). Import permit: 3564353.                                                                                                      |
| Oil blend (70182210, 70184642)                                              | Plant – Soybean, sunflower, lecithin                          | Soy – USA, Austria; Sunflower – Italy; Lecithin – India, USA                                                                                            | Oils imported under BICON case “Plant oils” and blended in Australia. Bleached and heated to 220°C.                                                                                                                                                                                         |
| Oil blend NZMP (73007331)                                                   | Sunflower, coconut, soybean, canola                           | Sunflower – Austria; Coconut – Vanuatu, Philippines; Soybean – USA, Austria; Canola – France; Soy Lecithin – USA, India; Ascorbyl palmitate - Australia | Oils imported under BICON case “Plant oils” and blended in Australia. Processing includes deodorization which involves an electrical heat treatment (direct contact) which sees product heated from 180°C to 260°C.                                                                         |
| Vegetable oils (72006914, 72007131, 70182289, 72003321, 73007135, 73007447) | Canola, coconut, corn, palm, soybean, sunflower, soy lecithin | Final blends made in Australia from Australian and imported oils                                                                                        | Vegetable oils imported under BICON case “Plant oils” and final blend in Australia. Bleached and heated in Australia to 230°C for 15 minutes.                                                                                                                                               |
| Honey (73006072)                                                            | <i>Apis mellifera</i> – Bee                                   | Argentina, Brazil, Uruguay, Chile, Mexico, Cuba                                                                                                         | Commercially prepared and packaged honey processed to remove any potential contaminants. Heat treated and sieved.                                                                                                                                                                           |
| Vanilla flavour powder (73006533)                                           | Synthetic flavour on a maltodextrin (corn derived) carrier    | Flavour – USA; Maltodextrin - China                                                                                                                     | Maltodextrin supplier: Qinhuangdao Lihua Starch Co., Ltd. with raw materials subjected to 105 °C for 150 minutes.                                                                                                                                                                           |

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|                                                         |                                      |          |                                                                                                                                                                                                                                                                                                                                                             |
|---------------------------------------------------------|--------------------------------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Trisodium citrate (70173733)                            | Purified from microbial fermentation |          | Citric acid and derivatives of citric acid are low risk biological ingredients for use in stockfeed and can be imported without an import permit for this end use.                                                                                                                                                                                          |
| Tripotassium citrate monohydrate (70173731)             | Purified from microbial fermentation |          |                                                                                                                                                                                                                                                                                                                                                             |
| Citric acid (70173732)                                  | Purified from microbial fermentation |          |                                                                                                                                                                                                                                                                                                                                                             |
| Ascorbic acid (70173714)<br>Sodium ascorbate (70173683) | Plant, derived by fermentation       | China    | Purified vitamins.                                                                                                                                                                                                                                                                                                                                          |
| Maltodextrin (73006064, 73006144)                       | Corn starch                          | China    | Corn has been heated to a minimum of 105°C for at least 150 minutes during production. Import permit: 3373047.                                                                                                                                                                                                                                              |
| Beta carotene<br>lucarotin (70173762)                   | Synthetic vitamin on plant carrier   | Germany  | Beta carotene and vitamin E mixed with glucose, medium chain triglycerides, and starch. Country of origin of starch is US sourced from corn grown in North America.                                                                                                                                                                                         |
| Vitamin B12 (70182257)                                  | Synthetic vitamin on plant carrier   | Denmark; | Synthetic vitamin mixed with maltodextrin (Ph.Eur. monograph compliant), trisodium citrate, and citric acid. Country of origin of maltodextrin is France but produced using corn grown in France, Germany, Romania, Bulgaria, and Serbia. Maltodextrin highly processed including multiple thermal processes above 120°C, pH <3.8, spray drying min. 150°C. |
| Inositol (70173712)                                     | <i>Oriza sativa</i> (Rice)           | Japan    | Heat treated at 80°C for a minimum of 45 minutes.                                                                                                                                                                                                                                                                                                           |
| L-Histidine (73008107)                                  | Fermentation derived                 | USA      | Purified amino acid manufactured without the use of materials of animal origin.                                                                                                                                                                                                                                                                             |
| Maltodextrin (73006064)                                 | Corn starch                          | China    | Supplied by Cargill Bio-Chemical Co. Ltd. (China). Processing includes steeping, washing, liquefaction and saccharification.                                                                                                                                                                                                                                |

## END USE ON TARGET SPECIES WITHIN AUSTRALIA:

| END USE   | TARGET SPECIES                            | BIOSECURITY RISK MITIGATION MEASURES, Inc. PROCESSING DETAILS                                                                                     |
|-----------|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| Stockfeed | Production animals: cattle, pigs, poultry | Dairy ingredients have been processed by equivalent minimum pasteurisation of 72°C for 15 seconds. No further processing of non-dairy components. |

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## OFFICIAL

Animal Biosecurity Branch – LZA section – comments – 6 November 2024

## Management of imported bulk food materials being repurposed as animal feeds

### ABB (LZA) General comments

- Can the department legitimately regulate end use (potentially including have authority to enforce sanctions for any breaches) after goods have been released from biosecurity control, and if so, how does the department do this?
- This paper is very limited in the options it considers. There is no mention of State/Territory requirements and whether they might be better placed to address some/most of this. Has AHP or AHC been consulted too? (and the dairy team, given reference to dairy within the document).
- The purpose of the paper does not appear to be a discussion; it is recommending changing import conditions prompted by some industry peak bodies reportedly. We did not think papers to the Board were supposed to determine/change import conditions in lieu of proper analysis through risk assessment. The latter, if warranted for the issue raised, would require *inter alia* a precise purpose and scope, availability of relevant, contemporary, unbiased and verifiable data that would support initiation of such project and the risk assessment, input across State, Territory and Commonwealth governments and the broader Australian industry, and availability of resources (Commonwealth and State/Territory) for the project.
- We feel there is likely a hierarchy of action that could be considered as next steps:
  - i. determine if the department can legitimately regulate end use (see first point)
  - ii. identify, to the extent possible, through targeted, appropriate research extent of diversion and what specific products are being diverted; care with bias, lack of broad representative input from industry, verifiable data etc.
    - a. Stockfeed Manufacturers' Council of Australia (SFMCA) did a survey in 2021 with a 21% response rate (see later comment in document)
    - b. ABB prepared a project proposal in March 2019, which was endorsed by Beth Cookson as the Assistant Secretary of ABB at the time, addressing this issue of diversion and seeking to engage ABARES to investigate and quantify the issue:
 

*'Proposal for project quantifying the level of diversion to stockfeed of food imported into Australia for human consumption'*

This proposed project could be reviewed and updated, and a suitable contracting group sought.
  - iii. ABIB, with wider Animal Division input, could revise the original paper below as a discussion paper to AHC and AHA.
  - iv. Once above satisfactorily achieved, and dependant on the evolution of issue following above, consider whether undertaking a risk review is an appropriate way forward that would justify resourcing a team and diverting them from any current and forecast priorities.

NOTE: any such review would have to stand significant challenge from a range of stakeholders. It would likely need to seek additional staffing and/or suitable contractor assistance for drafting at current staffing levels in ABB.

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Animal Biosecurity Branch – LZA section – comments – 6 November 2024

**Purpose**

To provide an overview of the current, industry-wide practice of domestic food manufacturers repurposing/diverting materials imported for human consumption to animal feeds without seeking prior approval from the Department of Agriculture, Fisheries and Forestry.

The desired outcome of this discussion paper is to inform decision makers about the biosecurity risks with the existing regulatory approach, and to offer, for consideration, the regulatory options available to manage the common practice of repurposing/diverting imported human food grade ingredients/materials into animal feeds.

**Introduction/background**

The repurposing/diversion of imported materials for human consumption to animal feeds<sup>1</sup> ~~is has been a longstanding common~~ industry-wide ~~custom and practice for significant length of time,~~ most likely for decades. ~~The diversion is largely an unregulated practice despite the~~ department's clear messaging that the practice is not permitted without thorough assessment by and approval from the department.

Recently, the department was approached by peak industry body representatives from <sup>s. 47(1)(b)</sup>

<sup>to raise awareness</sup> of the current practice of repurposing/diversion of imported materials for human consumption into animal feeds, and to collaborate to develop a pragmatic regulatory solution for the management of the practice. That is, ~~the~~ industry would like the department to reconsider the biosecurity risk setting for highly processed plant-derived materials specifically, as well as dairy materials for human consumption, knowing that these categories of imported materials are repurposed/diverted for animal feeds, usually ~~as~~ incorporated ~~as part of~~ into finished goods.

Peak industry bodies have informed the department that there are many reasons that finished goods need to be disposed of as municipal waste where they end up in landfill. The reasons are due to quality specifications, over order, inaccurate forecasting of consumer demand, expiry dates etc.

However, instead of disposing of finished goods to landfill, industry has advised that the manufacturers repurpose/divert the products to animal feed to save costs associated with disposal of materials at expensive landfill sites. There is a small income stream generated by selling to domestic stockfeed manufacturing facilities but the ~~overwhelming major~~ cost saving comes from not sending materials to landfill. In addition, a significant compelling factor for domestic manufacturers to repurpose/divert materials to animal feeds is the growing trend towards a circular economy. The number of local councils and governments prohibiting food materials from being sent to landfills due to their zero-waste policy is growing. It is also worth noting that domestic stockfeed manufacturers have become reliant on the materials received from human food manufacturing facilities for the significant volume of materials required for manufacture of stockfeed on an ongoing basis.

<sup>1</sup> Animal feeds cover all type of food fed to domestic animals including companion animals and livestock. For the purposes of discussion on the diversion/repurpose issue, stockfeed is of primary concern due to the exposure of susceptible high risk target species (i.e., domestic livestock) to imported goods.

**Commented [s. 22]:** Is this necessary?

**Commented [s. 22]:** Is there evidence of this being the case, for example leakage statistics etc.?

**Commented [s. 22(1)(a)]:** SMCA did a survey in 2021 of its members and got a 21% response rate. The paper with findings can be shared.  
'This survey of Australian importers and local producers of stockfeed was conducted on behalf of the department by the Stockfeed Manufacturers' Council of Australia (SFMCA) to gather evidence as to whether imported ingredients were being repurposed for animal feed use, the scale of this practice, and the reasons for it.'

**Commented [s. 22]:** Without prejudice, do we know what volumes of imported foodstuffs are on-sold for manufacturing purposes (and therefore not subject to direct permit requirements) vs used for manufacturing purposes by the holder of the permit?

**Commented [s. 22]:** Is there supporting evidence for this from (eg) a peak body?

**Commented [s. 22(1)(a)]:** Advice from entities with a known interest in a particular outcome should be augmented by other credible data sources

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Animal Biosecurity Branch – LZA section – comments – 6 November 2024

s. 47E(d)

**Legislation**

The Biosecurity (Conditionally Non-prohibited Goods) Determination 2021 (Goods Determination) does not require an import permit for the importation of a highly processed plant-derived materials for human consumption. s. 22(1)(a)(ii)

Commented [s. 22]: s. 47E(d)

Commented [s. 22]: s. 47E(d)

Commented [s. 22]: s. 47E(d)

**Commented [s. 22(1)]:** There appears to be more than two BICON cases for plant-derived materials for human consumption.

Does the author mean 'The two BICON cases OF CONCERN'

**Commented [s. 22(1)]:** Some preliminary work done by s. 22(1)( on that I think.

**Commented [s. 22(1)(a)(ii)]:** The draft paper of 2016 made recommendations including:  
**A. FULLY PROCESSED PLANT PRODUCTS IMPORTED IN BULK SPECIFICALLY FOR HUMAN CONSUMPTION**

These products are typically highly refined, free of any significant adventitious contamination, produced to comply with minimum food safety standards and deemed fit for human consumption. Although a small proportion of imported product may be diverted for direct or indirect stockfeed or fertiliser use, the animal biosecurity risk associated with processed finished plant based products deemed fit for human consumption is considered very low.

- The importation of bulk fully processed finished plant based products for human consumption does not represent a significant animal biosecurity risk.
- The application for a permit for the importation of bulk product for human consumption where the intention is the deliberate diversion to stockfeed may be an animal biosecurity concern and would be a breach of legislative requirements. Any such case should be referred to compliance for investigation.

**Commented [s. 22(1)(a)(ii)]:** Informally, the risk estimation matrix might suggest that if the 'likelihood of diversion' into stockfeed becomes moderate or higher, overall risk exceeds ALOP. However, this is should be read only as a flag on the issue, not to be taken as a risk assessment outcome per se for various reasons including adequacy of info as highlighted previously.

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Animal Biosecurity Branch – LZA section – comments – 6 November 2024

s. 22(1)(a)(ii)



***Import requirements for animal feeds (or ingredients for production into animal feeds)***

Imported animal feeds present a higher level of biosecurity risk due to their direct pathway to food producing animals. Contaminated materials can introduce diseases, pests or viable plant materials that can have a detrimental impact on Australia’s agriculture and environment. As such, repurposing/diversion of imported materials for human consumption to animal feeds represents one of the highest animal biosecurity risks due to a direct exposure pathway of susceptible domestic animals and environment to imported biological materials.

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s. 22(1)(a)(ii)

frequency of diversion to susceptible livestock. 3.... e

**Commented [s. 22(1)]:** Can I suggest an additional subsection here, the legal basis for, and limits to, the department’s ability to exercise such controls over end-use of imported goods? It could also describe who then has that control further downstream under constitutional arrangements.

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Animal Biosecurity Branch – LZA section – comments – 6 November 2024

Therefore, the department's current import policy for animal feeds is very stringent for all animal and plant-derived materials to ensure Australia's ALOP and favourable animal health status is maintained. Most animal-derived materials are not approved to be imported for use in stockfeeds as the biosecurity risks are deemed to be unacceptably high. Imported petfood can contain various animal materials but with strict sourcing and heat treatment requirements. For animal derived materials, there are also restrictions for sourcing from approved countries (i.e. countries not affected by bovine spongiform encephalopathy, foot-and-mouth disease, African swine fever, classical swine fever, etc). These stringent conditions are enforced through the import permit application process and conditions imposed on import permits.

s. 22(1)(a)(ii)

**Commented [s. 22(1)]:** Should we refine this comment to note that the level of processing of most of these goods is very low by contrast with microbially derived/synthesized specific additives (such as specific amino acids)?

s. 22(1)(a)(ii)

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### Recent approval provided to a local manufacturer to repurpose/divert materials from the manufacturing facilities into stockfeed – s. 47(1)(b)

Earlier this year, s. 47(1)(b) informed the department that unwanted finished products from their Australian factories producing food for human consumption were sold to s. 47(1)(b) stockfeed manufacturers. s. 47(1)(b) and the s. 47(1)(b) domestic stockfeed manufacturers relied on this long-standing arrangement to dispose of their unwanted finished products. s. 47(1)(b)

s. 47(1)(b) has acknowledged to the department that their standard operating procedures did not explicitly state that approvals from the department were needed to be sought before imported animal or plant-derived materials could be used in stockfeed production in Australia. As a multinational company, Australia has specific and additional requirements of which the company's upper management were not aware.

The department requested s. 47(1)(b) provide detailed and thorough information about the imported materials that were ultimately repurposed/diverted to s. 47(1)(b) domestic stockfeed manufacturers instead of being sent to landfills as well as any processing applied by s. 47(1)(b) and s. 47(1)(b) domestic stockfeed manufacturers.

s. 47(1)(b) informed the department that there were s. 47(1)(b) imported animal and plant derived materials used as ingredients across their s. 47(1)(b) Australian manufacturing facilities to produce s. 47(1)(b)

s. 47(1)(b)

**Commented [s. 22(1)]:** Figures from s. 47(1)(b) only (referencing earlier )comments on data)

Of the s. 47(1)(b) materials, only s. 47(1)(b) material s. 47(1)(b) was refused. All other s. 47(1)(b) materials were approved under change of end use certificate to be allowed for stockfeed manufacturing in Australia. ABIB also advised s. 47(1)(b) to apply for import permits for s. 47(1)(b) dairy products from s. 47(1)(b) which have now been granted as it would make it easier for s. 47(1)(b) to manage their imported materials by holding their own permits.

These materials were approved by the department for the change of end use based on following rationale:

- Decades of diversion from human consumption into animal feeds
- Significant dilution factor – imported materials constitute very small percentages of the many final products manufactured by s. 47(1)(b) by becoming incorporated with materials of Australian origin. These final products are then further incorporated into

**Commented [s. 22(1)]:** But how do we know. It may have been quite minimal but has ramped up in the last few years. This was indicated in the ABB project proposal mentioned earlier and has potential to change import conditions for various established import risk analyses.

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Animal Biosecurity Branch – LZA section – comments – 6 November 2024

stockfeed products after being combined with other materials at the stockfeed manufacturing facilities

- s. 47(1)(b)
- There were no animal biosecurity risks associated with the animal derived materials, except for the dairy material from s. 47(1)(b), as the dairy materials used by s. 47(1)(b) were all of s. 47(1)(b) and s. 47(1)(b) origin.
- The dairy product from s. 47(1)(b) was not approved for repurposing/diversion to stockfeed manufacturers.

**Commented [s. 22(1)]:** Could we expand on this - firstly in terms of the homogeneity of distribution in different product batches, and secondly with specific examples of the relative volumes of each ingredient in some typical products?

**Commented [s. 22(1)(a)(i)]:** Audited? Visible in their SOPs or what?

**Commented [s. 22(1)]:** s. 4. Has this been verified by the department via facility visits?

**Commented [s. 22(1)(a)(i)]:** See related question above

ABIB's assessment found that the biosecurity risks associated with the various animal and plant-derived materials used by s. 47(1)(b) were mitigated and would meet Australia's Appropriate Level of Protection by the processing applied by s. 47(1)(b) and stockfeed manufacturer as well as by sourcing from low risk countries for dairy materials (except for the s. 47(1)(b) dairy product).

**Commented [s. 22(1)]:** IS it possible to see that assessment please?

**Commented [s. 22(1)(a)(i)]:** Note this is a precedent going forward

The approval restricted s. 47(1)(b) to operate in compliance with the following requirements:

1. The goods must be processed as per the information provided to the Department of Agriculture, Fisheries and Forestry during the assessment of this change in end use approval.
2. The goods must be processed at the following facilities;  
s. 47(1)(b)
3. The goods must be sent to one of the animal feed manufacturing facilities supplied to the Department of Agriculture, Fisheries and Forestry during the assessment of this change in end use approval.

#### Challenges during the assessment

One of the major issues during the assessment of s. 47(1)(b) application for change of end use was that s. 47(1)(b) was the import permit holder of only s. 47(1)(b) of the s. 47(1)(b) materials. As a consequence, it proved to be arduous and challenging to obtain information from the suppliers of s. 47(1)(b) materials to s. 47(1)(b) regarding the processing and ingredients used in these materials. Many of s. 47(1)(b) suppliers were reluctant to provide information to the department because of concerns with the perception that their imported materials were of lesser quality by being associated with domestically manufactured animal feeds.

If ABIB assessed these s. 47(1)(b) materials under the current import policy and conditions for animal feeds, the majority of these products would not be allowed for importation. As explained above, the s. 47(1)(b) products were allowed for change of end use once the department took into account

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the processing at s. 47(1)(b) manufacturing facilities and the domestic stockfeed manufacturer in addition to the significant dilution factors and significant history of use.

**Commented [s. 22(1)]:** Have we independently verified that those facilities comply with the stated treatment conditions and is there now a rolling requirement for verification from s. 22(1)(a)(i) (eg by providing process records independently verified by appropriately qualified persons, audit records, etc.?)

Assessment of s. 47(1)(b) request for change of end use for these s. 47(1)(b) materials required ABIB to dedicate significant resources over four months to the process, and the branch continues to redirect substantial resources as other companies such as s. 47(1)(b) and s. 47(1)(b) have requested the same assessment.

Significant extra resourcing will need to be provided if more domestic companies approach the department for the same change of end use approvals.

Extrapolation of the volumes of diverted goods into animal feeds

Based on the annual volume of materials/products discarded by s. 47(1)(b) alone to animal feeds, it would not be an exaggeration to extrapolate that hundreds of thousands of tons of human food products containing imported animal and plant derived materials are currently being repurposed/diverted for animal feeds with the quantity to be increasing each year as more and more local governments prohibit disposal of products and materials in landfills.

**Commented [s. 22(1)]:** Suggest a table showing these figures would be good here. In addition, it could show what percentage of the imported products - ostensibly under permits for human end use - end up in stockfeed.

Options to manage biosecurity risks associated with diversion of imported materials for human consumption into animal feeds

1. Maintain status quo

s. 22(1)(a)(ii)

For dairy materials, continue the current arrangements in which only New Zealand is approved for export of dairy in bulk for both human consumption and animal feeds.  
From New Zealand

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- a. Human consumption – no import permit or government certification required, and can be imported with a manufacturer's declaration
- b. Animal feeds – an import permit is required with government certification stating the dairy is of New Zealand origin and about pasteurization time and temperature. A permit is available with multiple end uses (i.e. human consumption, pet food and stockfeed)

From approved countries other than New Zealand

- a. Human consumption – import permit required with government certification
- b. Animal feeds – import permit required with government certificate, allowed as a component in pet food only. Not allowed for importation in bulk for animal feeds
- c. Please note, for stockfeed, the department does approve of repurposing/diverting a small portion after imported for human consumption

2. Up the ante

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

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Animal Biosecurity Branch – LZA section – comments – 6 November 2024

s. 22(1)(a)(ii)

3. **Revise current policies and guidelines for animal risks associated with imported materials for human consumption – specifically plant-derived and dairy materials**

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

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Animal Biosecurity Branch – LZA section – comments – 6 November 2024

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

**Dairy material**

Only dairy of New Zealand origin is allowed to be imported in bulk for both human consumption and animal feeds.

Dairy material from all other approved countries is approved to be imported in bulk for human consumption only. Dairy from these approved countries, however, is not approved for importation in bulk for animal feeds. As mentioned above, the approved countries are those currently free from FMD and LSD. Please note, the department provides approval for repurposing/diversion for animal feeds subsequent to being imported into Australia if approval is sought.

Therefore, as part of revising import conditions so as to:

- a. allow importation of bulk dairy for use in animals feeds from all approved countries for human consumption, not just New Zealand, provided pasteurisation time and temperature are satisfactory and imported under government certification.

**Commented [s. 22(1)]:** This proposal and the rationale behind it in particular needs to be subjected to public scrutiny.

Therefore, adopting Option 3 would remove the requirement for department to regulate diversion.

**Recommendation**

Of the three options discussed above, the most reasonable, coherent and consistent approach to manage and deal with the repurposing/diversion of imported goods for human consumption into animal feeds is to adopt Option 3, based on:

- significant history of practice
- limited legal powers by the department and lack of robust traceability system in Australia to regulate once goods are released from biosecurity control
- food safety of materials for human consumption in the absence of stringent import conditions, especially for highly processed plant-derived materials
- ~~D~~ilution factor provided by being processed into final products by domestic manufacturers and then further processed by domestic stockfeed manufacturers

**Commented [s. 22(1)]:** Why are we jumping to a conclusion when we have not had the ability to view and then come to an agreed position on either whether this is the department's role under existing legal authority, and then on a technical basis what is the accepted risk assessment? In addition, a major change like this has potential to allow for a significant change in sourcing pathways as a lot of the assertions herein are not backed by evidence. As above, this probably needs to be aired much more widely and, as it has been custom and practice for some time, perhaps there is time to do so.

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Animal Biosecurity Branch – LZA section – comments – 6 November 2024

Attachment 1

s. 47(1)(b)

FOR INTERNAL USE ONLY

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s. 22(1)(a)(ii)

**From:** s. 22(1)(a)(ii)  
**Sent:** Friday, 25 October 2024 2:59 PM  
**To:** s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii); s. 22(1)(a)(ii)  
**Subject:** RE: Management of imported bulk food materials being repurposed as animal feeds  
- discussion paper [SEC=OFFICIAL:Sensitive]  
**Attachments:** Diversion of imported human food products to animal feed \_PRSG.docx

OFFICIAL: Sensitive

Hi s. 22(1)(a)(ii),

Thanks for the opportunity to comment. I have made some comments and added a section on jurisdictional feed bans and relevance, as discussed at our meeting. I was also curious if there was a difference between animal derived imports for food and feed use as doesn't seem to be covered, only for plant derived? I've arranged a brief chat with you on Monday to discuss as I think it could be significant re this change of end-use, and worth us liaising via AHC to ensure we are aligned.

Best wishes,

**s. 22(1)(a)(ii)**

OFFICIAL: Sensitive

**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Sent:** Friday, 18 October 2024 4:01 PM  
**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>  
**Subject:** Management of imported bulk food materials being repurposed as animal feeds - discussion paper [SEC=OFFICIAL:Sensitive]

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Hi everyone

Thank you very much for attending a meeting last month to discuss about the current practice of repurposing imported bulk food materials as animal feeds without department approval.

Attached for your review and feedback is a discussion paper that details the current practice of repurposing food material for animal feeds and the regulatory options that could be considered by the department to manage the issue. Also included in the paper is a recent example of **s. 47(1)(b)** request for approval to repurpose/divert their finished goods (that were manufactured in Australia for human consumption using both domestic and imported materials) for animal feeds.

I would be most grateful if I could have your comments back COB Friday 25 October please.  
Once your comments have been received and considered, s. 22(1)(a)(ii) will present this issue to the BADDIES Committee for consideration.

Kind regards

s. 22(1)(a)(ii)

Director | Animal Feeds Team

Animal and Biological Imports Branch | Biosecurity Animal Division

**Department of Agriculture, Fisheries and Forestry**

Agriculture House | 70 Northbourne Ave | GPO Box 858 | Canberra ACT 2601 | Australia

Ph: 1800 900 090 | Email: s. 22(1)(a)(ii)@aff.gov.au

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## Management of imported bulk food materials being repurposed as animal feeds

### Purpose

To provide an overview of the current, industry-wide practice of domestic food manufacturers repurposing/diverting materials imported for human consumption to animal feeds without seeking prior approval from the Department of Agriculture, Fisheries and Forestry.

The desired outcome of this discussion paper is to inform decision makers about the level of biosecurity risks with the existing regulatory approach, and to offer, for consideration, the regulatory or other options available to manage the common practice of repurposing/diverting imported human food grade ingredients/materials into animal feeds.

### Introduction/background

The repurposing/diversion of imported materials for human consumption to animal feeds<sup>1</sup> is a common industry-wide practice that has been undertaken for a significant length of time, most likely for decades. The diversion is largely an unregulated practice despite the department's clear messaging that the practice is not permitted without thorough assessment by and approval from the department.

Recently, the department was approached by peak industry body representatives from the Foods and Grocery Council of Australia, the Food & Beverage Importers Association, the Pet Food Industry Association of Australia and the Stockfeed Manufacturer's Council of Australia to raise awareness/inform the department of the current practice of repurposing/diversion of imported materials for human consumption into animal feeds, and to collaborate to develop a pragmatic regulatory solution for the management of the practice. That is, the industry would like the department to reconsider the biosecurity risk setting for highly processed plant-derived materials specifically, as well as dairy materials for human consumption, knowing that these categories of imported materials are repurposed/diverted for animal feeds, usually as incorporated as part of finished goods.

Peak industry bodies have informed the department that there are many reasons that finished goods need to be disposed of as non-food products. The reasons include are due to quality specifications, over-ordering, inaccurate forecasting of consumer demand, expiry dates etc. Without alternative uses such as stockfeed they become as municipal waste where they may end up in landfill. The reasons are due to quality specifications, over order, inaccurate forecasting of consumer demand, expiry dates etc.

However, instead of disposing of finished goods to landfill, To avoid this, industry has advised that the manufacturers repurpose/divert the products to animal feed to save costs associated with disposal of materials at expensive landfill sites. There is a small income stream generated by selling to domestic stockfeed manufacturing facilities but the overwhelming cost saving

<sup>1</sup> Animal feeds cover all type of food fed to domestic animals including companion animals and livestock. For the purposes of discussion on the diversion/repurpose issue, stockfeed is of primary concern due to the exposure of susceptible high risk target species (i.e., domestic livestock) to imported goods.

**Commented [s. 22]:** Good to highlight and reference this messaging. Has it been communicated through industry meetings/websites/notices/BICON etc? What is the wording that has been used etc?

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comes from not sending materials to landfill. ~~In addition, a significant~~ A related, compelling factor for domestic manufacturers to repurpose/divert materials to animal feeds is that this practice aligns with the growing trend towards a circular economy. The number of local councils and governments prohibiting food materials from being sent to landfills ~~s~~ due to ~~their~~ zero-waste policies ~~is~~ is growing. It is also worth noting that domestic stockfeed manufacturers have become reliant on the materials received from human food manufacturing facilities ~~for the~~ which now comprise a significant volume of materials required for the manufacture of stockfeed on an ongoing basis.

s. 47E(d)

### Legislation

The Biosecurity (Conditionally Non-prohibited Goods) Determination 2021 (Goods Determination) does not require an import permit for the importation of ~~a~~ highly processed plant-derived materials for human consumption. s. 22(1)(a)(ii)

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s. 47E(d)

s. 22(1)(a)(ii)

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s. 22(1)(a)(ii)

s. 22(1)(a)(ii)



*Import requirements for animal feeds (or ingredients for production into animal feeds)*

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Imported animal feeds present a higher level of biosecurity risk due to their direct risk pathway to food producing animals and the open environment (e.g. viable pests or seeds). Contaminated materials fed to animals can introduce diseases, pests or viable plant materials that can have a detrimental impact on Australia's agriculture and environment. As such, repurposing/diversion of imported materials for human consumption to animal feeds may represents a significant one of the highest animal biosecurity risks due to a direct exposure pathway of susceptible domestic animals and the environment to imported biological materials.

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**Commented [s. 22(1)]:** Compared to what?

Therefore, the department's current import policy for animal feeds is very stringent for all animal and plant-derived materials. Most animal-derived materials are not approved to be imported for use in stockfeeds as the biosecurity risks are deemed to be unacceptably high. Imported petfood can contain various animal materials but with strict sourcing and heat treatment requirements. For animal derived materials, there are also restrictions for sourcing from approved countries (i.e. countries not affected by bovine spongiform encephalopathy, foot-and-mouth disease, African swine fever, classical swine fever etc). These stringent conditions are enforced through the import permit application process and conditions imposed on import permits.

s. 22(1)(a)(ii)

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#### Domestic Regulatory Requirements for Safe Animal Feeding Managed by the States and Territories

There are two significant nationally applied regulations associated with animal feeding that mitigate the highest biosecurity risks associated with the practice, both managed at the state and territory level. These are the national swill feeding ban and the national ruminant feed ban. All states and territories have harmonized relevant regulations/definitions, and implement programs including awareness and audit and compliance activities to facilitate and enforce both bans. Animal Health Australia is involved at the national level to ensure jurisdictional harmonisation, as well as nationally coordinated awareness and compliance activity, partnered with industry.

The national swill feeding ban prohibits the feeding of swill (untreated animal material) to pigs to prevent the introduction and spread of numerous diseases including FMD, ASF, CSF and others. The national ruminant feed ban prevents the feeding to ruminants of any restricted animal material, including in processed feeds. It is primarily implemented to prevent the introduction and spread of bovine spongiform encephalopathy (BSE).

s. 22(1)(a)(ii)

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Here is national information from Animal Health Australia on national harmonization of the swill feeding ban: *Prohibited Pig Feed Compliance and Awareness - Animal Health Australia*, as well as example information on Queensland's swill feeding ban - *Laws against supplying and feeding prohibited feed to pigs (swill) | Business Queensland*. Here is AHA information on the *national harmonisation of Australia's ruminant feed ban Australian Ruminant Feed Ban - Animal Health Australia*, as well as example information from Victoria on its ban - *Ruminant Feed Ban | Animal diseases | Biosecurity | Agriculture Victoria*.

It is worth closely reviewing the current diversion to feed situation in the context of both the swill feeding and ruminant feed bans. In moving forward this should ideally be undertaken in partnership with our state and territory colleagues who are the responsible authorities. A brief overview is provided below.

For swill feeding, swill or prohibited pig feed is defined as: *material of mammalian origin, or any substance that has come in contact with this material, but **does not** include:*

*(i) Milk, milk products or milk by-products either of Australian provenance or **legally imported for stockfeed use into Australia**,*

*(ii) Material containing flesh, bones, blood, offal or mammal carcasses which is treated by an approved process<sup>1</sup>.*

*(iii) A carcass or part of a domestic pig, born and raised on the property on which the pig or pigs that are administered the part are held, that is administered for therapeutic purposes in accordance with the written instructions of a veterinary practitioner.*

*(iv) Material used under an individual and defined-period permit issued by a jurisdiction for the purposes of research or baiting.*

*<sup>1</sup>In terms of (ii), approved processes these are:*

- 1. rendering in accordance with the 'Australian Standard for the Hygienic Rendering of Animal Products'*
- 2. under jurisdictional permit, cooking processes subject to compliance verification that ensure that a core temperature of at least 100°C for a minimum of 30 minutes, or equivalent, has been reached.*
- 3. treatment of cooking oil, which has been used for cooking in Australia, in accordance with the 'National Standard for Recycling of Used Cooking Fats and Oils intended for Animal Feeds'*
- 4. under jurisdictional permit, any other **nationally agreed process approved by AHC** for which an acceptable risk assessment has been undertaken and that is subject to compliance verification.*

It would be worth checking if any of the imported products being diverted to stockfeed meet the definition of prohibited pig feed (swill), particularly for dairy given it must be legally imported as stockfeed to be excluded, which would not apply to these imported products. It would also be worth examining if the heat treatments applied are sufficient to exclude these products from the definition of swill. Clearly, if any of the products do meet this swill definition jurisdictions should be checking that they are not being fed to pigs.

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Restricted animal material (RAM) cannot be fed to ruminants and is defined as: *any material taken from a vertebrate animal other than tallow, gelatin, milk products or oils. It includes rendered products, such as blood meal, meat meal, meat and bone meal, fish meal, poultry meal, eggs, feather meal, and compounded feeds made from these products.*

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As with swill, it would be worth checking if any diverted, imported products meet the RAM definition and if so, if any of these products are being fed to ruminants. The major difference between the RAM definition for ruminants compared to the swill definition for pigfeed is that, unlike swill, there are no heat treatment provisions applicable to exclude products from being RAM. This reflects the risk from the highly stable and heat-resistant BSE prion, compared to the viral diseases of concern for pigs (e.g. FMD, ASF, CSF etc).

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Given the states and territories generally have legislative authority over on-shore biosecurity (post entry of animals or products within our borders) it could be argued they may have some role to play in managing the situation of the diversion of imported human food products to stockfeed. Whether this is only applicable to checking compliance with their existing animal feed laws on swill feeding and the ruminant feed ban, or whether this should be extended to consider a more general oversight of imported products ending up as feed could be a point of discussion.

Pending senior level agreement, the relevant states and territory authorities should be informed of the situation for their awareness and flagging potential risks relating to their existing legislated feed bans. If agreed, the appropriate forum to raise this is through Animal Health Committee via an in-session or out-of-session paper. The AHC secretariat within Animal Health Policy branch could be approached for their advice on such a process. AHC has provisions for confidentiality if this issue is deemed sensitive. I would make sense for this issue to be a shared responsibility for DAFF (at the border) and AHA and the jurisdictions (relating to domestic feeding practices).

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

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s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

#### Recent approval provided to a local manufacturer to repurpose/divert materials from the manufacturing facilities into stockfeed – s. 47(1)(b)

Earlier this year, s. 47(1)(b) informed the department that unwanted finished products from their Australian factories producing food for human consumption were sold to s. 47(1)(b) stockfeed manufacturers. s. 47(1)(b) and the s. 47(1)(b) domestic stockfeed manufacturers relied on this long-standing arrangement to dispose of their unwanted finished products. s. 47(1)(b)

has acknowledged to the department that their standard operating procedures did not explicitly state that approvals from the department were needed to be sought before imported animal or plant-derived materials could be used in stockfeed production in Australia. As a multinational company, Australia has specific and additional requirements of which the company's upper management were not aware.

The department requested s. 47(1)(b) provide detailed, ~~and~~ thorough information about the imported materials that were ultimately repurposed/diverted to s. 47(1)(b) domestic stockfeed manufacturers instead of being sent to landfills as well as any processing applied by s. 47(1)(b) and the s. 47(1)(b) domestic stockfeed manufacturers.

s. 47(1)(b) informed the department that there were s. 47(1)(b) imported animal and plant derived materials used as ingredients across their s. 47(1)(b) Australian manufacturing facilities to produce s. 47(1)(b)

s. 47(1)(b) estimated that approximately s. 47(1)(b) tons of finished products were annually sold to s. 47(1)(b) stockfeed manufacturers with the quantity expected to increase due to increases in their annual production volume.

The s. 47(1)(b) materials were categorised as the following:

- s. 47(1)(b)

**Commented [s. 22(1)]:** These need to be checked if meet definition of swill or RAM?

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Of the <sup>s. 47(1)(b)</sup> materials, only one material (which was a dairy product from <sup>s. 47(1)(b)</sup> imported under the 10% dairy rule for human consumption) was refused. All <sup>s. 47(1)(b)</sup> other <sup>s. 47(1)(b)</sup> materials were approved under <sup>s. 47(1)(b)</sup> a change of end-use certificate to be allowed for stockfeed manufacturing in Australia. ABIB also advised <sup>s. 47(1)(b)</sup> to apply for import permits for <sup>s. 47(1)(b)</sup> dairy products from <sup>s. 47(1)(b)</sup> which have now been granted as it would make it easier for <sup>s. 47(1)(b)</sup> to manage their imported materials by holding their own permits.

These materials were approved by the department for the change of end use based on following rationale:

- Decades of diversion from human consumption into animal feeds without issue
- Significant dilution factor – imported materials constitute very small percentages of the many final products manufactured by <sup>s. 47(1)(b)</sup> by becoming incorporated with materials of Australian origin. These final products are then further incorporated into stockfeed products after being combined with other materials at the stockfeed manufacturing facilities
- All materials were heat treated and processed twice. <sup>s. 47(1)(b)</sup>
- There were ~~no~~ extremely low animal biosecurity risks associated with the animal derived materials, except for the dairy material from <sup>s. 47(1)(b)</sup>, as the dairy materials used by <sup>s. 47(1)(b)</sup> were all of <sup>s. 47(1)(b)</sup> and <sup>s. 47(1)(b)</sup> origin. This includes as a result of the nationally harmonised feed bans legislated and implemented by the states and territories.
- The dairy product from <sup>s. 47(1)(b)</sup> was not approved for repurposing/diversion to stockfeed manufacturers.

**Commented [s. 22(1)(b)]:** Can we say this unequivocally with HPAI H5N1 spreading in dairy cows in <sup>s. 47</sup>? What about brucellosis/TB in <sup>s. 47</sup>? TB in possum reservoir in <sup>s. 47</sup>? Heat treatment sufficient?

ABIB's assessment found that the biosecurity risk associated with the various animal and plant-derived materials used by <sup>s. 47(1)(b)</sup> were mitigated and would meet Australia's Appropriate Level of Protection by the processing applied by <sup>s. 47(1)(b)</sup> and stockfeed manufacturer as well as by sourcing from low risk countries for dairy materials (except for the <sup>s. 47(1)(b)</sup> dairy product) and the legislated feed bans within Australia.

The approval restricted <sup>s. 47(1)(b)</sup> to operate in compliance with the following requirements:

1. The goods must be processed as per the information provided to the Department of Agriculture, Fisheries and Forestry during the assessment of this change in end use approval.
2. The goods must be processed at the following facilities;

<sup>s. 47(1)(b)</sup>

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3. The goods must be sent to one of the animal feed manufacturing facilities supplied to the Department of Agriculture, Fisheries and Forestry during the assessment of this change in end use approval.

*Challenges during the assessment*

One of the major issues during the assessment of s. 47(1)(b) application for change of end use was that s. 47(1)(b) was the import permit holder of only s. 47(1) of the s. 47(1) materials. As a consequence, it proved to be arduous and challenging to obtain information from the suppliers of s. 47(1) materials to s. 47(1)(b) regarding the processing and ingredients used in these materials. Many of s. 47(1)(b) suppliers were reluctant to provide information to the department because of concerns with the perception that their imported materials were of lesser quality by being associated with domestically manufactured animal feeds.

If ABIB assessed these s. 47(1) materials under the current import policy and conditions for animal feeds, the majority of these products would not be allowed for importation. As explained above, the s. 47(1) products were allowed for change of end use once the department took into account the processing at s. 47(1)(b) manufacturing facilities and the domestic stockfeed manufacturer in addition to the significant dilution factors, ~~and~~ significant history of use, and countries of origin.

Assessment of s. 47(1)(b) request for change of end use for these s. 47(1) materials required ABIB to dedicate significant resources over four months to the process, and the branch continues to redirect substantial resources as other companies such as s. 47(1)(b) and s. 47(1)(b) have requested the same assessment.

Significant extra resourcing will need to be provided if more domestic companies approach the department for the same change of end use approvals. However, the precedent and work undertaken for the first company may make subsequent assessments more efficient.

**Extrapolation of the volumes of diverted goods into animal feeds**

Based on the annual volume of materials/products discarded by s. 47(1)(b) alone to animal feeds, it would not be an exaggeration to extrapolate that hundreds of thousands of tons of human food products containing imported animal and plant derived materials are currently being repurposed/diverted for animal feeds with the quantity to be increasing each year as more and more local governments prohibit disposal of products and materials in landfills.

**Options to manage biosecurity risks associated with diversion of imported materials for human consumption into animal feeds****1. Maintain status quo**

s. 22(1)(a)(ii)

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**s. 22(1)(a)(ii)**

For dairy materials, continue the current arrangements in which only New Zealand is approved for export of dairy in bulk for both human consumption and animal feeds.

From New Zealand

- a.** Human consumption – no import permit or government certification required, and can be imported with a manufacturer's declaration
- b.** Animal feeds – an import permit is required with government certification stating the dairy is of New Zealand origin and about pasteurization time and temperature. A permit is available with multiple end uses (i.e. human consumption, pet food and stockfeed)

From approved countries other than New Zealand

- a.** Human consumption – import permit required with government certification
- b.** Animal feeds – import permit required with government certificate, allowed as a component in pet food only. Not allowed for importation in bulk for animal feeds
- c.** Please note, for stockfeed, the department does approve of repurposing/diverting a small portion after imported for human consumption

**2. Up the ante****s. 22(1)(a)(ii)**

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s. 22(1)(a)(ii)

3. **Revise current policies and guidelines for animal risks associated with imported materials for human consumption – specifically plant-derived and dairy materials**

s. 22(1)(a)(ii)

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## s. 22(1)(a)(ii)

- i. Amendments to the Goods Determination will be required to no longer require import permits for highly processed plant-derived materials for animal feeds.
- ii. As amendments to the Goods Determination will take a number of years, a staged approach could be considered, in the meantime, to remove the stringent heat treatment and audit requirements.

**Dairy material**

Only dairy of New Zealand origin is allowed to be imported in bulk for both human consumption and animal feeds.

Dairy material from all other approved countries is approved to be imported in bulk for human consumption only. Dairy from these approved countries, however, is not approved for importation in bulk for animal feeds. As mentioned above, the approved countries are those currently free from FMD and LSD. Please note, the department provides approval for repurposing/diversion for animal feeds subsequent to being imported into Australia if approval is sought.

Therefore, as part of revising import conditions so as to:

- a. allow importation of bulk dairy for use in animals feeds, as long as they comply with state and territory feed bans (e.g. swill feeding), from all approved countries for human consumption, not just New Zealand, provided pasteurisation time and temperature are satisfactory and imported under government certification.

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a- Initiating discussions with the states and territories regarding legislative responsibilities for safe animal feeding via AHC, as relevant to this issue, should also be considered.

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Therefore, adopting Option 3 would remove the requirement for department to regulate diversion.

### Recommendation

Of the three options discussed above, the most reasonable, coherent and consistent approach to manage and deal with the repurposing/diversion of imported goods for human consumption into animal feeds is to adopt Option 3, based on:

- significant history of practice
- limited legal powers by the department and lack of robust traceability system in Australia to regulate once goods are released from biosecurity control
- food safety of materials for human consumption in the absence of stringent import conditions, especially for highly processed plant-derived materials
- Dilution factor provided by being processed into final products by domestic manufacturers and then further processed by domestic stockfeed manufacturers

Initiating discussions with the states and territories regarding legislative responsibilities for safe animal feeding via AHC as relevant to this issue should also be considered.

Attachment 1

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s. 47(1)(b)

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s. 22(1)(a)(ii)

**Subject:** FW: Diversion project [SEC=OFFICIAL]

**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Sent:** Wednesday, August 28, 2024 11:59 AM

**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Subject:** FW: Diversion project [SEC=OFFICIAL]

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Hi <sup>s. 22(</sup>

Thanks for the heads up.

s. 22(1)(a)(ii) has been working on this issue and talking closely with s. 47(1)(b). The plan is to draft a paper in line with the open action item from the BADDIES committee (see highlighted text below)

So, it would be good to ensure we are all joined up on this issue. If you think it's worth a discussion let me know and we can set something up.

<sup>s. 22(1)(a)(ii)</sup>

| ID no.<br>(Meeting<br>no_Item<br>no) | Meeting<br>date | Current action items                                                                                                                                                                                                                                      | Action<br>officer | Deadline      | Status                            |
|--------------------------------------|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|-----------------------------------|
| 09_02                                | 15 Feb<br>24    | MCV working group to collaborate on activity design and process and report back to BADDIES prior to implementation                                                                                                                                        | Working<br>Group  | 30 June<br>25 | In progress                       |
| 10_01                                | 20 Mar<br>24    | Conduct IRA post-implementation review<br>Conduct a post-implementation review of a finalised IRA to improve internal practices for risk review content and process.                                                                                      | ASCB,<br>ABB      | 31 Dec<br>24  | Pending<br>finalisation<br>of IRA |
| 11_04                                | 1 May<br>24     | Develop a divisional capability register<br>EL2 Forum to develop a divisional capability register to support cross-divisional acting opportunities.                                                                                                       | EL2<br>Forum      | 31 Dec<br>24  | In progress                       |
| 11_05                                | 1 May<br>24     | Determine how to operationalise policy for <i>Pest or disease agent testing on imported goods for verification and compliance activities</i><br>Consider and determine the best method to operationalise the <i>Pest or disease agent testing</i> policy. | ABB,<br>ASCB      | 30 June<br>25 | Not<br>started                    |

| ID no.<br>(Meeting<br>no_Item<br>no) | Meeting<br>date | Current action items                                                                                                                                                                                                                                 | Action<br>officer             | Deadline     | Status      |
|--------------------------------------|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|--------------|-------------|
| 11_08                                | 1 May<br>24     | Develop paper on imported products repurposed into stockfeed<br>Prepare a scoping paper on the current issues and forward plan for imported products for human consumption repurposed into stockfeed.                                                | ABIB                          | 1 Nov 24     | In progress |
| 12_04                                | 5 Jul 24        | Committee members to finalise branch and divisional operating plans                                                                                                                                                                                  | ASCB,<br>ABB,<br>AHP,<br>ABIB | 31 Jul 24    | In progress |
| 12_06                                | 5 Jul 24        | Modify the recommendations in the cargo assessment paper and recirculate to committee members<br>ABIB to modify the paper to have a greater focus on biological risk rather than competency of border workers. Secretariat to circulate final paper. | ABIB                          | 9 Aug 24     | In progress |
| 13_01                                | 9 Aug 24        | BADDIES committee members to discuss the next steps for action item 11_05, operationalising the policy for <i>Pest or disease agent testing on imported goods for verification and compliance activities</i> , at the next meeting.                  | ABB,<br>ASCB,<br>AHP,<br>ABIB | 17 Sep<br>24 | New         |
| 13_02                                | 9 Aug 24        | Data analyst skills for BAD work - AHP to investigate the possibility of funding ABARES to conduct cost-benefit analyses, to determine whether the approach would benefit both areas by bringing skills back into the department.                    | AHP                           | 17 Sep<br>24 | New         |
| 13_03                                | 9 Aug 24        | Brant to follow up on waste policy ownership with BSRD and ensure they are aware sunseting legislation may feed into the larger waste management project.                                                                                            | Brant                         | 17 Sep<br>24 | New         |
| 13_04                                | 9 Aug 24        | ASCB to coordinate development of a cross divisional audit calendar by the next meeting.                                                                                                                                                             | ABB                           | 17 Sep<br>24 | New         |
| 13_05                                | 9 Aug 24        | ASCB to send a copy of the updated Terms of Reference to the division with the next communique.                                                                                                                                                      | ASCB                          | 17 Sep<br>24 | New         |
| 13_06                                | 9 Aug 24        | ABB to report back to the division/committee on how the prioritisation model was adapted for use within the branch                                                                                                                                   | ABB                           | 29 Oct<br>24 | New         |
| 13_07                                | 9 Aug 24        | ASCB to provide an updated TMAS to include the above suggestions for endorsement of the Chair by 17 September 2024.                                                                                                                                  | ASCB                          | 17 Sep<br>24 | New         |
| 13_08                                | 9 Aug 24        | Brant to ensure branch heads and subject matter experts meet out of session to discuss how to address the range of operational, policy and compliance issues associated with imported ornamental fish.                                               | ASCB                          | 17 Sep<br>24 | New         |
| 13_09                                | 9 Aug 24        | ASCB to send forward workplan out-of-session for committee to review and update before the next BADDIES committee meeting on 17 September 2024.                                                                                                      | ASCB                          | 17 Sep<br>24 | New         |

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**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>  
**Sent:** Wednesday, August 28, 2024 10:07 AM  
**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>  
**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Subject:** Diversion project [SEC=OFFICIAL]

OFFICIAL

Hi s. 22(1)(a)(ii)

At a team coffee the other day, s. 22(1)(a)(ii) mentioned ABIB has a project in progress concerning package size and risk of diversion to unauthorised end use species.

I wonder if you could fill us in on the detail please or provide a contact we could meet with?  
We would definitely like to hear more about this as it is integral to our work, including advices to ABIB

For background, ABB looked into the evolving risk of diversion of human food to animals a few years back (2020).

I attach the Minute for your background in case you were not already aware.

Kind Regards

s. 22(1)(a)(ii)  
Director  
Animal Biosecurity Branch  
Animal Division  
Ph: s. 22(1)(a)(ii)  
Mob: s. 22(1)(a)(ii)

Department of Agriculture, Fisheries and Forestry  
Biosecurity Animal Division  
GPO Box 858 Canberra ACT 2601 Australia

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**Australian Government**  
**Department of Agriculture,  
Water and the Environment**

Ref: 2019/000718E

s. 47F(1)  
Managing Director  
s. 47(1)(b)

Via email: s. 47F(1) @s. 47(1)(b)

Dear s. 47F(1)

Thank you for your letter dated 2 February 2021. I have recently transferred to the position of Assistant Secretary, Animal Biosecurity Branch, and welcome the opportunity to respond to s. 47(1)(b) most recent enquiry.

The department acknowledges that s. 47(1)(b) has a particular interest in importing bulk dairy products for animal consumption into Australia; specifically, a young ruminant milk replacer product (sourced from a number of European countries and manufactured in the Netherlands and Belgium).

As indicated in the department's first letter (Attachment 1), there are many existing requests on the department's work program. As a result, we expect it will be some years before a request of this type, with evidence of significant interest by the Australian domestic livestock peak industry bodies, could be considered for inclusion on the work program as a high priority.

For your information, the department is currently reviewing the animal biosecurity risks associated with importing dairy products for human consumption. Until the outcomes of this review are finalised, it would be premature to consider a biosecurity risk review of imported dairy products for animal consumption. It is worth noting that animal consumption pathways are known to pose a much greater animal biosecurity risk than those for human consumption.

Thank you for making the department aware of s. 47(1)(b) interest in importing this type of product for animal feed.

Yours sincerely

**s. 47F(1)**

Dr Peter Finnin  
Assistant Secretary  
Animal Biosecurity

20 August 2021

Attachment 1: Letter-DAWE(Cookson)-s. 47(1)(b)  
20201109.pdf

cc **s. 47F(1)** , Quality Assurance | Regulatory Affairs, **s. 47(1)(b)**

s. 22(1)(a)(ii)

**From:** s. 22(1)(a)(ii)  
**Sent:** Wednesday, 29 April 2020 1:16 PM  
**To:** s. 22(1)(a)(ii); s. 22(1)(a)(ii); s. 22(1)(a)(ii); s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii); s. 22(1)(a)(ii)  
**Subject:** Mars Wrigley request for departmental approval to downgrade confectionery production waste for alternative end uses [SEC=UNCLASSIFIED]  
**Attachments:** Mars Wrigley\_Application Dossier to DAWE\_PODS Mars Downgrade to Stockfeed\_APR 2020 V1.pdf

Hello everyone,

This email relates to a meeting request that I sent through earlier today. I wanted to summaries relevant points as we understand them.

Just to give you context:



- MARS Wrigley Australia have approached the department seeking approval to downgrade, for stock feed use, waste generated from the chocolate confectionery product lines at their site in Ballarat VIC. MARS describe downgraded product as that 'not able to be retailed to consumers for aesthetic reasons e.g. visually defective product, product 'sweepings'.
- The company is aiming for better environmental sustainability – current waste goes to landfill – and cost savings.
- The scope of the current proposal includes Pods variants (Snickers, MARS, Twix) but the company intend to expand their proposal to include M&M's, Maltesers, Mars Bar and Milky Way.
- Multiple in-process materials will be downgraded: unpacked finished pods, semi-finished raw materials.
- The following tables summarise **imported** ingredients used in manufacture of the Pods product lines

s. 47G(1)(b)

s. 47G(1)(b)

s. 47G(1)(b)



# s. 47G(1)(b)

- MARS have provided the following table which lists their preferred methods of disposal in descending order of preference:

S. 47G(1)(b)

# S. 47G(1)(b)

**Other relevant information:**

- This proposal links to previous approaches from the food and beverage industry seeking options for downgrading human food scraps and waste from the café/restaurant sector.

- In reading Agriculture Victoria's online information about [swill feeding](#) it would seem that they are fairly conservative. I understand that some states have options for heat treating food waste to allow it to be used as livestock feed. ABB may have more information on this.

Regards

s. 22(1)(a)(ii) (Position number: s. 22(1)(a)(ii))

Director – Veterinary Biologicals & Animal Feeds Section (Principal Veterinary Officer)  
Animal and Biological Imports Branch | Animal Division  
Department of Agriculture, Water and the Environment

s. 47E(d)@awe.gov.au

 | 1800 900 090    | s. 22(1)(a)(ii)    | PO Box 858, Canberra ACT 2601

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from the application of fines and terms of imprisonment, the provision of false or misleading information may lead to the suspension, refusal or revocation of import permits and or Approved Arrangements under the *Biosecurity Act 2015* and or other portfolio legislation.

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**From:** s. 47F(1) <s. 47F(1) @effem.com>

**Sent:** Thursday, 23 April 2020 10:40 AM

**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @awe.gov.au>

**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@agriculture.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@agriculture.gov.au>

**Subject:** FW: Mars Wrigley: Request for Assistance: Suitability of Finished Product Confectionery Production Waste for Stock Feed Disposal [SEC=UNCLASSIFIED]

Hi s. 22(1)(a)(ii) ,

s. 47(1)(b)

s. 47G(1)(b)

s. 47(1)(b)

Please do not hesitate to contact me if you have any further queries regarding this.

Kind regards,

s. 47F(1)

---

**From:** s. 47F(1)

**Sent:** Tuesday, 21 April 2020 2:48 PM

**To:** 's. 22(1)(a)(ii) ' <s. 22(1)(a)(ii) @awe.gov.au>

**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@agriculture.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@agriculture.gov.au>

**Subject:** RE: Mars Wrigley: Request for Assistance: Suitability of Finished Product Confectionery Production Waste for Stock Feed Disposal [SEC=UNCLASSIFIED]

Hi s. 22(1)(a)(ii) ,

Nice to meet you and thank you for responding so quickly on our proposal.

I will follow up to get this information as quickly as possible.

In the meantime I still need to provide a dossier for Pods Twix and Pods Snickers, I will send this along with the volumes when confirmed. I expect this will be no later than COB Thursday 23 April. I will keep you informed.

Kind regards,

s. 47F(1)

---

**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @awe.gov.au>

**Sent:** Tuesday, 21 April 2020 2:15 PM

**To:** s. 47F(1) s. 47F(1) @effem.com>

**Cc:** s. 22(1)(a)(ii)s <s. 22(1)(a)(ii)@agriculture.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)s@agriculture.gov.au>

**Subject:** FW: Mars Wrigley: Request for Assistance: Suitability of Finished Product Confectionery Production Waste for Stock Feed Disposal [SEC=UNCLASSIFIED]

[EXTERNAL]

Good afternoon s. 47F(1)

Unfortunately both s. 47F(1) and s. 47F(1) no longer work in my team but s. 47F(1) has forwarded your email to me for consideration. You have certainly raised an interesting proposal and it is something that I will need to discuss with my colleagues in the Animal Biosecurity Branch.

Before I do this I wanted to ask for some more relevant information. Based on today's level of production, and taking into consideration volumes of waste generated through all MARS Ballarat product lines (Mars Pods, Snickers Pods, Twix Pods, etc.) at all stages (in-process, semi-finished, finished wrapped), what sort of volume of waste is the facility generating per annum? Another way of asking this question – What sort of volume of material would the company ideally like to blend into stockfeed per annum?

Regards

s. 22(1)(a)(ii) (Position number: s. 22(1)(a)(ii))

Director – Veterinary Biologicals & Animal Feeds Section (Principal Veterinary Officer)  
Animal and Biological Imports Branch | Animal Division  
Department of Agriculture, Water and the Environment

s. 47E(d)@awe.gov.au

 | 1800 900 090  | 02 6272 5991  | PO Box 858, Canberra ACT 2601

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#### Providing false or misleading information

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**From:** s. 22(1)(a)(ii) s. 22(1)(a)(ii)@awe.gov.au>

**Sent:** Friday, 17 April 2020 11:28 AM

**To:** s. 22(1)(a)(ii) s. 22(1)(a)(ii)@awe.gov.au>

**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@agriculture.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@agriculture.gov.au>

**Subject:** Fw: Mars Wrigley: Request for Assistance: Suitability of Finished Product Confectionery Production Waste for Stock Feed Disposal [SEC=UNCLASSIFIED]

Hi s. 22(1)(a)(ii),

Hope all is well, are you still hanging out in the office by yourself?

s. 22(1)(a)(ii) and I received this email from s. 47F(1) from Mars, and I wasn't sure who in the team to direct the enquiry to so I am sending it to you.

I haven't replied to her yet.

Please let me know if I can help.

Kind Regards,

s. 22(1)(a)(ii)

---

**From:** s. 47F(1) <s. 47F(1) [@effem.com](mailto:@effem.com)>

**Sent:** Friday, 17 April 2020 9:22 AM

**To:** s. 22(1)(a)(ii); s. 22(1)(a)(ii)

**Subject:** Mars Wrigley: Request for Assistance: Suitability of Finished Product Confectionery Production Waste for Stock Feed Disposal [SEC=UNCLASSIFIED]



Dear <sup>s. 22(1)(a)(ii)</sup> and <sup>s. 22(1)(a)(ii)</sup>,

I hope you are both keeping well under the current circumstances.

Firstly my apologies for the significant delay in providing this information to you after we met in November 2019.

You may recall I attended a meeting with other Mars Associates, including <sup>s. 47F(1)</sup> from Mars Pet Care.

At the meeting I asked for assistance with regard to assessing if confectionery production scrap material was able to be diverted away from landfill disposal into stock feed or other alternative methods that are more environmentally sustainable.

I have prepared an application dossier for a product made at the Mars Wrigley manufacturing site at Ballarat, Victoria: PODS® Mars variant. Please find it attached.

I am preparing dossiers for PODS® Snickers Variant and PODS® Twix Variant which are very similar products, these will be submitted to you shortly.

We seek the Department's assistance to review the information in the dossier to either give Mars Wrigley approval to dispose to stock feed, or provide guidance on what further actions are required by us to achieve this.

I will follow up with a phone call on Monday to ensure you received this email and to field any immediate questions or concerns you may have.

I hope you have an enjoyable weekend,

Kind regards,

<sup>s. 47F(1)</sup>

<sup>s. 47F(1)</sup>

Scientific and Regulatory Affairs (SRA) Manager

M: <sup>s. 47F(1)</sup>

E: <sup>s. 47F(1)</sup> [@effem.com](mailto:@effem.com)

Melbourne address: Level 23, Tower 1, 727 Collins St, Melbourne VIC Australia 3008

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**MARS WRIGLEY**  
Confectionery

**better moments make  
the world smile**

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## PURPOSE

To respond to a request from Animal and Biological Imports Branch (ABIB) regarding irradiated mealworms (*Tenebrio molitor*), specifically does Animal Biosecurity Branch (ABB) consider the biosecurity risk associated with the feeding of imported irradiated mealworms as a treat acceptably low to feed to production animals or poultry? ABIB later clarified that it is seeking advice whether expanding the approved end uses to commercial poultry would still meet ALOP.

## INTRODUCTION

The principal question ABB has been asked in this advice is suitability of the imported product for feeding to poultry, noting the qualification 'as a treat'; however, to answer this question appropriately requires a consideration of the current conditions as displayed on BICON and proposed in REQ-16089/CASE-16090. It is noted conditions for insect-based pet food in small packages for retail sale have evolved based on case-by case assessments for these discrete scenarios deemed low biosecurity risk. Insect-based feeds have not been subject to formal biosecurity risk analyses other than, to some extent, by the EU.

ABB notes the current required statements for imported insect-based pet food in BICON case. We copy these below for comparison with CASE-16090 conditions, and to refer to in this advice.

### **Pet food, pet food ingredients, and supplements for companion animals**

#### **Goods are not being imported in bulk for further processing – Mealworms and other dried insects – Standard permit application**

The manufacturer's declaration must include a statement that:

- the only ingredient of animal origin contained in the goods is dried insects
- the insects have not been reared or fed on material derived from animals at any time in their lives
- all components of the product have been treated so that the final product does not require refrigeration
- the product does not contain any whole seeds or viable plant materials
- the product has not been exposed to contamination after processing
- the product is packed in clean, new packaging only.

The product must be labelled for direct retail sale in individual package sizes no greater than 5 kg. If the consignment is found not to be in retail packaging or in package sizes greater than 5 kg then the consignment must be exported or disposed of with all costs to be borne by the importer.

Import conditions after arrival in Australian territory:

- The goods must be treated in Australia with ionising radiation to a level that achieves a minimum absorbed dose of 50 kGy before being released to the importer. Irradiation at 50 kGy at a facility approved by the Department of Agriculture, Fisheries and Forestry is mandatory even if the goods have been irradiated prior to import into Australian territory.
- This import permit allows for the importation of goods for consumption only by pet animals, other than cats, unless the Department of Agriculture, Fisheries and Forestry approves an alternative end use. The goods must be prominently labelled with the statement 'Must not be fed to cats'.

- Imported goods and any by-products or derivatives of imported goods are not permitted for distribution, sale or for use as stock feed, aquaculture feed or environmental use unless approved by the Department of Agriculture, Fisheries and Forestry in writing for specific alternative uses.

The 'current import requirements' provided by ABIB in CASE-16090 state:

s. 47(1)(b)

- The mealworms have not been fed any animal-origin material.
- The insects have not been reared or fed on material derived from animals.
- The product has not been exposed to contamination after processing.
- The product is packed in clean, new packaging only.
- The product must be labelled for direct retail sale in individual package sizes of no greater than 10 kg.
- The goods are subject to irradiation at 50kGy at an approved facility.

There is a note indicating that the department has become aware that there are distributors currently utilising this pathway to purchase 10kg bags of mealworms, selling the goods onto domestic manufacturers to be incorporated into treats for reptiles, aviary birds and poultry. The department is aware that there is domestic demand for this product as a treat for backyard poultry (egg and meat producing birds).

At this time, and without an evaluation of any available peer-reviewed scientific evidence supporting an exclusively plant-based diet for a particular insect species, ABB's recommendations are not specific to particular insect species (that is, whether it is mealworms or black soldier fly larvae, etc). Until proven otherwise to ABB's satisfaction, our current position and advice is that animal material could be an ingredient or contaminant of the substrate fed to the insects overseas, **and this could include material of ruminant origin.**

## RECOMMENDATIONS

1. ABB considers that the treatment to which the mealworms are subjected, which includes irradiation at 50kGy in a facility approved by the Department of Agriculture, Fisheries and Forestry, is sufficient to mitigate the pathogens of animal biosecurity concern other than the prions responsible for the transmissible spongiform encephalopathies (TSEs).
  - ABB therefore supports expanding the approved end uses to backyard poultry, pet birds, pet reptiles but not to commercial, large-scale poultry considering the latter enterprises would likely be seeking bulk quantities of insect-based feed (with the potential for diversion to TSE susceptible species).
  - Restricting end use (i.e. to dogs, aviary birds, backyard poultry, pet reptiles) is appropriate.
  - However, the department's ability to regulate end-use is limited so restricting the size of packaging and requiring appropriate labelling of such packages for direct sale in retail outlets would improve the likelihood of compliance with that measure.

2. ABB recognises the inability to precisely define different categories of poultry (e.g. hobbyist /backyard poultry versus commercial poultry producer) and is not proposing the use of this terminology in import conditions (or on labels); rather ABB is pointing to the need to continue to manage package size (weight limits) such that only small quantities are available in individual packages at the point of retail sale to minimise diversion risk.
  - The price of individual packages at retail sale also works to limit diversion risk.
3. Noting Australian legislative requirements and an ongoing lack of clarification regarding whether insect-based feeds, or the substrates they are fed, represent prohibited pig feed (swill) or RAM, there are additional concerns for potential diversion risk to production animals.
  - Until further information is available to guide the department on whether insect-based feeds are swill as considered by the Australian government, these products should not be fed to any pigs (i.e. pet pigs or piggeries). ABIB should seek advice from ABB before permitting such end use.
4. The current import permit allows for the importation of goods for consumption only by pet animals, other than cats, unless the department approves an alternative end use. The goods must be prominently labelled with the statement 'Must not be fed to cats'.
  - There are published scientific papers from reputable sources indicating insects pose a significant biological hazard as they may act as vectors for prions from contaminated substrates derived from ruminants – thus posing a risk for humans and livestock (1,2). However, limiting package weight at retail sale, whether imported in small packages and irradiated, or imported in bulk (which is not the subject of this advice) and irradiated in the Approved Arrangement, then packaged for retail sale, goes some way to minimising diversion risk to ruminants.
  - ABB considers labelling should remain part of the suite of risk management measures but should be expanded as follows: 'Must not be fed to cats **or ruminants** (including cattle, sheep, deer, goats) **or pigs**.'
5. In terms of package weight, ABB supports the current BICON case for mealworms and other dried insects (standard permit application) which states the following:

*'The product must be labelled for direct retail sale in individual package sizes no greater than 5 kg.'*

  - ABB recommends this weight requirement also be applied to insect-based animal feed imported in bulk (and compliant with all the relevant conditions) into an Approved Arrangement in Australia for further processing (irradiation) and packaging for retail sale.
  - ABB acknowledges that a distributor may buy 2 or more bags of 5 kg insect-based feed at any time and welcomes discussion on this point with ABIB as necessary.

## ISSUES

### General comments:

- With respect to conditions in place currently, ABB notes that most if not all product is coming from countries with relatively poor animal health status and that most of the statements regarding treatments offshore would be unable to be verified. Thus, gamma irradiation at an approved onshore facility remains a key verifiable and effective measure for pathogens of biosecurity concern other than prions.
- There are a number of peer-reviewed scientific papers indicating insects pose a significant biological hazard in insect-based feeds as they may act as vectors for prions from contaminated substrates derived from ruminants – ‘thus posing a risk for humans and livestock’ (1,2). However, limiting package weight at retail sale goes some way to minimising diversion risk.
  - Prions are extremely resistant to heat and to normal sterilisation processes, including irradiation.
- ABB is unable to comment on feed *safety* risk for insect-based feeds other than noting that effective application of gamma irradiation at 50 kGy at a department approved facility would address most biological hazards (other than prions) that are of biosecurity and likely food safety concern, other than chemical hazards.
- It has already been noted that the irradiated product must not be fed to cats.

### Specific comments related to permit conditions:

- **s. 47(1)(b)**
  - ABB notes that the heat treatment has not been verified and there is likely to be minimal Competent Authority oversight in these source countries. In addition, the department has not undertaken Competent Authority assessments related to this trade. However, the application of a further effective treatment, namely irradiation at 50kGy at a department approved facility, provides sufficient assurance that pathogens of biosecurity concern other than prions responsible for TSEs have been inactivated.
- It is claimed that the insects have not been reared or fed on material derived from animals.
  - This claim cannot be verified by the department and even if the department was able to audit such facilities in country, the level of assurance is not greatly increased.
  - ABB considers the possible entry of TSEs, due to importation of insect-based feeds potentially contaminated with ruminant material and diverted to susceptible livestock, or otherwise accessible to susceptible species, would not be sufficiently mitigated by an in country (‘point in time’) audit by departmental officers, even if the source countries were to permit and facilitate such audit. **s. 47(1)(b)**
  - Therefore, for the purposes of risk management, it must be assumed that the insects may have been reared or fed on material derived from animals, and that this could include ruminant material.

- ABB also notes guidance on this subject in the Pet Food Guidelines (draft 4<sup>th</sup> edition as follows:
  - A primary issue of biosecurity concern is the substrate the insects are raised on. Insects may be raised on a substrate of organic material (plant and/or animal). The substrate could be contaminated with pathogens of biosecurity concern (including prions) and it is possible that these pathogens may persist in the digestive tract of the insects. Manufacturers may state that insect larvae are grown only on plant material. However, the larvae of many of the commercially significant species can be effectively grown on any organic matter and animal material cannot be ruled out as an ingredient or contaminant of the substrate without adequate assurances. Potential contamination of the substrate or insect protein with animal material during the production process is likely to lead to critical issues in the risk assessment.
- The current import permit allows for the importation of goods for consumption only by pet animals, other than cats, unless the department approves an alternative end use. The goods must be prominently labelled with the statement 'Must not be fed to cats'.
  - ABB considers this labelling remains appropriate but should be expanded as follows: 'Must not be fed to cats, **ruminants (such as, cattle, sheep, deer, goats) or pigs.**
- Poultry, and other avian species, are not known to be TSE susceptible species.
- ABIB has provided links to several websites selling this commodity which indicate that it is relatively expensive, ranging from \$29/kg **s. 47(1)(b)** to \$412/kg **s. 47(1)(b)**.
  - The cheapest product (\$29/kg for 2 x 5kg bags) is still priced as such that it is unlikely to be diverted to commercial poultry (not a biosecurity concern as not a TSE susceptible species) or to TSE susceptible livestock.

## BACKGROUND

The sourcing, processing, storage and transport of substrate for the insects represents a significant hazard when assessing animal biosecurity risk, and it is not possible to be continuously assured that no animal-based material has been included in the diet. An exception may apply if rigorous, targeted legislative controls exist, which are understood and complied with by the industry in that country, and which have been, and continue to be satisfactorily audited by a competent authority approved by the department. The department may also need to conduct audits in that scenario.

## REFERENCES

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9956073/>

1. Gatecki, R.; Bakuta, T.; Gołaszewski, J. Foodborne Diseases in the Edible Insect Industry in Europe—New Challenges and Old Problems. *Foods* 2023, 12, 770.  
<https://doi.org/10.3390/foods12040770>
2. EFSA Scientific Committee, 2015. Scientific Opinion on a risk profile related to production and consumption of insects as food and feed. *EFSA Journal* 2015; 13 (10):4257, 60 pp.  
[doi:10.2903/j.efsa.2015.4257](https://doi.org/10.2903/j.efsa.2015.4257)



**s. 22(1)(a)(ii)**

**From:** s. 22(1)(a)(ii)  
**Sent:** Wednesday, 26 June 2024 5:09 PM  
**To:** s. 22(1)(a)(ii); s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii)  
**Subject:** RE: Preparation of a meeting with the food and stockfeed industry on Friday 5 July - a list of questions [SEC=OFFICIAL]

Thanks s. 22(1)(a)(ii),

Agree they look good. My only other thought would be whether we would ask if they know of particular countries of origin/manufacture that products come from that are commonly downgraded....but maybe that's not relevant and it's a good star for the convo and no doubt there will be more questions as we have these discussions

Cheers

s. 22(1)(a)(ii)

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**From:** s. 22(1)(a)(ii)  
**Sent:** Monday, June 24, 2024 4:08 PM  
**To:** s. 22(1)(a)(ii) ; s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii)  
**Subject:** RE: Preparation of a meeting with the food and stockfeed industry on Friday 5 July - a list of questions [SEC=OFFICIAL]

Hi s. 22(1)(a)(ii) – looks good to me.

s. 22(1)(a)(ii)

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**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Sent:** Monday, June 24, 2024 12:08 PM  
**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Subject:** Preparation of a meeting with the food and stockfeed industry on Friday 5 July - a list of questions [SEC=OFFICIAL]

Hi s. 22(1)(a)(ii) and s. 22(1)(a)(ii)

In preparation of our meeting with s. 47F(1), s. 47F(1) and s. 47F(1) next week, we have come up with a few questions that would assist us in the meeting.

I thought it would be easier to exchange ideas about the relevant questions by using emails or Teams rather than having a brainstorm session.

Once we are happy with a list of questions, it would be ideal to share it with s. 47F(1) and the s. 47F(1) ahead of the meeting so that they can prepare for the meeting.

Grateful for your suggestions, please.

s. 22(1)(a)(ii)

Questions such as:

- What the reasons for downgrading?

- What kind of material are downgraded?
  - What are the usual ingredients/material that are downgraded to animal feed?
- What are the quantities?
- Which type of ingredient is most downgraded/repurposed into animal feed?
  - What would be the reason(s) for this?
- How long has this been going on?
- What is the cost of sending waste to land fill?
- How much do you earn by sending waste to stockfeed manufacturer?
- What is the primary driver of repurposing waste material to animal feed?
  - Is it to reduce the cost of sending waste material to landfill or to earn a revenue from the animal feed manufacturers?
- Is there a particular state or region involved?
- What is the demand from the animal feed industry to repurpose/downgrade?
- What are the usual feed products made from repurposed human food ingredients?
- How can we work with industry to achieve a good outcome?
- what type of quality management system used for human food ingredients?
- What have you thought of as solutions?

**s. 22(1)(a)(ii)**

Director (A/g) | Veterinary Biologicals and Animal Feed Team

Animal and Biological Imports Branch | Biosecurity Animal Division

**Department of Agriculture, Fisheries and Forestry**

Agriculture House | 70 Northbourne Ave | GPO Box 858 | Canberra ACT 2601 | Australia

Ph: 1800 900 090 | Email: [s. 22\(1\)\(a\)\(ii\)@aff.gov.au](mailto:s.22(1)(a)(ii)@aff.gov.au)

## Meeting Minutes - Repurposing of Imported Human Food into Animal Feed

**Date:** 05 July 2024, 09:30am

**Location:** Canberra and MS Teams

**Chair:** s. 22(1)(a)(ii)

**Minutes:** s. 22(1)(a)(ii)

### Participants

**DAFF:** Peter Finnin, s. 22(1)(a)(ii), s. 22(1)(a)(ii), s. 22(1)(a)(ii), s. 22(1)(a)(ii) s. 22(1)(a)(ii) , s. 22(1)(a)(ii) , s. 22(1)(a)(ii), s. 22(1)(a)(ii), s. 22(1)(a)(ii), s. 22(1)(a)(ii), s. 22(1)(a)(ii),

### Stakeholder Representatives:

s. 47F(1) (online) - Director, s. 47(1)(b)

s. 47F(1) - Executive Manager, s. 47(1)(b)

s. 47F(1) - CEO, s. 47(1)(b)

**Welcome (Chair: s. 22(1)(a)(ii)).**

- Reiterating that there is a long history of food or food products imported for human consumption, which have been diverted to stock or animals without overweight from DAFF.
- We want to work together to gain understanding about what products are involved, what species and countries of origin are involved.

### Discussion:

- Human consumption food, which is close to, or past a use by date has been readily diverted to stockfeed or pet feed end uses for many years. This especially applies to plant goods which were originally imported under a human consumption pathway.
- Industry is generally protective of the fact this happens, there is no valuable or long-term data available to supply information on the practice.
- There is a perception in industry that if the product has been allowed or human consumption, that this is the highest level of assessment and would therefore be acceptable for diversion into stock feed and pet food.
  - Accepted that this attitude comes from ignorance of the process on how to repurpose affected products, and also that in the human consumption industry, products are assessed against nutritional risks rather than biosecurity risks.
  - Often the decision makers are restricted by directions from higher management or may not understand the origin of the product.
- Industry participants are also often not the importer or holder of import permit (if applicable). Often the product in question is a complex food that was processed in Australia from local and imported ingredients. For example, a bakery will unlikely know whether their flour supply is local or imported, as it is likely supplied by a local supplier.

- It was noted that for this reason, end use restrictions on permits may not be useful.
- General industry participants would not understand how imports work, as the information from DAFF about the process is generally targeted at importer/brokers rather than the producer or seller who will likely divert the goods.
- There are many mechanisms for the need of potential diversion, including shipping routes available or delays, and compliance issues and flow on effects on use by date restrictions for human consumption purposes. It was noted that potential delays like this should be considered to gain a wholistic view of the driving forces behind food diversion practices.

Industry presented following information to understand the context behind diversion practices:

- Recognition of the need to reduce food waste globally to reduce environmental impacts and increase sustainability.
- Manufacturing produces waste due to production errors, overordering, inaccurate demand, customer returns etc.
- Human consumption food is mainly sent to food recovery organisations such as Ozharvest, however this is not an option for food items that pose risks to humans.
- Repurposing for animal feed is the next viable option.
- Repurposing for animal feed is not a revenue stream - landfill disposal is expensive and facilities that are zero-waste cannot utilise this option.
- EndFoodWaste Australia has developed food waste plans for the industry sector, which include diversion for animal feed. It was recommended to engage with participants such as this to help inform industry about the complexities involved.
- Generally, the understanding of Restricted Animal Material (RAM) risks is well understood, particularly in the stock feed production industry. However, knowing where to find information on particular products is challenging due to the many supply chains involved.
- Developing a risk-based framework was presented as a priority to find a practical solution, without compromising on plant and animal health through biosecurity risks involved.
- It was acknowledged that the current practices were not ideal, but generally participants were committed to help communicate issues and formulate solutions.
- Animal feed presents a significant risk due to the nature of the products that tend to be diverted. This is mitigated to some extent by facilities who hold Class 3.0AA, where imported and local products require physical segregation and available import permits.
  - It was noted that very few animal feed manufacturing facilities hold a Class 3.0AA, ingredients are bought and processed, then sold without ingredient oversight.
  - There appears to be little understanding of the origin of products that are commonly diverted to stockfeed.

- Traceability of mixed bulk products (e.g. Biscuit meal) is non-existent as there may be local and imported ingredients present.
  - The stakeholders involved may not be aware that there are imported ingredients present in the bulk product. The supply chains are complex, as mentioned above.
  - Products may be sourced locally or from imported goods depending on costs and availability. E.g. Droughts and seasonal availability. Often it is cheaper to use imported ingredients such as tomato paste. There is a perception that goods that have been imported for years and “cooked” pose no risk.
- There appears to be some conscious diversion in industry in terms of products containing animal products (egg, milk powder) that may pose risks to ruminants. These are often diverted to poultry or aquaculture feed.
  - It was noted that there is a general understanding in the industry of what RAM entails, and that there are 4-5 listed animal derived products that were excluded from that definition.
  - RAM would generally end up in bioreactors or landfill.
  - There are some feeds banned for use in producing animals such as pigs, regulations set by states/territories.
- Products destined for stockfeed or pet feed are generally heat treated into a pellet (usually 80°C for 30 seconds) or retorted. This is on top of prior heat treatment that may have been applied (e.g. biscuits). However, this may still not meet scientific advice to mitigate risks of some viruses, despite industry perception that it does.
  - It was noted that there is an 80 year history of this practice happening with no FMD/AI outbreaks occurring. However, this would not factor into DAFF assessments.
- Bulk plant products such as soybean meal and copra tend to originate from imports for stockfeed purposes – low risk. Products such as tapioca are generally not incorporated unless present in a finished product that is diverted.
  - Occasionally milk powder is obtained from downgraded human consumption products, e.g. baby powder. These are often floor scrapings from the facility. Milk powder has a lot of awareness in the industry as a whole, so this product tends to be diverted under better regulation unless in smaller quantities (such as the scrapings, which is rare).
  - Dual use permits for animal feed/human consumption for imported plant material are available but have not seen the uptake expected for following reasons:
    - Possible industry ignorance that these are available.
    - Restricted permit length is unattractive (2 years).
    - Often will not bother for one-off smaller quantities (e.g. 1T of milk powder).
    - Restrictions that imported would need go through as they would need to undergo a stockfeed import permit assessment if main purpose is human consumption.

- There are some companies doing the right thing, but it was noted it was commercially and economically disadvantageous for them to do so, with extra permit application costs and paper trail and traceability involved. It was also noted that the process is challenging and at times overwhelming.
- It was noted that some companies answer to global partners and financial stakeholders, under which they may be restricted as to how they can act. The regulation in Australia is far tighter than the rest of the world because of the Biosecurity Status of the country.
- Potential impact on DAFF if goal of 80% of companies would self-declare post awareness campaign of this issue:
  - Does DAFF have the resources to address an extra workload? This would need to be ascertained before messaging is released.

**Outcomes:**

- DAFF need to assess information received within this meeting in regard to commonly diverted ingredients and risks posed.
- Possibility for a risk-based decision tree has been raised. This may be feasible, if possible, under current legislation.
- Broadly, the industry requires better knowledge of the possible risks of diversion.
- Industry stakeholders noted that current examples of companies going through notification of diversion process should be used to formulate how the process is conducted in the future and inform how a risk-based decision tree may look.
- Industry stakeholders invited DAFF to visit stockfeed and pet feed manufacturing facility to gauge how current practices are carried out.
- All participants agreed that Biosecurity is the highest priority and focus for this issue.
- Next meeting will be held once information obtained is assessed and discussed.

s. 22(1)(a)(ii)

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**From:** s. 22(1)(a)(ii)  
**Sent:** Friday, 3 January 2025 2:29 PM  
**To:** s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii); s. 22(1)(a)(ii); s. 22(1)(a)(ii); s. 22(1)(a)(ii)  
**Subject:** RE: Diversion of imported food materials to animal feed [SEC=OFFICIAL:Sensitive]  
**Attachments:** Diversion of imported food materials to animal feed \_draft.docx

OFFICIAL: Sensitive

Thanks s. 22(1)(a)(ii)

Good work – much appreciated all

I've made a few changes to this – noting the highlighted parts probably still need a bit of refining. Can we chat when you are back?

Thanks

s. 22(1)(a)(ii)

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OFFICIAL: Sensitive

**From:** s. 22(1)(a)(ii)  
**Sent:** Tuesday, 24 December 2024 8:43 AM  
**To:** s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii) ; s. 22(1)(a)(ii) ; s. 22(1)(a)(ii)  
**Subject:** Diversion of imported food materials to animal feed [SEC=OFFICIAL:Sensitive]

OFFICIAL: Sensitive

Dear s. 22(1)(a)(ii)

Thanks to s. 22(1)(a)(ii) and s. 22(1)(a)(ii), attached is the draft discussion paper on diversion of imported food materials to animal feed.

Grateful for your review and feedback.

Kind regards

s. 22(1)(a)(ii)

Director | Animal Feeds Section  
Animal and Biological Imports Branch | Biosecurity Animal Division  
**Department of Agriculture, Fisheries and Forestry**  
Agriculture House | 70 Northbourne Ave | GPO Box 858 | Canberra ACT 2601 | Australia  
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## Biosecurity Management of imported food grade materials being repurposed as animal feed

### Purpose

To provide an overview of the , industry-wide practice by the domestic food manufacturers of repurposing/diverting materials imported for human consumption to animal feed without seeking prior approvals from the Department of Agriculture, Fisheries and Forestry.

The desired outcome of this discussion paper also is to have informed the decision makers of the level of biosecurity risk with the existing regulatory approach and current practice, and to suggest the alternate regulatory options be considered to manage the common practice of repurposing/diverting imported human food grade ingredients/materials into animal feed.

### Food Products that are known to be repurposed for animal feed

What products are relevant to this paper...add some high-level detail around what plant and dairy product are usually imported and used in vivo

s. 22(1)(a)(ii)

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s. 22(1)(a)(ii)

**Current Biosecurity Regulatory Arrangements**

BAD regulates the import of bulk products under the Biosecurity Act and its subordinate legislation, the Biosecurity Goods Determination. The regulatory arrangements for bulk products that could be used as either food for people or animals are longstanding. The department regulates imported bulk products by assessing their manufacture offshore and applying import conditions at border when goods arrive.

Generally, goods that are described as being used as livestock feeds at the time import undergo more rigorous regulation, as these products are deemed to present a significantly higher biosecurity risk due to their direct exposure to production animals. Whereas product that is manufactured into human food is deemed a lower biosecurity risk

It is common for product described as human food at the time of import to be 'repurposed' as animal feed after arriving in Australia. In this case the department has asked owners of the repurposed product to apply for an '*in vivo* approval', which allows for a more rigorous biosecurity assessment of the product given the increases risk of is new purpose resulting is direct exposure to domestic animals.

The department has recently received feedback from the Australian Food and Grocery Council and several large multinational food manufacturers' expressing difficulty in complying with the existing regulatory requirements, and that the existing regulations are not optimal. For example, the importer of these products often on-sell to food manufacturing companies, and it is these entities that decide to repurpose the product to animal feed after the goods have been released from biosecurity control. It is also possible that the existing that importers of these product use the path of least regulatory burden and declare the good as human food only at the time of import, even though they may be aware that their gods will likely be repurposed as animal feeds.

**Existing Import Conditions**

The department's current import policy for animal feed is very stringent. Most animal-derived materials, other than dairy, are not permitted to be imported for use in stockfeed as the biosecurity risks are deemed to be unacceptably high. Imported petfood can contain various animal materials but only with strict sourcing and heat treatment requirements (i.e. a minimum core temperature of 100 °C for at least 30 minutes) for countries other than New Zealand. There are also restrictions for sourcing from approved countries (i.e. countries not affected by bovine spongiform encephalopathy, foot-and-mouth disease, African swine fever, classical swine fever etc).

s. 22(1)(a)(ii)

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s. 22(1)(a)(ii)



#### **Dairy material**

Only dairy of New Zealand origin is allowed to be imported in bulk for both human consumption and animal feed (both stockfeed and pet food).

Dairy material from all other approved countries is approved to be imported in bulk for human consumption only. Please note, dairy from these approved countries, however, is not approved for

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importation in bulk for stockfeed (but allowed for pet food). The approved countries are those currently free from foot and mouth disease and lumpy skin disease.

The department provides approval for dairy imported for human consumption to be repurposed/diverted to animal feed (both stockfeed and pet food) subsequent to being imported into Australia, if approval is sought.

For example, dairy of US origin can be imported into Australia for human consumption but not for stockfeed. However, if the importer or domestic manufacturer would like to divert the US dairy from human consumption to animal feed, they will seek approval from the department and then they will receive an approval to do so. Dairy of US origin can still be used as stockfeed in Australia, but it just cannot be imported for stockfeed use.

Therefore, as part of revising import conditions:

- a. allow importation of bulk dairy for animal feed use from all approved countries for human consumption, as long as they comply with state and territory feed bans (e.g. swill feeding), with pasteurisation times and temperatures provided on government certification.

Initiate discussions with the states and territories regarding legislative responsibilities for safe animal feeding via AHC, as relevant to this issue, should also be considered.

#### Domestic Regulatory Requirements for Safe Animal Feeding Managed by the States and Territories

There are two significant nationally applied regulations associated with animal feeding that mitigate the high biosecurity risk associated with the practice, both managed at the state and territory level. These are the National Swill Feeding Ban and the National Ruminant Feed Ban. All States and Territories have harmonized relevant regulations/definitions, and implementation programs including awareness, audit and compliance activities to facilitate and enforce both bans. Animal Health Australia is involved at the national level to ensure jurisdictional harmonisation, as well as nationally coordinated awareness and compliance activities, partnered with industry.

The National Swill Feeding Ban prohibits the feeding of swill (untreated animal material) to pigs to prevent the introduction and spread of numerous diseases including FMD, ASF, CSF and others. The National Ruminant Feed Ban prevents the feeding to ruminants of any restricted animal material, including in processed feed. It is primarily implemented to prevent the introduction and spread of bovine spongiform encephalopathy (BSE).

Here is national information from Animal Health Australia on national harmonization of the swill feeding ban: [Prohibited Pig Feed Compliance and Awareness - Animal Health Australia](#), as well as example information on Queensland's swill feeding ban - [Laws against supplying and feeding prohibited feed to pigs \(swill\) | Business Queensland](#). Here is AHA information on the national harmonisation of Australia's ruminant feed ban [Australian Ruminant Feed Ban - Animal Health Australia](#), as well as example information from Victoria on its ban - [Ruminant Feed Ban | Animal diseases | Biosecurity | Agriculture Victoria](#)

For swill feeding, swill or prohibited pig feed is defined as: *material of mammalian origin, or any substance that has come in contact with this material, but **does not** include:*

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(i) Milk, milk products or milk by-products either of Australian provenance or legally imported for stockfeed use into Australia.

(ii) Material containing flesh, bones, blood, offal or mammal carcasses which is treated by an approved process<sup>1</sup>.

(iii) A carcass or part of a domestic pig, born and raised on the property on which the pig or pigs that are administered the part are held, that is administered for therapeutic purposes in accordance with the written instructions of a veterinary practitioner.

(iv) Material used under an individual and defined-period permit issued by a jurisdiction for the purposes of research or baiting.

Restricted animal material (RAM) cannot be fed to ruminants and is defined as: *any material taken from a vertebrate animal other than tallow, gelatin, milk products or oils. It includes rendered products, such as blood meal, meat meal, meat and bone meal, fish meal, poultry meal, eggs, feather meal, and compounded feeds made from these products.*

#### Industry feedback to date

##### Domestic Food Manufacturers

Recently the department was approached by the peak industry body representatives from the <sup>s. 47(1)(b)</sup> the s. 47(1)(b) \_\_\_\_\_, the s. 47(1)(b) \_\_\_\_\_ and the s. 47(1)(b) \_\_\_\_\_ to discuss the matter

Industry representatives have informed that there are several reasons for finished goods (as well as raw materials) being repurpose as animal feed. These include product not meeting quality specifications, over-ordering and the expiry of product. Without alternative uses such as animal feed, the only option is to be disposed of as municipal waste and end up in landfill, which represents a significant cost to any business as the volume/amount increases. There is an income stream generated by selling to domestic stockfeed manufacturing facilities, but the overwhelming and significant economic driver is to save the cost of sending the surplus/unwanted materials to landfill.

A related and compelling factor for domestic manufacturers to repurpose/divert materials to animal feed is also that this current practice aligns with the growing trend to reduce food loss and waste. There is a growing number of local councils and governments prohibiting food materials from being sent to landfill due to zero-waste policies. It is also worth noting that domestic stockfeed manufacturers have become reliant on the materials received from human food manufacturing facilities on an ongoing basis for their production of stockfeed products.

The peak industry representatives also highlighted several challenges to complying with existing regulations

- Many entities are unaware of the biosecurity regulations particularly those that pursue product already in Australia and are not aware that a product has imported components and may not have been assessed for use directly with animals
- Entities that do try and comply with existing regulation find it difficult to get the necessary product information requested by the department. Often these entities do not have commercial relationship with the overseas producer or exported of the product in question.

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Domestic Producers

s. 47(1)(b) feedback

States and Territories**Legal Considerations**

End use (human vs animal food) is used in Australian biosecurity legislation to differentiate import conditions, with product used directly with animals being more regulated than human food products. For example, the Biosecurity (Conditionally Non-prohibited Goods) Determination 2021 (Goods Determination) does not require an import permit for the importation of highly processed plant-derived materials for human consumption. However, many of these same products do require an import permit if they are declared for use as animal feeds.

There is a question about the legal powers underpinning the department's regulation of already imported product that was declared as human food. There is a risk that once released from biosecurity control at the time of import, the department's 'in vivo' regulatory framework is not supported by current legislative powers. Generally, post border biosecurity matters are the responsibility of States and Territories under Australia's shared biosecurity framework.

**Recent example of an approval provided to a local manufacturer to repurpose/divert materials from the manufacturing facilities into stockfeed – s. 47(1)(b)**

In March 2024, s. 47(1)(b) informed the department that they sold unwanted finished food products manufactured at their s. 47(1) Australian factories to s. 47(1) domestic stockfeed manufacturers for significant length of time (most likely for decades). s. 47(1)(b) relied on this long-standing arrangement to dispose of their unwanted finished products and for the five domestic stockfeed manufacturers to receive a steady supply of materials for their production. s. 47(1)(b) justified the company's negligence by stating that s. 47(1)(b) (as a multi-national company) was not aware that the diversion practice into stockfeed needed prior approval from the department.

In response, the department requested s. 47(1)(b) provide thorough, detailed information about the imported materials that were included in their food production and then repurposed/diverted to five domestic stockfeed manufacturers instead of being sent to landfill as well as any processing applied by s. 47(1)(b) and the s. 47(1) domestic stockfeed manufacturers.

s. 47(1)(b) advised that there were s. 47(1) imported animal and plant derived materials used as ingredients across their s. 47(1) Australian manufacturing facilities to produce s. 47(1)(b)

s. 47(1)(b) estimated that approximately s. 47(1)(b) of finished products were sold annually to the s. 47(1) stockfeed manufacturers with the quantity expected to increase in coming years due to increases in their annual production volume.

The s. 47(1) materials were categorised as the following:

s. 47(1)(b)

**Commented [s. 22(1)]:** While we haven't spoken directly to domestic stakeholders s. 22(1)(a)(ii) did mention that he received some feedback as part of the dairy IRA. s. 47(1)(b)

**Commented [s. 22(1)]:** Have we got any feedback from S&Ts at this point? If not can we say we haven't raised this matter with them yet.

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## s. 47(1)(b)

Of the s. 47(1)(b) materials, only one material (which was a dairy product from s. 47(1)(b) imported under the 10% dairy rule for human consumption) was refused. All the other s. 47(1)(b) materials were approved under a change of end-use certificate for use in stockfeed manufacturing in Australia.

These materials were approved for the change of end use based on following rationale:

- All materials were heat treated and processed twice. s. 47(1)(b)
  - For plant-derived materials for animal feed end use, the plant biosecurity risks are addressed by a simple processing plus a heat treatment at s. 47(1)(b) from all countries.
  - The same highly processed plant-derived materials are required to be heat treated at a minimum core temperature of 100 °C for at least 30 minutes if they are sourced from high-risk countries to address the potential contamination with animal matter (e.g. excreta, tissue), which would be a pathway to introduce exotic animal pathogens such as FMD, ASF, LSD etc.
  - Whilst acknowledging that contamination with animal matter in imported plant-derived materials for animal feed should be mitigated through heat treatments, the same materials, if for human consumption, are already allowed to be imported into Australia without import permits by declaring that the materials are highly processed and for human consumption, in accordance with relevant BICON cases. There are no requirements for GMP or quality management system to operate at the manufacturing facilities to ensure only food grade materials are manufactured and imported. Quality of imported materials are managed commercially.
  - The rationale to allow importation of highly processed plant materials for human consumption without an import permit is due to more stringent sourcing and hygienic processing applied to human food. Therefore, the plant-derived materials for human consumption, by extension, should be also allowed for animal feed for having very low animal biosecurity risk.
- Substantial dilution factor – imported materials constitute very small percentages of the many final products manufactured by s. 47(1)(b) by becoming incorporated with materials of Australian origin. These final products are then further incorporated into stockfeed products after being combined with other materials at the stockfeed manufacturing facilities
- Very low animal biosecurity risk associated with the animal derived materials, except for the dairy material from s. 47(1)(b), as the dairy materials used by s. 47(1)(b) were all of s. 47(1)(b) and s. 47(1)(b) origin. The s. 47(1)(b) dairy for human consumption is, however, required to be accompanied by s. 47(1)(b) government certification attesting to the origin and heat treatment for pasteurisation.
- Significant diversion from human consumption into animal feed pathway without known issues – i.e. diverting s. 47(1)(b) annually.
- The nationally harmonised feed bans legislated and implemented by the states and territories.

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Therefore, ABIB's assessment found that the biosecurity risk associated with the various animal and plant-derived materials used by s. 47(1)(b) were mitigated, and would meet Australia's Appropriate Level of Protection by the processing applied by s. 47(1)(b) and stockfeed manufacturer as well as by sourcing from low risk countries for dairy materials (except for the s. 47(1)(b) dairy product) and the legislated feed bans within Australia.

#### *Challenges during the assessment for change of end use*

One of the major issues during the assessment of s. 47(1)(b) application for change of end use was that s. 47(1)(b) was the import permit holder of only s. 47(1)(b) of the s. 47(1)(b) materials. It proved to be arduous and challenging to obtain information from the suppliers of s. 47(1)(b) materials regarding the processing and raw materials used. Many of s. 47(1)(b) suppliers questioned the reason for being requested to provide such information, and expressed concerns with the perception that their imported materials were of lesser quality by being associated with domestically manufactured stockfeed.

If ABIB assessed these s. 47(1)(b) materials under the current import policy and conditions for animal feed, most of these products would not be allowed for importation. As explained above, the s. 47(1)(b) products were allowed for change of end use once the department considered the processing at s. 47(1)(b) manufacturing facilities and the domestic stockfeed manufacturer in addition to the substantial dilution factor, significant history of use, countries of origin and nationally harmonized feed bans.

Assessment of s. 47(1)(b) request for change of end use for these s. 47(1)(b) materials required ABIB to dedicate significant resources over four months, and the branch continues to redirect substantial resources as other companies such as s. 47(1)(b) and s. 47(1)(b) have requested the same assessment.

Significant extra resourcing and budget will need to be provided if more domestic companies approach the department for the same change of end use approvals.

**Commented [s. 22(1)]:** Can we make this example an attachment

#### **Recommendations**

1. **Further stakeholder engagement – BAD should raise this matter with State and Territories and domestic producers such as s. 47(1)(b)**
2. **Conduct further research to establish the extent of repurposing of imported ingredients - Research organisations such as ABARES could be engaged to investigate and quantify the extent of the issue on behalf of BAD**
3. **s. 47E(d)**
4. **The department should consider whether the currently biosecurity policy setting align with the appropriate level of protection level of protection (ALOP) in the Biosecurity Act**

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2016. The department may be unnecessarily regulating import goods, particularly plant based ingredients.

s. 47(1)(b)



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s. 22(1)(a)(ii)

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**From:** s. 22(1)(a)(ii)  
**Sent:** Monday, 3 March 2025 3:36 PM  
**To:** s. 22(1)(a)(ii)  
**Subject:** Diversion of imported food material to animal feed - draft  
**Attachments:** Diversion of imported food materials to animal feed \_draft\_ s. 22(1)(a)(ii).docx

Hi s. 22(1)(a)(ii)

Here is the draft paper on the diversion issue.  
Grateful for your review please.

s. 22(1)(a)(ii)

Director | Animal Feeds Section  
Animal and Biological Imports Branch | Biosecurity Animal Division  
**Department of Agriculture, Fisheries and Forestry**

Agriculture House | 70 Northbourne Ave | GPO Box 858 | Canberra ACT 2601 | Australia  
Ph: 1800 900 090 | Email: s. 22(1)(a)(ii)@aff.gov.au

# Management of imported food materials being repurposed as animal feed

## Purpose

To provide an overview of the current, industry-wide practice by the domestic food manufacturers of repurposing/diverting materials imported for human consumption to animal feed without seeking prior approvals from the Department of Agriculture, Fisheries and Forestry.

The desired outcome of this discussion paper is to have informed the decision makers of the level of biosecurity risk with the existing regulatory approach and current practice, and to suggest the alternate regulatory options be considered to manage the common practice of repurposing/diverting imported human food grade ingredients/materials into animal feed.

## Introduction/background

Repurposing/diversion of imported materials for human consumption to animal feed<sup>1</sup> is a common and entrenched industry-wide practice that has been in place for decades.

Recently, the department was approached by the peak industry body representatives from the <sup>s. 47(1)(b)</sup>, the s. 47(1)(b), the s. 47(1)(b) and the s. 47(1)(b) of Australia to discuss the current practice of repurposing/diverting imported materials for human consumption to animal feed (overwhelmingly to stockfeed but sometimes to petfood), and to collaborate to develop a pragmatic solution for the management of the practice. That is, the industry would like the department to reconsider the biosecurity risk setting for bulk imported, highly processed plant-derived materials specifically, as well as for dairy materials for human consumption, knowing that these categories of materials imported for human consumption are repurposed/diverted to animal feed, usually after incorporated as part of finished goods.

The reason that peak industry representatives have approached the department is that the department has taken a position to regulate the change of end-use for imported food materials to animal feed by advising the industry that repurposing/diverting imported food materials to animal feed can only be approved by the department after conducting a thorough assessment to determine that the biosecurity risks are mitigated.

The peak industry bodies have informed that there are many reasons for finished goods (as well as raw materials) needing to be disposed of as non-food products and end up as part of animal feed. The reasons include quality specifications, over-ordering, inaccurate forecasting of consumer demand, expiry dates etc. Without alternative uses such as animal feed, the only option is to be disposed of as municipal waste and end up in landfill, which represents a significant cost to any business as the volume/amount increases.

To avoid the costly expense of disposing materials to landfill, industry representatives have advised that the manufacturers repurpose/divert to animal feed. There is a small income stream generated by

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<sup>1</sup> Animal feed covers all type of food fed to domestic animals including companion animals and livestock. For the purposes of discussion on the diversion/repurpose issue, stockfeed is of primary concern due to the exposure of susceptible high risk target species (i.e., domestic livestock) to imported goods.

selling to domestic stockfeed manufacturing facilities, but the overwhelming and significant economic driver is to save the cost of sending the surplus/unwanted materials to landfill. A related and compelling factor for domestic manufacturers to repurpose/divert materials to animal feed is also that this current practice aligns with the growing trend to reduce food loss and waste. There is a growing number of local councils and governments prohibiting food materials from being sent to landfill due to zero-waste policies. It is also worth noting that domestic stockfeed manufacturers have become reliant on the materials received from human food manufacturing facilities on an ongoing basis for their production of stockfeed products.

In addition to the economic driver, the peak industry representatives have highlighted that many of the domestic food manufacturers are simply unaware of the biosecurity risks associated with repurposing/diverting imported food materials to animal feed or whether their domestically sourced raw materials could even contain imported materials. For those domestic manufacturers who have repurposed/diverted imported food materials to animal feed and then subsequently become aware of the department's requirement for prior approval, they are unwilling to engage the department due to possible sanctions and penalties by the department.

#### s. 47E(d)

Most, but not all, of the imported food materials being repurposed/diverted to animal feed are highly processed plant-derived materials. Imported dairy material is also recognised as an important source of protein for the domestic livestock industry.

The next section details the way current legislation allows importation of various commodities for human consumption and animal feed, particularly the pathway for repurposing/diverting imported highly processed plant-derived food to animal feed.

### **Legislation**

#### **Commonwealth requirement for plant-derived materials for human consumption**

#### s. 22(1)(a)(ii)

s. 22(1)(a)(ii)



**s. 22(1)(a)(ii)*****Import requirements for animal feed (or ingredients for production into animal feed)***

The department's current import policy for animal feed is very stringent for all animal and plant-derived materials. Most animal-derived materials are not approved to be imported for use in stockfeed as the biosecurity risks are deemed to be unacceptably high. Imported petfood can contain various animal materials but only with strict sourcing and heat treatment requirements (i.e. a minimum core temperature of 100 °C for at least 30 minutes) for countries other than New Zealand. For animal-derived materials for pet food, there are also restrictions for sourcing from approved countries (i.e. countries not affected by bovine spongiform encephalopathy, foot-and-mouth disease, African swine fever, classical swine fever etc). These stringent conditions are enforced through the import permit application process and conditions imposed on import permits.

**s. 22(1)(a)(ii)****Domestic Regulatory Requirements for Safe Animal Feeding Managed by the States and Territories**

There are two significant nationally applied regulations associated with animal feeding that mitigate the high biosecurity risk associated with the practice, both managed at the state and territory level. These are the National Swill Feeding Ban and the National Ruminant Feed Ban. All states and territories have harmonized relevant regulations/definitions, and implementation programs including awareness, audit and compliance activities to facilitate and enforce both bans. **s. 22(1)(a)(ii)**

is involved at the national level to ensure jurisdictional harmonisation, as well as nationally coordinated awareness and compliance activities, partnered with industry.

The National Swill Feeding Ban prohibits the feeding of swill (untreated animal material) to pigs to prevent the introduction and spread of numerous diseases including FMD, ASF, CSF and others. The National Ruminant Feed Ban prevents the feeding to ruminants of any restricted animal material, including in processed feed. It is primarily implemented to prevent the introduction and spread of bovine spongiform encephalopathy (BSE).

Here is national information from Animal Health Australia on national harmonization of the swill feeding ban: [Prohibited Pig Feed Compliance and Awareness - Animal Health Australia](#), as well as example information on Queensland's swill feeding ban - [Laws against supplying and feeding prohibited feed to pigs \(swill\) | Business Queensland](#). Here is AHA information on the national harmonisation of Australia's ruminant feed ban [Australian Ruminant Feed Ban - Animal Health Australia](#), as well as example information from Victoria on its ban - [Ruminant Feed Ban | Animal diseases | Biosecurity | Agriculture Victoria](#)

For swill feeding, swill or prohibited pig feed is defined as: *material of mammalian origin, or any substance that has come in contact with this material, but **does not** include:*

- (i) Milk, milk products or milk by-products either of Australian provenance or legally imported for stockfeed use into Australia.
- (ii) Material containing flesh, bones, blood, offal or mammal carcasses which is treated by an approved process<sup>2</sup>.
- (iii) A carcass or part of a domestic pig, born and raised on the property on which the pig or pigs that are administered the part are held, that is administered for therapeutic purposes in accordance with the written instructions of a veterinary practitioner.
- (iv) Material used under an individual and defined-period permit issued by a jurisdiction for the purposes of research or baiting.

Restricted animal material (RAM) cannot be fed to ruminants and is defined as: *any material taken from a vertebrate animal other than tallow, gelatin, milk products or oils. It includes rendered products, such as blood meal, meat meal, meat and bone meal, fish meal, poultry meal, eggs, feather meal, and compounded feeds made from these products.*

## Current situation

### s. 22(1)(a)(ii)

<sup>2</sup> In terms of (ii), approved processes these are:

1. rendering in accordance with the 'Australian Standard for the Hygienic Rendering of Animal Products'
2. under jurisdictional permit, cooking processes subject to compliance verification that ensure that a core temperature of at least 100°C for a minimum of 30 minutes, or equivalent, has been reached.
3. treatment of cooking oil, which has been used for cooking in Australia, in accordance with the 'National Standard for Recycling of Used Cooking Fats and Oils intended for Animal Feeds'
4. under jurisdictional permit, any other nationally agreed process approved by AHC for which an acceptable risk assessment has been undertaken and that is subject to compliance verification.

Due to the import pathway for highly processed plant-derived materials for human consumption being significantly simpler compared with that for animal feed, there exists an incentive to import these materials under the import pathway for human consumption and then subsequently repurpose/divert to animal feed as there is no robust traceability system once goods are in Australia or the end use of an import permit cannot be enforced beyond the importer.

Although commercial incentive exists, please note there is no evidence goods are intentionally imported as food but with a pre-determined, intended subsequent use as animal feed.

**Recent example of an approval provided to a local manufacturer to repurpose/divert materials from the manufacturing facilities into stockfeed – s. 47(1)(b)**

In March 2024, s. 47(1)(b) informed the department that they sold unwanted finished food products manufactured at their s. 47(1)(b) Australian factories to s. 47(1)(b) domestic stockfeed manufacturers for significant length of time (most likely for decades). s. 47(1)(b) relied on this long-standing arrangement to dispose of their unwanted finished products and for the five domestic stockfeed manufacturers to receive a steady supply of materials for their production. s. 47(1)(b) justified the company's negligence by stating that s. 47(1)(b) (as a multi-national company) was not aware that the diversion practice into stockfeed needed prior approval from the department.

In response, the department requested s. 47(1)(b) provide thorough, detailed information about the imported materials that were included in their food production and then repurposed/diverted to s. 47(1)(b) domestic stockfeed manufacturers instead of being sent to landfill as well as any processing applied by s. 47(1)(b) and the s. 47(1)(b) domestic stockfeed manufacturers.

s. 47(1)(b) advised that there were s. 47(1)(b) imported animal and plant derived materials used as ingredients across their s. 47(1)(b) Australian manufacturing facilities to produce s. 47(1)(b)

s. 47(1)(b) estimated that approximately s. 47(1)(b) of finished products were sold annually to the s. 47(1)(b) stockfeed manufacturers with the quantity expected to increase in coming years due to increases in their annual production volume.

The s. 47(1)(b) materials were categorised as the following:

s. 47(1)(b)

Of the s. 47(1)(b) materials, only one material (which was a dairy product from s. 47(1)(b) imported under the 10% dairy rule for human consumption) was refused. All the other s. 47(1)(b) materials were approved under a change of end-use certificate for use in stockfeed manufacturing in Australia.

These materials were approved for the change of end use based on following rationale:

- All materials were heat treated and processed twice. s. 47(1)(b)
  - For plant-derived materials for animal feed end use, the plant biosecurity risks are addressed by a simple processing plus a heat treatment at s. 47(1)(b) from all countries.
  - The same highly processed plant-derived materials are required to be heat treated at a minimum core temperature of 100 °C for at least 30 minutes if they are sourced from high-risk countries to address the potential contamination with animal matter (e.g. excreta, tissue), which would be a pathway to introduce exotic animal pathogens such as FMD, ASF, LSD etc.
  - Whilst acknowledging that contamination with animal matter in imported plant-derived materials for animal feed should be mitigated through heat treatments, the same materials, if for human consumption, are already allowed to be imported into Australia without import permits by declaring that the materials are highly processed and for human consumption, in accordance with relevant BICON cases. There are no requirements for GMP or quality management system to operate at the manufacturing facilities to ensure only food grade materials are manufactured and imported. Quality of imported materials are managed commercially.
  - The rationale to allow importation of highly processed plant materials for human consumption without an import permit is due to more stringent sourcing and hygienic processing applied to human food. Therefore, the plant-derived materials for human consumption, by extension, should be also allowed for animal feed for having very low animal biosecurity risk.
- Substantial dilution factor – imported materials constitute very small percentages of the many final products manufactured by s. 47(1)(b) by becoming incorporated with materials of Australian origin. These final products are then further incorporated into stockfeed products after being combined with other materials at the stockfeed manufacturing facilities
- Very low animal biosecurity risk associated with the animal derived materials, except for the dairy material from s. 47(1)(b) as the dairy materials used by s. 47(1)(b) were all of s. 47(1)(b) and s. 47(1)(b) origin. The s. 47(1)(b) dairy for human consumption is, however, required to be accompanied by s. 47(1)(b) government certification attesting to the origin and heat treatment for pasteurisation.
- Significant diversion from human consumption into animal feed pathway without known issues – i.e. diverting s. 47(1)(b) tonnes annually.
- The nationally harmonised feed bans legislated and implemented by the states and territories.

Therefore, ABIB's assessment found that the biosecurity risk associated with the various animal and plant-derived materials used by s. 47(1)(b) were mitigated, and would meet Australia's Appropriate Level of Protection by the processing applied by s. 47(1)(b) and stockfeed manufacturer as well as by sourcing from low risk countries for dairy materials (except for the s. 47(1)(b) dairy product) and the legislated feed bans within Australia.



### *Challenges during the assessment for change of end use*

One of the major issues during the assessment of s. 47(1)(b) application for change of end use was that s. 47(1)(b) was the import permit holder of only s. 47(1) of the s. 47(1)(b) materials. It proved to be arduous and challenging to obtain information from the suppliers of s. 47(1)(b) materials regarding the processing and raw materials used. Many of s. 47(1)(b) suppliers questioned the reason for being requested to provide such information, and expressed concerns with the perception that their imported materials were of lesser quality by being associated with domestically manufactured stockfeed.

If ABIB assessed these s. 47(1)(b) materials under the current import policy and conditions for animal feed, most of these products would not be allowed for importation. As explained above, the s. 47(1)(b) products were allowed for change of end use once the department considered the processing at s. 47(1)(b) manufacturing facilities and the domestic stockfeed manufacturer in addition to the substantial dilution factor, significant history of use, countries of origin and nationally harmonized feed bans.

Assessment of s. 47(1)(b) request for change of end use for these s. 47(1)(b) materials required ABIB to dedicate significant resources over four months, and the branch continues to redirect substantial resources as other companies such as s. 47(1)(b) and s. 47(1)(b) have requested the same assessment.

Significant extra resourcing and budget will need to be provided if more domestic companies approach the department for the same change of end use approvals.

### **Extrapolation of the volumes of diverted goods into animal feed**

Based on the annual volume of materials/products discarded by s. 47(1)(b) alone to animal feed manufacturing, it would not be an exaggeration to extrapolate that hundreds of thousands of tons of human food products containing imported animal and plant derived materials are currently being repurposed/diverted to animal feed with the quantity to be increasing each year as more and more local governments prohibit disposal of products and materials in landfills.

### **Options to manage biosecurity risks associated with diversion of imported materials for human consumption into animal feed**

1. **Determine the legal powers to regulate end use of goods released from biosecurity control**
  - a. Department has presumed a responsibility for post border management of the biosecurity risk with change of end use for goods legally imported into Australia.
  - b. Biosecurity Animal Division should engage the Legal Division to seek advice whether BAD's current arrangement is a valid exercise of power under the *Biosecurity Act 2015*.
  - c. In addition, given the important role of the states and territories, it would be worth checking via s. 47(1)(b) if any of the imported products being diverted to stockfeed would be managed under the definition of prohibited pig feed (swill). Clearly, if any of the products do meet the definition for swill, jurisdictions should be checking that they are excluded from being fed to pigs.

- d. As with swill, it would be worth checking if any diverted, imported products would be managed under the ruminant feed ban.
- e. The relevant states and territory authorities should be informed of the situation for their awareness and flagging potential risk relating to their existing legislated feed bans. The appropriate forum to raise this is through the **s. 47(1)(b)** via an in-session or out-of-session paper. The AHC secretariat within Animal Health Policy branch could be approached for their advice on such a process. **s. 47(1)(b)** has provisions for confidentiality if this issue is deemed sensitive.

## 2. Maintain status quo

### **s. 22(1)(a)(ii)**

#### **Dairy-derived materials**

Continue the current arrangements in which New Zealand is the only country approved for import of dairy in bulk into Australia for both human consumption and animal feed.

Therefore,

From New Zealand, for

- a. Human consumption – no import permit or government certification is required and can be imported with a manufacturer's declaration.
- b. Animal feed – an import permit is required with government certification stating the dairy is of New Zealand origin and pasteurization time and temperature. A permit is available with multiple end-uses (i.e. human consumption, pet food and stockfeed).

A large importer of NZ dairy, s. 47(1)(b) has informed the department that they prefer to divert/repurpose their surplus dairy material imported for human consumption to stockfeed by receiving an approval from the department post arrival instead of obtaining import permits with multiple end use for stockfeed use. s. 47(1)(b) has indicated that the regulatory burden in New Zealand is far greater for export of dairy for stockfeed use, and they find it significantly simpler to import under the human consumption pathway and then divert to stockfeed in Australia.

From approved countries other than New Zealand, for

- a. Human consumption – import permit required with government certification.
- b. Animal feed – import permit is required with government certificate, allowed as a component in pet food only. Not allowed for importation in bulk for stockfeed
- c. Please note, for stockfeed, the department approves repurposing/diversion to stockfeed after imported for human consumption if the imported material is surplus to their needs.

s. 22(1)(a)(ii)

**4. Conduct a thorough and unbiased research to establish the extent of diversion**

- a.** Identify, to the extent possible, through target, appropriate research and establish the extent of the current diversion to animal feed in terms of the volume and the specific materials/products
  - i.** Research organisations such as ABARES could be engaged to investigate and quantify the extent of the issue on behalf of BAD
- b.** Once data has been satisfactorily collected and the situation has been established, a risk review may need to be conducted

**5. Revise current policies and guidelines for animal biosecurity risks associated with imported materials for animal feed – specifically plant-derived and dairy materials**

s. 22(1)(a)(ii)

**s. 22(1)(a)(ii)****Dairy material**

Only dairy of New Zealand origin is allowed to be imported in bulk for both human consumption and animal feed (both stockfeed and pet food).

Dairy material from all other approved countries is approved to be imported in bulk for human consumption only. Please note, dairy from these approved countries, however, is not approved for importation in bulk for stockfeed (but allowed for pet food). The approved countries are those currently free from foot and mouth disease and lumpy skin disease.

The department provides approval for dairy imported for human consumption to be repurposed/diverted to animal feed (both stockfeed and pet food) subsequent to being imported into Australia, if approval is sought.

For example, dairy of US origin can be imported into Australia for human consumption but not for stockfeed. However, if the importer or domestic manufacturer would like to divert the US dairy from human consumption to animal feed, they will seek approval from the department and then they will receive an approval to do so. Dairy of US origin can still be used as stockfeed in Australia, but it just cannot be imported for stockfeed use.

Therefore, as part of revising import conditions:

- a. allow importation of bulk dairy for animal feed use from all approved countries for human consumption, as long as they comply with state and territory feed bans (e.g. swill feeding), with pasteurisation times and temperatures provided on government certification.

Initiate discussions with the states and territories regarding legislative responsibilities for safe animal feeding via <sup>s. 47(1)(b)</sup>, as relevant to this issue, should also be considered.

**Recommendation**

Option 1 should be pursued as a matter of priority to determine that the department's current arrangements are a valid exercise of power under the *Biosecurity Act 2015*.

In terms of the other options discussed above, the reasonable, coherent and consistent approach to manage and deal with the issue of repurposing/diversion of imported goods for human consumption into animal feed is to adopt Option 5, based on:

- significant history of practice
- food safety of materials for human consumption in the absence of stringent import conditions, especially for highly processed plant-derived materials
- dilution factor provided by being processed into final products by domestic manufacturers and then further processed by domestic stockfeed manufacturers
- growing number of local councils and governments prohibiting food materials from being sent to landfill due to zero-waste policies

**Attachment 1**

S. 47(1)(b)

FOR INTERNAL USE ONLY

s. 22(1)(a)(ii)

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**From:** s. 22(1)(a)(ii)  
**Sent:** Thursday, 13 March 2025 12:27 PM  
**To:** s. 47F(1)  
**Subject:** Options paper on diversion of imported food materials to animal feed  
**Attachments:** Diversion of imported food materials to animal feed \_draft\_<sup>s. 22(1)(</sup>.docx

Dear s. 47F(1)

As discussed, attached is the draft discussion paper on the imported human food materials/ingredients diverted to animal feed.

Please contact me if you would like further information.

Kind regards

s. 22(1)(a)(ii)

Director | Animal Feeds Section  
Animal and Biological Imports Branch | Biosecurity Animal Division  
**Department of Agriculture, Fisheries and Forestry**

Agriculture House | 70 Northbourne Ave | GPO Box 858 | Canberra ACT 2601 | Australia  
Ph: 1800 900 090 | Email: s. 22(1)(a)(ii)@aff.gov.au

s. 22(1)(a)(ii)

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**From:** s. 47E(d)  
**Sent:** Thursday, 22 August 2024 2:44 PM  
**To:** s. 47F(1) @flyfarm.com  
**Subject:** RE: Webform submission from: Online enquiries [SEC=OFFICIAL]

Good afternoon s. 47F(1),

Would you be able to provide more information to clarify your intentions with the goods to be imported? There are a few things I wish to clarify:

- Which enzymes did you plan to import? Are these sourced from plants, animals, or are they microbially fermented?
- What is the nature of the “organic waste”? What is it comprised of mostly?
- What is your intention for the waste once it has been recycled? What will it be exposed to? E.g. plants, animals, insects, or the environment?
- Will the organic waste be sterilised or treated afterwards?

Kind regards,

s. 22(1)(a)(ii)

Assessing Officer | Laboratory & Human Tissues Section

Animal & Biological Imports Branch | Biosecurity Animal Division

Department of Agriculture, Fisheries and Forestry



We acknowledge the Traditional Custodians of Australia and their continuing connection to land and sea, waters, environment and community. We pay our respects to the Traditional Custodians of the lands we live and work on, their culture, and their Elders past and present.

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**From:** s. 47E(d) <s. 47E(d)s@aff.gov.au>  
**Sent:** Friday, August 16, 2024 11:14 AM  
**To:** s. 47E(d) <s. 47E(d)s@aff.gov.au>  
**Subject:** FW: Webform submission from: Online enquiries [SEC=OFFICIAL]

OFFICIAL

Hey Team would you able to advice on which Bicon case this would fall under?

**Note:** Import conditions can and may change without notice. We recommend you check our website regularly for up-to-date information - <https://www.agriculture.gov.au/biosecurity-trade/import>

Kind Regards,

s. 22(1)(a)(ii)



Import Support Officer | Biosecurity Import Support Team | Phone: 1800 900 090 (from outside Australia + 61 3 8318 6700)

Animal and Biological Imports Branch | Biosecurity Animal Division | Department of Agriculture, Fisheries and Forestry, GPO Box 858, Canberra, ACT, 2601, Australia

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OFFICIAL

**From:** DAFF <[daff.noreply@govcms.gov.au](mailto:daff.noreply@govcms.gov.au)>

**Sent:** Thursday, August 15, 2024 1:37 PM

**To:** s. 47E(d) <[s.47E\(d\)@aff.gov.au](mailto:s.47E(d)@aff.gov.au)>

**Subject:** Webform submission from: Online enquiries

submit date: Thu, 2024-08-15 13:37

**My enquiry is about:**

Importing goods into Australia

**Comments**

Hi, I would like to import some enzymes for lab test on organic waste recycling. I saw that I could apply for standard permit to do that, but I have not seen what are the requirements for confirming if the enzymes are in the correction conditions to import?

**Would you like a reply?**

Yes

**Your name**

s. 47F(1)

**Email**

s. 47F(1) [@flyfarm.com](mailto:@flyfarm.com)

s. 22(1)(a)(ii)

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**From:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>  
**Sent:** Thursday, 27 March 2025 2:36 PM  
**To:** s. 22(1)(a)(ii)  
**Cc:** s. 47E(d) ; s. 22(1)(a)(ii) s. 47F(1) ;  
s. 22(1)(a)(ii)  
**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

OFFICIAL

s. 33(a)(iii)

s. 47F(1) | Market Access Counsellor  
Bilateral Relations and Trade (Europe, UK, Oceania)  
Trade and International Relations Directorate | Policy & Trade Branch  
Ministry for Primary Industries - Manatū Ahu Matua  
Telephone: s. 47F(1) | s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



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OFFICIAL

**From:** s. 22(1)(a)(ii)  
**Sent:** Tuesday, 18 March 2025 10:29 AM  
**To:** s. 47F(1)

**Cc:** s. 47E(d) ; s. 22(1)(a)(ii) ; s. 47F(1) ; s. 22(1)(a)(ii)  
**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

OFFICIAL

s. 33(a)(iii)

s. 22(1)(a)(ii)

Assistant Director | International Strategy and Assurance  
Animal Strategy and Coordination Branch | Biosecurity Animal Division

' 1800 900 090 | ' s. 22(1)(a)(ii) (From Outside Australia)

Email: s. 22(1)(a)(ii)@aff.gov.au

Department of Agriculture, Fisheries and Forestry  
70 Northbourne Avenue, Canberra ACT 2601 Australia  
GPO Box 858 Canberra ACT 2601 Australia

[aff.gov.au](http://aff.gov.au)



We acknowledge the continuous connection of First Nations Traditional Owners and Custodians to the lands, seas and waters of Australia. We recognise their care for and cultivation of Country. We pay respect to Elders past and present, and recognise their knowledge and contribution to the productivity, innovation and sustainability of Australia's agriculture, fisheries and forestry industries.

OFFICIAL

**From:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>  
**Sent:** Monday, 17 March 2025 9:09 AM  
**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Cc:** s. 47E(d) <s. 47E(d)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

OFFICIAL

Hi s. 22(1)(a)(ii)

s. 33(a)(iii)

Kind regards

s. 47F(1)

s. 47F(1) | Market Access Counsellor  
Bilateral Relations and Trade (Europe, UK, Oceania)  
Trade and International Relations Directorate | Policy & Trade Branch  
Ministry for Primary Industries - Manatū Ahu Matua  
Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



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OFFICIAL

**From:** s. 47F(1)  
**Sent:** Friday, 14 March 2025 9:56 AM  
**To:** 's. 22(1)(a)(ii)' <s. 22(1)(a)(ii)@aff.gov.au>  
**Cc:** s. 47E(d) <s. 47E(d)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1)@mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

Hi s. 22(1)(a)(ii)

s. 33(a)(iii)

I have attached another map that shows all the district and city council boundaries in the South Island for further context.

Kind regards

s. 47F(1)

s. 47F(1) | Market Access Counsellor  
Bilateral Relations and Trade (Europe, UK, Oceania)  
Trade and International Relations Directorate | Policy & Trade Branch  
Ministry for Primary Industries - Manatū Ahu Matua  
Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



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**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Sent:** Thursday, 13 March 2025 6:33 PM  
**To:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>  
**Cc:** s. 47E(d) <s. 47E(d)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

OFFICIAL

Dear s. 47F(1)

s. 33(a)(iii)

s. 22(1)(a)(ii)

Assistant Director | International Strategy and Assurance  
Animal Strategy and Coordination Branch | Biosecurity Animal Division

' 1800 900 090 | ' s. 22(1)(a)(ii) (From Outside Australia)

Email: s. 22(1)(a)(ii)@aff.gov.au

Department of Agriculture, Fisheries and Forestry  
70 Northbourne Avenue, Canberra ACT 2601 Australia  
GPO Box 858 Canberra ACT 2601 Australia

[aff.gov.au](http://aff.gov.au)



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OFFICIAL

**From:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>

**Sent:** Thursday, 13 March 2025 12:58 PM

**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>

**Cc:** s. 47E(d) <s. 47E(d) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii)@aff.gov.au; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

OFFICIAL

Hi s. 22(1)(a)(ii)

s. 33(a)(iii)

Kind regards

s. 47F(1)

s. 47F(1) | Market Access Counsellor  
Bilateral Relations and Trade (Europe, UK, Oceania)  
Trade and International Relations Directorate | Policy & Trade Branch  
Ministry for Primary Industries - Manatū Ahu Matua  
Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



---

OFFICIAL

**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Sent:** Wednesday, 12 March 2025 3:25 PM  
**To:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>  
**Cc:** s. 47E(d) <s. 47E(d)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>  
**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

OFFICIAL

s. 33(a)(iii)

s. 22(1)(a)(ii)

Assistant Director | International Strategy and Assurance  
Animal Strategy and Coordination Branch | Biosecurity Animal Division

' 1800 900 090 | ' s. 22(1)(a)(ii) (From Outside Australia)

Email: s. 22(1)(a)(ii)@aff.gov.au

Department of Agriculture, Fisheries and Forestry  
70 Northbourne Avenue, Canberra ACT 2601 Australia  
GPO Box 858 Canberra ACT 2601 Australia

[aff.gov.au](http://aff.gov.au)



We acknowledge the continuous connection of First Nations Traditional Owners and Custodians to the lands, seas and waters of Australia. We recognise their care for and cultivation of Country. We pay respect to Elders past and present, and recognise their knowledge and contribution to the productivity, innovation and sustainability of Australia's agriculture, fisheries and forestry industries.

OFFICIAL

**From:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>

**Sent:** Friday, 28 February 2025 12:44 PM

**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>

**Cc:** s. 47E(d) <s. 47E(d)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

OFFICIAL

s. 33(a)(iii)

s. 47F(1) | Market Access Counsellor  
Bilateral Relations and Trade (Europe, UK, Oceania)  
Trade and International Relations Directorate | Policy & Trade Branch  
Ministry for Primary Industries - Manatū Ahu Matua  
Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)





## OFFICIAL

**From:** s. 47F(1)  
**Sent:** Friday, 28 February 2025 2:18 PM  
**To:** 's. 22(1)(a)(ii)' <s. 22(1)(a)(ii)@aff.gov.au>  
**Cc:** s. 47E(d) <s. 47E(d)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1)@mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

Hi s. 22(1)(a)(ii)

s. 33(a)(iii)

Kind regards

s. 47F(1)

s. 47F(1) | Market Access Counsellor  
Bilateral Relations and Trade (Europe, UK, Oceania)  
Trade and International Relations Directorate | Policy & Trade Branch  
Ministry for Primary Industries - Manatū Ahu Matua  
Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>

**Sent:** Thursday, 27 February 2025 3:25 PM

**To:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>

**Cc:** s. 47E(d)

<s. 47E(d) @aff.gov.au>; s. 22(1)(a)(ii)

<s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>;

s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

OFFICIAL

s. 33(a)(iii)

s. 22(1)(a)(ii)

Assistant Director | International Strategy and Assurance  
Animal Strategy and Coordination Branch | Biosecurity Animal Division

' 1800 900 090 | ' s. 22(1)(a)(ii) (From Outside Australia)

Email: s. 22(1)(a)(ii)@aff.gov.au

Department of Agriculture, Fisheries and Forestry  
70 Northbourne Avenue, Canberra ACT 2601 Australia  
GPO Box 858 Canberra ACT 2601 Australia

[aff.gov.au](http://aff.gov.au)



We acknowledge the continuous connection of First Nations Traditional Owners and Custodians to the lands, seas and waters of Australia. We recognise their care for and cultivation of Country. We pay respect to Elders past and present, and recognise their knowledge and contribution to the productivity, innovation and sustainability of Australia's agriculture, fisheries and forestry industries.

## OFFICIAL

**From:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>

**Sent:** Wednesday, 19 February 2025 11:24 AM

**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Cc:** s. 47E(d) <s. 47E(d) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>

**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

## OFFICIAL

s. 33(a)(iii)

s. 47F(1) | Market Access Counsellor  
Bilateral Relations and Trade (Europe, UK, Oceania)  
Trade and International Relations Directorate | Policy & Trade Branch  
Ministry for Primary Industries - Manatū Ahu Matua  
Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



OFFICIAL

**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>  
**Sent:** Tuesday, 18 February 2025 4:01 PM  
**To:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>  
**Cc:** s. 47E(d) <s. 47E(d) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

OFFICIAL

s. 33(a)(iii)

regards,

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)  
Senior Policy Officer | International Strategy and Assurance Section  
Department of Agriculture, Fisheries and Forestry  
Animal Strategy and Coordination Branch | Biosecurity Animal Division  
Ngunnawal and Ngambri Country  
Agriculture House, 70 Northbourne Avenue, Canberra ACT 2601  
GPO Box 858, Canberra ACT 2601



We acknowledge the continuous connection of First Nations Traditional Owners and Custodians to the lands, seas and waters of Australia. We recognise their ongoing cultivation of Country. We pay respect to Elders past and present, and recognise their knowledge and contribution to the productivity, innovation and sustainability of our agriculture, fisheries and forestry industries.

OFFICIAL

**From:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>  
**Sent:** Friday, 14 Feb s. 22(1)(a)(ii):35 AM  
**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Cc:** s. 47E(d) <s. 47E(d)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

OFFICIAL

s. 33(a)(iii)

s. 47F(1) | Specialist Adviser  
 Bilateral Relations and Trade (Europe, UK, Oceania)  
 Trade and International Relations Directorate | Policy and Trade Branch  
 Ministry for Primary Industries – Manatū Ahu Matua  
 Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)

OFFICIAL

**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Sent:** Thursday, 23 January 2025 12:11 pm  
**To:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>  
**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 47E(d) <s. 47E(d)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>  
**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

OFFICIAL

s. 33(a)(iii)

s. 22(1)(a)(ii)

A/g Director | International Strategy and Assurance  
Animal Strategy and Coordination Branch | Biosecurity Animal Division

' 1800 900 090 | ' s. 22(1)(a)(ii) (From Outside Australia)

Email: s. 22(1)(a)(ii)@aff.gov.au

Department of Agriculture, Fisheries and Forestry  
70 Northbourne Avenue, Canberra ACT 2601 Australia  
GPO Box 858 Canberra ACT 2601 Australia

[aff.gov.au](http://aff.gov.au)



We acknowledge the continuous connection of First Nations Traditional Owners and Custodians to the lands, seas and waters of Australia. We recognise their care for and cultivation of Country. We pay respect to Elders past and present, and recognise their knowledge and contribution to the productivity, innovation and sustainability of Australia's agriculture, fisheries and forestry industries.

OFFICIAL

**From:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>  
**Sent:** Wednesday, 22 January 2025 8:53 AM  
**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>;  
 s. 47E(d) <s. 47E(d) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>;  
 s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>  
**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]  
**Importance:** High

OFFICIAL

s. 33(a)(iii)

s. 33(a)(iii)

s. 47F(1) | Market Access Counsellor  
Bilateral Relations and Trade (Europe, UK, Oceania)  
Trade and International Relations Directorate | Policy & Trade Branch  
Ministry for Primary Industries - Manatū Ahu Matua  
Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



---

OFFICIAL

**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>

**Sent:** Tuesday, January 21, 2025 6:21 PM

**To:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 47F(1)



<s. 47F(1) @mpi.govt.nz>

**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>;

s. 47E(d) <s. 47E(d) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>

**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

OFFICIAL

s. 33(a)(iii)

s. 22(1)(a)(ii)

A/g Director | International Strategy and Assurance  
Animal Strategy and Coordination Branch | Biosecurity Animal Division

' 1800 900 090 | ' s. 22(1)(a)(ii) (From Outside Australia)

Email: [s. 22\(1\)\(a\)\(ii\)@aff.gov.au](mailto:s.22(1)(a)(ii)@aff.gov.au)

Department of Agriculture, Fisheries and Forestry  
70 Northbourne Avenue, Canberra ACT 2601 Australia  
GPO Box 858 Canberra ACT 2601 Australia

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We acknowledge the continuous connection of First Nations Traditional Owners and Custodians to the lands, seas and waters of Australia. We recognise their care for and cultivation of Country. We pay respect to Elders past and present, and recognise their knowledge and contribution to the productivity, innovation and sustainability of Australia's agriculture, fisheries and forestry industries.

---

OFFICIAL

**From:** [s. 47F\(1\)](#) <[s. 47F\(1\)](#) [@mpi.govt.nz](mailto:@mpi.govt.nz)>

**Sent:** Tuesday, 14 January 2025 11:04 AM

**To:** [s. 22\(1\)\(a\)\(ii\)](#) <[s. 22\(1\)\(a\)\(ii\)](#) [@aff.gov.au](mailto:@aff.gov.au)>; [s. 47F\(1\)](#) <[s. 47F\(1\)](#) [@mpi.govt.nz](mailto:@mpi.govt.nz)>

**Cc:** [s. 22\(1\)\(a\)\(ii\)](#) <[s. 22\(1\)\(a\)\(ii\)](#) [@aff.gov.au](mailto:@aff.gov.au)>; [s. 22\(1\)\(a\)\(ii\)](#) <[s. 22\(1\)\(a\)\(ii\)](#) [@aff.gov.au](mailto:@aff.gov.au)>; [s. 22\(1\)\(a\)\(ii\)](#) <[s. 22\(1\)\(a\)\(ii\)](#) [@aff.gov.au](mailto:@aff.gov.au)>; [s. 47E\(d\)](#) <[s. 47E\(d\)](#) [@aff.gov.au](mailto:@aff.gov.au)>

**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL:Sensitive]

OFFICIAL

[s. 33\(a\)\(iii\)](#)

s. 33(a)(iii)

s. 47F(1) | Market Access Counsellor  
 Bilateral Relations and Trade (Europe, UK, Oceania)  
 Trade and International Relations Directorate | Policy & Trade Branch  
 Ministry for Primary Industries - Manatū Ahu Matua  
 Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



## OFFICIAL

**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>  
**Sent:** Tuesday, January 14, 2025 12:35 PM  
**To:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>  
**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 47E(d) <s. 47E(d) @aff.gov.au>  
**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL:Sensitive]

## OFFICIAL

s. 33(a)(iii)

s. 33(a)(iii)

s. 22(1)(a)(ii)

Senior Policy Officer | International Strategy and Assurance Section

Department of Agriculture, Fisheries and Forestry  
 Animal Strategy and Coordination Branch | Biosecurity Animal Division  
 Ngunnawal and Ngambri Country  
 Agriculture House, 70 Northbourne Avenue, Canberra ACT 2601  
 GPO Box 858, Canberra ACT 2601

[agriculture.gov.au](http://agriculture.gov.au)

We acknowledge the continuous connection of First Nations Traditional Owners and Custodians to the lands, seas and waters of Australia. We recognise their ongoing cultivation of Country. We pay respect to Elders past and present, and recognise their knowledge and contribution to the productivity, innovation and sustainability of agriculture, fisheries and forestry industries.

OFFICIAL

**From:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>**Sent:** Friday, 20 December 2024 6:58 AM**To:** s. 47E(d)

&lt;s. 47E(d) @aff.gov.au&gt;; s. 47F(1) &lt;s. 47F(1) @mpi.govt.nz&gt;

**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

OFFICIAL

s. 47F(1) | Specialist Adviser  
Bilateral Relations and Trade (Europe, UK, Oceania)  
Trade and International Relations Directorate | Policy and Trade Branch  
Ministry for Primary Industries – Manatū Ahu Matua  
Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)

---

## OFFICIAL

**From:** s. 47E(d) <s. 47E(d)@aff.gov.au>  
**Sent:** Monday, December 16, 2024 4:29 PM  
**To:** s. 47F(1) <s. 47F(1)@mpi.govt.nz>  
**Cc:** s. 47F(1) <s. 47F(1)@mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47E(d) <s. 47E(d)@aff.gov.au>  
**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

## OFFICIAL

s. 33(a)(iii)

s. 22(1)(a)(ii)

Senior Policy Officer | International Strategy and Assurance Section

Department of Agriculture, Fisheries and Forestry  
Animal Strategy and Coordination Branch | Biosecurity Animal Division  
Ngunnawal and Ngambri Country  
Agriculture House, 70 Northbourne Avenue, Canberra ACT 2601  
GPO Box 858, Canberra ACT 2601

[agriculture.gov.au](http://agriculture.gov.au)



We acknowledge the continuous connection of First Nations Traditional Owners and Custodians to the lands, seas and waters of Australia. We recognise their ongoing cultivation of Country. We pay respect to Elders past and present, and recognise their knowledge and contribution to the productivity, innovation and sustainability of the agriculture, fisheries and forestry industries.

OFFICIAL

OFFICIAL

**From:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>  
**Sent:** Thursday, 28 November 2024 1:41 PM  
**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 47E(d) <s. 47E(d) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>  
**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

OFFICIAL

s. 33(a)(iii)

s. 47F(1) | Market Access Counsellor  
 Bilateral Relations and Trade (Europe, UK, Oceania)  
 Trade and International Relations Directorate | Policy & Trade Branch  
 Ministry for Primary Industries - Manatū Ahu Matua  
 Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



OFFICIAL

**From:** s. 47F(1)  
**Sent:** Friday, November 22, 2024 9:39 AM  
**To:** 's. 22(1)(a)(ii)' <s. 22(1)(a)(ii)@aff.gov.au>  
**Cc:** 's. 22(1)(a)(ii)' <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; 's. 47E(d)' <s. 47E(d) @aff.gov.au>; 's. 22(1)(a)(ii)' <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; 's. 22(1)(a)(ii)' <s. 22(1)(a)(ii) @aff.gov.au>; 's. 22(1)(a)(ii)' <s. 22(1)(a)(ii) @aff.gov.au>  
**Subject:** Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

s. 33(a)(iii)

s. 33(a)(iii)

s. 47F(1) | Market Access Counsellor  
 Bilateral Relations and Trade (Europe, UK, Oceania)  
 Trade and International Relations Directorate | Policy & Trade Branch  
 Ministry for Primary Industries - Manatū Ahu Matua  
 Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)




---

**From:** s. 47F(1)  
**Sent:** Thursday, October 31, 2024 4:31 PM  
**To:** 's. 22(1)(a)(ii)' <s. 22(1)(a)(ii)@aff.gov.au>  
**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 47E(d) <s. 47E(d) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>  
**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

s. 33(a)(iii)

s. 47F(1) | Market Access Counsellor  
 Bilateral Relations and Trade (Europe, UK, Oceania)  
 Trade and International Relations Directorate | Policy & Trade Branch  
 Ministry for Primary Industries - Manatū Ahu Matua  
 Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)




---

**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Sent:** Wednesday, October 30, 2024 2:25 PM  
**To:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>



**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 47E(d) <s. 47E(d) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Subject:** RE: Trans-Tasman Principles sub-working group meeting [SEC=OFFICIAL]

OFFICIAL

s. 33(a)(iii)

s. 22(1)(a)(ii)

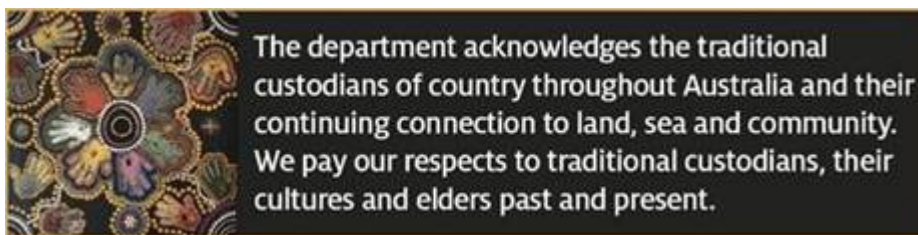
Assistant Director | International Strategy and Assurance  
Animal Strategy and Coordination Branch | Biosecurity Animal Division

' 1800 900 090 | ' s. 22(1)(a)(ii) (From Outside Australia)

Email: s. 22(1)(a)(ii)@aff.gov.au

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**Subject:** Trans-Tasman Principles sub-working group meeting

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s. 33(a)(iii)

s. 47F(1) | Market Access Counsellor  
 Bilateral Relations and Trade (Europe, UK, Oceania)  
 Trade and International Relations Directorate | Policy & Trade Branch  
 Ministry for Primary Industries - Manatū Ahu Matua  
 Telephone: s. 47F(1) Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



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s. 33(a)(iii)

s. 47F(1) | Market Access Counsellor

Bilateral Relations and Trade (Europe, UK, Oceania)  
 Trade and International Relations Directorate | Policy & Trade Branch  
 Ministry for Primary Industries - Manatū Ahu Matua  
 Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



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s. 33(a)(iii)

s. 22(1)(a)(ii)

Assistant Director | International Strategy and Assurance  
 Animal Strategy and Coordination Branch | Biosecurity Animal Division

' 1800 900 090 | ' s. 22(1)(a)(ii) (From Outside Australia)

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Department of Agriculture, Fisheries and Forestry  
 70 Northbourne Avenue, Canberra ACT 2601 Australia  
 GPO Box 858 Canberra ACT 2601 Australia

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s. 33(a)(iii)

s. 47F(1) | Market Access Counsellor  
 Bilateral Relations and Trade (Europe, UK, Oceania)  
 Trade and International Relations Directorate | Policy & Trade Branch  
 Ministry for Primary Industries - Manatū Ahu Matua  
 Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



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s. 22(1)(a)(ii)

Senior Policy Officer | International Strategy and Assurance Section

Department of Agriculture, Fisheries and Forestry

Animal Strategy and Coordination Branch | Biosecurity Animal Division

Ngunnawal and Ngambri Country

Agriculture House, 70 Northbourne Avenue, Canberra ACT 2601

GPO Box 858, Canberra ACT 2601

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**s. 47F(1)** | Market Access Counsellor

Bilateral Relations and Trade (Europe, UK, Oceania)

Trade and International Relations Directorate | Policy & Trade Branch

Ministry for Primary Industries - Manatū Ahu Matua

Telephone: **s. 47F(1)** | Mobile: **s. 47F(1)** | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>  
**Sent:** Thursday, October 3, 2024 1:43 PM  
**To:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>  
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**Subject:** RE: TWG draft agenda 2024 [SEC=OFFICIAL]

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s. 33(a)(iii)

Kind regards,

s. 22(1)(a)(ii)

Senior Policy Officer | International Strategy and Assurance Section

Department of Agriculture, Fisheries and Forestry  
 Animal Strategy and Coordination Branch | Biosecurity Animal Division  
 Ngunnawal and Ngambri Country  
 Agriculture House, 70 Northbourne Avenue, Canberra ACT 2601  
 GPO Box 858, Canberra ACT 2601

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<s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>

**Subject:** RE: TWG draft agenda 2024 [SEC=OFFICIAL]

s. 33(a)(iii)

Kind regards,

s. 22(1)(a)(ii) (she/her)

Senior Policy Officer | International Strategy and Assurance Section

Department of Agriculture, Fisheries and Forestry  
Animal Strategy and Coordination Branch | Biosecurity Animal Division  
Ngunnawal and Ngambri Country  
Agriculture House, 70 Northbourne Avenue, Canberra ACT 2601  
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**Subject:** RE: TWG draft agenda 2024 [SEC=OFFICIAL]

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s. 33(a)(iii)

s. 47F(1) | Market Access Counsellor  
Bilateral Relations and Trade (Europe, UK, Oceania)  
Trade and International Relations Directorate | Policy & Trade Branch  
Ministry for Primary Industries - Manatū Ahu Matua  
Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



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**Subject:** RE: TWG draft agenda 2024 [SEC=OFFICIAL]

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s. 33(a)(iii)

s. 33(a)(iii)

Kind regards,

s. 22(1)(a)(ii)

Senior Policy Officer | International Strategy and Assurance Section

Department of Agriculture, Fisheries and Forestry  
 Animal Strategy and Coordination Branch | Biosecurity Animal Division  
 Ngunnawal and Ngambri Country  
 Agriculture House, 70 Northbourne Avenue, Canberra ACT 2601  
 GPO Box 858, Canberra ACT 2601

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**Subject:** RE: TWG draft agenda 2024 [SEC=OFFICIAL]

s. 33(a)(iii)

s. 33(a)(iii)

Kind regards,

s. 22(1)(a)(ii)

Senior Policy Officer | International Strategy and Assurance Section

Department of Agriculture, Fisheries and Forestry  
 Animal Strategy and Coordination Branch | Biosecurity Animal Division  
 Ngunnawal and Ngambri Country  
 Agriculture House, 70 Northbourne Avenue, Canberra ACT 2601  
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**Subject:** RE: TWG draft agenda 2024 [SEC=OFFICIAL]

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**s. 47F(1)** | Market Access Counsellor  
 Bilateral Relations and Trade (Europe, UK, Oceania)  
 Trade and International Relations Directorate | Policy & Trade Branch  
 Ministry for Primary Industries - Manatū Ahu Matua  
 Telephone: **s. 47F(1)** | Mobile: **s. 47F(1)** | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



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**Subject:** RE: TWG draft agenda 2024 [SEC=OFFICIAL]

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**s. 33(a)(iii)**

**s. 22(1)(a)(ii)**  
 Director (acting) | International Strategy and Assurance  
 Animal Strategy and Coordination Branch | Biosecurity Animal Division

Department of Agriculture, Fisheries and Forestry  
 Agriculture House, 70 Northbourne Avenue, Canberra ACT 2601 Australia  
 GPO Box 858, Canberra ACT 2601 Australia  
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s. 33(a)(iii)<sup>1</sup>

s. 47F(1) | Market Access Counsellor  
 Bilateral Relations and Trade (Europe, UK, Oceania)  
 Trade and International Relations Directorate | Policy & Trade Branch  
 Ministry for Primary Industries - Manatū Ahu Matua  
 Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



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s. 47F(1) | Market Access Counsellor  
Bilateral Relations and Trade (Europe, UK, Oceania)  
Trade and International Relations Directorate | Policy & Trade Branch  
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s. 33(a)(iii)<sup>1</sup>

s. 47F(1) | Market Access Counsellor  
Bilateral Relations and Trade (Europe, UK, Oceania)  
Trade and International Relations Directorate | Policy & Trade Branch  
Ministry for Primary Industries - Manatū Ahu Matua  
Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>

**Sent:** Friday, September 6, 2024 12:32 PM

**To:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 47E(d) <s. 47E(d) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Subject:** RE: Follow up post visit to Canberra [SEC=OFFICIAL]

OFFICIAL

s. 33(a)(iii)

1

s. 22(1)(a)(ii)

Director (acting) | International Strategy and Assurance

Animal Strategy and Coordination Branch | Biosecurity Animal Division

Department of Agriculture, Fisheries and Forestry

Agriculture House, 70 Northbourne Avenue, Canberra ACT 2601 Australia

GPO Box 858, Canberra ACT 2601 Australia

[agriculture.gov.au](http://agriculture.gov.au)



The department acknowledges the Traditional Custodians of Australia and their continuing connection to land, sea environment, water and community. We pay our respect to the Traditional Custodians, their culture, and elders both past and present.

OFFICIAL

**From:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>

**Sent:** Friday, September 6, 2024 9:04 AM

**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 47E(d) <s. 47E(d) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>

**Subject:** RE: Follow up post visit to Canberra [SEC=OFFICIAL]

OFFICIAL

s. 33(a)(iii)

s. 47F(1) | Market Access Counsellor  
Bilateral Relations and Trade (Europe, UK, Oceania)  
Trade and International Relations Directorate | Policy & Trade Branch  
Ministry for Primary Industries - Manatū Ahu Matua  
Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)



OFFICIAL

**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>  
**Sent:** Thursday, September 5, 2024 3:03 PM  
**To:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>  
**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 47E(d) <s. 47E(d) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>  
**Subject:** RE: Follow up post visit to Canberra [SEC=OFFICIAL]

OFFICIAL

s. 33(a)(iii)



s. 33(a)(iii)

Kind regards,

s. 22(1)(a)(ii)

Senior Policy Officer | International Strategy and Assurance Section

Department of Agriculture, Fisheries and Forestry  
 Animal Strategy and Coordination Branch | Biosecurity Animal Division  
 Ngunnawal and Ngambri Country  
 Agriculture House, 70 Northbourne Avenue, Canberra ACT 2601  
 GPO Box 858, Canberra ACT 2601

[agriculture.gov.au](http://agriculture.gov.au)

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OFFICIAL

**From:** s. 22(1)(a)(ii)**Sent:** Tuesday, August 20, 2024 10:23 AM**To:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>

**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 47E(d) <s. 47E(d) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>

**Subject:** RE: Follow up post visit to Canberra [SEC=OFFICIAL]

s. 33(a)(iii)

s. 33(a)(iii)

)

Kind regards,

s. 22(1)(a)(ii)

Senior Policy Officer | International Strategy and Assurance Section

Department of Agriculture, Fisheries and Forestry  
 Animal Strategy and Coordination Branch | Biosecurity Animal Division  
 Ngunnawal and Ngambri Country  
 Agriculture House, 70 Northbourne Avenue, Canberra ACT 2601  
 GPO Box 858, Canberra ACT 2601

[agriculture.gov.au](http://agriculture.gov.au)

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**From:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>
**Sent:** Monday, August 19, 2024 7:53 AM**To:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>

**Subject:** RE: Follow up post visit to Canberra [SEC=OFFICIAL]

s. 33(a)(iii)

s. 47F(1) | Market Access Counsellor  
 Bilateral Relations and Trade (Europe, UK, Oceania)




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**From:** s. 47F(1)
**Sent:** Tuesday, July 30, 2024 10:44 AM**To:** 's. 22(1)(a)(ii)' <s. 22(1)(a)(ii)@aff.gov.au>
**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>
**Subject:** RE: Follow up post visit to Canberra [SEC=OFFICIAL]

s. 33(a)(iii)

s. 47F(1) | Market Access Counsellor

Bilateral Relations and Trade (Europe, UK, Oceania)

Trade and International Relations Directorate | Policy &amp; Trade Branch

Ministry for Primary Industries - Manatū Ahu Matua

Telephone: s. 47F(1) | Mobile: s. 47F(1) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)


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**From:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>
**Sent:** Thursday, July 11, 2024 3:36 PM
**To:** s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>; s. 47F(1) <s. 47F(1) @mpi.govt.nz>

**Cc:** s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii)@aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>; s. 22(1)(a)(ii) <s. 22(1)(a)(ii) @aff.gov.au>
**Subject:** Follow up post visit to Canberra [SEC=OFFICIAL]

s. 33(a)(iii)

s. 33(a)(iii)

s. 22(1)(a)(ii)

Policy Officer | International Strategy and Assurance

s. 22(1)(a)(ii)@aff.gov.au

s. 22(1)(a)(ii)

Department of Agriculture, Fisheries and Forestry

Animal Strategy and Coordination Branch | Biosecurity Animal Division

Civic Quarter 2 | 70 Northbourne Avenue | Canberra ACT 2601 | Australia

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