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14 May 2008

The Secretary
Senate Standing Committee on Rural
and Regional Affairs and Transport
PO Box 6100
Parliament House
CANBERRA ACT 2600

Dear Secretary

Re: Sheepmeat Council of Australia's Submission to Senate Inquiry into Meat Marketing

The Sheepmeat Council of Australia (SCA) appreciates the opportunity to make a submission to the Senate Standing Committee on Rural and Regional Affairs and Transport Inquiry into Meat Marketing.

SCA is the nation's peak body representing and promoting the national and international interests of lamb and sheepmeat producers in Australia.

SCA understands that the origins of the Senate Inquiry into Meat Marketing primarily relate to the branding of lamb and the opportunities for increased harmonisation of the regulatory approaches that underpin lamb branding across Australia.

As such, SCA's submission will be specifically focused on the current lamb definition, the existing regulatory schemes, opportunities for increased harmonisation, and SCA's current collaboration with the Australian Meat Industry Council.

Representatives of SCA would be happy to speak with the Senate Standing Committee on Rural and Regional Affairs and Transport should a hearing be held for this Inquiry.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'B. O'Sullivan', is written over a light blue horizontal line.

Bernie O'Sullivan
EXECUTIVE DIRECTOR



**Submission to the Senate Standing Committee
on Rural and Regional Affairs and Transport**

Inquiry into Meat Marketing

Submitted by

Sheepmeat Council of Australia

May 2008

Supported by Sheepmeat Council of Australia's members:

*NSW Farmers' Association
Victorian Farmers' Federation
AgForce Queensland*

*Tasmanian Farmers and Graziers Association
Pastoralists & Graziers Association of WA
Western Australian Farmers' Federation*

TABLE OF CONTENTS		Page
1.	EXECUTIVE SUMMARY	3
2.	INTRODUCTION	4
2.1	Background to Sheepmeat Council of Australia	
2.2	Sheepmeat Council's Response to the Senate Inquiry into Meat Marketing	5
3.	DEFINITION OF A LAMB	6
3.1	Australia	
3.2	New Zealand	
3.3	United States	7
3.4	United Nations	
4.	CURRENT REGULATORY SYSTEM	8
4.1	Export – AQIS and AUS-MEAT	
4.2	Domestic – State Authorities	
5.	CHALLENGES WITH THE CURRENT SYSTEM	9
5.1	Allegations of Mis-description	
5.2	Lack of Consistency in Lamb Branding Provisions and Compliance – Need for Harmonisation	10
5.3	Previous Proposals to Deregulate Lamb Branding and Establish Alternative Industry Arrangements	11
6.	LAMB AND SHEEPMEAT MARKETING AND EATING QUALITY RESEARCH	14
6.1	Lamb Marketing and Growth	
6.2	Sheepmeat Eating Quality Research	
7.	INDUSTRY COLLABORATION – SCA AND AMIC WORK PLAN	15
8.	KEY ELEMENTS OF A HARMONISED SYSTEM	16
9.	CONCLUSION	17

1. EXECUTIVE SUMMARY

The Australian lamb industry has grown from strength to strength and is a professional, stand alone industry that places great importance on the quality, safety and integrity of its lamb and sheepmeat products. Australian lamb is in high demand domestically and overseas, being exported to over 100 countries globally. The Australian entire lamb and sheepmeat industry is valued at \$3.7 billion.

The Sheepmeat Council of Australia (SCA) is the nation's peak body representing and promoting the national and international interests of lamb and sheepmeat producers in Australia.

SCA understands that the origins of the Senate Inquiry into Meat Marketing primarily relate to the branding of lamb and the opportunities for increased harmonisation of the regulatory approaches that underpin lamb branding across Australia. As such, SCA's submission will be specifically focused on the current lamb definition, the existing regulatory schemes, and opportunities for increased harmonisation.

There is currently a range of different regulatory and compliance systems across federal and state jurisdictions that underpin, to varying degrees, the practice of lamb branding. The variability of these systems periodically produces allegations of misdescription, and these impact on the integrity and reputation of Australia's premier lamb industry.

There is a need for one set of rules, across all jurisdictions. SCA strongly recommends the harmonisation of all federal and state compliance schemes underpinning the description of lamb, into one effective compliance scheme that could be consistently applied across Australia.

Sheepmeat Council of Australia (SCA) and the Australian Meat Industry Council (AMIC) are currently working closely together to investigate the regulatory systems underpinning the lamb brand and the options for the development of an effective, national compliance scheme.

SCA and AMIC established a Lamb Definition Working Group and terms of reference in late 2007, and both organisation's supported a detailed Lamb Definition Work Plan in March 2008.

The results of the SCA / AMIC Lamb Definition Work Plan are expected in the second half of 2008, and are directly relevant to the deliberations of this Senate Inquiry into Meat Marketing.

The information delivered under the Work Plan will assist both SCA and AMIC to develop recommended policy positions that will improve and harmonise the current systems underpinning the integrity of the lamb category.

2. INTRODUCTION

2.1 Background to Sheepmeat Council of Australia

The Sheepmeat Council of Australia (SCA) is the nation's peak body representing and promoting the national and international interests of lamb and sheepmeat producers in Australia.

SCA's goal is to deliver professional policy development and lobbying outcomes that enhance the integrity, profitability and sustainability of the Australian sheepmeat industry.

Sheepmeat Council of Australia's members are the State Farm Organisations. The Council consists of nine (9) Councillors (lamb and sheepmeat producers) who represent each sheep producing state of Australia, and who are supported by a small team of staff based in the National Farmers' Federation (NFF) House in Canberra.

SCA is recognised as the prescribed peak industry body by section 59 of the *Australian Meat and Livestock Industry Act 1997*. SCA has a key role in scrutinising the performance of and settling the strategic imperatives to be pursued by levy funded bodies, in particular, Meat & Livestock Australia (MLA), Animal Health Australia and the National Residue Survey.

SCA also provides policy advice to the federal Minister for Agriculture and makes recommendations to the Minister on the rate of levy to apply. Sheepmeat Council of Australia is funded by voluntary membership subscriptions paid by State Farm Organisations and through the industry activities it performs for all sheep and lamb levy payers on behalf of the Red Meat Advisory Council (RMAC).

SCA is a full member of the Australian Meat Industry Language and Standards Committee, which is convened in accordance with AUS-MEAT's constitution and includes representation from all relevant industry stakeholders. The Committee is the Industry Standards Body for trade description of meat and is responsible for setting and implementation of Industry Standards, including the AUS-MEAT Language and AUS-MEAT National Accreditation Standards for AUS-MEAT Accredited Enterprises.

2.2 Sheepmeat Council's Response to the Senate Inquiry into Meat Marketing

SCA is responding to the Inquiry into Meat Marketing being held by the Senate Standing Committee on Rural and Regional Affairs and Transport. The terms of reference for the Inquiry are:

Concerns in relation to meat marketing, with particular reference to the need for effective supervision of national standards and controls and the national harmonisation of regulations applying to the branding and marketing of meat.

SCA understands that the origins of the Inquiry primarily relate to the branding of lamb and the opportunities for increased harmonisation of the regulatory approaches that underpin lamb branding across Australia. As such, SCA's submission will be specifically focused on the current lamb definition, the existing regulatory schemes, and opportunities for increased harmonisation.

SCA is mindful of minimising duplication, where possible, between the submissions of Sheepmeat Council and Meat & Livestock Australia, the red meat industry's service provider company. SCA has relied on the MLA submission to the Inquiry to cover in more detail the broad aspects of lamb and sheepmeat marketing in domestic and export markets, and the important findings and implementation of research into the eating quality of lamb and sheepmeat.

3. DEFINITION OF A LAMB

3.1 Australia

There is a standard definition of a lamb used in Australia for both the export and domestic sectors, which relies on dentition for determination.

The Australian Quarantine and Inspection Service (AQIS), which regulates export meat processing works, administers the *Export Control (Meat and Meat Products) Orders (2005)*. The definition of a lamb within the Orders, and which is reflected in the AUS-MEAT Language, is as follows:

“a Lamb carcase shall be derived from a female, castrated male or entire male ovine animal that shows no evidence of eruption of permanent incisor teeth”

Domestic meat processing establishments use the same definition of lamb, though are regulated by State Food / Meat Authorities under State legislation.

3.2 New Zealand

New Zealand, which is Australia’s key global competitor in lamb and sheepmeat products, has a slightly different definition of a lamb, though also uses dentition as the method of determination. The New Zealand definition states a Lamb as:

“a young sheep under 12 months of age or one which does not have any permanent incisors in wear”

This particular definition allows the New Zealand meat industry with slightly more flexibility than Australia, ensuring that animals that leave the farm gate for slaughter with no permanent incisor teeth erupted, are still considered a lamb if they have cut a permanent incisor by slaughter. Notwithstanding this, there is a short window of time (from several days to several weeks) between when the first two permanent incisors have erupted and when they are considered “in wear” (ie. when they have reached the height of the remaining immature teeth).

It must be noted that New Zealand has a much more intensive and uniform production system than Australia, with the vast majority of lambing occurring in the spring, allowing most animals to be slaughtered as lambs prior to October the following year (when lambs become a year old on October 1, triggering mouthing and dentition checks).

In comparison, Australia witnesses a larger degree of variation due to seasonal conditions, breed types and a goal to have lamb supply all-year-round.

3.3 United States

The United States, Australia's largest lamb export destination, uses the other internationally recognised method - the "break joint" - to determine whether an animal can be classified as a lamb. This method assesses the degree of ossification of the "break joint" in the fore leg.

It is considered a measure of the animal's physiological maturity, as distinct to chronological age (dentition). There are advantages and disadvantages of either method, however, Australia's current dentition method relies less on the subjective judgement of the particular assessor.

3.4 United Nations

The United Nations (UN) Economic Commission for Europe standards for ovine carcasses and cuts, developed in 2001 involving 55 member countries, provide an international trading language for meat.

This definition is recognised internationally by all UN/ECE member countries, and states that a lamb is as follows:

"Lamb under 12 months of age which does not have any permanent incisor teeth".

4. CURRENT REGULATORY SYSTEM

4.1 Export – AQIS and AUS-MEAT

As previously mentioned, AQIS regulates export meat processing works, and has primary responsibility for the accurate description of the “basic categories”, being Lamb, Mutton and Ram. Maintenance of these basic categories by AQIS is a government to government requirement set by many of Australia’s trading partners.

AQIS relies on AUS-MEAT to verify the accuracy of trade description by taking day-to-day operational responsibility, including that for corrective action, for all trade description other than those specific descriptions that trading partner governments may require AQIS to directly oversight. Licensed meat exporters must be AUS-MEAT accredited.

AUS-MEAT is the national industry owned standards organisation responsible for the objective and uniform description of Australian meat and livestock. National industry standards for trade description of meat are part of the AUS-MEAT National Accreditation Standards for AUS-MEAT accredited enterprises and are included in the AUS-MEAT Language.

AUS-MEAT ensures that export meat processing establishments have approved quality systems in place that are routinely audited by AUS-MEAT. AQIS remains responsible for taking any legal sanctions under the legislation where required.

AUS-MEAT accredited export establishments, which also supply lamb to the domestic market, require independently audited and approved quality management systems in place to ensure the integrity of product description is maintained. These establishments use AUS-MEAT Roller Brands only when supplying lamb to the domestic market. The brand is applied in a prescribed way to each side of the carcass. In regard to the branding of export lambs, these animals need to be branded with the approved AQIS “Australian Inspected - Lamb” (AI) brand.

4.2 Domestic – State Authorities

Individual State Food / Meat Authorities are responsible, to varying degrees, under state legislation for the maintenance of the lamb definition within their state. Licensed establishments generally must apply in a prescribed way an approved lamb brand to all lambs, and it is an offence under state legislation to apply a lamb brand to product that does not meet the lamb definition.

The various state authorities are:

- *New South Wales* - Safe Food Production NSW
- *Victoria* - PrimeSafe Victoria
- *Queensland* - Safe Food Production Queensland
- *South Australia* - South Australian Meat Hygiene Unit
- *Western Australia* - WA Meat Industry Authority
- *Tasmania* - Currently has no legislation in place for the branding of lambs. AUS-MEAT Accredited Enterprises wishing to brand Lambs may apply and be issued AUS-MEAT roller brands.

SCA understands that AUS-MEAT Limited's submission to this Senate Inquiry outlined the provisions of the above state regulatory systems in more detail.

5. CHALLENGES OF CURRENT SYSTEM

5.1 Allegations of Misdescription

Periodically, allegations arise that unscrupulous operators within the meat processing industry are misbranding older animals, which have cut permanent incisor teeth, as lambs.

These allegations can unfortunately damage the integrity and professional image of Australia's premier lamb industry, both at home and in valuable export markets. The extremely strong domestic and global demand for Australian lamb products is built on a reputation for quality, safety and integrity. This reputation, which allows Australia to sell quality lamb products to over 100 countries world wide, needs to be maintained and maximised.

If some meat processing establishments are able to misdescribe product, and remain undetected, it places the vast majority of honest operators at a significant commercial disincentive. As dentition is the method for determining the lamb definition, the removal and disposal of the animal's head at slaughter creates challenges for follow-up auditing of compliance.

A proportion of the allegations of misdescription can tend to be seasonal in nature, appearing more at times when older lambs are being phased out as new lambs come on to the market.

5.2 Lack of Consistency in Lamb Branding Provisions and Compliance – Need for Harmonisation

There is currently a range of different regulatory and compliance systems across federal and state jurisdictions that underpin, to varying degrees, the practice of lamb branding.

Each federal and state authority:

- operate under different legislation, with varying standards;
- require different approved systems for their licensed establishments;
- have different branding / stamping provisions;
- have various inspection and compliance schemes;
- have varying degrees of success in being able to expose operators that are mis-describing product; and
- have different penalties in place.

It is currently very difficult to compare the robustness of various jurisdictional approaches to enforcing the accurate description of lamb. This in turn, encourages accusations being levelled at one jurisdictional approach over another. There is a need for one set of rules across the country, which all regulatory bodies would follow. This would promote a higher level of confidence that the compliance system in each jurisdiction had “teeth” and would equally detect and deal with any cases of misdescription.

SCA strongly recommends the harmonisation of all federal and state compliance schemes underpinning the description of lamb, into one effective compliance scheme that could be consistently applied across jurisdictions and the entire Australian lamb industry.

5.3 Previous Proposals to Deregulate Lamb Branding and Establish Alternative Industry Arrangements

State Authorities have increasingly indicated their desire to deregulate their lamb branding provisions, viewing them as a quality standard for industry to manage, and not in line with their perceived role relating to food safety and hygiene.

With the incorporation of the responsibilities of the NSW Meat Industry Authority into Safe Food NSW in August 2000, the NSW Government proposed that there be no provision under the Safe Food Act to continue the strip branding of lamb. However, the NSW Sheepmeat Industry successfully argued for a 3 year extension of the regulation until August 2003 on the grounds that sufficient time was required to develop and implement an alternative arrangement.

Around this time, in July 1999, the Australian Government announced a Lamb Industry Development Program (LIDP) as one initiative in response to the United States' decision to impose a restrictive three year tariff rate quota on Australian lamb. A Lamb Industry Development Advisory Committee (LIDAC) was established in November 1999 to make recommendations on funding priorities. Improving lamb product quality and integrity was identified as one of five key program elements for targeting and funding.

Considering the growing difficulty of maintaining state regulation of lamb branding, the Sheepmeat Council (SCA) and National Meat Association (NMA) submitted a funding proposal to LIDAC in March 2000, to develop a business plan addressing the harmonisation of lamb meat description in Australia.

Sheepmeat Council and National Meat Association then developed and submitted a business plan to LIDAC in March 2001, titled, *Harmonisation of Lamb Meat Description in Australia, Business Plan*. The Business Plan proposed the development and testing of a licensed quality mark concept for lamb, which could replace existing state statutory support. It was proposed that the quality mark be underpinned by an industry owned, national, self-regulated quality assurance program.

It was well recognised that lamb was an established brand; that the category was valued by end users and consumers; and that industry's significant investment in promoting the lamb category to consumers needed to be protected.

Following industry consultation and concern over the proposed deregulation of lamb branding in NSW, the SCA / NMA proposal was amended in mid 2001 to delay the development of the quality mark concept, in preference to the project investigating the likely impacts of state deregulation, and what the range of co-regulatory, legislative or other options were available to the industry should deregulation occur. SCA and NMA subsequently commissioned AUS-MEAT Limited to carry out this work, which finalised its report in April 2002, titled *Harmonisation of Lamb Meat Description in Australia*. The recommendations of this report were developed in the context of there no longer being statutory state branding available.

At that time, AUS-MEAT recommended a self-regulated, auditable, enforceable, market driven code of practice to underpin lamb branding in a deregulated market, using the AUS-MEAT system as the nationally recognised standard. In May 2002, SCA, NMA and the Australian Meat Council supported the recommendations of the AUS-MEAT report and then undertook consultation with industry and government in each State, as the first stage of implementation.

However, this proposal relied on very strong market forces to ensure all establishments were treated equitably. An impediment to the market driven approach was the significant number of lambs being processed for the domestic market by non AUS-MEAT accredited domestic establishments (around 50% of lambs in NSW). A key question was how AUS-MEAT, as administering the national standard would be able to protect the integrity of lamb, when not all processing establishments were AUS-MEAT accredited. Those domestic AUS-MEAT accredited establishments would be financially disadvantaged if a lack of market forces meant that some establishments chose not to participate.

At the time, the provisions of the Trade Practices Act were also investigated. It was considered that the consumer protection provisions contained within the Act to provide “truth in labeling” would not provide a ready solution, as when the animal’s head is removed, it is extremely difficult to achieve a successful prosecution.

Under the recommended approach following any deregulation, AUS-MEAT accredited facilities would have access to the AUS-MEAT lamb brand and would continue to be subject to 3rd party audit. AUS-MEAT rules would prevent accredited establishments from describing other categories of ovine as lamb.

However, it was noted that non AUS-MEAT accredited establishments would be free to describe any category of ovine as lamb, subject to the provisions of the Trade Practices Act, in terms of its provision to protect consumers (or industry) from misdescription of product or misleading or deceptive conduct.

It was clear from the above, that with the impending repeal of statutory lamb branding, the competitive dynamics associated with the production, processing and marketing of lamb would be altered. There would be difficulties of implementing any revised industry owned lamb branding program if there was not uniformity and equity across the national industry, particularly domestic and export processing establishments.

Subsequently, the NSW Government planned to enforce the deregulation of the lamb branding provisions from August 2003. This would have meant that the NSW state authority would have had no involvement in lamb branding within the state.

Both Victoria and Queensland indicated at the time that they also intended to follow suit and deregulate their lamb branding provisions. The fact that State Governments were (and remain) committed, by their agreement to mutual recognition of state legislation, to

allow product fit for sale in one state to be sold in all states, accentuated the consequences of the NSW Government's decision.

Sheepmeat Council and the NSW Farmers' Association made representations to the NSW Government in 2003 requesting that the existing legislative underpinning of lamb branding continue until a satisfactory alternative was able to be fully implemented.

Sheepmeat Council at the time highlighted to the NSW Government that the premature deregulation of lamb branding in NSW would:

- precipitate a national push for deregulation of an essential product description tool;
- in the absence of an alternative, would increase the opportunity, and therefore likelihood, of mis-description of product;
- lead to a significant variation in quality standards;
- reduce consumers' confidence in lamb - the industry's premier brand - hence loss of market share for the product;
- jeopardise the investment of millions of dollars of producer levy funds spent annually to promote lamb, if the very definition of lamb could no longer be enforced or protected.

The NSW Government was not successful in its attempt to deregulate the lamb brand from August 2003. Since then, the Victorian Government reviewed the lamb branding provisions under its meat industry regulations in 2005. The Victorian regulations pertaining to lamb branding will now sunset in 2010, unless pressure from industry extends this deadline.

6. LAMB AND SHEEPMEAT MARKETING AND EATING QUALITY RESEARCH

As previously mentioned, SCA has relied on the MLA submission to the Inquiry to cover in more detail the key aspects of lamb and sheepmeat marketing in domestic and export markets, and the important findings and implementation of research into the eating quality of lamb and sheepmeat. Some brief observations are included below.

6.1 Lamb Marketing and Growth

The lamb and sheepmeat industry in Australia has been a major agricultural success story. It has seen terrific growth and demand over the last 15 years, and has grown into a professional and sophisticated industry. Domestic consumer expenditure on lamb has increased 126% between 1994 to 2007, from \$0.93 billion to \$2.1 billion.

The Australian lamb and sheepmeat industry (including livestock exports) is now valued at approximately \$3.9 billion to the Australian economy, up 100% since 1994 (\$1.96 billion). Exports of Australian lamb have increased from 15% of production in the early 1990s to 44% in 2007, an increase of 193%.

The growth in the lamb industry is attributable to some of the following key initiatives:

- Delivering what the customer wants (ie. lean lambs)
- The use of superior genetics, evaluated by the industry's genetic measurement program called *LAMBPLAN* (now *Sheep Genetics*) (ie. increased growth rate, less fat, improving muscling)
- Improved production systems (ie. nutrition, pasture management and feeding strategies);
- Producers investing in marketing and research and development (ie. the lamb industry's successful campaign to claim Australia Day, as Lamb's national day);
- Having a "whole-of-industry" focus with a teamwork approach.

6.2 Sheepmeat Eating Quality Research

Lamb and sheepmeat producer levies have funded an ambitious program since 2000, designed to define, predict and improve the eating quality of lamb and sheepmeat.

Targeted research and development, and consumer evaluations, have identified the key factors affecting eating quality from "paddock to plate". Factors examined ranged from on-farm (ie. breeding, nutrition, age, stress), through processing (ie. stress, electrical inputs, hanging, chilling, aging) to cooking (ie. type of cut and cooking method).

The sheepmeat eating quality program has developed and commercialised pathways that will significantly increase the eating quality of lamb and sheepmeat. With this new knowledge, standards and training packages have been developed by MLA and are

being adopted commercially by industry participants under the Meat Standards Australia (MSA) program.

The sheepmeat eating quality research, and commercialisation through the MSA Sheepmeat program, will increasingly complement and reduce “failure” rates in the lamb and sheepmeat categories, as currently described by dentition.

7. INDUSTRY COLLABORATION – SCA AND AMIC WORK PLAN

Sheepmeat Council of Australia (SCA) and the Australian Meat Industry Council (AMIC) are currently working closely together to investigate the current lamb definition; the regulatory systems underpinning the lamb brand; and the options for the development of an effective, national compliance scheme.

AMIC and SCA established a Lamb Definition Working Group and terms of reference in late 2007, and both organisation’s supported a detailed Lamb Definition Work Plan in March 2008.

Element 1 of the SCA / AMIC Lamb Definition Work Plan is as follows:

- Investigate:
 - the extent of mis-description with the current lamb definition and the range of state and federal systems regulating the definition;
 - options for an effective compliance scheme that can be consistently applied across the entire Australian lamb industry; and
 - to what degree extending the lamb definition addresses the current mis-description issues.

The remaining elements of the Work Plan assess the current lamb definition, and what impact an extension to the definition would have on:

- Eating quality; the economic impact on stakeholders and industry; stakeholder perception; and the international environment.

The results of the SCA / AMIC Lamb Definition Work Plan are expected in the second half of 2008, and are directly relevant to the deliberations of this Senate Inquiry into Meat Marketing.

The information delivered under the Work Plan will assist both SCA and AMIC to develop recommended policy positions that will improve and harmonise the current systems underpinning the integrity of the lamb category. Developing an effective, national compliance scheme is a key goal of the collaboration between SCA and AMIC.

8. KEY ELEMENTS OF A HARMONISED SYSTEM

There is a range of key elements that would likely be required to underpin the development of an effective national compliance system to protect the integrity of the lamb category. As previously mentioned, this information will be delivered under the SCA / AMIC Lamb Definition Work Plan. Without prejudicing the outcomes of this work, key elements, as developed previously by AUS-MEAT, may include:

- Agreement on the definition of lamb;
- The definition adopted being objective, measurable, repeatable and applicable nationally;
- A national standard method for assessing and determining the category of carcasses at slaughter, which could be checked at a later time;
- Establishments branding carcasses as lamb operating under an approved and effective Company Quality Management System, which details how the establishment will ensure the category is accurately applied (includes training);
- A third party auditing program to assess compliance to the requirements of the program (including unannounced audits);
- Sanctions such as removal of brands and/or accreditation where clear and blatant cases of product misdescription are detected; and
- An effective education program to ensure the entire lamb industry is aware of the requirements of the compliance system, and what the ramifications are of not following the rules.

Put simply, any harmonised compliance system should:

- have integrity;
- be auditable;
- be effective and reliable;
- provide industry confidence; and
- have teeth.

SCA notes that national industry standards for trade description of meat are currently embodied into the AUS-MEAT National Accreditation Standards for AUS-MEAT Accredited Enterprises (AUS-MEAT Accreditation Standards) and the Australian Meat Industry Classification System known as the AUS-MEAT Language. The tools within these industry standards would provide guidance on key elements that could facilitate the adoption of a uniform compliance system by regulatory authorities.

9. CONCLUSION

The Australian lamb industry is a professional industry that places great importance on the quality, safety and integrity of its lamb and sheepmeat products.

There is currently a range of different regulatory and compliance systems across federal and state jurisdictions that underpin, to varying degrees, the practice of lamb branding. Periodically, there are allegations of misdescription, and these impact on the integrity and reputation of Australia's lamb industry.

There is a need to harmonise all federal and state compliance schemes underpinning the description of lamb, into an effective compliance scheme that could be consistently applied across all jurisdictions.

Sheepmeat Council and the Australian Meat Industry Council are currently working closely together to investigate the regulatory systems underpinning the lamb brand and the options for the development of an effective, national compliance scheme.