

MEAT HYGIENE IN SOUTH AUSTRALIA

JOHN H. HOLMDEN

CHAIRMAN, MEAT HYGIENE AUTHORITY

Some form of meat hygiene has been practised for as long as man has eaten meat. The first form was, doubtless, the removal of inedible contaminants of field butchering such as sticks, stone and similar extraneous material.

There are references throughout history to other forms of meat hygiene, some of which were not necessarily recognised as such at the time:-

- . The non-consumption of pig meat by orthodox Jews and Moslems.
- . The Moslem custom of Halal slaughtering.
- . The Jewish custom of kosher slaughtering.
- . A form of meat inspection during the Roman Empire.
- . Some controls over the standards of meat sold to the public in fourteenth century England.
- . The introduction in the nineteenth century into many European countries of formal control over meat hygiene.
- . The introduction of compulsory meat inspection in the U.S.A. in 1891.
- . The introduction of public health laws in Canada in 1906 requiring approval of slaughtering by a King's officer and inspection of meat prior to public distribution.

. The custom which persists to this day in parts of England whereby pork and oysters are eaten only in those months in which there is a letter "R" i.e. not in the warm months of May, June, July and August.

In South Australia local government bodies were given, or assumed, responsibility for meat hygiene in the developing colony which was founded in 1836. This responsibility was part of a general responsibility under building and health legislation.

In 1908 the Metropolitan Abattoirs Act, which was concerned specifically with meat hygiene, was enacted by the Parliament of South Australia. This Act provided for the establishment of a central killing facility, a metropolitan abattoir, to service the city of Adelaide and to replace the large number of unsatisfactory slaughterhouses which at that time serviced the needs of the city.

This Act was followed in 1911 by a similar Act, the Abattoirs Act, covering other population centres in the State.

Responsibility for the administration of both Acts remained largely with local government which provided a meat inspection service in abattoirs established under the provision of the Acts.

During the 1920's the export meat trade developed to the extent that the Commonwealth Government, under its constitutional responsibility for exports, was obliged to provide an export meat inspection service in abattoirs which catered for the export trade.

In addition a third inspection service was developed during this period. This service was provided by the State Government to abattoirs, notably the bacon factories in the Adelaide Hills, which were outside the responsibility of local government but were not export abattoirs and therefore not serviced by the Commonwealth Government.

It was inevitable that the existence of three systems inspecting one commodity within one State produced a number of anomalies, overlaps, inequities and inefficiencies which, by the early 1960's were of sufficient significance that the State Government negotiated an agreement in 1965 with the Commonwealth Government by which the Commonwealth provided the meat inspection service to South Australian abattoirs. This agreement under the provisions of the 1964 Meat Inspection Arrangements Act (Commonwealth) has been progressively implemented to the stage at which today all of the two hundred meat inspectors employed in South Australian abattoirs are employed by the Commonwealth.

The rationalisation of the inspection systems however, had little impact on the standards of construction and hygiene in many of the premises in which meat was prepared and inspected. With the exception of export abattoirs, which must comply with the standards set by the importing countries, standards were still set under general legislation relating to building, health, and food and not specifically to meat and meat hygiene.

However, the industry had undergone changes for which the specific Acts of 1908 and 1911 and the more general legislation were inadequate:

- . Intensification in the management of pigs and poultry rearing industries which pre-dispose animals to salmonellosis and other diseases associated with high stocking densities.
- . Increase in the use of chemicals and drugs in agriculture.
- . Longer journeys resulting from improved communication and transport systems for both animals and meat which establishes greater risk of disease spread and carcass contamination and deterioration.
- . Increase in the quantity and diversity of smallgoods and other meat products available to consumers.
- . A general trend towards the consumption of rarer (lightly cooked) meat.
- . Increase in the number and range of take-away food outlets, restaurants and convenience foods.
- . Technological change which resulted in development of mechanised meat processing and handling equipment and economics of scale in large slaughtering works.

These factors, together with the increasing disparity in standards between export and non-export establishments, created in the early 1970's a need to introduce new and specific meat hygiene legislation. However, lengthy and at times bitter debate between the various interest groups in the meat industry delayed the development of an acceptable formula for ten years.

In addition to accommodating general industry change it was necessary to allow for some special circumstances in South Australia:

- . The majority of the State is sparsely populated, having an area of one million hectares occupied by a population of 1.3 million people of which almost one million live in the Adelaide metropolitan area. While it was relatively simple to cater for the needs of a large population centre, it was also necessary to solve the problem of servicing sparsely populated remote areas of the State.
- . Under the agreement with the Commonwealth Government the meat inspection service provided to the State is paid for on a per inspector basis rather than on a per carcase basis. It is not therefore economical to inspect small quantities of meat prepared in small works in remote areas of the State.
- . Local government believed that it should continue to play a significant role in meat hygiene as a part of its perceived responsibility to ensure the wholesomeness of all food supplied to the community.
- . The poultry industry did not wish to be included in the same legislation as its major competitor, the red meat industry. Industrial relations in the poultry processing industry were very much better than those in the red meat industry and the poultry industry feared that by being closely linked industrial relations problems would also be linked.
- . Producers feared that any reduction in the number of slaughterhouses would result in lack of competition for their stock in country markets.

- . There were 15 abattoirs, 150 slaughterhouses and an unknown number of pet food works and poultry processing plants in the State during this period. The owners of these works and frequently their local communities were vocal in defence of the status quo.

While not all these issues are peculiar to South Australia they had, nevertheless, to be accommodated in any legislation which was to be acceptable to the groups which constitute the industry.

The evolution of acceptable legislation was in essence a process of convincing an essentially conservative industry that change was necessary. It has been said that slaughtering was the last of the peasant industries to enter the 20th Century. Although this process is still incomplete it is of value to examine the process to date.

A Meat Industry Bill was prepared in 1974. This Bill, which proposed an eight member Authority responsible not only for hygiene but also for marketing, was rejected by industry before being introduced to Parliament.

An interdepartmental committee was established in 1976 by the Minister of Agriculture with the following terms of reference:-

- . To report on the implementation of minimum uniform standards of meat hygiene in abattoirs, slaughterhouses and pet food establishments in South Australia and to include such interrelated matters as meat transport and meat inspection which are necessary for the preparation of hygienic products.

- . In making its report the Committee is to be mindful of economic considerations and the cost of providing adequate standards of meat hygiene.
- . The Committee shall not be bound by the concept of a "Meat Industry Authority."

Following receipt of the report of this committee, a new Bill, the Abattoirs and Pet Food Works Bill, was drafted and introduced to Parliament in 1978.

However, this Bill was also rejected and referred to a Select Committee of both Houses of Parliament which heard representations from all interested industry groups before making recommendations which resulted in the drafting and passage of the Meat Hygiene Act 1980. This Act accommodates, as far as is possible, the varying and conflicting interests by providing:-

- . that the red meat slaughtering industry be governed by a State instrumentality, the South Australian Meat Hygiene Authority, responsible to the Minister of Agriculture.
- . that the Authority comprise three members:-
 - a veterinary surgeon from the Department of Agriculture as Chairman
 - a nominee of the Minister of Health
 - a nominee of local government.
- . that the Act relate only to slaughtering works (wholesalers, boning rooms, smallgoods manufacturers butchers shops, etc. are excluded)
- . that there be three categories of slaughtering works:
 - abattoirs with full-time meat inspection which are permitted to trade freely throughout the State.

- slaughterhouses which are not required to have full-time meat inspection but are restricted in both throughput and outlets for their product.
- pet food works which may only process pet food.
- . that the poultry processing industry should be governed by separate legislation.
- . that all three classes of premises have the same standards of construction and hygiene.
- . that there be a Meat Hygiene Consultative Committee, comprised of representatives from all organisations with an interest in slaughtering, to advise the Authority. The Australian Institute of Health Surveyors (S.A. Division) is represented on the Consultative Committee.
- . that the Act and the Authority exclude commercial considerations, contrary to the situation in other states.

The Act was proclaimed on 12th June 1980 and the Regulations, largely those drafted by the Local Government Association, were gazetted in February 1981. Following this, local councils were invited to nominate suitably qualified persons to be appointed by the Governor as Inspectors under the Act. Most, as you are aware, did so but a few, regrettably, chose to refrain from any involvement in the Act.

Operators of slaughtering works were given 15 months from February 1981 to June 1982 to examine the meat hygiene legislation and decide whether or not to develop a programme of up-grading of their premises so as to comply with the legislation. Renewal of licence in June 1982 was conditional upon prior submission to the Authority of an acceptable up-grading programme, to be completed in two years. Some slaughtering

works decided that it was uneconomical to up-grade and elected to close, others decided to pool their resources either to upgrade an existing works or to build a new works. The net result was a reduction in the number of slaughtering works.

This was not unexpected, and indeed, in retrospect it is a pity that more operators did not decide to close or join forces with their neighbours. However, as I pointed out earlier, the Authority is specifically prohibited from taking economic factors into consideration in deciding whether or not to grant a licence. Market forces must prevail. We can advise, we can suggest, and we do - but we cannot direct.

By June 1984 all but a handful of slaughtering works had completed their up-grading programmes and were in substantial compliance with the legislation. Of "the handful", a few realised that the game was up and voluntarily decided not to apply for renewal of their licences. The remainder were required by the Authority to show cause why their licences should not be suspended or cancelled. This had a salutary effect and in all but one case produced a flurry of activity. As Dr. Samuel Johnson observed:

"Depend on it Sir, when a man knows he is to be hanged in a fortnight, it concentrates his mind wonderfully".

During the up-grading period (1981-84), many Health Surveyors that were gazetted as Inspectors under the Act were of great assistance to the Authority in advising and monitoring changes in slaughterhouse construction. The Authority is well aware of wide range of health, hygiene and environmental matters that are the responsibility of Health Surveyors; this being so, I am particularly appreciative of those who devoted so much time to the slaughterhouses in their areas.

In this connection I should elaborate on the special place of slaughterhouses, vis-a-vis abattoirs. Members may remember that the original legislation, the 1978 Abattoirs and Pet Food Works Bill, would have abolished slaughterhouses altogether. However, after this Bill was rejected the Select Committee repleved slaughterhouses, but with the recommendation "that such premises be licensed to trade in those restricted areas, to supply their own retail outlets and that the Authority be empowered to fix levels of throughput above which a slaughterhouse will be required to become an abattoir."

The Select Committee considered that the Authority should have flexibility in setting levels of throughput but is of the opinion that 5 000 sheep equivalent units per annum is a reasonable level (see para 9.2).

However, the same Committee also recommended that all slaughtering works that had been in existence for a minimum of six months prior to the promulgation of the legislation should get a licence. This meant that the Authority not only inherited a large number of sub-standard works, but also several slaughterhouses whose existing throughputs were way in excess of the 5 000 sheep equivalent units recommended by the Select Committee (and incorporated into the legislation in Victoria). In 1982, about 18 months after the legislation come into being, the Authority reviewed the throughputs of slaughterhouses and determined that 23 of the 110 licenced slaughterhouses exceeded 5 000 units. Of these all but half a dozen were below 8 000 units. After consultation with industry the Authority resolved that 8 000 units should be the upper limit and that those in

excess of this should be given two years, either to reduce to 8 000 or to become an abattoir. This period will expire in June 1985 but most of the six have already become abattoirs or closed.

As a matter of policy the Authority would like all meat to be inspected, as at abattoirs, but realises that it is not practical to provide a meat inspector service for 85 slaughterhouses which collectively process no more than 5% of the meat produced in South Australia. Nevertheless the Authority believes that slaughterhouses should continue to have restrictions on their throughputs and the number of outlets that they can supply, that these outlets (Shops) would preferably be in the same ownership, and in the same or adjacent local government area as the slaughterhouse to provide continuity of surveillance along the food chain. Ideally, slaughterhouses would only exist in rural areas in situations without ready access to abattoir killed meat.

The Future

The Woodward Royal Commission into the Meat Industry strongly recommended that there should be a single meat inspection service. In effect South Australia has had this since 1965, with the Commonwealth Department of Primary Industry providing an inspection service on behalf of the Authority. However the Commonwealth enforces State law, the Meat Hygiene Act, rather than Commonwealth law which they would prefer to do. Following the amalgamation of the NSW state meat inspection service with the Commonwealth, discussions have been initiated here to examine the feasibility of any change. Central to this are the question of whether the Authority would or should retain control of licencing, the Commonwealth's attitude to operations peripheral to abattoirs; viz. slaughterhouses, boning rooms, pet food works, cold

stores, wholesalers.

The meat substitution scandal in 1981 caused a complete and searching review of the pet food industry in Australia. The Authority has greatly expanded the draft legislation covering pet food, in three main areas:

- . fool-proof identification (Brilliant Blue dye)
- . Detailed records of production and distribution.
- . Standards for construction and hygiene at pet food works.

The latter has been developed in conjunction with the Food and Drugs Regulations as they apply to the sale of pet food in human food premises. These regulations are ready to go to Cabinet for approval and thence to Parliament for gazettal.

The original legislation, already referred to, would have included poultry processing. However the white meat industry reacts strongly to this with the result that it was decided to draft separate legislation. This has been done and a draft Poultry Meat Industry Bill has been sent to industry for comment. I expect that the legislation will be presented to Parliament in the new year. The Bill is similar to the Meat Hygiene Act and empowers the Meat Hygiene Authority to administer the legislation.

The Role of Health Surveyors

Firstly I am going to assume that Health Surveyors are gazetted as Inspectors under the Act. This is essential as the Act gives an Inspector far more power than he has under the Food and Drugs Act or the Health Act.

Those Health Surveyors that are not appointed should request their employers to nominate them to the Authority.

1. Although, as I said earlier, all slaughtering works now comply substantially with the meat hygiene legislation, this has not necessarily meant that there has been a concomitant increase in the skills of the people using slaughtering works. Construction standards can be defined - a wall is or is not impervious, a premises is or is not fly proof, an underfloor drain is just that. The premises either complies or it doesn't and the deficiencies can be listed. But slaughtering skills and hygiene standards are far less tangible. It is all very well to have an immaculate brand-new slaughterhouse, it is quite another matter to have the ability to use it efficiently and to keep it clean. It is a curious anomaly that there are training courses for shop butchers, and for meat inspectors, but none for slaughtermen, with the result that the skills and standards in many slaughterhouses fall well short of what is required. This is the Authority's next task.

Slaughterhouses are here to stay so that the people in them must be taught how to raise their game. The meat hygiene section has made a start but the message needs constant reinforcement. Unless the emotion supports a change no amount of intellectual reasoning will induce the mind to make the change. Slaughtering skills can be taught and have demonstrable benefit: they are either easier or quicker or both. But hygiene is a state of mind. The mind must understand and accept the reason why, before it will give the order for action.

As Health Surveyors you know why. If you can explain why to the slaughtermen in your area, you will be helping to raise the standards towards those which are accepted without question at abattoirs. Make random checks - are the doors closed?, are the sterilisers working?, is the slaughtering being conducted off the floor? If not, why not?

2. The Food and Drugs Regulations have recently been amended to keep meat that was not produced at a licenced slaughtering works out of butchers shops etc. This may have caused some complaints, but the possible disparity between the hygiene of farm-killed meat and that of licenced slaughtering is such that it is clear that the twain ne'er meet (if you will pardon the pun). This amendment also closed a loophole exploited by illegal slaughterers - that the unbranded carcass hanging in the butcher's chiller was not slaughtered illegally, but belonged to a farmer who had brought it in for cutting up (after a certain amount of arm twisting a farmer could usually be produced who would commit perjury and claim the carcass was, indeed, his). Now, no more. When you visit butchers shops in your area, I would be grateful if you would firstly check on whether all the carcasses are branded, and secondly, what brands? pink, round, abattoir brands or brown, square, slaughterhouse brands (and if so what numbers?)
3. There is still a certain amount of illegal slaughtering. Now I don't expect you to tackle these operations single-handed, unless you want to. I am full aware that you have to live in the area and that might not be so pleasant if you are known as a policeman. But

I would like information. A good lead - place, people, best time to raid, and we will do the rest. Your name need never be mentioned.

4. Finally, as I have indicated, the poultry processing legislation is being changed. There will be poultry processing inspectors but Inspectors appointed under the Meat Hygiene Act will not automatically be Inspectors under the Poultry Meat Industry Act. This is because not all Inspectors under the Act have the additional skills and knowledge required for poultry processing. Those that have experience with the industry may apply, through their employers to the Authority for appointment. There are about 40 processing works that we know of and many of them will need to be up-graded, both structurally and in some cases attitudinally, like some of their fellows in the red meat industry.

In conclusion, I would like to thank your Institute for providing the opportunity for me to exchange information with you. As front line custodians of the State's continued good health you will, I hope now, see the benefits which meat hygiene, under the guidance of the Authority and with the support SAGRIC staff.

We are all heading in the same direction!