

ACCREDITATION FOR QUALITY ASSURANCE A NEW CONCEPT FOR REGULATION OF THE MEAT INDUSTRY

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SUMMARY

The Government of Queensland, Australia has introduced new legislation to regulate the meat processing industry of that State. The accreditation system established by this is leading to the adoption of quality assurance across the full range of meat industry activities, from point of slaughter of livestock to point of retail sale of meat to the consumer. Accreditation sets simple boundaries for operation. Within these boundaries, industry has the flexibility to function as it deems best. The concept of accreditation became law on 1 January 1994 and industry is being given three years to adapt its operations to meet the new requirements.

Introduction

Following the general election of December 1989, the Labour Party of Queensland was appointed to government of the State, thus ending a 32 year role as the opposition party.

High on the list of priorities of the new government was an evaluation of all major pieces of State legislation to ensure that Queenslanders were only subject to laws that were necessary, effective and applicable.

Agriculture and mining provided the original base for the development of the Queensland economy and the livestock and meat industry, particularly beef cattle, continues to be of major importance to the State and its people (Anon. 1994). With 9.6 million head, Queensland holds more than 40% of the national cattle herd and is considered to be Australia's cattle State. More than 80% of meat produced in Queensland is destined for export, accounting for 51% of the total Australian meat exports (Anon. 1993).

It follows that Queensland legislation relating to the slaughter and processing of livestock for meat production is of major importance. This legislation was therefore one of the first items of review for the new government in 1990. Consequent to the review, the government determined that the legislation governing the meat processing industry (the Meat Industry Act 1965 and Meat Industry Regulations 1973) should be repealed and replaced with new legislation addressing the needs of society, industry and government for the 1990's and the beginning of the 21st century.

The new legislation was developed through a process of consultation with industry (Wythes and Palmer 1994). It resulted in the Meat Industry Act 1993 (the Act) which established three statutory bodies (the Queensland Livestock and Meat Industry Policy Council, the Queensland Abattoir Corporation and the Queensland Livestock and Meat Authority) and introduced a system of accreditation for the regulation of the meat industry. Through accreditation, the one Act controls all meat processing in the State from point of slaughter to point of retail sale to the consumer.

The development and application of the accreditation concept is the subject of the following discussion.

Material

Under the previous legislation, regulatory administration of the meat processing industry was a complex, prescriptive and restrictive activity. As is common with many systems of regulation, it operated through the licensing or registration of the premises used for meat processing purposes. Significantly, premises were grouped into distinct classes or blocks, each with minimum standards of construction and equipment, irrespective of the wide variety of type and volume of operations intended to be carried out at such premises. The traditional grouping of large sectors of the industry (eg smallgoods factories, slaughtering establishments, retail premises) on a generic basis, rather than in accordance with

specific requirements, often imposed unnecessary costs upon industry. Unnecessary costs can limit the entry of those innovators and entrepreneurs any industry needs to prosper.

The previous legislation placed the emphasis upon premises and things rather than upon process and product. Its inflexibility increased costs without generating extra benefit.

In addition to prescribing restrictive and inflexible standards for processing premises, the previous system required the slaughter and dressing of stock to occur only in the presence of government inspectors who performed traditional meat inspection routines and overviewed all processing practices.

This was quite simply quality control imposed through the presence and direction of an external force. It often presented as an adversarial situation which lead to disharmony, distrust and conflict. On balance, it did not protect the consumer and did not assist industry.

During the consultations that preceded the new legislation, all parties accepted that the new Act should serve two purposes. It would ensure, as far as possible, that any meat offered to the public was wholesome. It would also ensure that any imposition it placed upon industry was no more than the minimum required to ensure product wholesomeness.

The new legislation does this by using a system of accreditation to focus upon the wholesomeness of the meat product being produced.

Method

Simplistically, the normal healthy animal can be considered as wholesome meat packaged in skin and thus protected from contamination by substances or organisms including the micro-organisms of food poisoning. Again simplistically, meat processing can be viewed as the sequence of all events that allow the wholesome tissue of the live animal to be converted to the wrapped parcel of meat sold to the consumer. Accreditation seeks to maintain the wholesomeness of the meat tissue during its journey through the meat processing operation.

The accreditation concept is based on the belief that only two factors, (physical) things and (people's) actions, can jeopardise this wholesomeness. Through accreditation, the Act works to ensure that no thing or action occurs in meat processing that could jeopardise the product.

The Act allows meat processing to occur only under an accreditation. The accreditation system is administered by the Queensland Livestock and Meat Authority (the Authority), one of the statutory bodies set up under the Act. The Authority issues an accreditation to a person for a particular purpose but can do so only if it is satisfied that the premises to be used and the programme of production to be used are individually and conjointly suitable for the particular purpose. They will be suitable if they do not cause jeopardy to the wholesomeness of the product.

Through further use of the consultative process (Wythes and Palmer 1994), the Authority has set particular standards which prohibit certain practices and specify certain qualities for the materials used in construction of premises and equipment. An applicant for accreditation must demonstrate to the Authority that the premises and equipment (the things) proposed to be used for the applicant's meat processing operations are suitable for the purpose by being of a size and construction such that, when considered in conjunction with the proposed product flow through the premises, they will not jeopardise product wholesomeness. The applicant must also propose an associated programme of production (the actions) which will satisfy the Authority that, given compliance with Authority standards relating to prohibited practices, the meat processing activity can take place in the premises without jeopardy to the product's wholesomeness.

The onus is on the applicant to propose both the premises and programme of production to be used. In this, the applicant is setting his own restrictions which must be accepted by the Authority if they protect the wholesomeness of product. They need not be any more than the minimum necessary for this protection: they may not be less.

The Authority will only be satisfied that a programme of production is suitable if it is either a quality assurance (QA) programme to Q-Safe standard (a Queensland standard approximating ISO9002) or a programme of quality control imposed through the full-time presence of Authority officers, the full cost of which is continually met by the holder of accreditation.

Results

It is too early for results at time of writing (April 1994). As would be expected, there has been some resistance to change by sections within industry, particularly those served by poor internal communication during the process of

development of the legislation (Wythes and Palmer 1994). The resistance seems based upon fear of the unknown in changing from what has been traditional to what is new, rather than to any matter of substance.

Discussion

Accreditation has required the establishment of a statutory body. The ideal sought by both industry and government is effective self regulation and the new Act, through accreditation, encourages moves towards this. However society rightfully expects that any meat offered for its consumption will be wholesome and needs to be assured of this by the action of some party whose primary interest in the meat industry is society's wellbeing rather than the profitable production of meat itself. Industry is seen to have vested interests and a primary concern with its own wellbeing. As such, it is not seen as properly filling the position of society's guardian. This is particularly so when meat holds generic status as is currently the case in Australia (although there is an increasing move towards brand development). The government as the assurer is acceptable to society since, in a democratic system, it represents society. For this reason the Act establishes a statutory body, the Queensland Livestock and Meat Authority, whose primary function is to ensure, through the accreditation system provided under the Act, that the wholesomeness of meat is maintained.

Accreditation leads to a questioning of established practice. Through accreditation, the Act focuses on the wholesomeness of product. With this approach, the appropriateness of any procedures affecting the product must be considered. Such procedures must include those of meat inspection.

European settlement of Australia and Queensland occurred a little over 200 years ago. Apart from the early years of settlement (through necessity) and the last few years (through novelty), the native fauna and flora of Australia have not been used for food. Instead, the traditional livestock of Europe (cattle, pigs and sheep) was introduced to and farmed in Australia, and traditional (European) meat inspection systems applied during processing for meat purposes.

Few zoonotic diseases of importance to meat consumers occur in Australian livestock. In Queensland, the environmental conditions and extensive system of livestock production practised mitigate against those few conditions which do occur, with low prevalence, elsewhere.

Traditional meat inspection is effective in detecting in meat conditions of aesthetic concern, but aesthetics are perhaps a matter for industry concerned with the reputation of its product rather than for government. Traditional inspection has also played a major role in the national tuberculosis and brucellosis eradication campaign. Apart from this, traditional inspection in Queensland is using valuable resources for the purpose of detecting diseases and conditions which are of minor, if any, consequence to public health. At the same time, the techniques of incision and palpation traditionally employed are providing an avenue for cross-contamination between carcasses and tissues with micro-organisms of significant concern to public health.

The introduction of the accreditation concept supports a review of the rationale for meat inspection, particularly inspection as traditionally practised.

The Act, through accreditation, requires industry to undergo very substantial change in both attitude and practice. It is unreasonable to expect industry to have mastered the change on the day the Act became law. Consequently, 31 December 1996 is set as the last day on which industry can continue to operate under the conditions and restrictions applied by the previous law. From 1 January 1997, all meat processing activities in Queensland will occur under full QA or, at owner's cost, expensive quality control.

The paradoxical nature of successful QA programmes imposed by law is addressed in the following conclusion.

Conclusion

There is nothing new in the use of QA in the meat processing industry. In Queensland, Q-Safe operation has been in place at several of the smaller slaughtering establishments since 1989. The Australian Quarantine and Inspection Service has overseen the adoption of approved QA programmes for operations of ancillary services and, to a lesser extent, full operation at several large abattoirs.

What is believed to be new is the adoption of QA across all operations of an entire industry, from point of slaughter to point of retail sale.

Such a totality of QA uptake within a limited time can only occur through legislative requirement. It is accepted that effective QA cannot be imposed by an external force but rather must flow from the culture which is to

operate under QA. It is likely that a QA programme put in place for no reason other than a legal requirement will prove to be ineffective. As such, evidence of nonconformity will be discovered through one of the routine audits performed by Authority officers, and this will lead to the accreditation being cancelled or suspended or made conditional upon increased audit the full cost of which must be met by the accredited person. For at least financial reasons, those who cannot or will not comply will not remain in the industry.

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