

RISK BACKGROUND

Repurposing imported biological goods for animal feed use

Overview



(Image: DAWE Image Photo Library)

The way that goods are used once they are imported into Australia is relevant to the level of biosecurity risk associated with those goods.

For example, goods imported to be used for human consumption will present a different level of biosecurity risk than those imported for animal feed e.g. pet food, stock feed. If human food is inadvertently contaminated with animal pathogens, it is less likely to cause disease in humans than if it were fed to susceptible animal species.

Stock feed presents a high level of biosecurity risk due to its direct pathway to livestock.

Biosecurity officers perform risk assessments on biological goods that are to be used in different ways. These risk assessments and the import conditions applied to goods may be different depending on how the goods will be used in Australia. Some of these differences can include:

- Approved countries of origin i.e. raw material sourcing, manufacture, export
- Restrictions on source species and tissues of origin
- Treatment requirements
- Audit requirements
- Product grade or manufacturer quality system requirements
- Export documentation requirements
- Imported Food Control Act requirements.

The department regularly receives queries from clients about repurposing imported goods. Clients sometimes request approval from the department to repurpose goods in the following way:

- Goods imported for human consumption to be used for animal feed
- Goods imported for use in pet food production to be fed to production animals in Australia, or
- Waste generated from domestic production systems for use as animal feed.

The following information is presented to increase awareness about the risks associated with repurposing biological goods for alternative end uses.

¹ 'Biosecurity risk' means the likelihood of a disease or pest entering Australia or establishing itself or spreading in Australia where that disease or pest can cause harm to humans, animals, plants, or the environment, and have significant economic consequences.

Frequently asked questions

Can I feed goods imported for human consumption to animals in Australia?

Goods imported for human consumption cannot be fed to animals in Australia unless the department has authorised this end use as part of the biosecurity import conditions for the specific goods.

Australian states and territories also regulate the use of stockfeed, fishmeal products and stockfeed ingredients and may impose specific conditions, such as product labelling or treatment requirements.

States and territories strictly prohibit swill feeding. Swill feeding is the feeding of certain food substances and food waste to Australian pigs.

The Australian Ruminant Feed Ban strictly prohibits feeding Restricted Animal Material (RAM) such as meat, fishmeal, and eggs to ruminant livestock species (e.g. cattle, sheep, goats or deer) in Australia.

For further information please see the webpage of the agricultural department in your state or territory and the [Animal Health Australia website](#).

Why can't I feed imported goods which are fit for human consumption to animals?

Animal biosecurity and human food safety are not the same.

Animal biosecurity relates to the introduction of exotic animal diseases, such as foot and mouth disease (FMD), into Australia. Most of these diseases are highly contagious to animals however do not affect humans. The transmission of animal diseases is an issue unlikely to be considered during the development of human food manufacturing systems.

Human food safety is concerned with the transmission of foodborne diseases which cause illness in humans. Most of these diseases do not affect animals or are already present in Australia.

Diverting human foods to animal feed results in an increase in animal biosecurity risk. This is because the human food (which may be contaminated with animal diseases) will now be fed directly to a susceptible species.

For example, a human food product containing pork meat that is contaminated with African swine fever (ASF) will not cause disease in humans. The same meat product is likely to cause an outbreak of ASF if fed to Australian pigs.

Animal disease outbreaks result in restrictions on Australian exports and cause major economic loss and social consequences for Australian rural communities.

Can imported human foods be safely fed to animals if they are highly processed?

Not necessarily. Many diseases are resistant to processing.

For example, spray drying, which is the process whereby small particles of product are sprayed through hot air, usually at high temperatures for very short periods of time, has a negligible effect on many viral animal diseases.

How bad could feeding imported human food to animals be?

Biosecurity controls at Australia's borders minimise the risk of exotic animal diseases entering Australia. These controls protect agricultural industries, our unique environment, native flora and fauna, and our tourism industries and lifestyle.

The introduction of an exotic animal disease would reduce animal productivity, result in a loss of income, disruption to supply chains, loss of export opportunities, and reputational damage to Australian agricultural industries. The cost involved in managing such an outbreak would be significant.

Following an outbreak of FMD in the United Kingdom in 2001, the government report concluded:

Having investigated and eliminated all other possible sources of infection I have concluded that the likeliest source of infection for the pigs on Burnside Farm was meat or meat products containing or contaminated with FMD virus and that the virus could have been introduced to his pigs through the consumption of such material in unprocessed or inadequately processed waste food or the consumption of processed waste food contaminated with such material.

In October 2013, the Australian Bureau of Agricultural and Resource Economics and Sciences (ABARES) put the cost of a large foot and mouth disease (FMD) outbreak in Australia at more than \$50 billion over 10 years.

What if I still want to feed imported goods (or derivatives of imported goods) to Australian animals?

The only option is to obtain approval in writing from the department using one of the two methods outlined below:

Method 1 - If goods have not been imported into Australia

Check the import conditions for the specific goods on the department's [BICON database](#).

If the BICON case indicates that you need an import permit for the goods, apply for the import permit through the case and indicate in your application that approval is sought for multiple end uses e.g. human consumption, pet food, stock feed.

If the BICON case indicates that an import permit is not required if the goods are imported for human consumption only, check the relevant BICON animal feed case (i.e. stock feed, pet food) to determine if the goods are eligible for importation for animal feed use. If the goods are eligible, apply for an import permit using the BICON animal feed pathway.

Method 2 – If goods have already been imported into Australia

If the goods have already been imported into Australia using import conditions applicable to human food products only, you can apply for approval for the goods to be used for animal feed. Please contact the department's Animal and Biological Imports Branch for more information and to determine if your goods may be eligible (imports@agriculture.gov.au; 1800 900 090).

Please note:

- Imported goods must not be fed to animals until the department has issued approval for a change in end use of the imported goods.
- Due to the potential for animal-derived material to contain animal diseases, there are only a very small number of animal products that can be repurposed from human food to animal feed e.g. bovine dairy from countries recognised by the department as free from FMD and lumpy skin disease.
- Additional fees apply for an assessment of biosecurity risks associated with a change in end use of imported goods for animal feed.

For further information please contact the department using:

Phone: 1800 900 090

E-mail: imports@awe.gov.au