Final Report

Harmonisation of supplier accreditation and auditing requirements for red meats

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1.0 Abstract 3

2.0 Executive summary 3

3.0 Introduction 7

4.0 Project objectives 7

5.0 Methodology 8

6.0 Results 10

7.0 Discussion 14

7.1 Background and operating context 14

7.2 Summary of industry engagement findings 15

7.3 Classification of compliance programs 17

7.4 Costing analysis 17

7.5 Compliance mapping 18

7.6 Pathway feasibility assessment 19

7.7 Technological tools to support harmonisation 23

7.8 Implementation considerations 25

8.0 Conclusions 28

9.0 Recommendations 29

10.0 Bibliography 29

11.0 Appendices 30

11.1 Case Study: The Global Red Meat Standard (Denmark) 30

11.2 List of acronyms 32

1.0 Abstract

2.0 This report outlines opportunities to reduce the high costs and disruption imposed on the Australian red meat processing industry by the labyrinthine compliance burden imposed by government agencies, importing countries and commercial clients. The mapping of industry's most commonly required Standards has verified the extent of duplication, indicating instances of more than 95% duplication requiring 3,233 audit days across industry, averaging 42 days per establishment. The estimated direct cost to industry is $98,973,268 per annum (which equates to almost $1.3 million per establishment). The methodology involved consultation with industry to better understand the problem; a search and comparison of audit checklists to create a database and identify areas of duplication; consultation with a sample of key commercial clients, auditors, certifying bodies, AUS-MEAT, BRCGS, as well as State and Federal government representatives to better understand the practical barriers to harmonisation; research on potential technical solutions to compliance verification; and extensive mapping of the audit checklists to pinpoint where duplication is occurring. The project has identified five potentially viable harmonisation pathways for industry to pursue. The next step is for industry to develop an implementation plan to further advance the most feasible elements of the identified pathways to harmonisation.

3.0 Executive summary

The purpose of this project was to identify opportunities to harmonise Australia's labyrinthine red meat compliance regime by pinpointing areas of overlap where audit requirements can be eliminated or reduced, thereby reducing costs and associated disruption. The specific project tasks were:

1. Review of compliance arrangements and costs associated with supplier accreditation and auditing requirements
2. Identification of areas of duplication and potential harmonisation within programs
3. Identification of opportunities to reduce compliance costs using technology, software or streamlined systems
4. Assessment of the feasibility of introducing a harmonised framework for the red meat processing sector
5. Development of a harmonisation strategy for Australian red meat processors' accreditation and auditing requirements.

The methodology included stages of industry and customer consultation, detailed mapping of audit programs using both targeted AI and expert verification, further consultation with key stakeholders on draft findings, followed by analysis and reporting.

The consultation with QA personnel and management from the larger processors revealed a number of consistent themes:

1. Australia's high meat standards are both a blessing and a curse
2. Audits are excessive, highly disruptive, intrusive, costly and do not materially improve food safety and product integrity.
3. Australian processors need to access multiple domestic and international markets to maximise returns on each carcase, which increases compliance costs.
4. There is a perceived double standard among both markets and customers, as they set higher standards for suppliers than they uphold themselves.
5. The risk of losing a market or customer due to non-compliance is highly stressful.
6. Duplication in the audit process is costing everyone money, but it is unclear how the cost burden is shared among the consumer, producer or processor.
7. Increasingly, retailers and food service brands are adding audit items to differentiate themselves and substantiate marketing claims.
8. Brand integrity is just as critical as product integrity; processors are strongly incentivised to uphold product integrity to protect their own brand.
9. There is a perception that auditors are conditioned to look for faults.
10. There is a looming shortage of auditors that could worsen.
11. QA managers are too distracted by other audit obligations to devote time to continuous improvement.

The harmonisation journey began with the compilation of a comprehensive database of the collective requirements of government and importing countries, as well as those of commercial, retail, food service, and manufacturing businesses. A total of 66 audits were identified and categorised into the areas of food safety, trade description, food quality, animal welfare, or corporate and social responsibility.

The estimated direct total cost of compliance for the Australian meat industry was calculated at $98,973,268 per annum, which equates to almost $1.3 million per establishment. This cost includes an estimate of the time spent by processor personnel preparing, facilitating and following up on paperwork, responding to the identified corrective actions required (CAR) and completing the closing documentation. The total DAFF charges, including the AQIS on-premises veterinarian (OPV) and Food Safety Meat Assessor (FMSA), account for $74,489,523 of the total cost to industry. Collectively, there are 3,233 audit days across industry, averaging 42 days per establishment.

The next stages of the project involved a mapping process to compare the various audit programs and identify areas of overlap and significant gaps between them. The mapping process was made challenging by the fact that the various checklists use inconsistent language to describe essentially the same audit activity with the same intent.

The first stage of mapping compared EMSAP to BRCGS to identify duplication and test the viability of harmonisation. Further mapping compared BRCGS with the major domestic commercial client programs, including Coles, Woolworths, Aldi, Costco and McDonald's, to assess the extent to which these commercial addenda were already covered and could therefore be eliminated or reduced. This work concluded that there was a very high degree of overlap, although significant gaps remained in product specification attributes.

Checkpoints covered by Certification Standard												
Client audits	**Client audit checkpoints**	**BRCGS**		**EMSAP**		**AUS-MEAT**		**AAWCS**		**Client audit covered by one or more audit standard**		**Total est. cost of client audits 2025/26***
McDonalds	518	502	97%	124	24%	3	1%	59	11%	500	97%	$1,085,000
Woolworths	124	55	44%	119	96%	58	47%	36	29%	124	100%	$347,200
Coles CMFRS	71	58	82%	37	52%	17	24%	2	3%	60	85%	$120,000
Coles HGP	41	34	83%	32	78%	32	78%	11	27%	40	98%	$60,000
COSTCO	15	15	100%	0	0%	0	0%	0	0%	15	100%	$177,750
Aldi	12	8	67%	4	33%	4	33%	0	0%	10	83%	$90,000
Total	**781**	**672**		**316**		**114**		**108**		**749**		**$1,879,950**
% coverage of checkpoints by standards		**86%**		**40%**		**15%**		**14%**		**96%**		

Notes:

1. *Coles establishment staff costs only - Coles pay for their own audits*
2. *COSTCO and ALDI costs for their part of Composite audit.*

The analysis identified seven potentially viable pathways to harmonisation for further evaluation:

1. BRCGS and SQF accept EMSAP equivalence
2. A meat-specific module is added to BRCGS
3. EMSAP accepts equivalency of BRCGS for applicable elements
4. Industry develops a holistic, meat-specific accredited program
5. AUS-MEAT introduce an alternative to SMETA, tailored for the meat industry
6. Commercial customers accept EMSAP Tier 2 as the industry standard
7. Commercial customer addenda are eliminated or reduced through strengthening existing programs (EMSAP, BRCGS, AUS-MEAT or AAWCS).

Of the seven pathways evaluated, the following five are judged to be feasible in principle or have elements of feasibility:

Shortlisted pathways to harmonisation	Feasibility	Timeframe
Pathway 2: A meat-specific bolt-on module is added to BRCGS	Very High	2 to 3 years
Pathway 3: EMSAP accepts equivalency of BRCGS for applicable elements	Possible	4 to 5 years
Pathway 4: Industry develops a holistic, meat-specific, accredited program	Possible	4 years
Pathway 5: AUS-MEAT introduce an alternative to SMETA, tailored for the meat industry (in progress)	High	To be launched 2026
Pathway 7: Commercial customer addenda are eliminated or reduced through strengthening existing programs or Standards.	Very High	2 to 3 years

A high-level review of potential technological tools to facilitate harmonisation was also included in the report. This categorised options into three broad and overlapping areas:

1. **Data verification technologies** that provide secure, validated proof of compliance, accessible only to authorised parties, including secure registers, digital signatures, passports, and verification protocols.
2. **Monitoring technologies** such as AI-enabled CCTV, smart glasses, and Internet of Things (IoT) data capture.
3. **Process efficiency technologies** (e.g., smart systems, AI, etc.) that include predictive risk analysis, automated inspection, non-compliance pattern identification, automated reporting, real-time smartphone reporting, and more.

The report makes the following conclusions:

1. There is a high degree of unnecessary duplication, which is costly, disruptive and stressful, and does not materially enhance food safety and product integrity.
2. The estimated annual compliance cost to industry is $22,257,950, excluding on-site costs and time for the DAFF OPVs, which amount to an additional $75 million per annum. The disruption to industry covers 3,233 days per annum, or an average of 42 days per plant.
3. It is improbable that any of the four mainstream programs (EMSAP, BRCGS, AUS-MEAT, and AAWCS) could be eliminated and will remain the basis of Australia’s red meat compliance.
4. The timing is right to seek change with the consultation suggesting that there is a high degree of frustration within industry, yet a clear willingness was expressed by government and commercial clients to collaborate to find workable solutions for greater harmonisation where duplication can be demonstrated.
5. Five harmonisation pathways have been identified that could feasibly deliver substantial reductions in costs, audit days and stressful disruption.
6. There is significant variation in the degree of difficulty and, therefore, in the realistic delivery timeline between each of the viable pathways to harmonisation.

7. A major reason commercial clients insist on their own audits is that they do not appreciate the comprehensiveness and rigour of the existing mainstream programs, which use different language to describe elements with essentially the same intent, or because they do not trust the rigor of those programs. A major education and communication effort is required to redress these concerns and misconceptions.
8. A holistic, all-encompassing Standard owned by the Australian meat industry would need to be GFSI-accredited to be accepted by commercial customers and government.
9. The wider adoption of technology by processors could substantially reduce the audit burden and a RegTech solution to verification and aggregation of certification could be considered as an industry wide project.

The report also provides high-level guidance for implementing each pathway.

4.0 Introduction

The purpose of this project was to identify opportunities to harmonise the labyrinth of red meat compliance in Australia by pinpointing areas of overlap where audit requirements can be eliminated or reduced, thereby reducing costs and, more importantly, the associated disruption to meat processors.

The project sought to address the increasing complexity, cost, disruption and stress imposed on the Australian red meat processing sector by excessive duplication of audits and the general compliance burden.

The main questions being asked in the research were:

- Where was the duplication of auditing occurring?
- What was the best estimate of cost to industry?
- What was the viewpoint of key stakeholder groups on this issue?
- What pathways were available towards harmonisation?
- What were the practicalities of achieving change?
- What next steps would be required to action lasting improvement in the situation for industry?

The target audience for this report is the Australian Meat Processing industry.

The results provide a sound understanding of the situation surrounding audit duplication, and provide a basis for industry to seek change.

5.0 Project objectives

1. Review of compliance arrangements and costs associated with supplier accreditation and auditing requirements.
2. Identification of areas of duplication and potential harmonisation within programs.

3. Identification of opportunities to reduce compliance costs using technology, software or streamlined systems.
4. Assessment of the feasibility of introducing a harmonised framework for the red meat processing sector.
5. Development of a harmonisation strategy for Australian red meat processors' accreditation and auditing requirements.

6.0 Methodology

In consultation with the project steering committee, a variation to the methodology occurred during the project with the following being the final approach used.

STEP 1: Inception meeting

STEP 2: Desktop discovery of prior knowledge

- Discovery and assimilation of relevant previous work and background information on current QA systems.
- A deep dive into the HARPS harmonisation program successfully operating in the Australian horticultural sector to extract key learnings about the process and outcomes.

STEP 3: Industry engagement

An industry Steering Committee with representation from AMIC and major processors was established by AMPC to oversee the project and provide relevant introductions for the consultation. Engagement was conducted with over 50 personnel from the relevant stakeholder organisations to understand the operational details of the compliance requirements, processes, language and implications for each cohort in the supply chain. The majority of the interviews were conducted in person at the interviewees' premises. The leadership team at AUS-MEAT provided an invaluable technical touch-point at critical milestones throughout the project.

Stakeholder category	Number
Processors (senior management and QA personnel)	27
Standards owners	2
Certifying bodies	7
Commercial clients	10
Government agency personnel	9
Industry officers	3

The original project methodology proposed inclusion of an industry survey, but this was altered due to survey fatigue in the industry and replaced with additional interviews.

STEP 4: Data mapping

The data mapping involved the following stages:

1. The development of a comprehensive database of compliance programs covering all processors and markets.
2. Mapping areas of duplication in a matrix in an Excel spreadsheet, with duplications and overlaps highlighted
3. Checklists were obtained from key customers and mapped against four mainstream programs: EMSAP, BRCGS, AAWACS and AUS-MEAT.
4. AI was used to cross-reference the addenda
5. The findings from the AI analysis were cross-checked by a consultant with vast experience in the meat industry.

STEP 5: Quantifying the cost of duplication

- Estimates of the cost of auditing were extrapolated from the database exercise
- The personnel cost was estimated by allowing 2 days of preparation for each audit day.

STEP 6: Feasibility assessment

The feasibility of a harmonisation scheme for the red meat industry was considered as follows:

- Whether there was sufficient commonality across the programs in terms of attributes and metrics to justify harmonisation, including whether harmonisation could be achieved with some compromise in language, metrics or tolerances.
- Whether customers and accreditation agencies would be willing to participate and the extent to which they are prepared to compromise to achieve harmonisation. This was validated through further consultation with 5 of the 6 major commercial clients.
- Whether pathways were practical and achievable. Multiple meetings were held with the senior personnel at AUS-MEAT to ‘stress test’ pathway assumptions and feasibilty of proposed solutions.

STEP 7: Technology alignment

This desktop review explored potential technologies and process improvements that could be used to reduce audit compliance costs. The technology review also drew on consultations with processors in earlier steps.

STEP 8: Reporting and knowledge transfer

The final report (this document) summarises the key findings from the research stages and provides a high-level guide to implementing the harmonisation scheme successfully.

Project Outputs/Deliverables

1. Project plan
2. Database of compliance programs
3. Mapping and analysis of compliance overlaps
4. Mapping of commercial customer addenda against the major programs
5. Feasibility report
6. Final report with recommendations on implementing the preferred pathways to harmonisation.

Note: Items 2, 3 and 4 and the worksheets with supporting data have been submitted to the Project Manager in a separate data link.

7.0 Results

The results of this research project clearly prove that there is an excessive amount of duplication in audit and compliance activity in the Australian meat industry and that this comes at considerable cost to processors and by default, to consumers. The disruption to industry is not easily measured but the industry consultation suggests that it is pervasive and advancing at an alarming rate.

The first stage of mapping identified at least 66 audit programs with audits spread across the five areas of compliance as follows:

Food Safety	42
Food Quality	27
Trade Description	47
Animal Welfare	25
Corporate and Social Responsibility	6

Collectively, there are 3,233 days of audit time across 78 Tier 2 establishments, averaging 42 days per establishment.

The detailed maps that assess the degree of overlap between the various compliance programs and identifies the gaps have been submitted to the Project Manager in a separate data link. A summary of the overlap between the commercial client addenda and the four major audits is presented in the table below. Both of the two Coles addenda were mapped: CMFRS (Coles Manufacturing Supplier Requirements) and HGP (Hormone Growth Promotant).

Table 1: Major clients audit overlap summary, number and percentage of duplicate checkpoints, 2026

Checkpoints covered by Certification Standard												
Client audits	**Client audit checkpoints**	**BRCGS**		**EMSAP**		**AUS-MEAT**		**AAWCS**		**Client audit covered by one or more audit standard**		**Total est. cost of client audits 2025/26***
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% coverage of checkpoints by standards		**86%**		**40%**		**15%**		**14%**		**96%**		

Source: McKINNA et al, Milestones 4 & 5 report

** Notes:*

3. *Coles establishment staff costs only - Coles pay for their own audits*
4. *COSTCO and ALDI costs for their part of Composite audit.*

Table 2: Estimate of costs of audits for licenced meat exporter 2025/26

Program	Estimated annual industrywide audit cost
EMSAP	$2,652,000
AUS-MEAT includes MSA and HQB	$2,808,000
Halal / Malaysia Halal	$2,964,000
BRCGS – GFSI composite	$829,600
North American Beef composite	$627,200
AAWCS composite	$288,600
Woolworths – WQA Abattoir & Boning every 2nd year composite	$347,200
McDonalds Beef audit Full HACCP/GMP audit composite	$571,200
HACCP certificate	$23,400
McDonalds Animal Welfare – unannounced	$392,000
McDonalds FMG Angus composite	$296,800

McDonalds Grinder Sponsor (every 2 year by McDonalds)	$476,000
North American Animal welfare	$819,000
North American sheep Audit	$430,500
Safe Food QLD /other state authorities/ state Animal Welfare	$780,000
Specific country audits	$936,000
Aldi composite	$90,000
COSTCO addendum audit composite	$90,000
COSTCO Food Safety GMP audit – unannounced	$87,750
A&W burger chain	$520,800
Burger King	$520,800
Wendy's	296,800
Sainsbury / Tesco	$296,800
Coles CFMSR	$120,000
Coles HGP Free	$60,000
AHSLEA	$135,000
ARA	$721,500
SEDEX	$2,067,000
NATA	$165,000
Lab DAFF	$165,000
SQF	$57,500
PFIAA	$1,000,000
Campbell soups	$30,000
Foetal Blood	$65,000
Heart sacs -Edwards or Heart sacs -Maverick	$90,000
Mars	$130,000
Nestle	$130,000
Organic National Standard USDA NOP or Organic Korea	$112,500
Known Consignor/ Trusted Trader or EcoVadis	$65,000
Total	$22,257,950

Note: Figures may differ from cost recovery implementation statement: meat exports 2025–26 (DAFF).

Table 3: Estimate of DAFF fees and charges on meat exports 2025/26

	Unit	**Volume Units (Head)**	**Unit price $**	**Estimated cost 2025/26 $**
Throughput				
Cattle, buffalo, camel	Per animal	9,000,000	0.46	4,140,000
Goat, lamb and sheep	Per animal	33,000,000	0.12	3,960,000
Calf	Per animal	300,000	0.05	15,000
Throughput Total				8,115,000
Audit and inspections				
Standard Audit	Per quarter hour	14,809	64	947,776
Specialist audit	Per quarter hour	20,769	109	2,263,821
FSMA quarter planned	Per quarter hour	920,036	27	24,840,972
FSMA quarter unplanned	Per quarter hour	47,484	39	1,851,876
OPV -quarter hour planned	Per quarter hour	882,030	36	31,753,080
OPV -quarter hour unplanned	Per quarter hour	33,600	51	1,713,600
Electronic certificates	Per document	336,407	5	1,653,664
Manual documents	Per document	1,001	43	43,043
Document - replacements	Per document	2,309	551	1,272,259
Organic certifying organisation	Annual	4	8,608	34,432
Audit and inspections Total				66,374,523
TOTAL				**$74,489,523**

8.0 Discussion

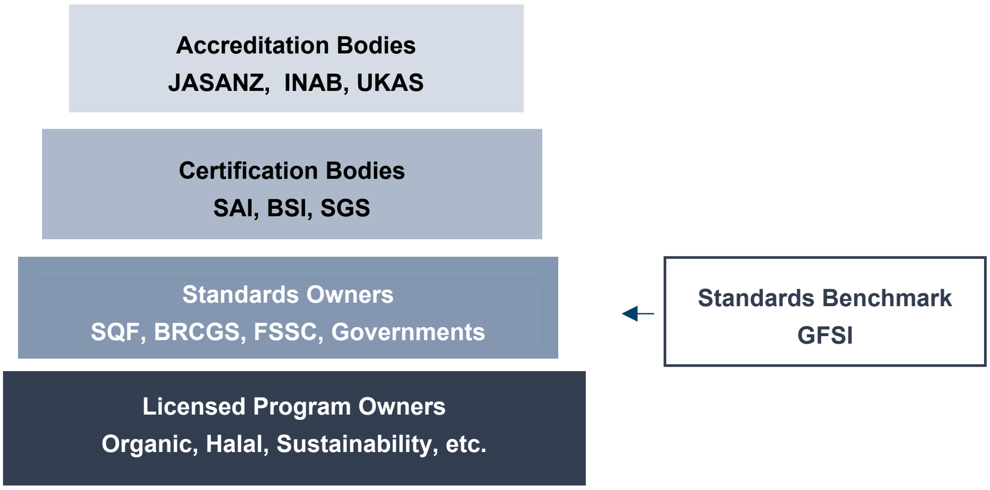
7.1 Background and operating context

The global meat industry has its own complex eco-system of organisations associated with food safety and other accreditation along with extensive government to government intervention in trade. In Australia alone the processing industry has a highly complex compliance regime which is outlined in the Milestone 2 report and summarised here.

Accreditation and certification bodies

The administration and governance of accreditation fall within four cascading tiers of accreditation and certification bodies, as illustrated in the diagram below and explained in the following text.

Hierarchy of compliance systems



Source: McKINNA et al, 2025

Accreditation Bodies

Accreditation Bodies are independent organisations that provide internationally recognised accreditation for audit providers and certifiers. They assess the competence of auditors, certifiers, or inspectors to conduct audits in accordance with specific standards; for example, AUS-MEAT is JASANZ-accredited. The Accreditation Bodies are audited by the International Accreditation Forum (IAF).

Certification Bodies

Certification bodies endorse organisations that can demonstrate that their products and processes meet a specific Standard. These bodies must be accredited and audited by a recognised Accreditation Body in accordance with an international Standard, such as ISO 17065. They are also responsible for monitoring the ongoing performance and competence of individual auditors for their Standard. This monitoring is carried out through training, review of audit reports and witnessed audits.

Standards Owners

Standard owners develop and oversee the published Standards that govern product safety, integrity, legality and quality, as well as the operational controls required to meet them. The Standards specify the required levels of quality assurance and food safety and may be graded to reflect different levels of achievement against a single Standard.

The Global Food Safety Initiative (GFSI) is a benchmarking authority that assesses and endorses the effectiveness of leading global food standards, aiming to bring consistency worldwide to food safety and integrity systems and to reduce excessive cross-border auditing. GFSI-endorsed food standards incorporate elements of good manufacturing practice (GMP), ISO 22000 principles, legislative compliance and HACCP. GFSI was established through a collaboration among global food processors and retailers to reduce duplication of standards within the food industry and improve food safety outcomes worldwide. GFSI benchmarks the two main standards used in Australian meat processing, namely BRCGS and SQF.

Source: SGS, Comparing Global Food Safety (GFS) Recognized Standards, 2022

Licensed Program Owners

Alongside the mandatory standards, private programs are increasingly being introduced to help processors differentiate their products in the marketplace. Examples include ‘organic’ or ‘zero carbon’ certification schemes, breed endorsements, as well as various raising claims. The auditing requirements for most of these Licensed Programs are as rigorous as those for government or commercial standards, but most are voluntary (apart from labelling and raising claims that appear on packaging, which are governed by the Australian Meat Standard).

7.2 Summary of industry engagement findings

The researchers engaged with QA personnel and management from the larger processors; auditors and other industry stakeholders to understand their perspectives on compliance. The following is a summary of the key themes that emerged from these discussions.

1. The fact that Australia has the highest meat standards in the world is both a blessing (because they uphold Brand Australia’s reputation for the cleanest, highest-quality meat) and a curse (because of the cost and disruption).
2. Audits are excessive, highly disruptive, intrusive, costly and do not materially improve food safety and product integrity.

3. Australian processors need to access multiple domestic and international markets to maximise returns on each carcase, which increases compliance costs.
4. There is a perceived double standard among both markets and customers, as they set higher standards for suppliers than they uphold themselves.
5. The risk of losing a market or customer due to non-compliance is highly stressful.
6. Duplication in the audit process is costing everyone money, but it is unclear how the cost burden is shared among the consumer, producer or processor.
7. Increasingly, retailers and food service brands are adding audit items to differentiate themselves and substantiate marketing claims.
8. Brand integrity is just as critical as product integrity; processors are strongly incentivised to uphold product integrity to protect their own brand.
9. There is a perception that auditors are conditioned to look for faults.
10. There is a looming shortage of auditors that will create problems in the future, especially if GFSI goes ahead with its proposed requirement that its auditors be tertiary qualified in food science.
11. QA managers are too distracted by other audit obligations to devote time to continuous improvement.

Consultation was also held with a number of commercial customers, with all but one of the retailers eager to contribute to the discussion. The commercial clients are most certainly aware of the industry position on excessive duplication of effort. Those interviewed all emphasised their willingness to assist in addressing the industry-wide challenge of reducing the cost burden. All the commercial clients were open to further discussions and future collaboration to find workable solutions for greater harmonisation where duplication can be demonstrated. The need to demonstrate clearly where duplication is occurring was emphasised because each retailer has an obligation to their own customers and shareholders to protect their brand and comply with their legal requirements for food safety. The multi-national commercial clients also have obligations to their global head office to maintain their world-wide Standards. All of those interviewed require a GFSI Standard as a minimum.

The major retailers noted that the experience of implementing the domestic HARPS program in the horticultural supply chain has resulted in learnings about the collaborative process towards achieving harmonisation. HARPS is still viewed as a ‘work in progress’ with retailers acknowledging some successes and failures.

The interviews with non-commercial stakeholders also revealed an equally strong willingness to collaborate. DAFF is open to further discussions about accepting equivalency where demonstrated overlap between EMSAP and BRCGS is evident. The auditing bodies communicated the imperative to streamline and automate more workflows to respond to forecast future shortages of auditors. The AUS-MEAT leadership team are highly supportive of working with all stakeholders to achieve greater harmonisation and made a generous contribution of time and expertise to this project.

7.3 Classification of compliance programs

To facilitate the mapping process, it was necessary to classify the compliance programs into 5 levels according to their importance:

1. Obligatory to operate
2. Required to export
3. Essential commercial
4. Discretionary commercial
5. Brand endorsement

The compliance programs were further classified by compliance area to enable the mapping in the later stages, as follows:

- Food safety
- Food quality
- Trade description
- Animal welfare
- Corporate and social responsibility

Compliance database

An exhaustive database was developed using audit checklists provided by processors and major domestic clients (submitted to AMPC via a separate data link). The database identified at least 66 audit programs. Not all listed programs are required by every plant; some plants choose not to process co-products, nor to serve markets such as Malaysia or certain customers due to additional requirements.

Of the audits, the following is the breakdown across the five classifications used in the mapping:

Food Safety	42
Food Quality	27
Trade Description	47
Animal Welfare	25
Corporate and Social Responsibility	6

Collectively, there are 3,233 days of audit time across 78 Tier 2 establishments, averaging 42 days per establishment.

7.4 Costing analysis

Milestone 3 of the project included an estimate of the costs processors must incur to meet compliance requirements from government and commercial clients. The estimates are based on confidential data from major processors, including invoices, reports, fee schedules and operational details. They apply only to the compliance requirements of government and commercial customers for food safety, food quality, product integrity, animal welfare and corporate and social responsibility. The costings do not include other certifications and registrations required to conduct business. The estimates are based on 39 individual audits identified in the Milestone 2 Report and workings from these Excel spreadsheets have been provided to the AMPC Project Manager in a separate data link.

The estimates break down the following components for each audit:

- Frequency per year
- Number of days per audit
- Audit cost per establishment
- Auditor travel cost
- Staff costs for preparation, conduct of audit, follow-up paperwork and corrective action to identified areas of non-compliance
- Annual cost per plant
- Number of establishments
- Total costs.

The estimated direct, total cost of compliance for all Australian processors is $98,973,268 per annum, which equates to almost $1.3 million per establishment. This cost includes an estimate of the time spent by processor staff preparing, facilitating, and following up on paperwork, responding to the identified corrective actions required (CARs), and closing documentation. The total DAFF charges, including the AQIS on-premises veterinarian and FMSA, amount to $74,489,523. (Note: Figures may differ from Cost Recovery Implementation Statement: Meat Exports 2025–26, DAFF).

7.5 Compliance mapping

The project work involved mapping existing programs to assess the feasibility of harmonisation by eliminating or reducing the audit burden. The starting point was to map EMSAP against BRCGS to assess the viability of eliminating or reducing the BRCGS audit. The mapping indicated significant overlap between EMSAP and BRCGS in Food Safety, Trade Description and Animal Welfare. In Food Safety, EMSAP is more comprehensive because it is specific to red meat and ensures compliance with Australian meat export regulations. EMSAP requires evidence that systems and processes deliver food safety and product integrity, whereas BRCGS focuses on demonstrating that the systems and processes are in place.

BRCGS includes additional Food Quality components with a stronger commercial focus. The BRCGS Food Quality measures cover compliance with product and packaging specifications, raising and responsible sourcing claims, allergens, continuous improvement and certification for global retailers. Trade Description and Animal Welfare are covered more comprehensively in EMSAP.

Based on the above findings, EMSAP could supersede BRCGS for Food Safety, Trade Description, and Animal Welfare with minimal compromise, but it falls short on the commercial aspects of Food Quality. Neither EMSAP nor BRCGS adequately covers Corporate and Social Responsibility, which is addressed by SMETA. The BRCGS audit could be substantially reduced to the food quality and product specification components. However, subsequent engagement with major domestic clients and DAFF indicated that this option was not viable. The major clients are heavily committed to GFSI, with BRCGS being the preferred GFSI Standard. Australian BRCGS management indicated that the global organisation would be highly unlikely to consider such a proposal, given the lack of precedent. DAFF also expressed concerns about potential liabilities associated with such an arrangement.

A second exercise mapped BRCGS against the major domestic commercial client programs, including Coles, Woolworths, Aldi, Costco and McDonald's, to assess the extent to which these commercial addenda could be eliminated or reduced. This work concluded that there was a very high degree of overlap, although significant gaps remained in specific customer-ready product attributes requiring attention.

Based on this preliminary mapping, seven potential harmonisation pathways were identified for subsequent viability assessment as outlined below.

1. BRCGS and SQF accept EMSAP equivalence
2. A meat-specific module is added to BRCGS
3. EMSAP accepts equivalency of BRCGS for applicable elements
4. Industry develops a holistic, meat-specific accredited program
5. AUS-MEAT introduce an alternative to SMETA, tailored for the meat industry (in progress)
6. Commercial customers accept EMSAP Tier 2 as the industry standard
7. Commercial customer addenda are eliminated or reduced through strengthening existing programs (EMSAP, BRCGS, AUS-MEAT or AAWCS).

The analysis of the above pathways was workshopped with a team from AUS-MEAT, resulting in a second, more granular stage of mapping to cross-reference the following programs:

1. EMSAP compared to BRCGS
2. Coles' supplier standard compared to BRCGS, EMSAP, AUS-MEAT and AAWCS
3. Coles' HGP standard compared to BRCGS, EMSAP, AUS-MEAT and AAWCS
4. Woolworths standard compared to BRCGS, EMSAP, AUS-MEAT and AAWCS
5. Aldi standard compared to BRCGS, EMSAP, AUS-MEAT and AAWCS
6. Costco compared to BRCGS, EMSAP, AUS-MEAT and AAWCS
7. McDonald's standard compared to BRCGS, EMSAP, AUS-MEAT and AAWCS

The mapping was assisted by AI and cross-checked by a consultant highly credentialled in this area. The outputs form this mapping informed the assessment of each of the seven potential pathways to harmonisation.

7.6 Pathway feasibility assessment

Pathway 1: BRCGS and SQF accept EMSAP equivalence

Discussions with the Australian representative of BRCGS indicated that the organisation would be unlikely to accept any equivalency, given the absence of a global precedent, particularly because EMSAP is not GFSI-benchmarked. The commercial clients have indicated they are strongly committed to BRCGS because it is GFSI-accredited and are unlikely to change this position. Furthermore, DAFF may not support this proposal due to concerns about exposure to liability arising from implied endorsement.

This pathway does not seem to be viable and is not worth pursuing.

Pathway 2: A meat-specific module is added to BRCGS

The BRCGS organisation does offer a number of customised add-on modules, which can be either private or public. These add-on modules are in addition to their core GFSI-benchmarked Food Standard Number 9. So-called ‘public modules’ are added to the BRCGS audit report as an addendum and are on the public record; ‘private modules’ are certified separately, with a private report that goes only to the client. The add-on modules are not GFSI-accredited but are endorsed by BRCGS.

This pathway appears to offer a highly feasible replacement for the collective commercial addenda, but far less so for EMSAP. Leaving aside animal welfare, the issue for commercial customers is that the bulk of the remaining addenda relate to product specifications, packaging materials, shelf-life testing and claims handling, most of which are already covered by BRCGS at a general level and just need to be made more detailed and meat-specific. Given the high degree of commonality across the addenda themes of the key commercial customers, it should be possible to develop an add-on module that captures the high-level, general requirements for all commercial clients. Attempting to cover each client's specific requirements separately would be unworkable, as it would need to include more detailed criteria, each client's preferred measurements and methodologies.

The detailed analysis of the commercial client addenda indicates that an add-on module to BRCGS is the preferred pathway if commercial clients are unwilling to accept the existing programs. Securing buy-in from commercial customers should be achievable, provided they are convinced that the add-on module meets their requirements, as virtually all commercial customers already require a GFSI-benchmarked Standard. The challenge will be aligning all commercial customers on common terminology, criteria and a compliance-checking methodology. Even if only a few commercial customers came on board, this pathway would still effectively harmonise some audit requirements.

The notion that a BRCGS add-on module could supersede the entire EMSAP audit is improbable, but partial acceptance of equivalency is possible (as discussed in Pathway 3 below). This pathway would depend heavily on the regulatory bodies in each importing country accepting partial BRCGS equivalency for EMSAP Approved Arrangements, which is likely to be challenging. However, there is a precedent because the US FDA now accepts BRCGS for imports under its Food Safety Modernisation Act (FSMA), provided the additional private FSMA BRCGS module is included. The FSMA module covers the 5% of US FDA’s requirements not covered by the BRCGS core food Standard. This is discussed in more detail under Pathway 3. The most likely scenario is that the specific country's requirements would still apply in a separate audit.

Potentially, this pathway offers significant benefits and appears to have a reasonable chance of securing buy-in from enough clients to make it worthwhile. However, the likelihood of DAFF accepting BRCGS equivalency for EMSAP in entirety appears low.

Pathway 3: EMSAP accepts equivalency of BRCGS for applicable elements

Given the high degree of alignment between the requirements of the Australian Meat Standard (AS4696) and BRCGS there is a compelling case to put to DAFF for at least partial acceptance of equivalency between BRCGS and EMSAP. However, because of the major gaps in BRCGS for Halal, animal sourcing and the importing countries' other specific requirements (e.g. export documentation, security and integrity), BRCGS could never be expected to fully supersede EMSAP.

This pathway appears to offer strong potential to reduce the number of audit days per facility, perhaps from 8 to 4 (300 total audit days across the industry), which would be a major cost and disruption savings.

Preliminary consultation with DAFF on this project indicated openness to exploring opportunities to accept equivalency for established commercial programs. DAFF currently accept BRCGS for food imports, as do several Australian state government agencies.

Pathway 4: Industry develops a holistic, meat-specific accredited program

A one-stop-shop compliance program would be the utopian pathway, but it faces many challenges. There is precedent in Denmark, which has a GFSI accredited program specifically for meat. Although the Danish Standard is used by a few other countries, it delivers an element of 'brand endorsement' attesting to the safety of Danish meat globally. There is also precedent in Australia's horticultural sector through the HARPs program (Harmonised Australian Retailer Produce Scheme), a universal scheme that covers 80% of domestic clients.

Incorporating EMSAP into the program would be particularly challenging given the complex and diverse requirements of importing countries, although DAFF may recognise the equivalence of some elements under Pathway 3. Even without EMSAP, this pathway would still deliver significant benefits.

The pivotal issue is whether an Australian meat-specific Standard would need to be GFSI-accredited. Realistically, a GFSI-benchmarked Standard is not negotiable for virtually all retail customers and agencies, however, GFSI benchmarking significantly increases the degree of difficulty, complexity, timing, and cost. GFSI endorsement would significantly reduce flexibility in the structure and management of the Standard and would take time to implement. The program would also be subject to annual audits against ever-escalating requirements. Furthermore, if GFSI proceeds with its plan to require auditors to hold tertiary qualifications in food science, there will be a chronic shortage of auditors in Australia with the right skill sets. However, this issue applies equally to BRCGS, which is a GFSI-benchmarked Standard. Realistically, an Australian standard would need to be GFSI-accredited; the question is whether the industry can live with all the incumbrances that come with GFSI.

This pathway would provide the ultimate solution but faces many challenges, the biggest of which is securing buy-in from all Australian processors to maximise its impact on 'brand Australia'. Achieving buy-in on the demand side from clients would be almost impossible without GFSI benchmarking, but having a national standard that is GFSI-approved would certainly add to the program's cost and complexity and significantly curtail industry control.

This pathway will take many years to establish, given the entrenched positions of the various stakeholder groups and the scheme's complexity. Nevertheless, given its attractiveness and the value it could add to the Australian meat brand globally, it would still be worth pursuing. A good starting point would be to examine the Danish GRSM Standard more closely, as outlined in the Milestone 4&5 report's case study.

Pathway 5: AUS-MEAT introduce an alternative to SMETA, tailored for the meat industry

The AUS-MEAT CSR program is planned to launch later in 2026. It could offer significant benefits to the industry, particularly by addressing complications in the PALM scheme and reducing disruption and costs. The program's success will depend on the level of client acceptance. The key test will be clients' willingness to accept the AUS-MEAT alternative to SMETA, despite their apparent strong commitment to SMETA.

Pathway 6: Commercial customers accept EMSAP Tier 2 as the industry standard

Based on discussions with the main domestic commercial customers and DAFF, acceptance of this pathway by both parties would be highly unlikely. The key commercial customers are adamant that suppliers must be accredited to a GFSI-benchmarked Standard, with a preference for BRCGS. Most export customers also require GFSI accreditation. Another potential blocker is DAFF's concern that this pathway may expose the Department to liability, as it could be interpreted as an implied guarantee of safety. This concern could be addressed through an appropriate legal instrument.

On balance, this pathway is highly unlikely.

Pathway 7: Commercial customer addenda are eliminated or reduced through strengthening existing programs

At face value, there are excellent prospects for harmonising the commercial customer addenda, given the more than 95% overlap across the four mainstream programs. At the very least, there should be significant scope to reduce the length and complexity of addenda audits.

Overwhelmingly, the four mainstream audits cover systems and processes related to food safety, trade description, and animal welfare, and On-Premises Veterinarians (OPVs) are on site, continuously checking compliance with the standards.

The fact that customers require duplicate audits for these areas of overlap suggests a combination of three things:

1. Client personnel do not understand the comprehensiveness and rigour of the mainstream compliance regime.
2. There is confusion over the language used in checklists (because different terms are used to describe essentially the same thing, many resort to overly complex, convoluted text to express simple requirements).
3. Clients lack confidence in the rigour of the existing programs.

The above needs to be determined and addressed appropriately during the implementation stage.

The main gaps between the mainstream programs and the commercial addenda relate to product quality, compliance with specific customer specifications, labelling accuracy, segregation, and traceability. Whilst the four mainstream audits cover most of these areas in a general sense, they do not go far enough to address customers' specific requirements, such as standards and tolerances, labelling and packaging integrity. The key differences centre on brand-specific areas and the need to reassure retailers and McDonald's that their specifications are being met. Broadly speaking, the key areas of difference are:

- Being an approved supplier
- Following approved customer specifications
- Product is safely and humanely produced, i.e. animal welfare complies
- Hygiene
- Freedom from foreign bodies, trim level, CLs

- Packed and labelled to customer specifications.

The best possible outcome would be to persuade these companies to drop addendum audits and manage risk through other means, such as technical solutions (e.g. digital or AI systems), given the extensive coverage of the existing programs. The continued presence of the DAFF OPVs on site should increase confidence and their role needs to be promoted to improve understanding.

Having all retailers accept that BRCGS accreditation provides complete coverage of safety requirements would remove many of the issues.

In the most likely scenario, if commercial customers require their specific concerns to be mandated on a separate checklist, the logical solutions probably lie in a BRCGS add-on meat module (Pathway 2) or an expansion of the AUS-MEAT audits. Both cover these areas in general terms but do not go far enough to satisfy commercial customers.

One common theme across many addenda is animal welfare, given the extreme consumer sensitivity to the issue. Engagement with commercial customers makes it clear that some lack confidence in AAWCS. Although the introduction of compulsory CCTV has improved the situation, some still question whether CCTV is sufficiently tamper-proof. Another issue is that AAWCS does not cover transport, which some clients require; it starts with the receipt of livestock at the plant. Transport of livestock is covered by The Australian Animal Welfare Standards and Guidelines for Land Transport of Livestock, a nationally agreed, legally binding State and Territory legislation that sets animal welfare requirements during transport. Ideally, the transport component would be integrated into the AAWCS audit.

There is also a mistaken belief that AAWCS does not monitor or penalise breaches. However, AUS-MEAT indicates that breaches are closely monitored and that premises can lose their AAWCS accreditation and consequently, their ability to export if a non-conformance occurs. Clearly, there is a need to communicate the scope and mechanics of AAWCS more broadly.

None of the broader mainstream audits cover CSR measures in depth, so the SMETA audit or the planned AUS-MEAT alternative could not be eliminated. This was discussed under Pathway 5.

Coles is the only commercial customer requiring a separate HGP audit. The four existing mainstream programs appear to already include the regulatory requirement to support an HGP raising claim. The AUS-MEAT language is the legally accepted support for a raising claim. If Coles cannot be convinced of this, it may be necessary to strengthen the AUS-MEAT standard and escalate enforcement of vendor declarations.

It is believed that many of the above issues stem from a communication problem between customers and the industry, including misunderstandings about the depth of existing audits and policies for addressing breaches. The industry needs to invest to correct such misconceptions.

7.7 Technological tools to support harmonisation

The Milestone Four report provides a high-level review of potential technological solutions to achieve harmonisation across the red meat processing sector. A substantial amount of R&D has been conducted on these solutions, including some funded by AMPC and MLA.

Technical solutions to harmonisation can be categorised into three broad and overlapping areas:

1. **Regulatory technologies**, including secure registers, digital signatures, passports, and verification protocols, provide secure, validated proof of compliance that is accessible only to authorised parties.
2. **Monitoring technologies** such as AI-enabled CCTV, smart glasses, and Internet of Things (IoT) data capture.
3. **Process efficiency technologies** (e.g., smart systems, AI) that include predictive risk analysis, automated inspection, non-compliance pattern identification, automated reporting, smartphone real-time reporting and more.

Of the above categories of technological solutions, Monitoring and Process Efficiency technologies tend to fall into the decision set of individual businesses. Regulatory Technologies (RegTech) however, could offer industry-wide solutions to reduce the cost and complexity of accreditation through data verification and collation of certification.

Australian Agriculture Data Exchange (AADX), formerly known as the Agrifood Data Exchange, could facilitate the sharing of aggregated accreditation certifications from meat processors, so they can be collated once and shared often. While most Standards owners verify establishments certified under their program by posting this on their website, some do not, and there is no single or unique location where all of an individual establishment's verified certifications can be examined. This creates work for QA Managers to collate all certificates when required. This central data repository could be used by State/Territory governments to easily verify Tier 1 and 2 certifications for the issuing of licences.

Most compliance verification processes are currently collected manually and recorded in disconnected digital or paper-based systems. Virtually all compliance programs, across both commercial and government agencies, require processors to provide proof of compliance. This is managed on a need-to-know basis, generally through email exchanges. This is extremely time-consuming; some larger processors have full-time staff on their QA team to manage these exchanges.

More recently, AgTrace Australia has been formed to deliver a traceability verification protocol. The Australian Agriculture Traceability Protocol (AATP) provides a framework and infrastructure for sharing verified claims via a Digital Product Passport (DPP). The DPP is intended to help Australian agrifood producers meet ESG and environmental regulatory requirements in both domestic and export markets. The focus is on traceability and verification of claims. Unlike the Data Exchange concept, the AgTrace platform links data without centralising it. AgTrace ensures information is accurate, traceable, and tamper-resistant by verifying claims. It validates claims against Standards or protocols and issues cryptographically verifiable digital credentials. AgTrace sets a precedent for what a RegTech platform could achieve if the full spectrum of food safety compliance was built in.

A RegTech solution could be useful for the meat processing industry because most commercial addenda relate to supporting product, brand and responsible sourcing claims, e.g. HGP-free, grass-fed, Never Ever, etc., which are currently policed through additional on-site audits. It would seem straightforward to apply a passport system, a secure portal, or a network like the Agriculture Data Exchange through a linked, whole-of-supply-chain verification system. This type of verification solution may reduce the need for audits such as the Coles HGP audit, or for State/Territory governments to verify successful completion of audits. There may also be potential to apply systems like AgTrace to verify equivalency in cases where elements of one program are recognised by another as meeting their compliance requirements.

7.8 Implementation considerations

The report overwhelmingly indicates a compelling business case for the industry to strongly advance the compliance harmonisation agenda. It is beyond the revised scope of this project to develop a comprehensive implementation plan. The following is a high-level implementation roadmap.

Of the seven pathways evaluated, the following five have been judged to be feasible:

Pathway 2: A meat-specific bolt-on module is added to BRCGS

Pathway 3: EMSAP accepts equivalency of BRCGS for applicable elements

Pathway 4: Industry develops a holistic meat-specific accredited program

Pathway 5: AUS-MEAT introduce an alternative to SMETA, tailored for the meat industry (in progress)

Pathway 7: Commercial customer addenda are eliminated or reduced through strengthening existing programs or Standards.

Sequencing and timelines

There is significant variation in the degree of difficulty, and therefore in the timeline to achieve the desired outcome of increased harmonisation.

Pathway 5 is in train, and no further action is needed.

The low-hanging fruit option is Pathway 7. Research overwhelmingly shows that EMSAP, BRCGS, AUS-MEAT, and AAWCS collectively overlap with the various commercial addenda. A large part of the issue is that commercial clients have limited understanding of the comprehensiveness of these existing programs, and that different language is used to describe elements with the same intent. It may be just a matter of education and convincing clients that the gaps are inconsequential to food safety and product integrity.

If that approach fails, the fallback option is Pathway 2, a BRCGS meat-specific add-on module. This pathway will take time to develop because it requires negotiating with BRCGS and securing agreement from the commercial clients on a common set of generic specifications that satisfy all parties.

Pathway 3, where EMSAP accepts elements of BRCGS, is likely to be a slow burn because of the need to meet the requirements of importing countries and to navigate government mechanisms, which are typically slow. The work could commence immediately, but it will inevitably take some years to achieve the desired outcome.

Pathway 4, where industry develops an Australian GFSI-accredited meat Standard, will also take several years to complete, given the complexity of navigating disparate stakeholder agendas, the development work, and the need to obtain GFSI accreditation.

Given that Pathway 5 is already in progress, work on the other four pathways can proceed in parallel, with recognition of differing timelines.

Pathway development steps

Pathways 2 & 7 (A meat-specific bolt-on module is added to BRCGS; and Commercial customer addenda are eliminated or reduced through strengthening existing programs or Standards) could be run together, as Pathway 2 is the logical extension of Pathway 7. Ideally, commercial clients would accept the four mainstream programs (EMSAP, BRCGS, AUS-MEAT, AAWCS) and be prepared to drop the addenda entirely. If some insist on retaining some addenda, the fallback position is either a BRCGS bolt-on module or an augmented AUS-MEAT audit.

The implementation process would involve the following steps:

1. Request ACCC approval to convene a meeting of commercial customers to discuss pre-competitive matters relating to compliance harmonisation
2. Convene a one-day workshop inviting all domestic commercial client QA managers to present and discuss the findings of this project.
3. Commission a consultant to conduct one-on-one working sessions with the QA teams of each commercial client willing to participate. These working sessions would be designed to guide the commercial clients through the detailed maps to assess and negotiate harmonisation options line by line.
4. Engage the consultant to compile a situation analysis that maps the position of all commercial clients and identifies a pathway that accommodates the needs of most clients.
5. Convene a second workshop with QA managers from the participating domestic commercial clients to present and discuss the situation analysis report and to outline the proposed harmonisation pathway. The desired outcome of this workshop is a collective agreement on the way forward, with the aim of achieving the ideal of eliminating all addenda.
6. An MOU would be drafted to formalise the agreement between industry and all commercial clients.

If enough clients insist on retaining certain addenda, the next step is to explore the BRCGS meat-specific add-on module.

1. The first step would be to meet with the BRCGS Australian representatives to be briefed on the requirements, essential elements and limitations of an add-on module. BRCGS has a detailed process that must be followed.
2. The module will be developed in close consultation with the client's QA teams, under the direction of the appointed consultant.

The advancement of Pathway 3 (EMSAP accepts equivalency of BRCGS for applicable elements) will largely be in DAFF's hands. The starting point would be for AMPC to convene a meeting with relevant senior management at DAFF to discuss the proposal and outline the detailed mapping. Provided there is positive interest, DAFF would be encouraged to assign a technical team to review the mapping and assess feasibility from its perspective. Any proposal would likely need to be formally reviewed by BRCGS.

Pathway 4 (Industry develops a holistic, meat-specific, accredited program) would realistically involve a long, protracted process over several years, but could offer additional benefits beyond harmonisation (i.e., adding value to Brand Australia).

1. The first checkpoint would be for industry stakeholders to reach an in-principle agreement to pursue this pathway. This would likely require forming an industry task force to canvass the proposal and gauge interest, recognising that GFSI accreditation restrictions may make the scheme unattractive to industry.
2. The second checkpoint would be to canvass the level of support for such a scheme among client stakeholders, including EMSAP and the long tail of commercial clients, including overseas companies

3. Assuming the proposal passes the two checkpoints above, there would be a feasibility study and a business case for consideration by industry stakeholders. If the proposal does not pass these two tests, the project would be aborted.
4. Assuming there is sufficient industry agreement to proceed with the proposal, the next step would be to form a technical task force to develop the program's details.
5. Early in the development process, it will be important to engage with GFSI to understand the certification requirements. It may also be worthwhile to engage with the managers of the Danish GRMS program to see whether they are willing to share their experience in development and governance.
6. Appoint a technical task force, led by a consultant, to develop the program and checklists.
7. Submit program to GFSI for accreditation.
8. Finalise details of the program.
9. Establish an industry-owned entity to manage the program, together with a board and supporting technical advisory committees.

It will be critical to engage with the wider Australian industry throughout this pathway, as its power will not be fully realised unless it is adopted by the major processors.

Implementation structure

This report summarises viable harmonisation pathways and outlines a roadmap for their implementation. A structure will be needed to advance the project, with AMPC leading the way and inviting appropriate involvement from AMIC and MLA. At this point, the project remains in the R&D stage. Further development needs to be overseen by independent parties without commercial or political agendas. To this end, it is proposed that AMPC and MLA jointly establish a working group comprising representatives of both organisations and a cross-section of industry stakeholders with suitable technical expertise to oversee the next stage of development. This working group will require a resource to implement the recommended action steps. AUS-MEAT would be the logical choice to fill this role, as a jointly owned entity of AMPC and MLA with deep expertise in compliance matters. The alternative would be an independent consultancy.

Client advisory committee

Given the highly dynamic nature of the compliance space, it is critical to have a vehicle for ongoing dialogue with commercial clients to gather feedback on the scheme's operation, flag potential issues, suggest changes and, most importantly, drive further improvement. It is therefore proposed that an advisory committee be established to meet regularly. All participating commercial clients would be invited to serve on the committee.

9.0 Conclusions

This report makes the following conclusions:

1. The processing industry is highly frustrated by the excessive duplication of compliance demands from governments and commercial clients, which is costly, disruptive and stressful, but, most importantly, in their view, does not materially improve food safety or product integrity. The detailed analysis for this project strongly indicates a high degree of overlap across the mainstream programs required by commercial and government clients (EMSAP, BRCGS, AUS-MEAT, and AAWCS), with significant scope to reduce the compliance burden.
2. The estimated annual compliance cost to industry is $22,257,950, excluding on-site costs and time for the DAFF OPVs, which amount to an additional $75 million per annum. More importantly, it is highly disruptive to processors, totalling 3,233 days per annum, or an average of 42 days per plant.
3. Realistically, for reasons outlined in the report, it is improbable that any of these four mainstream programs (EMSAP, BRCGS, AUS-MEAT, and AAWCS) could be eliminated and will remain the basis of Australia's red meat compliance. Consequently, any harmonisation must come from achieving acceptance of the comprehensiveness and rigour of these four programs as a basis for removing or reducing other audits.
4. The timing is right to seek change with the consultation suggesting that there is a high degree of frustration within industry, yet a clear willingness was expressed by government and commercial clients to collaborate to find workable solutions for greater harmonisation where duplication can be demonstrated.
5. Based on the above proposition, the report has identified that components of five of the seven potential pathways may be viable:

   Pathway 2: A meat-specific bolt-on module is added to BRCGS

   Pathway 3: EMSAP accepts BRCGS equivalency for applicable elements

   Pathway 4: Industry develops a holistic meat-specific accredited program

   Pathway 5: AUS-MEAT to introduce an alternative to SMETA, tailored for the meat industry (in progress)

   Pathway 7: Commercial customer addenda are eliminated or reduced by strengthening existing programs or Standards.
6. There is significant variation in the degree of difficulty of the various pathways, and therefore in the realistic delivery timeline. Although all are judged feasible, the outcome for each pathway will depend on reconciling the positions of disparate stakeholder groups, particularly the willingness of commercial clients, importing countries and DAFF to accept the respective pathways. The 'low-hanging fruit' option is identified as Pathway 7.
7. Commercial clients insist on their addenda audits for several reasons, some of which may be rectified with an education and engagement program:
   - They do not appear to appreciate the comprehensiveness and rigour of the current mainstream program.
   - They are confused, using different language to describe elements with essentially the same intent.
   - They do not trust the rigour of the existing programs.

8. A holistic, all-encompassing Standard owned by the Australian meat industry would need to be GFSI-accredited to be accepted by commercial customers and government.
9. The wider adoption of technology by processors could substantially reduce the audit burden and a RegTech solution to verification and aggregation of certification could be considered as an industry wide project.

10.0 Recommendations

1. It is recommended that the key findings from this report be widely distributed to industry and client stakeholder groups to build awareness and advance the identified opportunities to substantially reduce the audit burden.
2. It is further recommended that AMPC and MLA jointly convene a task force to advance the identified opportunities outlined in the report.

Tangible deliverables for this project that provide further detail on the research findings include:

Milestone 1 Report: Project plan

Milestone 2 Report: Compliance database

Milestone 3 Report: Compliance mapping

Milestones 4 & 5 report: Commercial customer consultation & feasibility assessment

Appendices: Items 2, 3 and 4 and the worksheets with supporting data have been submitted to the Project Manager in a separate data link.

11.0 Bibliography

No references were used in the final report.

12.0 Appendices

Due to the size and complexity of the spreadsheets generated, this information has been submitted to the Project Manager in a separate data link.

11.1 Case Study: The Global Red Meat Standard (Denmark)

The following GFSI standards all cover ‘processing of perishable animal products’, but the Global Red Meat Standard (GRMS) is the only GFSI Standard in the world that is specific to red meat in its entirety.

Table 1: GFSI accredited Standards that cover processing of animal products

BRCGS	FSSC 22000	Global Red Meat Standard
Global Red Meat Standard	Global Seafood Alliance	IFS International Featured Standards
Japan Food Safety Management Association	SQF	SQF

Source: myGFSI.com

11.1.1 GRMS overview

The Global Red Meat Standard (GRMS) is an industry-owned Standard that has been accredited with GFSI since 2006. All Danish slaughterhouses and cutting plants have implemented the GRMS standard but sites are also approved in Belgium and Sweden.

GRMS has been designed with input from the Danish Meat Research Institute. It is uniquely for red meat facilities, specifically for slaughtering, cutting and deboning. Because the scope is narrow, GRMS is claimed to be easier to comply with in the processing plant compared to BRCGS, but also captures all the issues unique to meat, such as animal welfare, chemical use and environment. The red meat species covered in GRMS are pork, beef, lamb, sheep, goat and horse. It also claims to contribute to 11 of the United Nation’s 17 Sustainable Development Goals.

GRMS is owned and was initiated by the Danish Agriculture and Food Council (DAFC), which is the industry peak representative body with a far wider mandate than accreditation. DAFC membership encompasses all Danish food industries. Its member base spans the entire food supply chain from farm to retail/foodservice and includes agricultural associations, corporates (including dairies, slaughterhouses, feed and supply companies, processors, traders, manufacturers of machinery and equipment, research and advisory companies) and family farming businesses. It exists to drive advocacy, R&D, member services, environmental stewardship, animal welfare develop food and trade policy and represent Denmark’s interests in the EU food arena.

11.1.2 GRMS background

The DAFC owns GRMS because food safety is one if its most important mandates. Danish food safety legislation is claimed by Denmark to be highest in the EU member states, so the development of GRMS aimed to verify this and create a GFSI standard that was more relevant to meat, particularly pork, which is a key export for Denmark. Other reasons stated are:

1. BRCGS was not granular enough for red meat
2. Animal welfare and traceability were not integrated in other Standards
3. To leverage the premium quality and high food safety standards of Danish pork exports and support ‘Brand Denmark’.

11.1.3 GRMS scope and governance

GRMS is overseen by a governance board of three people that is chaired by DAFC chair and is managed by a secretariat. There is a technical working group (including government, DAFC and two industry representatives) that ensures technical accuracy and drives continuous improvement. A stakeholder group has also been formed to discuss interpretation issues as they arise.

There are two certifying bodies, one in Belgium and one in Denmark who are subject to an integrity monitoring process that includes continuous improvement.

GRMS approved sites are listed on the website: www.grms.org.

The scope of the GRMS Version 7 checklist covers the following areas:

3. Management system
4. Quality system
5. Food safety system
6. HACCP system
7. Production site standards
8. Animal welfare
9. Process management and production monitoring
10. Monitoring equipment
11. Personnel, external labour and visitors

11.1.4 The audit process

The GRMS audit process categorises requirements in two areas: practise and documentation

First audit: Unannounced for 2 days plus 1 day reporting

Ongoing audits: Annual then every 3 years, the audit of already certified sites will be unannounced within a window of 8 weeks.

Typical minimum audit duration related to activities and scope are:

- Head office (separate audit), slaughterhouse and deboning: 1.5 days

- Casing facility: 0.5 day

Follow up audits may be carried out for non-compliance.

GRMS is tailored to business-to-business meat customers rather than retailer or foodservice customers. It integrates animal welfare and strict meat hygiene laws into a food safety management system.

11.2 List of acronyms

Acronym	Full form / meaning
AAWCS	Australian Animal Welfare Certification System
ACCC	Australian Competition and Consumer Commission
AHSLEA	Australian Hide, Skin and Leather Exporters Association
AI	Artificial intelligence
AIO	Approved Islamic Organisation
AMIC	Australian Meat Industry Council
AMPC	Australian Meat Processor Corporation
AQIS	Australian Quarantine and Inspection Service
ARA	Australian Renderers Association
AS	Australian Standard
AUS-MEAT	Australian Meat and Livestock Classification Services
BRCGS	Brand Reputation Compliance Global Standards (formerly BRC)
CAR	Corrective action request
CFMSR	Coles Food Manufacturing Supplier Requirements
CCTV	Closed-circuit television
CSR	Corporate and social responsibility
DAFF	Department of Agriculture, Fisheries and Forestry
EMSAP	Export Meat Systems Audit Program
FDA	Food and Drug Administration
FMSA	Food Safety Meat Assessor
FSMA	Food Safety Modernization Act
GFSI	Global Food Safety Initiative
GMP	Good manufacturing practice

GRMS	Global Red Meat Standard
HACCP	Hazard Analysis and Critical Control Point
HARPS	Harmonised Australian Retailer Produce Scheme
HGP	Hormonal growth promotant
HQB	High Quality Beef
IAF	International Accreditation Forum
IoT	Internet of Things
ISO	International Organization for Standardization
JASANZ	Joint Accreditation System of Australia and New Zealand
MLA	Meat & Livestock Australia
MOU	Memorandum of understanding
MSA	Meat Standards Australia
NATA	National Association of Testing Authorities
NOP	National Organic Program
OPV	On-Premises Veterinarian
PALM Scheme	Pacific Australia Labour Mobility Scheme
PFIAA	Pet Food Industry Association of Australia
QA	Quality assurance
R&D	Research and development
RDC	Rural Research and Development Corporation
SEDEX	Supplier Ethical Data Exchange
SMETA	Sedex Members Ethical Trade Audit
SQF	Safe Quality Food
USDA	United States Department of Agriculture
WQA	Woolworths Quality Assurance