



National Competition Policy analysis 2025

INTERIM REPORT
5 September 2025

1 About AMIC

The Australian Meat Industry Council (AMIC) is the peak body representing the post-farm gate red meat industry. AMIC members include businesses processing red meat for domestic and export consumption, smallgoods manufacturers, boning rooms, cold stores, wholesalers, distributors and independent retail butchers.

The post-farm gate meat industry employs approximately 190,000 people directly and indirectly and is often the single largest employer in rural and regional areas, underpinning vitality and sustainability of Australia's agricultural sector and regional communities. In 2023-24, household income from people employed by the red meat processing sector was \$17.8 billion¹.

Meat and meat product manufacturing is the largest employer in the Australian manufacturing sector, employing 67,000 employees², with a further 25,000 employed in meat and retailing³.

The Red Meat Processing sector contributed 1.21% to Australia's GDP and the post farm-gate industry plays a critical part in a modern, vibrant economy⁴.

2 Summary

The Australian Meat Industry Council (AMIC) welcomes the opportunity to provide input on the Productivity Commission's Interim Report on the National Competition Policy (NCP) Analysis.

Standards play a critical role in underpinning domestic and international trade, safety, and efficiency in Australia's meat industry. They provide assurance across domestic and export markets, while also imposing obligations that, if inconsistent, outdated, or inaccessible, can increase compliance costs and undermine productivity.

AMIC supports the Productivity Commission's focus on ensuring that mandated standards are fit-for-purpose, consistent across jurisdictions, and aligned with international best practice. The Interim Report's findings highlight significant issues that directly affect AMIC members, particularly:

- The high proportion of bespoke Australian Standards with no international equivalent
- The lack of consistency in how mandated standards are applied across jurisdictions
- The substantial proportion of outdated standards still referenced in legislation

Limited public accessibility to mandated standards creates barriers to compliance and participation, particularly for small and medium-sized businesses.

3 Standards

AMIC supports greater harmonisation of Australian Standards with international and overseas standards, where this delivers practical benefits to industry and does not compromise food safety, biosecurity, product integrity, or market access.

¹ *Evaluating the socio-economic benefit of the red meat processing industry in regional Australia 2024*

² Australian Bureau of Statistics (ABS) 2024, *Table 1 Manufacturing industry by ANZSIC class*

³ Australian Bureau of Statistics (ABS) *Census 2021*

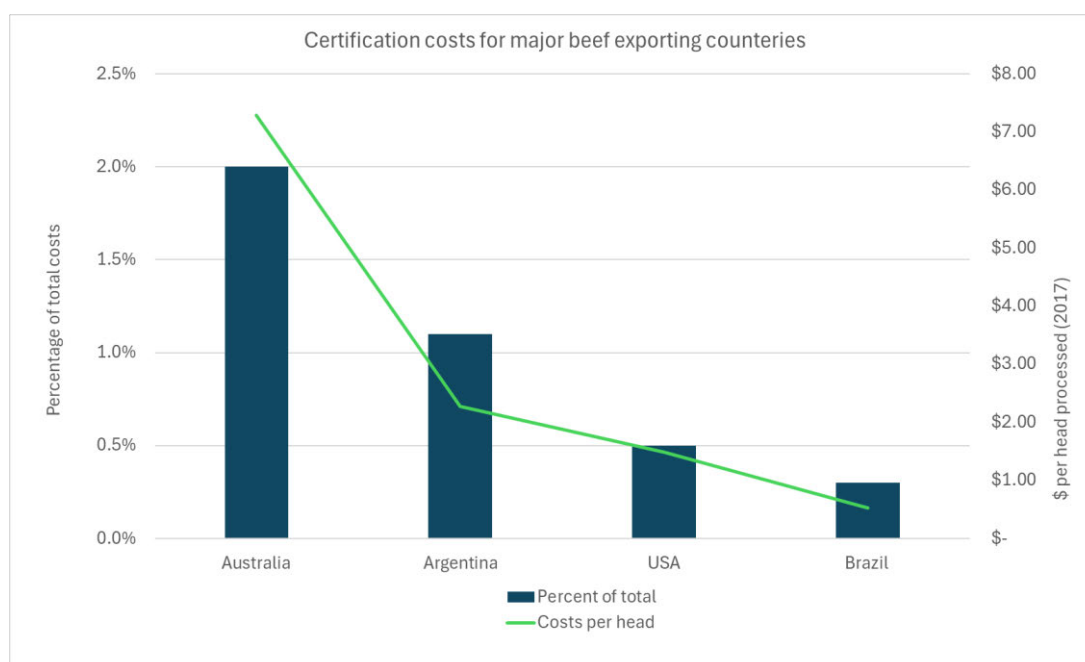
⁴ *Evaluating the socio-economic benefit of the red meat processing industry in regional Australia 2024*

AMIC notes that of the 893 Australian standards mandated in legislation, 352 (about 40%) relate to the manufacturing sector (which includes red meat processing) and of these 248 (about 70%) have no international equivalent standard⁵.

The Australian red meat processing sector incurs high costs associated with certification and associated audits. For example, in beef processing the weighted estimated average cost is 2 per cent of total operating costs⁶. These costs are associated with meeting public standards, required under Australian legislation to process and export beef, and those required to meet commercial or external standards.

Divergence from international standards should only occur where justified by uniquely Australian conditions, risks, or consumer expectations.

Certification costs for Australian red meat processing facilities are far higher than their global competitors. As a proportion of total processing costs, Australian certification costs are 182% higher than Argentina, 400% higher than USA and 667% higher than Brazil⁷, as highlighted below. This makes a significant difference when competing in global export markets.



There are at least 17 separate certification programs operating in the Australian beef industry alone, incorporating both voluntary and regulated standards. Compliance with these requirements is costly and extremely disruptive to processing businesses, particularly when they utilise different standards but duplicate areas of audit and compliance. This issue was acknowledged in the recent ACCC Supermarkets Inquiry which recommended harmonisation of accreditation and auditing requirements (Recommendation 11).

⁵ Productivity Commission Interim Report on NCP Analysis 2025

⁶ Analysis of regulatory and related costs in red meat processing, AMPC 2018. Note: Total operating costs include labour-related costs, utilities-related costs and certification-related costs

⁷ Analysis of regulatory and related costs in red meat processing, AMPC 2018

AMIC strongly supports the Commission's recommendation to harmonise regulatory requirements across states and territories. Inconsistent application of mandated standards adds unnecessary cost and complexity for businesses operating in multiple jurisdictions. This is exacerbated for the red meat industry when considering the various areas of regulation and compliance that apply, including food safety, biosecurity, animal welfare, labour and the environment.

A nationally consistent approach is essential to ensuring a level playing field within Australia and against our international competitors, and ensuring regulation is streamlined, fit-for purpose and overall minimises the regulatory burden.

AMIC supports the Commission's call to update laws to reference current versions of standards. AMIC supports exploring options for free or low-cost access to mandated standards.

Current paywall barriers disproportionately affect smaller operators, limiting their ability to fully comply and engage. However, AMIC recognises this is a complex issue requiring careful consideration of Standards Australia's funding model and the role of cross-subsidisation in standards development.

AMIC emphasises the importance of preserving Australia's transparent, consensus-based approach to standards development. Reforms must not bypass established processes or sideline expert industry input, as this risks undermining confidence in the system and creating fragmented or inconsistent regulatory framework.

4 Occupational licensing

AMIC notes the report's focus on occupational licensing as a key area where regulatory reform could deliver productivity gains and reduce red tape. Within the post-farmgate meat industry there is a dependence on high-risk trades, such as electricians, to be able to operate in plants across different jurisdictions. Licensing reform would promote labour mobility and improve productivity, as workers move to places where their skills are most needed and valued.

Harmonisation of occupational licensing across jurisdictions would also help individuals wishing to deliver specialised services to clients across Australia, e.g. tradespeople specialising in red meat processing.

Duplication across jurisdictions and inconsistent application of licensing frameworks add unnecessary compliance costs for businesses operating across multiple states and territories, reduces the ability to effectively allocate staff across state borders, and adds extra burden and costs to meat production.

AMIC supports reforms that:

- Streamline occupational licensing and accreditation requirements across jurisdictions
- Promote national consistency in competency standards and mutual recognition arrangements
- Ensure licensing remains risk-based and proportionate to the outcomes it seeks to achieve

5 Additional National Competition Policy reforms

AMIC recognises that workforce shortages and labour market constraints remain a structural challenge for the meat industry, requiring regulatory settings that support, rather than restrict, access to skilled and unskilled workers.

AMIC notes the importance of ensuring reforms under the NCP continue to promote fair competition while supporting the competitiveness of Australian meat processors and exporters in global markets.

6 Conclusion

AMIC urges the Productivity Commission and governments to:

- Prioritise national consistency and harmonisation of mandated standards
- Provide practical solutions to reduce cost burdens on business, including improved accessibility to mandated standards
- Avoid regulatory changes that duplicate or bypass existing standards development frameworks

AMIC supports the proposed reforms and encourages the adoption of a practical, nationally consistent approach that supports both regulatory integrity and industry competitiveness.

AMIC will continue to engage with the Productivity Commission, Standards Australia, and government stakeholders to ensure that any reforms strengthen rather than weaken Australia's standards system.

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