

**Regulation of Australian Agriculture, Productivity commission Draft Report, July 2016 –
Information Request 9.2**

The NSW Egg Farmers' Association is grateful for the in-depth assessment of its submission on egg stamping.

The Association noted that the Productivity Commission is seeking information (request 9.2, page 372) on;

- a) The costs and benefits of egg stamping relative to alternative traceability systems for eggs and
- b) Examples where the source of an outbreak of salmonellosis caused by eggs could not have been traced in the absence of egg stamping The Association is not aware of comparative Australian or overseas data that enables such a comparison.

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Regarding (b), the Association is not aware of reported outbreaks in Australia that could not be traced because of the absence of egg stamps. The Association knows of only one egg recall (RL Adams, Darling Downs, Qld, March 2015 (<https://www.recalls.gov.au/content/index.phtml/itemId/1068908>) where individual egg stamps were publicised in addition to the carton identifying features.

The Association is aware of egg recall data (ACCC, Product Safety Recalls, Australia, <https://www.recalls.gov.au/content/index.phtml/itemId/952826/fromItemId/952823>) that imply optimal traceability without egg stamping.

- The recall data on the ACCC site is available from 1999 onward.
- Egg stamping was introduced in NSW at the end of November 2014 and although NSW experienced egg associated Salmonella outbreaks prior to egg stamping, not one industry-wide recall (or any egg recall) was reported in NSW from 1999 to 2014 (ACCC, Product Safety Recalls, Australia).
- Considering the FSANZ claim in its RIS that inability to trace the source would lead to industry-wide recalls, their absence suggests that traceability was possible for all outbreaks, even prior to the introduction of egg stamping in NSW.
- This is consistent with the acknowledgement by the NSW Food Authority in its 2005 RIS that packaging labelling requirements were sufficient to enable traceability.

The Association has appreciated the opportunities to provide information to Foo Cordelia, Research Economist with the Productivity Commission, during the formation of the draft report and looks forward to the opportunity for further contribution in respect to new data that may be received by the Commission in response to 'information request 9.2'.

Yours Sincerely
Joe Damjanovic
(President NSW Egg Farmers Association Inc.)