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# Export Meat Operational Guideline

## 3.13 Use of hazardous materials on-plant



### Purpose

This document provides departmental operational guidance on the use of hazardous materials in export-registered meat establishments to ensure compliance with export legislation and importing country requirements. It specifies:

- responsibilities in relation to the supply, management, use and storage of hazardous materials (chemical compounds) at export-registered establishments and during transportation of edible product
- a system where vendors of chemicals to the export meat, wild game and poultry industries shall provide assurances to the industry using a 'Declaration of assurance for hazardous material use at Department of Agriculture, Fisheries and Forestry export-registered meat establishments' ([Attachment 3](#)).

### Scope

This document covers management of chemical usage in export-registered meat establishments to ensure:

- chemical usage is not hazardous to animals
- chemical usage does not contaminate or cause unacceptable chemical residues in edible product.

### Legislative basis

Under the *Export Control Act 2020*, and Export Control Rules 2021 (meat, wild game and poultry) there are legislative requirements relating to:

- an establishment to be approved for export registration
- compliance with the Australian Standard for an arrangement to be approved ('approved arrangement')
- requirements to be compliant with the [Australia New Zealand Food Standards Code](#).

## In this document

Principles.....	3
Hazardous materials.....	4
Processing aids and food additives .....	4
Related Material.....	5
Attachment 1: Roles and responsibilities.....	6
Departmental auditors .....	6
Departmental on-plant officers .....	6
Export-registered establishments.....	6
Vendors of hazardous materials .....	6
Attachment 2: Definitions .....	7
Attachment 3: Declaration of assurance for hazardous material use at Department of Agriculture, Fisheries and Forestry export-registered meat establishments.....	8
Attachment 4: Information regarding hazardous materials (chemical compounds) used at export- registered meat establishments .....	9
Hazardous materials requiring vendor declaration .....	9
Chemical compounds that do not require departmental approval/acceptance.....	10
Hazardous materials in common use with general acceptance .....	11
Hazardous materials that are not acceptable for use in export-registered meat establishments.....	11
Potentially harmful compounds requiring manufacturers declaration .....	11
Edible oils .....	12
Odorous compounds .....	12

## Principles

The Australian standards for meat and wild game provide instruction for the use and management of hazardous materials and chemicals at processing establishments. 'Hazardous materials' include cleaning compounds, pesticides, detergents and sanitisers. 'Other chemicals' examples include processing aids, food additives and edible oils (see Figure 1).

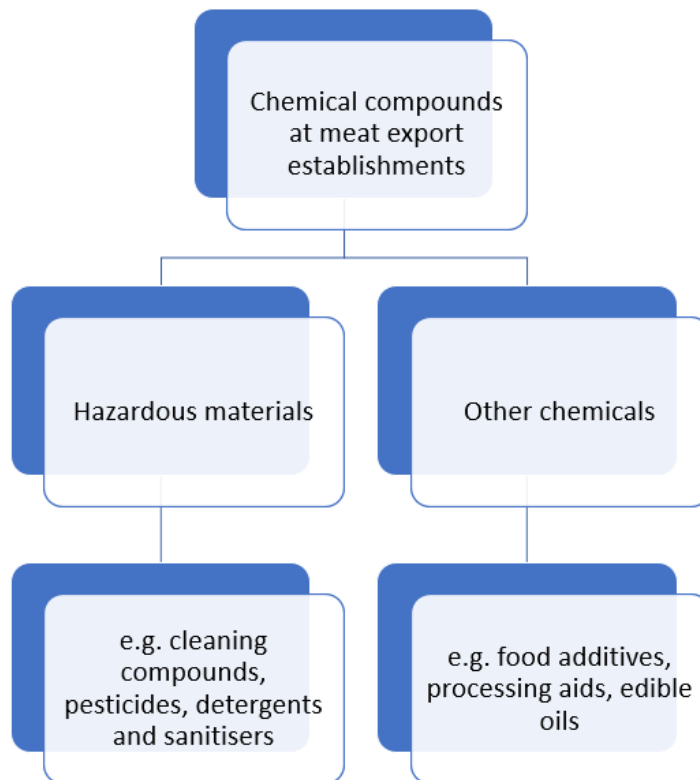


Figure 1: Diagram summarising guideline terminology with some examples of 'hazardous materials' and 'other chemicals'.

All chemical compounds used must be fit-for-purpose and managed in such a way as to prevent contamination of animals and edible products. This guideline applies to all export-registered meat, wild game and poultry establishments (Tier 1 and Tier 2) (see Attachment 2: [Definitions](#)).

## Hazardous materials

Hazardous materials must be stored and handled so as not to jeopardise the integrity and wholesomeness of edible products.

Before using a hazardous material (listed in paragraph 1 of Attachment 4: [Information regarding hazardous materials \(chemical compounds\) used at export-registered meat establishments](#)) establishments must obtain all of the following:

- A declaration of assurance from the vendor, which has been signed and dated by a qualified chemist.
- A copy of a Material Safety Data Sheet (MSDS) or a Safety Data Sheet (SDS) for each hazardous material used at the establishment (See Attachment 3: [Declaration of assurance for hazardous material use at Department of Agriculture, Fisheries and Forestry export-registered meat establishments](#)).
- Any necessary evidence to substantiate 'fit-for-purpose' of any hazardous materials such as list of ingredients, instructions for use and/or evidence of general acceptance.

## Processing aids and food additives

The [Australia New Zealand Food Standards Code](#) (the code) sets out requirements regarding processing aids and food additives that may be used to manufacture food in Australia. Part 1.3 of the code should be read in conjunction with other relevant parts of the code. The code is published on the Food Standards Australia New Zealand website.

Although a substance may be permitted for use in a particular type of food by the code, export-registered establishments must also meet any relevant importing country requirements. For example, certain destinations do not accept the use of anti-microbial washes (the substances used in such washes are processing aids). Importing country requirements for the use of processing aids and food additives are available in the department's [Manual of Importing Country Requirements \(Micor\)](#) database.

## Related Material

The following related material is available on the department's website:

Webpage: [Approved arrangement guidelines – Meat](#)

Webpage: [Approved arrangement guidelines – Wild game meat](#)

Webpage: [Approved arrangement guidelines – Poultry](#)

The following related material is available on the internet:

- Webpage: [Export Control Act 2020](#)
- Webpage: [Export Control \(Meat and Meat Products\) Rules 2021](#)
- Webpage: [Export Control \(Wild Game Meat and Wild Game Meat Products\) Rules 2021](#)
- Webpage: [Export Control \(Poultry Meat and Poultry Meat Products\) Rules 2021](#)
- Webpage: [Australian standard for the hygienic production and transportation of meat and meat products for human consumption \(AS4696\)](#)
- Webpage: [Australian standard for the hygienic production of wild game meat for human consumption \(AS4464\)](#)
- Webpage: [Food Standards Code](#)

Webpage: [Manual of Importing Country Requirements \(Micor\)](#)

# Attachment 1: Roles and responsibilities

## Departmental auditors

- Ensure that the export establishment's approved arrangement has a documented system to effectively manage the sourcing, use and storage of each hazardous material in use and/or stored at the export establishment.
- Verify during audits, ongoing compliance with the establishment's approved arrangement to maintain the integrity and wholesomeness of export product.

## Departmental on-plant officers

- Consistent with the establishment's approved arrangement, monitor implementation and on-going compliance, sourcing, use and storage of hazardous materials.
- Conduct the required frequencies of independent verification checks and record results.
- Report any non-compliance through the Audit Management System (AMS)/ Meat Establishment Verification System (MEVS).

## Export-registered establishments

- The export-registered establishment is responsible for ensuring their approved arrangement (AA) is approved and compliant with:
  - this document, and the Australian standards relating to the sourcing, use, management, and storage of hazardous materials
  - any importing country requirements relating to use and storage of hazardous materials.
- The AA should also reference:
  - a system to document the sourcing and use of hazardous materials at their establishment
  - procedures to ensure that hazardous materials are fit-for-purpose
  - procedures to ensure hazardous materials do not contaminate animals and/or their meat and their meat products
  - performance indicators for the control of hazardous materials as outlined in Section 8 of Part 2 of the department's approved arrangement guidelines.
- Establishment management must ensure copies of declarations, instructions for use, associated MSDS or SDS and/or other evidence of fitness for purpose is held on establishment files accessible to company operators for guidance and departmental officers for verification purposes.

## Vendors of hazardous materials

- Vendors supplying hazardous materials to export establishments will provide assurances, by way of a declaration, of fitness for purpose of those hazardous materials to export establishments (refer to Attachment 3: [Declaration of assurance for hazardous material use at Department of Agriculture, Fisheries and Forestry export-registered meat establishments](#) for declaration format).
- Provide instructions, list of ingredients and/or any other relevant information necessary to substantiate the declaration and provide appropriate details relating to the hazardous material.

## Attachment 2: Definitions

### Approved arrangement (AA)

As per the Export Control (Meat and Meat Products) Rules 2021, means an arrangement approved under Chapter 5 of the Export Control (Meat and Meat Products) Rules 2021.

As per the Export Control (Wild Game Meat and Wild Game Meat Products) Rules 2021, means an arrangement approved under Chapter 5 of the Export Control (Wild Game Meat and Wild Game Meat Products) Rules 2021.

As per the Export Control (Poultry Meat and Poultry Meat Products) Rules 2021, means an arrangement approved under Chapter 5 of the Export Control (Poultry Meat and Poultry Meat Products) Rules 2021.

### Chemical compounds

A subset of potentially hazardous materials/substances. Chemical compounds can have the same meaning of chemical, hazardous substance(s) or hazardous materials in this document and in referenced documents.

### Chemist

A suitably qualified person who has had direct involvement or experience in the manufacture of the hazardous material.

### Departmental Auditor

As per the *Export Control Act 2020*, means an authorised officer who is an officer or employee of a Commonwealth body.

### Departmental on-plant officers

As per the *Export Control Act 2020*, means an authorised officer who is an officer or employee of a Commonwealth body and has presence during production for export at an export-registered establishment.

### Hazardous materials

Substances that are used in, or as a condition of, food and/or food processing at export establishments that can cause an adverse health effect in humans if not used in accordance with the manufacturer's instructions.

### Tier 1 export-registered establishment

An establishment operating under the Export-Registered Australian Standard Meat Establishment (Tier 1) Scheme. Tier 1 relates to exports of food and agriculture products prepared under the requirements of the relevant Australian standard (AS). Tier 1 establishments are managed by state and territory governments on behalf of the department. On a regular basis, the department verifies the state or territory ability to ensure the establishments are compliant with the AS, and that approved arrangements are assessed, and any non-compliances are dealt with appropriately.

### Tier 2 export-registered establishment

An establishment operating under the Export-Registered Australian Standard Meat Establishment (Tier 2) Scheme. Tier 2 covers standards set by overseas governments for access to their markets additional to the standards set under Tier 1. Tier 2 establishments have a full-time departmental on-plant presence to ensure maintained compliance.

## Attachment 3: Declaration of assurance for hazardous material use at Department of Agriculture, Fisheries and Forestry export-registered meat establishments

### Declaration of assurance for hazardous material use in Department of Agriculture, Fisheries and Forestry export-registered meat establishments

Declaration of vendor

<Vendor name>

<Vendor address>

<Vendor telephone No>

<Manufacturer of hazardous material>

<Name of hazardous material>

<Category of use of hazardous material> (as per Attachment 4: [Information regarding hazardous materials \(chemical compounds\) used at export-registered meat establishments](#))

<Intended use of hazardous material>

<Insert the description of food preparation areas or other areas in which the hazardous material is to be used>

I <insert vendor management name and chemist name>, the vendor of the above hazardous material declare that the <Name of hazardous material> is suitable for use in export-registered meat establishments for the purposes stated in this application, that I have supplied a copy of the label and MSDS or SDS with this declaration and acknowledge that this declaration is subject to the following conditions:

This declaration is rendered invalid by:

1. any change in the formulation of the following hazardous material
2. any change in the instructions for use in the following hazardous material
3. any incorrect and/or unintended use of the following hazardous material.

Signature of vendor: \_\_\_\_\_ Date \_\_\_\_/\_\_\_\_/\_\_\_\_

#### Declaration of qualified chemist

The hazardous material identified above, when used in accordance with the directions on the label and associated MSDS or SDS:

- is fit for the purpose for which they are to be used;
- will not contaminate animals, meat and meat products in a way that will jeopardise its wholesomeness.

Printed name of qualified chemist: \_\_\_\_\_

Qualifications of qualified chemist: \_\_\_\_\_

Signature of qualified chemist: \_\_\_\_\_ Date \_\_\_\_/\_\_\_\_/\_\_\_\_



## **Attachment 4: Information regarding hazardous materials (chemical compounds) used at export-registered meat establishments**

### **Hazardous materials requiring vendor declaration**

Hazardous materials requiring vendor declaration include the following:

- Chemical compounds for use in areas where edible food products are prepared, handled or stored (please note that chemical compounds used as an ingredient for edible products are not included in this requirement)
- Cleaning compounds
- Sanitising compounds
- Compounds provided for personnel care
- Pesticides
- Cooling and retort water treatments
- Boiler treatments
- Compounds for steam lines (where steam contacts edible products directly or indirectly) or primary water-cooling loops
- Pig scald treatments
- Tripe processing chemicals (hazardous materials)
- Lubricants for use in areas where incidental contact with edible product may occur
- Branding or marking inks
- Odour neutralising agents

## Chemical compounds that do not require departmental approval/acceptance

Chemical compounds that do not require departmental approval/acceptance include the following:

- Chemical compounds for use solely:
  - as ingredients in prescribed goods
  - as ingredients
  - as denaturants
  - in laboratories for analytical and similar use
  - in offices or areas in an export-registered meat establishment where prescribed goods are not prepared
  - in cafeterias or other retail food service areas
  - in space heating systems or cooling towers
  - in treating materials such as skins and hides
  - for use solely in holding pens, stock trucks and the like (except insecticides)
  - in sewage or wastewater systems outside buildings
  - in secondary cooling loops
  - on the exterior of buildings or areas immediately adjacent to the exterior of buildings
  - for cleaning or maintenance of vehicle exteriors
  - in maintenance workshops for cleaning machinery, removing grease/oil, lubricating equipment for use in inedible product areas
  - in closed systems where product integrity and wholesomeness cannot be compromised during normal use (i.e. sealed gear boxes and similar sealed pieces of equipment).
- Marking inks used for the application of information to packaging materials used as coverings of prescribed goods
- Soda ash or similar chemical compounds held as a contingency specifically for use in the disinfecting of premises in the event of an of an exotic disease incident.

## Hazardous materials in common use with general acceptance

A number of hazardous materials in common use are marketed as pure chemicals using the generic name rather than a trade name. A manufacturer's declaration may not be required for these chemicals as general acceptance of common use exists. Substances in this category include:

- Acetic acid
- Calcium carbonate
- Calcium hydroxide
- Calcium hypochlorite
- Citric acid
- Hydrochloric acid
- Hydrogen peroxide
- Lactic acid
- Phosphoric acid
- Potassium hypochlorite
- Sodium bicarbonate
- Sodium carbonate (soda ash)
- Sodium hydroxide (caustic soda)
- Sodium hypochlorite
- Sodium metasilicate
- Sodium tripolyphosphate
- Sulfuric acid
- Tetrasodium pyrophosphate
- Trisodium phosphate

## Hazardous materials that are not acceptable for use in export-registered meat establishments

These materials include preparations containing antimony, arsenic, cadmium, lead, mercury, selenium, or other materials such as carcinogens, mutagens, and teratogens classified as hazardous substances may not be used for any purpose anywhere within an establishment.

Specific exceptions, such as the use of lead (Pb) in solders or other alloys used in the fabrication and/or maintenance of plant facilities, may be used where it can be demonstrated that there is no hazard created to edible product.

## Potentially harmful compounds requiring manufacturers declaration

Potentially harmful compounds such as chromic acid, formaldehyde, hydrofluoric acid, hydrofluosilicic acid, oxalic acid, or the salts of those compounds are not generally permitted for use.

Establishments proposing to use any potentially harmful compound must obtain a vendor declaration for fitness and safety of use and be able to demonstrate that product integrity and wholesomeness is not compromised before any potentially harmful compound is brought onto the establishment premise.

## Edible oils

Edible oils that meet the requirements of the food standards code may be used for lubrication purposes without restriction or need of a manufacturer's declaration. These include:

- arachis oil (peanut oil)
- cottonseed oil
- maize or corn oil
- olive oil
- rapeseed oil
- safflower oil
- soyabean oil
- sunflower oil.

## Odorous compounds

Export-registered meat establishments must not use odorous compounds in food production areas such as:

- preparations containing heavy perfumes, isomers of dichlorobenzene, pine oil etc.
- hand care preparations which leave a residual fragrance on the hands after rinsing.