Export Meat Operational Policy

# 17.0 Transition arrangements for the implementation of the new Australian standard for the hygienic production and transportation of meat and meat products for human consumption (AS4696:2023)

**Purpose**

May

2023

 

The objective of this operational policy is to:

* ensure importing country requirements with respect to post-mortem inspection and disposition procedures continue to be met
* maintain Australia’s strong global reputation for producing safe, wholesome and high-quality meat and meat products for export.

**Scope**

This policy applies to the export of meat and meat products that are required by Australia’s export legislation to be processed in accordance with the Australian standard for the hygienic production and transportation of meat and meat products for human consumption, AS4696:2023, from 1 July 2023. These products include prescribed meat and meat products of:

* cattle and buffalo
* sheep and goats
* pigs.

**Legislative basis**

Under the *Export Control Act 2020* and subordinate legislation the export of prescribed goods must:

* be processed in accordance with the relevant Australian standard, and
* meet importing country requirements.

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## Current arrangements

The current arrangements (arrangements prior to the commencement of AS 4696:2023 in export registered meat establishments) for the processing and export of prescribed meat and meat products includes the following controls:

* The Australian Export Meat Inspection System (AEMIS), an integrated set of controls specified and verified by the government that ensure the safety, suitability and integrity of Australian meat and meat products. Underpinning AEMIS are objective hygiene and performance standards that are continually monitored.
* The Australian standard for the hygienic production and transportation of meat and meat products for human consumption (AS4696, the Australian Meat Standard) requires that a suitably qualified meat inspector performs post-mortem inspection and makes decisions on each carcase and its carcase parts. Procedures for post-mortem inspection are set out in Schedule 2 and disposition judgements are set out in Schedule 3 of the Australian Meat Standard.
* Regulatory inspection activities are delivered either by department officials called Food Safety Meat Assessors (FSMAs) or Australian Government Authorised Officers (AAOs). The latter are employed by the establishment or by a department-approved provider, to satisfy importing country requirements for Australian Government health certification. Further details are provided in the [Australian Export Meat Inspection System information package](#_Related_Material_1).
* The *Export Control Act 2020* and the accompanying Export Control (Meat and Meat Products) Rules 2021 (the Meat Rules) grants the Department of Agriculture, Fisheries and Forestry (the department) the authority to impose restrictions on the export of meat and meat products in order to safeguard public health and meet importing country requirements. This policy sets out transition arrangements for the implementation of the new Australian Meat Standard (AS4696:2023) to ensure export-registered meat establishments continue to meet importing country requirements where trading partner agreement on amendments to inspection procedures is pending.

### Changes to current arrangements

* The Australian Meat Standard has undergone revision by Standards Australia to incorporate risk-based amendments to post-mortem inspection procedures (Schedule 2) and disposition judgements (Schedule 3) for cattle, sheep and goats, and pigs.
* The revisions are supported by research projects funded by industry bodies including Australian Pork Limited (APL), Meat and Livestock Australia (MLA) and the Australian Meat Processing Corporation (AMPC) and have been completed using a risk-based framework to review inspection techniques and disposition judgements for a number of food safety conditions in cattle, sheep, goats and pigs.
* The amendments to Schedule 2 and 3 of the Australian Meat Standard and the inspection procedures requiring trading partner agreement are detailed in [Attachment 1: Amendments to AS4696 Schedule 2 and EU, UK and US requirements](#_Attachment_A_-).
* The amendments to Schedule 3 of the Australian Meat Standard are detailed in [Attachment 2: Amendments to AS4696 Schedule 3](#_Attachment_2:_Amendments). None of the changes to disposition judgement criteria in Schedule 3 are subject to trading partner agreement and must be implemented in full in all export meat establishments from 1 July 2023.

## Transition process

### Legislative amendments

* The publication of the revised Australian Meat Standard (AS4696:2023) on 31 March 2023 marks the beginning of a transition process that will enable the utilisation of the new standard in Tier 1 and Tier 2 export-registered meat establishments.
* The definition of the Australian Meat Standard in the Meat Rules will be amended from AS 4696:2007 to AS4696:2023 to come into effect on 1 July 2023.
* Once the Meat Rules are amended, inspection procedures and disposition judgements will be conducted in accordance with AS4696:2023, unless alternative inspection procedures are required to meet importing country requirements such as for the United States (US), the European Union (EU), and the United Kingdom (UK) pending their agreement, and as detailed in the department’s [Manual of Importing Country Requirements](#_Related_Material_1) (Micor).

### Training requirements

* Australian Government Authorised Officers (AAOs), whether employed by an export‑registered establishment or third party providers will be required to:
* undertake training on the updated inspection procedures and disposition judgements and provide evidence of completion to the department prior to the Australian Meat Standard coming into effect.
* undertake a National Meat Industry Training Advisory Council Limited (MINTRAC) online training module.
* Department-employed authorised officers will be required to undertake departmental training.

### Post-mortem verification activities

* The verification of post-mortem inspection against post-mortem inspection performance standards is conducted by an On-Plant Veterinarian (OPV) who may be assisted by an FSMA.
* Verification assesses both inspection procedures and inspected product in a defined, random sample of production.
* In accordance with the recently updated [Export Meat Operational Guideline 9.2 Meat Establishment Verification System (MEVS) - Establishments](#_Related_Material_1), verification activities will continue to verify compliance.

#### Tier 1 establishments

The transition path for Tier 1 export meat establishments is detailed as follows:

* Food safety meat inspectors complete training in accordance with state regulatory authority (SRA) requirements prior to 1 July 2023; and
* Commence inspection procedures in accordance with AS4696:2023 once amendments to the Meat Rules come into force from 1 July 2023; and
* Meet importing country requirements as prescribed in Micor.
* Audit and assurance activities continue to be undertaken by SRA officers as agreed in the Memorandum of Understanding (MoU) signed by the department and the respective SRA.

#### Tier 2 export meat establishments

The transition path for Tier 2 export meat establishments is detailed as follows:

* Commence inspection procedures in accordance AS4696:2023 when amendments to the Meat Rules come into force from 1 July 2023; and
* AAOs are required to have successfully completed MINTRAC’s online training module and provide a certificate of attainment to the department prior to legislative amendments being enacted; and
* Meet importing country requirements as prescribed in Micor and set out in [Attachment 1](#_Attachment_A_-).
* Verification of post-mortem inspection procedures will be undertaken by OPVs in accordance with [Export Meat Operational Guideline 9.2 Meat Establishment Verification System (MEVS) – Establishments.](#_Related_Material_1)

## Additional requirements for US, EU and UK listed establishments

* US requirements are such that a US listing applies to all relevant operations at the establishment. As a result, all processes on US-listed establishments must be carried out in compliance with US requirements described in Micor ([Attachment 1](#_Attachment_1:_Amendments)) until such time that equivalence has been agreed.
* For product exported to the EU and UK markets, inspection procedures for cattle, sheep and goats will be conducted in accordance with EU and UK requirements until such time that equivalence has been agreed ([Attachment 1](#_Attachment_A_-)).

## Related Material

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

* Webpage: [Meat Establishment Verification System (MEVS) – Establishments](https://www.agriculture.gov.au/biosecurity-trade/export/controlled-goods/meat/elmer-3/mevs-abattoir)
* Webpage: [Manual of Importing Country Requirements (Micor)](https://micor.agriculture.gov.au/Pages/default.aspx)
* Webpage: [Australian Export Meat Inspection System information package](https://www.agriculture.gov.au/biosecurity-trade/export/controlled-goods/meat/elmer-3/meat-inspection-aemis-package#verification-work-load)
* PDF: [Export Meat Operational Guideline 9.2 Meat Establishment Verification System (MEVS) - Establishments](https://www.agriculture.gov.au/sites/default/files/documents/ELMER-export-meat-operational-guideline-9-2-meat-establishment-verification-system-establishments.pdf)

The following related material is available on the internet:

* Webpage: [Australian standard for the hygienic production and transportation of meat and meat products for human consumption (AS4696): 2007](https://www.publish.csiro.au/ebook/download/pdf/5553)
* Webpage: [Australian standard for the hygienic production and transportation of meat and meat products for human consumption (AS4696): 2023](https://store.standards.org.au/product/as-4696-2023)
* Webpage: [MINTRAC](https://www.mintrac.com.au/)
* Webpage: [Export Control Act 2020](https://www.legislation.gov.au/Series/C2020A00012)
* Webpage: [Export Control (Meat and Meat Products) Rules 2021](https://www.legislation.gov.au/Series/F2021L00334)

## Attachment 1: Amendments to AS 4696 Schedule 2 and EU, UK and US requirements

**NOTE: Unless otherwise indicated in Tables 1 – 5 below, procedures in AS 4696:2023 meet importing country requirements and must be implemented from 1 July 2023.**

### Cattle and buffalo

#### Table 1 – Inspection of carcases – Cattle and buffalo

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Inspection site | 2007 Standard | 2023 Standard | EU/UK requirement | US requirement |
| Superficial inguinal lymph node | See Note #1 of Table 1 of the Australian Meat Standard 2007.Palpate the superficial inguinal and internal iliac lymph nodes or, for animals in an area in relation to which the relevant Commonwealth, state or territory controlling authority requires minimal risk inspection for tuberculosis (other than animal subject to conditional slaughter or emergency slaughter), an equivalent procedure is to observe the nodes (other than in bulls and mature females).  | Observe. See Note #1 of Table 1 of the Australian Meat Standard 2023.Palpate the superficial inguinal and internal iliac lymph nodes in animals subject to conditional slaughter or emergency slaughter and in bulls and mature females. | - | - |
| Internal iliac lymph node | As above | As above | - | - |

#### Table 2 – Inspection of viscera – Cattle and buffalo

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Inspection site | 2007 Standard | 2023 Standard | EU/UK requirement | US requirement |
| Bronchial and mediastinal lymph nodes | See Note #1 of Table 2 of the Australian Meat Standard 2007.Incise the bronchial and mediastinal lymph nodes or, for animals in an area in relation to which the relevant Commonwealth, state or territory controlling authority requires minimal risk inspection for tuberculosis (other than animal subject to conditional slaughter or emergency slaughter), an equivalent procedure is to observe the nodes. | Observe. See Note #1 of Table 2 of the Australian Meat Standard 2023.Incise the bronchial and mediastinal lymph nodes in animals subject to conditional slaughter or emergency slaughter. | - | - |
| HeartNote: Inspection procedure for hearts of cattle and buffalo is equivalent in the 2007 and 2023 editions, additional note included in 2023 edition for cattle and buffalo. | Palpate. Incise internal musculature three to four times in cattle and buffalo. | Palpate. Incise internal musculature three to four times in cattle and buffalo. See Note #5 of Table 2 of the Australian Meat Standard 2023.Palpate and incise heart musculature three to four times in cattle and buffalo, unless animal has grazed on properties where exposure to *Cysticercus bovis* infection (beef measles) may have occurred, whereby procedures in Table 4 should apply.Table # 4 *Cysticercus bovis* in cattle, buffalo and deer: Incise masseter and heart muscles, tongue and diaphragm after removal of serous membranes and observe all exposed muscle surfaces. | - | - |

#### Table 3 – Inspection of heads – Cattle and buffalo

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Inspection site | 2007 Standard | 2023 Standard | EU/UK requirement | US requirement |
| Submaxillary lymph node | Note #2 of Table 3 of the Australian Meat Standard 2007.Incise the submaxillary, parotid and retropharyngeal lymph nodes or, for animals in an area in relation to which the relevant Commonwealth, state or territory controlling authority requires minimal risk inspection for tuberculosis (other than animal subject to conditional slaughter or emergency slaughter), an equivalent procedure are:1. observe only, or
2. excise and discard those nodes without inspection.
 | Observe. See Note #2 of Table 3 of the Australian Meat Standard 2023.Incise the submaxillary, parotid and retropharyngeal lymph nodes in animals subject to conditional slaughter or emergency slaughter. | - | - |
| Parotid lymph node | As above | As above | - | - |
| Retropharyngeal lymph node | As above | As above | - | - |
| Masticatory muscles (internal and external) | Incise | Observe. See Note #3 of Table 3 of the Australian Meat Standard 2023.If cattle or buffalo have grazed on properties where exposure to *Cysticercus bovis* infection (beef measles) may have occurred, procedures in Table 4 of the Australian Meat Standard 2023 *C. bovis* apply, otherwise observe.Table #4 *Cysticercus bovis* in cattle, buffalo and deer: Incise masseter and heart muscles, tongue and diaphragm after removal of serous membranes and observe all exposed muscle surfaces. | AS4696:2007 procedure applies | AS4696:2007 procedure applies |

### Sheep and goats

#### Table 4 – Inspection of carcases – sheep and goats

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Inspection site | 2007 Standard | 2023 Standard | EU/UK requirement | US requirement |
| Superficial inguinal lymph node | See Note #2 of Table 1 of the Australian Meat Standard 2007.Palpate the superficial inguinal, precrural and superficial cervical lymph nodes or, other than animals subject to conditional slaughter or emergency slaughter, an equivalent procedure is to excise and discard these nodes without inspection. | Observe | - | AS4696:2007 procedure applies |
| Internal iliac lymph node | Palpate | Observe | - | AS4696:2007 procedure applies |
| Lumbar lymph node | Palpate | Observe | - | AS4696:2007 procedure applies |
| Precrural lymph node | See Note #2 of Table 1 of the Australian Meat Standard 2007.Palpate the superficial inguinal, precrural and superficial cervical lymph nodes or, other than animals subject to conditional slaughter or emergency slaughter, an equivalent procedure is to excise and discard these nodes without inspection. | Palpate | - | AS4696:2007 procedure applies |
| Superficial cervical lymph node | As above | Palpate | - | AS4696:2007 procedure applies |

#### Table 5 – Inspection of viscera – sheep and goats

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Inspection site | 2007 Standard | 2023 Standard | EU/UK requirement | US requirement |
| Bronchial and mediastinal lymph nodes | Palpate | Observe. See Note #3 of Table 2 of the Australian Meat Standard, 2023.Where lungs are kept for human consumption the bronchial and mediastinal lymph nodes will be palpated. | AS4696:2007 procedure applies | AS4696:2007 procedure applies |
| Lungs | Palpate, except in lambs where observe. Additionally, bronchi opened and internal surfaces observed when saved for human consumption. | Palpate, except in sheep, goats, lambs and pigs where observe. See Note #4. Additionally, bronchi opened and internal surfaces observed when saved for human consumption.Note #4 of Table 2 of the Australian Meat Standard, 2023.Where lungs are kept for human consumption in sheep and goats they will be palpated. | AS4696:2007 procedure applies | AS4696:2007 procedure applies |
| Liver | Palpate, except in lambs where observe. Incise main bile ducts transversely and observe contents, except in pigs where inspection of bile ducts not required (see Note #2 for option).Note #2 of Table 2 of Australian Meat Standard 2007: All animals – procedures for the incision of main bile ducts and observation of contents may not be required at a meat business by the controlling authority. | Palpate, except in sheep, goats, lambs and pigs where observe. Incise main bile ducts transversely and observe contents, except in pigs where inspection of bile ducts not required (see Note #2 for option).Note #2 of Table 2 of Australian Meat Standard 2023: All animals – procedures for the incision of main bile ducts and observation of contents may not be required at a meat business by the controlling authority. | AS4696:2007 procedure applies | AS4696:2007 procedure applies |
| Spleen | Palpate | Observe | - | - |
| Kidney (enucleated) | Observe | Observe. See Note #6 of Table 2 of Australian Meat Standard, 2023).When kept for human consumption kidneys are to be observed enucleated, when not kept observe unenucleated.  | - | AS4696:2007 procedure applies |

### Pigs

**NOTE: None of the changes to inspection procedures for pigs in Schedule 2 are subject to trading partner agreement and must be implemented in full in all pig export meat establishments from 1 July 2023.**

#### Table 6 – Inspection of viscera – Pigs

|  |  |  |
| --- | --- | --- |
| Inspection site | 2007 Standard | 2023 Standard |
| Bronchial and mediastinal lymph nodes | Palpate | Observe |
| Portal lymph nodes | Palpate | Observe |
| Lungs | Palpate, except in lambs where observe. Additionally, bronchi opened and internal surfaces observed when saved for human consumption. | Palpate, except in sheep, goats, lambs and pigs where observe. See Note #4. Additionally, bronchi opened and internal surfaces observed when saved for human consumption. |
| Heart | Palpate. Incise internal musculature three to four times in cattle and buffalo. | Observe |
| Liver | Palpate | Observe |
| Kidneys (enucleated) | Palpate | Observe. Note #6 of Table 2 of Australian Meat Standard, 2023.When kept for human consumption kidneys are to be observed enucleated, when not kept observe unenucleated. |

#### Table 7 – Inspection of heads – Pigs

|  |  |  |
| --- | --- | --- |
| Inspection site | 2007 Standard | 2023 Standard |
| Submaxillary lymph node | See Note #4 of Table 3 of Australian Meat Standard 2007.Incise and observe submaxillary and cervical lymph nodes or, other than animals subject to conditional slaughter or emergency slaughter, equivalent procedures are:1. observe only, or
2. excise and discard those nodes without inspection.
 | Observe. See Note #4 of Table 3 of Australian Meat Standard 2023.Observe submaxillary and cervical lymph nodes or, other than animals subject to conditional slaughter or emergency slaughter, an equivalent procedure is to excise and discard these nodes without inspection. |
| Cervical lymph node | As above | As above |

### All animals

Table 8 below refers to new content within Table 4 of AS4696:2023.

#### Table 8 – All animals

|  |  |  |
| --- | --- | --- |
| Disease | 2007 Standard  | 2023 Standard |
| Gross abnormalities | - | Palpation and incision may be used where appropriate to ensure wholesomeness is achieved; this also covers gross abnormalities arising from animal health (including zoonoses) and welfare problems (refer to Clause 10.2). Palpation and incision may be used in determining if there is evidence of active systemic infection to inform carcase disposition judgement.When palpation and incision are used, these additional procedures must be followed by effective decontamination interventions of hands and associated equipment to minimise cross-contamination. |

## Attachment 2: Amendments to AS4696 Schedule 3

**NOTE: None of the changes to disposition judgement criteria in Schedule 3 are subject to trading partner agreement and must be implemented in full in all export meat establishments.**

### Non-infectious conditions – tumours

This section corresponds to section 2.6 of Schedule 3 of the Australian Meat Standard, 2023 that covers non-infectious conditions - tumours.

#### Table 9 – Tumours

|  |  |  |
| --- | --- | --- |
| Disease | 2007 Standard Disposition | 2023 Standard Disposition |
| 2007 Standard - Circumscribed benign tumours, neurofibromas and intercostal nerves and nerve plexes2023 Standard - Circumscribed benign tumours, neurofibromas and intercostal nerves and nerve plexuses, **and melanoma of pigs that have not progressed beyond the immediate draining lymph node** | Depending on extent, lesion trimmed and condemned or affected carcase part condemned. | Depending on extent, lesion trimmed and condemned or affected carcase part condemned. |
| Malignant tumours (carcinoma, sarcoma) | Carcase and all its carcase parts condemned. | Carcase and all its carcase parts condemned. |
| Multiple tumours (evidence of metastasis or multiple lesions in different organs) | As above | As above |

### Respiratory system

This section corresponds to section 3.3 of Schedule 3 of the Australian Meat Standard, 2023 that covers the respiratory system.

#### Table 10 – Respiratory system

|  |  |  |
| --- | --- | --- |
| Disease | 2007 Standard Disposition | 2023 Standard Disposition |
| Atelectasis, emphysema, pigmentation, aspiration of blood, scalding water or ingesta | Affected lungs condemned | Affected lungs condemned |
| Bronchitis | Affected lungs condemned | Affected lungs condemned |
| 2007 Standard only - Multiple pulmonary abscesses | Carcase and all its carcase parts condemned | n/a |
| 2007 Standard only - Peri-acute pneumonia such as severe purulent bronchopneumonia, gangrene of the lungs or necrotic pneumonia | Carcase and all its carcase parts condemned | n/a |
| 2023 Standard only - Pneumonia or bronchopneumonia- acute infectious with evidence of septicaemia, petechial haemorrhage, polyserositis | n/a | Carcase and all its carcase parts condemned |
| 2023 Standard only - Pneumonia or bronchopneumonia - chronic, may show multiple localised abnormalities in lungs, no evidence of septicaemia | n/a | Affected lungs condemned |
| 2007 Standard only - Pneumonia or bronchopneumonia | Affected lungs condemned | n/a |
| Sinusitis | Affected head condemned | Affected head condemned |

### Pleura

This section corresponds to section 3.4 of Schedule 3 of the Australian Meat Standard, 2023 that covers pleura.

#### Table 11 – Pleura

|  |  |  |
| --- | --- | --- |
| Disease | 2007 Standard Disposition | 2023 Standard Disposition |
| 2007 Standard only - Adhesions and patches of fibrinous tissue | Affected serous membranes stripped and affected parts condemned | n/a |
| 2007 Standard only - Diffuse serofibrinous, suppurative or gangrenous pleurisy | Carcase and all its carcase parts condemned | n/a |
| 2023 Standard only - Pleurisy - acute infectious with evidence of septicaemia, petechial haemorrhage, polyserositis | n/a | Carcase and all its carcase parts condemned. |
| 2023 Standard only - Pleurisy - chronic with adhesions and patches of fibrinous material, no evidence of septicaemia | n/a | Affected serous membranes stripped and affected parts condemned. |

### Musculo-skeletal arthritis

This section corresponds to section 3.11 of Schedule 3 of the Australian Meat Standard, 2023 that covers musculo-skeletal arthritis.

#### Table 12 – Musculo-skeletal arthritis

|  |  |  |
| --- | --- | --- |
| Disease | 2007 Standard Disposition | 2023 Standard Disposition |
| 2007 Standard only - Acute infectious | Carcase and all its carcase parts condemned. | n/a |
| 2007 Standard only - Non-infectious, chronic with no systemic effects | Affected part condemned. | n/a |
| 2023 Standard only - Acute infectious with evidence of septicaemia, petechial haemorrhage, polyserositis | n/a | Carcase and all its carcase parts condemned. |
| 2023 Standard only - Chronic, may have multiple affected joints, no evidence of septicaemia, or cachexia | n/a | Affected part(s) condemned. |
| 2023 Standard only - Refer to swine erysipelas for pigs | n/a |  |

## Attachment 3: Definitions

Australian Government Authorised Officer (AAO)

Means a meat safety inspector who is authorised under Chapter 9 Part 4 of the Export Control (Meat and Meat Products) Rules 2021 to perform the services for the purposes of the Australian Export Meat Inspection System (AEMIS).

Authorised officer

An authorised officer is a person authorised by the Secretary (or a delegate of the Secretary) of the Department of Agriculture, Fisheries and Forestry under the *Export Control Act 2020* (the Act), Section 291.

The 3 types of authorised officers are:

* Commonwealth authorised officers—officers or employees of the Department of Agriculture, Fisheries and Forestry
* state or territory authorised officers—officers or employees of a state or territory body authorised under the Act
* third party authorised officers—persons authorised by the Secretary following an application process.

Commonwealth authorised officer

As per the *Export Control Act 2020* means an authorised officer who is an officer or employee of a Commonwealth body. For the purposes of this document, this includes On-Plant Veterinarians (OPVs), Food Safety Meat Assessors (FSMAs) and Food Safety Assessors (FSAs).

Food Safety Meat Assessor (FSMA)

Commonwealth authorised officer who has meat inspection qualifications and works on export‑registered slaughtering establishments. The tasks undertaken by an FSMA depends on the particular AEMIS model operating at the establishment.

On-Plant Veterinarian (OPV)

A Commonwealth authorised officer (veterinarian) employed by the Department to conduct ante‑mortem inspection and to provide daily supervision of post-mortem inspection and verification of the establishment’s approved arrangement.

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.