



## Approved Arrangement Checklist – Fish Processing / Storage Establishment

Use this checklist to review your food safety system and assess your preparedness for audit and for compliance with the requirements of the [Export Control Act 2020 \(the Act\)](#) and the [Export Control \(Fish and Fish Products\) Rules 2021 \(the Fish Rules\)](#)

<b>Company name:</b>	<b>Completed by:</b>	<b>Position within company:</b>	<b>Date:</b>
<b>Physical address of establishment:</b>		<b>If a vessel – vessel name:</b>	
<b>Products/ manufacturing processes you want to be export registered for.</b>  Please tick <b>all</b> relevant operations unless “Storage only” is selected.	<input type="checkbox"/> Storage only – no packing or processing <input type="checkbox"/> Receiving / catching and packing out only live fish, live crustaceans, or live molluscs <input type="checkbox"/> Receiving and packing out live bi-valve molluscs <input type="checkbox"/> Receiving / catching and processing / packing out fish and fish products (not ready to eat) <input type="checkbox"/> Receiving / catching and processing /packing out fish and fish products (ready to eat) <input type="checkbox"/> pasteurising or retorting fish and fish products <input type="checkbox"/> drying fish and fish products <input type="checkbox"/> Other – please specify:		
<b>Fish species you intend to process for export:</b> See: <a href="#">Standards Search   FRDC</a> <b>Note:</b> Australian Fish Name and/or scientific name must be used to identify fish for export			
<b>Countries you want to export to once approved where additional requirements must be met:</b> See: <a href="#">Manual of Importing Country Requirements (Micor) - DAFF (agriculture.gov.au)</a>	<input type="checkbox"/> European Union (EU) <input type="checkbox"/> United Kingdom (UK) <input type="checkbox"/> Vietnam <input type="checkbox"/> China	<input type="checkbox"/> Kingdom of Saudi Arabia (KSA) <input type="checkbox"/> Taiwan: <input type="checkbox"/> Other – please specify:	

## AA – Plans and specifications

### Chapter 4 (4-4) of the Fish Rules

#### Element – Plans and specifications

##### Requirements:

A copy of the floor plan showing the different production/ storage areas and key equipment that will be required to be supplied to the auditor as part of the approval process. The auditor will verify the floor plan during the initial registration onsite audit.

The current layout and floor plan of the structure needs to include:

- The different areas of the premises (e.g., process areas, storage, receival and dispatch, staff toilets and offices)
- all levels (including mezzanine and office-only levels)
- the key equipment (e.g., chillers/freezers, tanks, equipment)
- the water supply, stormwater, and wastewater drainage (including drain locations and sewer lines)

Provide a brief description of where you have documented this.

## AA – Record Keeping requirements

### Chapter 11, Part 2 of the Fish Rules

#### Element – Records

##### Requirements:

The Rules require records to be kept for all export operations carried out at the establishment (i.e., storage, manufacturing, exporting, and applying official marks). Records must be kept for at least 3 years.

Records include:

- Declarations and other documents used by the exporter to request an export permit and to demonstrate compliance with requirements
- records showing that occupier or arrangement holder is complying with the requirements of the Act, the approved arrangement and any applicable conditions of registration, the approved arrangement, and any applicable importing country requirements

Records must be:

- In English (or another language if required by importing country requirements)
- dated
- accurate, legible, and able to be audited
- must not be altered or de-faced during the retention period

There are documented controls in place for the identification, management and storage of records that are kept – including procedures that will ensure that:

- The version of the AA is current and controlled, including any associated monitoring, or reporting forms
- only current documents are used
- amendments to the AA are managed and recorded – including how personnel are advised of changes
- amendments required to be pre-approved by DAFF prior to implementation (i.e., variations required to be approved by submitting an EX26a, b, c or application for a cut-code, some country listings) are identified and understood.

Provide a brief description of where you have documented this.

This checklist will assist you when reviewing your documentation to see if you are ready to apply for registration as an export manufacturer or storage establishment. The Approved Arrangement is the departments name for a food safety management plan that documents how you will make sure that export requirements are, and will continue to be, met at your establishment.

If you are already preparing or storing fish and fish products for the domestic market, your self-assessment should include a review of your existing system and documents. You may already have some of the required documentation in place (for example, a refrigeration temperature record). You may need to provide additional details (for example, adding a documented procedure to your temperature record that explains who completes the record, when they complete it, and how they complete it).

**Notes:**

- If you are only **storing** export eligible products that have been manufactured in a registered export establishment, you may not need to provide the same level of detail in some sections that **processing** establishments are required to.
- If you are not sure of the requirements, please go to the relevant section of the Act or the Fish Rules and check what the legislative requirement is. **This checklist is to assist but may not include every legislative requirement that applies to your business.**

[Export Control Act 2020 \(legislation.gov.au\)](https://www.legislation.gov.au) and [Export Control \(Fish and Fish Products\) Rules 2021 \(legislation.gov.au\)](https://www.legislation.gov.au)

**AA – Management Practices**

**Chapter 5, Division 9 of the Fish Rules**

**Element – Management Practices**

**Requirements:**

The **management commitment** states and describes the occupier’s commitment to the objects of the *Export Control Act 2020* and includes a commitment that good that are exported:

- Meet importing country requirements; and
- comply with the government or industry standards or requirements relating to the goods; and
- are traceable and can be recalled, the integrity of the goods is maintained; and
- trade descriptions are accurate; and
- the goods are compliant with any relevant international agreements to which Australia is a party.

Provide a brief description of where you have documented this. This can be a statement by the management that they are committed to the above and can be added to existing quality or food safety policy statements.

**Other products at the establishment:**

The AA includes:

- Details of all other products prepared or stored at the establishment including those intended only for domestic supply, bait, animal food and/or product for pharmaceutical.

Provide a brief description of where you have documented this. This is to make sure that you have identified different products and can segregate them if required to prevent cross-contamination. All products must be identifiable at all times.

**Element – Organisational Structure**

**Requirements:**

There is an outline of the **organisations structure** including a description of the operations and its resources.

This must include:

- The person(s) nominated in management and control of the establishment (persons listed on the EX26a application form)
- An organisational chart or list describing the positions that clearly shows the reporting structure

Provide a brief description of where you have documented this. This can be a diagram showing the people in the establishment and their title (for example QA Manager). Do not give people more than one title and make sure that the same titles are used throughout the AA documents (for example; in SOPs and HACCP Plans) so it is clear who does what.

The **roles and responsibilities** of each position in the organisational structure are described, and identify the person(s):

- With overall responsibility for ensuring compliance with the AA
- who can approve amendments to the AA and understand when DAFF approval is required before making changes
- who is responsible for the day-to-day control of key activities detailed in the AA
- with responsibility for decision-making if the usual person responsible is away
- other key personnel involved in management or control

Provide a brief description of where you have documented this. There should be a job description for each role in the organisational structure that refers to what a person in the position is responsible for when it comes to managing the AA system (for example: identifying the person who is responsible for actually carrying out internal audits, the person who will be responsible for checking that monitoring records have been filled out correctly, who can sign declarations in transfer documents when export product is moved between establishments).

### Element – Resources and personnel

#### Requirements:

There is a documented procedure for **training** everyone that has a job description that:

- Identifies and addresses the training needs of personnel in a way that is appropriate to make sure the requirements of the Act, Rules and any applicable importing country requirements are met.
- makes sure employees are assessed for competence against their job descriptions in key tasks
- includes induction and ongoing training
- includes training in the monitoring of Critical Control Points (CCP's) identified in the HACCP Plan
- includes what records are made to show personnel have been trained, have been assessed for competence and have met requirements

Provide a brief description of where and how you have documented this. All staff will require some level of training in how the AA system you have documented works – from the Managing Director who is responsible for the system, to specific training for staff who receive, prepare and dispatch product. You will need to think about what training each position needs and document how you will make sure they receive the required training and, once trained, are assessed as being able to work in their role. For some roles this may be in the form of induction training when starting the role, through to Managing Directors confirming that they have read and understood the legislation and the AA system in place.

#### Element – Verification Activities (see also Verification in HACCP Section)

##### Requirements:

A written record is made of the methods, procedures, tests and monitoring and other evaluations (i.e., reviews, internal audits etc.) used to verify compliance with the legislation and includes:

- Review of the management practices in place at the establishment (structure, responsibilities)
- review of the training procedure, plan, or program in place at the establishment
- procedures for making sure that the procedures documented in the AA are being followed. [See: Division 2 of Chapter 5 of the Rules (i.e., hygiene controls, temperature controls, trade descriptions applied to goods, segregation, and identification of product not eligible for export and traceability)]
- details of how each of the requirements in [Section AA - System of Controls](#) are controlled, monitored, and includes details of how checks of the system are recorded, how the information is used, and what action is taken when non-compliance is identified
- These controls and the associated records are being reviewed as part of internal audits/ management reviews

Provide a brief description of where you have documented this. Verification activities are activities that are carried out to make sure that the system is working and that the procedures in the AA are being followed and should include:

- Regular review of monitoring records to make sure issues are identified and forms are being filled out correctly and in full
- Planned internal reviews of the AA documentation to make sure they are up-to-date and reflect actual procedures
- Planned internal reviews of the site and equipment to make sure daily monitoring is picking up issues related to operations
- Annual review of the HACCP Plan
- Other verification activities – including product testing, shelf-life testing

#### **Internal Audit and Management Review**

**Note:** Internal audits are not required if there are fewer than 3 personnel employed to carry out export operations and management reviews are being conducted.

There is a procedure in place for keeping a record of:

- Each internal audit and management review conducted
- the review of internal audit outcomes at Management Review
- the results of each internal audit and review
- each decision to take corrective action as a result of a finding of an internal audit or management review - including details of who is responsible for taking the action
- the outcome of each corrective action taken

Provide a brief description of where you have documented this. At a minimum the AA needs to include a procedure for having an annual Management Review Meeting that checks the operation of the entire AA system to make sure it is up to date, and reflects what is actually happening at the establishment. The procedure should include details of who is responsible for arranging the meeting, who must attend the meeting, what will be checked to make sure the whole system is being reviewed, and that all verification activities are being carried out – and what happens if they are not. Include details of who is responsible for taking action if internal audits show the system is not working, or is not up to date.



**Element – Corrective Action**

**Requirements:**

There are procedures in place requiring corrective action to be taken when monitoring, review, internal audit, or management review identifies non-compliance or where non-compliance is identified by other means (customer complaints, third party audits, recalls).

Provide a brief description of where you have documented this. Each part of the AA that provides an important instruction to be followed should also contain details of what the person responsible needs to do if a requirement is not met, an action is not carried out, or a measurement is not within the required range (for example, an activity is not carried out on the due date, a temperature is not cold enough, etc.).

There is a process for recording and actioning identified non-compliances that includes:

- Taking immediate action to identify and manage any goods or ingredients that may be affected
- Identifying the root cause of the failure to comply
- Implementing in a timely manner, a corrective action to eliminate or reduce the likelihood of re-occurrence
- Assessing the effectiveness of the corrective action taken
- Documenting the outcome

Provide a brief description of where you have documented this. As an example – all monitoring forms need to record the results of what is being measured or checked, and what has to happen if the requirements being recorded are not met. When the correction is not a normal part of regular operations (for example, adjusting a weight or a temperature as per instructions) then there needs to be a procedure to record what has occurred and what has been done to fix the issue. Importantly, this needs to include what has been done to stop the problem happening again.

## AA – System of controls

### Chapter 5 of the Fish Rules

#### Element – Importing Country Requirements must be met (Division 2)

##### Requirements:

There is a procedure for identifying importing country requirements where requirements of the importing country are different or additional to the Act.

The arrangement identifies:

- Each importing country requirement that will not be met simply by complying with the Act
- what specific requirements must be met for each importing country with different requirements
- the system of controls that is in place to ensure each requirement will be met.
- **FOR COLD STORES** – this may include where storage establishments must be list to store product for specific countries or have HALAL programs in place

Provide a brief description of where you have documented this. You need to be aware of the requirements for exporting to different countries. This should include referring to [MICoR](#) before accessing a new market, making any changes to the AA required if the importing country has different requirements (i.e. labelling, micro, or chemical differences). You must also subscribe to [Market Access Advice notices](#) and export [Industry Advice Notices](#).

#### Element – Operational Hygiene (Division 3)

##### Requirements:

Each procedure should include details of the requirement, who undertakes the activity, how the activity is monitored, the action to be taken if the activity is not conducted as detailed and provision for information to be recorded that demonstrates that the activity was completed as detailed or if not completed as detailed – the action taken to rectify.

**Establishment and equipment – cleaning of premise and equipment**

There is a procedure in place to ensure that the establishment and its equipment is cleaned and maintained to prevent the contamination of the food being stored or prepared.

Provide a brief description of where you have documented this. This needs to include instructions for cleaning, including the chemicals used and the concentrations necessary to make sure cleaning is effective.

**Establishment and equipment - maintenance of premise**

There is a procedure in place to ensure that the buildings fixtures and fittings are maintained appropriately.

Provide a brief description of where you have documented this. This needs to include the surroundings of the building and how it is kept tidy and free of dust and pests.

**Establishment and equipment – maintenance of equipment**

There is a procedure in place to ensure that equipment at the establishment is maintained in the state of repair and working order necessary to facilitate operations to prepare prescribed foods that are fit for human consumption and is sufficient in regard to its use.

Provide a brief description of where you have documented this. This needs to include equipment such as ice machines, packaging, or filleting machines – any equipment used in preparing or handling products.

**Hygiene controls for processing – prevention of pests**

There is a procedure in place to prevent the entry of pests and their harbourage (e.g. nests or hives) into the establishment, this also includes the equipment.

Provide a brief description of where you have documented this. This may include details of an external service or your own procedures and include details of what you do if a pest is found.

**Hygiene controls for processing – hazardous substances**

There is a procedure in place to ensure hazardous substances are labelled, used as directed so they are not a source of contamination.

Provide a brief description of where you have documented this. This needs to include where the substances are stored, who can access and what the substances are used for.

**Hygiene controls for processing – prevention of contamination**

There is a procedure in place to ensure any other substances that may be a source of contamination are not used or stored in food handling areas other than as necessary for hygienic or preparation purposes. This includes waste.

Provide a brief description of where you have documented this. This needs to include how waste is identified. You may also need to consider how you keep some products separate, an example of this is ready to eat products and raw products.

### Equipment - calibration

There is a procedure in place to ensure measuring devices are accurately calibrated as required and routinely checked to ensure accuracy. Temperature monitors should be accurate to within +1/-1 degree C.

**Note:** Calibration typically refers to adjusting a piece of equipment to bring it into specification. Checking for accuracy is generally conducted against a known weight or temperature.

Provide a brief description of where you have documented this. Needs to include scales, temperature probes, ovens, cookers, pasteurisers, retorts, chillers, and freezers. May also include equipment used to measure pH, salinity, or water activity.

### Hygiene controls for processing – temperature controls

Considering maximum capacity, refrigeration chambers at the establishment achieve the temperatures required for chilling, freezing, maintaining, thawing, and tempering the foods. Measures are in place to validate the effectiveness of temperature controls for chilling, freezing, thawing, and tempering.

Provide a brief description of where you have documented this. This must include evidence that the time it takes to chill, freeze, or thaw products during your processes has been measured against your existing equipment while in use.

### Evaluation of fitness for human consumption

There is a procedure in place to:

- ensure all raw materials and ingredients used are fit for purpose (evaluated for fitness for human consumption), and
- are labelled, stored, and handled in a way that ensures their identify can be ascertained.
- **FOR COLD STORES** – this would include inspection of incoming and outgoing goods for temperature / condition

Provide a brief description of where you have documented this. This is typically achieved by documenting the requirements for the products you will receive and then making and recording checks when received. Also, by making and documenting a check of the finished product against the Product Specification (See HACCP Section) and conducting in-line checks.

There is a procedure to ensure that packaging, labels, and other materials used to package or identify prescribed foods, are:

- Fit for purpose
- will not adversely affect the fitness of the foods for human consumption
- effective in protecting the food from contamination under which they are to be stored, handled, loaded, and transported
- **FOR COLD STORES** – this would include inspection of incoming and outgoing goods for temperature / condition

Provide a brief description of where you have documented this. This must include information from the supplier or other checks to demonstrate that packing materials will not contaminate the product being packed.

#### **Requirements relating to water**

There are procedures in place that:

- Provides for all water, ice, and recirculated water to be potable unless identified as not coming into contact with prescribed foods
- if required for the processing of fish, provides for the use of clean sea water and includes measures to ensure it is clean
- details the system of controls in place to ensure water is potable (including treatment, testing, and verification etc)
- provides for analysis at a NATA lab to ensure water is potable and contains no detectable E. coli for every 100 millilitres of water tested

Provide a brief description of where you have documented this. If using clean seawater, include how this is sourced and used. If using non-potable water, detail how this is identified. This procedure needs to include details of who is responsible for: taking water and ice samples, checking the results when received, and for taking the documented corrective action if unsatisfactory results are returned.

### **Steam, compressed air and other gasses**

If steam, compressed air, or other gasses are used there is a procedure in place to ensure their use does not have the potential to cause harm to human health or be a source of contamination.

Provide a brief description of where you have documented this or indicate which of these is used, or not used, in processing.

### **Personal hygiene and health**

There is a procedure in place to provide staff with a clear understanding of requirements for personal hygiene when in food handling areas, including:

- Exclusion of persons suffering from a medical condition from any food handling area in a capacity in which there is a risk of contamination
- responsibility to advise of medical conditions that may be transmitted through food
- requirements for wearing appropriate clothing to prevent contamination of food or work surfaces
- requirements for handling food to prevent contamination (including use of coloured, waterproof, bandages)
- exclusion of personal belongings and clothing from storage in food handling areas
- requirements for handwashing using a sanitising agent
- **FOR COLD STORES** –areas (including freezers) are food handling areas if fish or ingredients are exposed or packaging is stored.

Provide a brief description of where you have documented this.

**Temperature controls, storing, handling, and loading**

There are procedures in place for ensuring required temperature controls are in place for the storing, handling, loading, and transporting of prescribed foods.

This may include specific requirements for different commodities: i.e., frozen, chilled, shelf stable, dried, fish, crocodiles.

Provide a brief description of where you have documented this.

Note that the Legislation allows for “hard frozen” but it is recommended an actual temperature is specified so accurate measurements of temperature can be made. It is an importing country requirement that products for export to the EU/UK must be held and transported at no warmer than -18 degrees C.

There are procedures in place to ensure that container system units, food carrying compartments of vehicles will maintain foods at the required temperatures, are clean and will not be a source of contamination.

Provide a brief description of where you have documented this.

There are procedures in place to ensure container system units, food carrying compartments, vehicles and equipment used to handle and load prescribed foods are clean, sanitised whenever necessary and are in good repair and working order.



Provide a brief description of where you have documented this.

For Meat products: provision for the application of bolt seals to container system units (5-19) of the Meat Rules.

Provide a brief description of where you have documented this.

**Element – AA – Segregation, identification, security, traceability, and integrity (Division 4, 5, 7, 8)**

**Requirements:**

**Traceability / Inventory controls**

There is a procedure for ensuring that products and their ingredients are sourced only from suppliers with inventory and tracing systems to ensure that products and their ingredients are traceable and can be recalled if required.

Provide a brief description of where you have documented this.

There are inventory controls in place that include documented details for each lot prepared for export that include:

- Traceability to the supplier of ingredients / raw materials used in the lot
- The identity and quantity of the lot and the date of preparation (for fish harvested at the establishment – the date and location of harvest).

Provide a brief description of where you have documented this. Production records are required to be kept for all processes showing both input and output.

#### **Trade descriptions**

There is a procedure for determining the information that is required to be included in a trade description appropriate to the food being prepared (i.e., naming of ingredients, identification of processor, exporter, or consignee).

Provide a brief description of where you have documented this.

There is a procedure in place to ensure accurate trade descriptions are applied to prescribed foods at the final place of processing before being loaded for export.

**FOR COLD STORES:** There are documented procedures for when additional labelling may (or may not) be applied to packaged export eligible products

Provide a brief description of where you have documented this.

Trade descriptions applied to fish and fish products include:

- The Australian Fish Name and or scientific name of the fish
- For shellfish – lot identification of harvest area or lease

Provide a brief description of where you have documented this.

There is a procedure to ensure that that the information in trade descriptions applied to immediate containers and outer cartons is not inconsistent and if in a language other than English, translations have been verified by a person qualified to do so.

Provide a brief description of where you have documented this.

<b>Identification</b>
<p>There are procedures in place to identify and segregate products that are not for export as food or are not fit for human consumption or are manufacturing grade including.</p> <ul style="list-style-type: none"><li>• Identifying animal food as animal food and not fit for human consumption</li><li>• identifying manufacturing grade food as such and as not fit for human consumption</li><li>• keeping in a way that ensures these products are not a source of contamination</li></ul>
<p>Provide a brief description of where you have documented this.</p>
<p>There are procedures in place to ensure that the identity of the products for export can be determined at all times.</p>
<p>Provide a brief description of where you have documented this.</p>
<p>There are procedures in place to ensure that fish and fish products are, or are made from, the species that they are labelled as.</p>
<p>Provide a brief description of where you have documented this.</p>

<b>Transfer information</b>
The AA identifies persons that may make declarations on behalf of the owner of the establishment.
Provide a brief description of where you have documented this. The AA needs to include the names or the positions of staff at the establishment who can sign transfer documents on behalf of the owner when goods are transferred between registered establishments.
There are procedures in place to take appropriate action when information and declarations required to be provided in relation to products received are not received or are incomplete.
Provide a brief description of where you have documented this.
<b>Export Documentation</b>
There are procedures in place showing how to request export permits and government certificates (where required) including: <ul style="list-style-type: none"> <li>• Persons who are responsible for making requests and authorising documentation</li> <li>• Storage and retention of documentation – i.e., copies of Health Certificates</li> </ul>
Provide a brief description of where you have documented this.

## AA – Product requirements

### Chapter 5 of the Fish Rules

#### Element – Sourcing requirements (5-16)

**FOR COLD STORES:** This section will be met by ensuring that export eligible products are accompanied by accurate transfer documentation.

#### Requirements:

Procedures are in place to ensure that:

- Product is not sourced from areas where there are reasonable grounds to believe that potentially harmful pathogens or substances could be present and result in unacceptable levels in the products
- products affected by notifiable diseases are reported

Provide a brief description of where you have documented this.

Procedures are in place to ensure product for export is sourced (as applicable) only directly from:

- Registered establishments
- Catcher boats / aquaculture farms with controls in place (5-16 (4)) of the Fish Rules
- An establishment with an exemption from registration under Part 2, Chapter 2 of the Act.

Provide a brief description of where you have documented this.

Where sourced from the above (other than registered establishments, the product is sourced from establishments that have controls in place for:

- Disease management
- Making sure product is collected / harvested or caught and handled under hygienic conditions
- placing product under appropriate temperature controls
- are traceable

Provide a brief description of where you have documented this.

**Additional requirements for sourcing fish**

Procedures are in place to ensure that:

- Fish that are dead (other than because of the method of catching the fish) are not harvested or prepared for export
- fish that are diseased or have a condition likely to affect fitness for human consumption are not prepared for export
- fish are not taken from or washed using water where there is reasonable grounds to believe potentially harmful pathogens or substances could be present and result in unacceptable levels in the fish

Provide a brief description of where you have documented this.

Procedures are in place that minimise the taking (and preparation) of fish that are likely to be affected by ciguatoxin.

Provide a brief description of where you have documented this. Reference at a minimum should be made to [industry standards](#) or state requirements.

Procedures are in place to ensure additional requirements for handling [export shellfish](#) are in place including.

- Ensuring shellfish for export are harvested from an area specified in the Harvest Areas ([Shellfish for Export](#)) List
- identifying by lot and kept separate from other lots (no co-mingling)
- not held in storage tanks with other fish
- transfer information includes harvest areas, lease numbers and date of harvest as applicable

Provide a brief description of where you have documented this.

### **Product Standards**

Procedures are in place that ensure that products for export do not contain any of the following that does not comply with a requirement of the Food Standards Code (or a stricter importing country requirement):

- Levels of metal or non-metal or natural toxicant
- An amount of agricultural or veterinary chemical
- A food additive, processing aid, vitamin, mineral, added nutrient or other matter or substance



Provide a brief description of where you have documented this.

Procedures are in place to ensure that the products for export and their ingredients meet the microbiological limits specified for the product and their ingredients in the [Australian New Zealand Food Standards Code](#).

Provide a brief description of where you have documented this.

## AA – HACCP System

(Link - [HACCP General Principles of Food Hygiene CXC 1-1969 Rev. 2020](#))

### Chapter 5 (5-2) of the Fish Rules

**Note: potential hazards are controlled by verified support programs are not required to be identified in the hazard analysis step.**

#### Element – Identification of responsibility (HACCP team)

##### Requirements:

The following is documented:

- Responsibility for developing, maintaining, and reviewing the HACCP Plan is identified – including re-validation as applicable
- Requirement to review when any changes are made to product, processing or procedures

Provide a brief description of where you have documented this.

### Element – Identification of scope

HACCP Plan includes a statement of scope that includes all export operations at the establishment. This includes a methodology used to determine controls identified as required (i.e., use of decision tree / matrix) and correctly applied.

**FOR COLD STORES:** This may include the determination by the holder of the arrangement that the support programs in place are sufficient to control food safety hazards. (see within this document the [AA – System of controls section](#) )

Provide a brief description of where you have documented this.

### Element – Product Descriptions

Product descriptions have been developed for each product, product type, or product line as appropriate:

- Products may be described individually or in groups if this does not compromise the awareness of hazards or other factors such as suitability of the products for the purpose intended.
- Any grouping of food products should be based on them having similar inputs and ingredients, product characteristics (such as pH, water activity (aw)), process steps and/or intended purpose.
- The product description includes consideration of the use intended by the business and the expected uses of the product by the next business in the food chain or the consumer, including vulnerable populations.
- **FOR COLD STORES:** minimal descriptions are acceptable – i.e., frozen packaged fish and fish products, chilled packaged fish and fish products etc

Provide a brief description of where you have documented this.

The product descriptions include, as appropriate:

- A full description of how the product has been developed, including relevant safety information such as composition (i.e., ingredients), physical/chemical characteristics (e.g., aw, pH, preservatives, allergens), processing methods/technologies (heat-treatment, freezing, drying, brining, smoking, etc.), packaging, durability/shelf life, storage conditions, and method of distribution.
- the intended use of the food, e.g., whether it is ready-to-eat, or whether it is intended for further processing either by consumers or another business, for example raw seafood to be cooked.
- any relevant specifications e.g., ingredient composition, aw, pH, type of preservation method used (if any), or important characteristics associated with the food, such as any allergens present.
- any relevant limits established for the food by the competent authority or, if there is no competent authority, set by the holder of the approved arrangement.
- instructions provided for further use, for example keep frozen until cooking, cook to a specified temperature for a specified length of time, product shelf-life (use-by date).
- storage of product (e.g., refrigerated/frozen/shelf stable) and transport conditions required.
- food packaging material used.

Provide a brief description of where you have documented this.

## Element – Process Flow Diagrams

A systematic representation of the sequence of steps used in the preparation (including storing handling and loading) of food/s is available.

Provide a brief description of where you have documented this.

The steps are accurately identified as points, procedures, operations, or stages in the food chain.

Provide a brief description of where you have documented this.

Flow diagrams are clear, accurate and sufficiently detailed to conduct the hazard analysis. Flow diagrams should, as appropriate, include but are not be limited to the following:

- the sequence and interaction of the steps in the operation
- where raw materials, ingredients, processing aids, packaging materials, utilities and intermediate products enter the flow
- any outsourced processes
- where applicable reworking and recycling take place
- where end products, intermediate products, waste, and by-products are released or removed

Provide a brief description of where you have documented this.

## Element – Hazard analysis

(Refer also to Chapter 5 of the Fish Rules – Division 4 – Preparation & Transport for requirements for thermal processing, preserving etc).

Potential hazards reasonably expected to occur in the sourcing and preparation of the product have been identified at each step of the flow diagram.

**FOR COLD STORES:** potential hazards reasonably expected to occur during receipt, storage and dispatch

Provide a brief description of where you have documented this.

For each potential hazard an appropriate condition / reasonable cause has been identified.

Provide a brief description of where you have documented this.

For each potential hazard an appropriate control measure has been identified as an action or activity that can be used to prevent or eliminate a hazard or reduce it to an acceptable level.

**NOTE:** if indicated as being controlled by support programs (See: [AA – System of controls](#)), details of the appropriate control/s must be included in the documented support program).

- If the composition of a food is important in preventing microbial growth and toxin production, e.g., in its formulation by adding preservatives, including acids, salts, food additives or other compounds, systems should be in place to ensure that the product is formulated correctly and that the controlling parameters are monitored.
- When formulation is used to control foodborne pathogens (e.g., adjusting the pH or aw to a level that prevents growth), systems should be in place to ensure that the product is formulated correctly and that the controlling parameters are monitored.

- When heat treatment is used to control foodborne pathogens (e.g., cooking, pasteurisation, retorting,) systems should be in place to ensure that a validated heat treatment is applied and that the controlling parameters are monitored.

Provide a brief description of where you have documented this.

‘Significant hazards’ are present if their prevention, elimination, or reduction to acceptable levels is essential to the production of safe food, this is because the hazard is reasonably likely to occur in the absence of control and reasonably likely to cause illness or injury if present. These ‘significant hazards’ must be accurately identified and controlled by measures designed to prevent or eliminate these hazards or reduce them to an acceptable level.

Provide a brief description of where you have documented this.

#### Element – HACCP Plan

If the hazard analysis identifies significant hazards – the HACCP Plan includes:

- The appropriate control/s that can be applied at the step/s identified
- The critical limits at the step that are specified and are scientifically validated
- The critical limits that are measurable or observable at the step

Provide a brief description of where you have documented this.

**Monitoring and corrective action**

Monitoring of CCPs is relative to the critical limits specified and:

- Are able to detect a deviation at the CCP
- are by a method and at a frequency able to detect a failure before critical limits are exceeded and a deviation occurs
- are documented and reviewed

Provide a brief description of where you have documented this.

Corrective actions specify the action to be taken if a deviation occurs and:

- Are able to bring the process back under control
- Identify all product that has been affected by the deviation
- Includes provisions for isolating and evaluating the safety of the affected products.

Provide a brief description of where you have documented this.

The task of monitoring any identified CCPs is documented. Persons responsible for monitoring and corrective action are identified and trained in monitoring activities.

Provide a brief description of where you have documented this.

#### Element – Verification

The HACCP Plan or another section of the AA accurately specifies the methods, procedures, tests, and other evaluations, **in addition to monitoring** that will be used to determine whether a control measure is or has been operating as intended.

Provide a brief description of where you have documented this.

Verification activities are carried out, importantly the people who do the verification activities must not be the same staff who undertake the monitoring.

Provide a brief description of where you have documented this.



**Element – Validation**

There is evidence that each control measure or combination of control measures identified, if properly implemented, is capable of controlling ‘significant hazards’ to a specified outcome.

Provide a brief description of where you have documented this. Evidence may be by referencing regulatory limits, scientific papers, or industry codes of conduct.

**Additional Questions for the Seafood Export Facilitator**

Email the completed form to: [dairyeggsfish@aff.gov.au](mailto:dairyeggsfish@aff.gov.au)