

**Export Meat Operational Guideline**

# 3.17 Interruption to production

**Purpose**

March

2023

 

This document describes the process that the department implements to address situations where there are critical interruptions to production. The department will work with export‑registered meat establishments to:

* maintain the eligibility of product to meet Australian standards and importing country requirements (including factors such as product integrity, product wholesomeness, food safety, animal welfare requirements)
* ensure normal production can resume as soon as possible.

Critical interruptions to production include:

* mechanical failures such as refrigeration failures (product cannot be refrigerated within 2 hours of slaughter, meeting refrigeration index (RI) and critical control point (CCP) requirements)
* interruption to production from power failures, storms and floods, and fires
* activist interference with plant production
* accidental or deliberate contamination of product during production.

**Scope**

The scope of this guidelines includes:

* export-registered red meat abattoirs (including Tier 1 establishments)
* independent boning rooms
* wild game meat processing plants.

Items that are not considered as ‘interruptions to production’ as defined in this document and therefore out of scope, include:

* short term interruptions to production that the company is able to resolve quickly and still ensure product is produced in compliance with relevant standards.

Where an interruption to production relates to a suspect or confirmed emergency animal disease, this will be managed separate from this guideline through the relevant AUSVETPLAN plan and relevant state biosecurity measures.

**Legislative basis**

Under the Export Control (Meat and Meat Products) Rules 2021, made under the *Export Control Act 2020* (‘the Act’):

* a disposition, and any conditions specified in relation to a disposition, applied to carcase or carcase parts, or prescribed meat or meat products, by an authorised officer must be complied with (as per ‘5-9 Compliance with decisions and dispositions’ made under Chapter 5, Part 1, Division 2)
* as soon as the holder of an approved arrangement becomes aware that something has occurred at the registered establishment that has affected or could affect the wholesomeness or integrity of a prescribed meat or meat products, they must identify the meat or meat products, notify an authorised officer of the circumstance and ensure that the meat or meat products are held separately under conditions of security until an authorised officer applies a disposition or notifies the holder of action to be taken in relation to the meat or meat products (as per ‘5-37 Action if prescribed meat or meat products are unwholesome or integrity etc. cannot be ensured’ made under Chapter 5, Part 1, Division 2).

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## Principles

The following principles underpin this guideline:

* Ensuring workplace health and safety of all persons at the establishment is prioritised over any product integrity, safety, or wholesomeness concerns.
* Comprehensive communication between all people on site is essential to manage interruption to production incidents.

Following an interruption to production incident, product must be assessed to determine whether it is eligible for: export to the destination country or other eligible countries; or supply to the domestic market.

## Workplace health and safety

If workplace health and safety (WHS) issues occur during an interruption to production, all persons on plant must ensure the health and safety of themselves and others on-site, prior to managing issues related to product integrity, safety and/or wholesomeness.

The following establishment procedures must be adhered to by all persons on-plant during an interruption to production incident:

* company workplace health and safety procedures
* company emergency procedures and
* company first response strategies.

All departmental staff are to follow direction from the company where there is a WHS incident during an interruption to production, except where they believe their health and safety is put at risk by following the directions of the company.

### Health and safety risks to departmental staff

The following table outlines the process where DAFF staff believe that their health or safety is at risk by following company directive during an interruption to production incident.

Table 1 Health and safety risks to departmental staff

| Stage | Process | Responsible party |
| --- | --- | --- |
| 1. | If an officer believes their health and safety is at risk, they should take immediate action to make themselves safe. When they are safe, they must contact their Assistant Director (AD), Veterinary and Export Meat Branch. | Departmental on‑plant staff |
| 2. | The AD then becomes the DAFF contact point with the company in relation to all departmental work, health, and safety matters during the interruption of production incident. | AD, Veterinary and Export Meat Branch |
| 3. | The AD provides the future direction to DAFF staff on-plant in relation to the interruption to production incident. | AD, Veterinary and Export Meat Branch |
| 4. | After the interruption to production incident is resolved, a debrief occurs between DAFF and the company to assess how effectively the interruption to production was managed. | DAFF and company |

## Product integrity, safety, and wholesomeness

Where an interruption to production event occurs that affects either product integrity, product safety or product wholesomeness, or a combination of these:

* the establishment will manage the interruption to production as per procedures in their approved arrangement to return the establishment to normal operations
* the department will provide direction as to the procedures required to confirm the eligibility of product for export that has been affected by an interruption to production
* the establishment must hold product that has been affected by an interruption to production until the department has made a disposition
* the department will determine the final disposition of product and confirm whether it is eligible for export

Note: product directed to the domestic market will be released after disposition is provided from the relevant state/territory authority. The company will provide DAFF with copies of the disposition results for this product from the relevant state/territory authority.

### Additional requirements to determine eligibility of product

To assess the condition of product affected by an interruption to production incident, and to confirm whether product is eligible for export or not, the following may be required (depending on the circumstances):

* additional microbiological testing of product
* analysis of refrigeration index (RI) of affected product
* assessment of the measures that were taken to manage the product during the interruption to production
* visual assessment of the product
* organoleptic assessment of product
* where the interruption to production involved refrigeration breakdown, the [Guideline for the Application of the Refrigeration Index to Refrigeration of Meat and Meat Products](#_Related_material_1) provides further advice.

## Product recall

Where product has been affected by an interruption to production incident and has been exported or is in the process of being exported, the department will make a determination on the product and may direct any of the following:

* recall of product
* product be destroyed
* no action required.

Where product has been affected by an interruption to production incident and has been released to the domestic market or is in the process of being released to the domestic market, state authorities will determine action required in relation to the product.

## Communication

### No risk to product integrity, product safety or wholesomeness

Where there is no risk to product integrity, product safety or wholesomeness related to an interruption to production incident:

* the OPV will notify the ATM and AD in the weekly report.

### Risk to product integrity, product safety or wholesomeness

The following table outlines the process for communication in the event of an interruption to production, where there is a risk to export product integrity, product safety or wholesomeness.

Table 2 Communication process where there is a risk to product integrity, product safety or wholesomeness

| Stage | Process | Responsible party |
| --- | --- | --- |
| 1. | OPV (or in their absence the FSMA) to notify the Establishment ATM and the AD of the interruption to production | OPV or FSMA (in absence of OPV) |
| 2. | Establishment ATM (or in their absence the FOM) becomes the DAFF point of contact with the establishment in relation to all technical matters pertaining to interruption to production. | ATM or FOM (in absence of ATM) |
| 3. | ATM copies the AD into all correspondence regarding the interruption | ATM |
| 4. | The ATM/FOM provides written instruction to the company and DAFF staff as to the short-term corrective actions (STCAs), long term preventative actions (LTPAs) and records required to protect the integrity, food safety and wholesomeness of any product affected. | ATM/FOM |
| 5. | The company (with support of DAFF staff) provide a final report to the ATM/FOM on the outcomes achieved. | Company |
| 6. | ATM/FOM make a final disposition on product affected by the interruption to production. | ATM/FOM |
| 7. | Debrief between DAFF and the company as to how effectively the interruption to production was handled. | DAFF and Company |

## Related material

The following related material is available on the internet:

* 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)
* Webpage: [Export Control (Wild Game Meat and Wild Game Meat Products) Rules 2021](https://www.legislation.gov.au/Series/F2021L00313)
* Webpage: [Export Control (Rabbit and Ratite Meat and Rabbit and Ratite Meat Products) Rules 2021](https://www.legislation.gov.au/Series/F2021L00308)
* Webpage: [Export Control (Poultry Meat and Poultry Meat Products) Rules 2021](https://www.legislation.gov.au/Series/F2021L00310)
* Webpage: [Work Health and Safety Act 2011](https://www.legislation.gov.au/Series/C2011A00137)
* Webpage: [Work Health and Safety Regulations 2011](https://www.legislation.gov.au/Series/F2011L02664)
* Webpage: [Model WHS Regulations](https://www.safeworkaustralia.gov.au/doc/model-whs-regulations)
* Webpage: [Model Code of Practice: Managing the work environment and facilities](https://www.safeworkaustralia.gov.au/doc/model-code-practice-managing-work-environment-and-facilities)
* Webpage: [Model Code of Practice: First aid in the workplace](https://www.safeworkaustralia.gov.au/doc/model-code-practice-first-aid-workplace)
* Webpage: [Model Code of Practice: How to manage and control asbestos in the workplace](https://www.safeworkaustralia.gov.au/doc/model-code-practice-how-manage-and-control-asbestos-workplace)

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

* Webpage: [Guideline for the application of the Refrigeration Index to refrigeration of meat and meat products](https://www.agriculture.gov.au/biosecurity-trade/export/controlled-goods/meat/elmer-3/guideline-application-refrigeration-index)

## Attachment 1: Roles and responsibilities

### Assistant Director (AD), Veterinary and Export Meat (VEMB)

* Where a departmental on-plant staff member believes their health and safety (or a colleague’s health safety) is at risk, the Assistant Director becomes the DAFF contact point with the company in relation to the interruption to production.

### Director, Veterinary and Export Meat (VEMB)

* Manages operational requirements for on-plant staff affected by the interruption to production.

### Establishment Area Technical Manager (ATM)

* Point of contact with the establishment in relation to all technical matters pertaining to the interruption to production.
* Ensure VEMB Director is provided all correspondence in relation to the interruption to production.
* Provide written instruction to the establishment and DAFF as to the short-term corrective actions (STCAs) and long-term preventative actions (LTPAs) and records required to protect the integrity, food safety and wholesomeness of any product affected.
* Make final disposition on product affected by the interruption to production incident.
* Receive final report from establishment management and discuss how effectively the interruption to production was handled with establishment management.

### Establishment Management

* Ensure workplace health and safety of all persons at the establishment.
* Manage the interruption to production as per procedures in their approved arrangement to return the establishment to normal operations.
* Provide a final report to the ATM/FOM on the outcomes achieved following the interruption to production.
* Discuss how effectively the interruption to production was handled with the ATM.

### Field Operations Manager (FOM)

* Where the ATM is not available, performs the roles and responsibilities of the ATM as specified in this document.

### On-plant officers (On-Plant Veterinarian and Food Safety Assessor)

* Notify ATM and AD of the interruption to production.
* Follow written instructions from the ATM/FOM pertaining to the interruption to production incident.

## Attachment 2: Definitions

Approved arrangement (AA)

An approved arrangement under Chapter 5 of the *Export Control Act 2020*.

An arrangement for a kind of export operations in relation to a kind of prescribed goods approved by the secretary.

An approved arrangement:

* documents the controls and processes to be followed when undertaking export operations in relation to prescribed goods for export
* enables the secretary to have oversight of specific export operations.

Area Technical Manager (ATM)

A Commonwealth authorised officer with veterinary qualifications who has responsibility for the supervision, technical performance, assessment and verification of technical standards and operations in a defined group of export meat establishments.

* ATM with day-to-day on-plant responsibilities, on-plant staff technical review responsibilities and an establishment critical incident response audit (CIRA) role.
* Approves the establishment’s approved arrangement and/or any amendments made to it.

Assistant Director (AD), Veterinary and Export Meat (VEMB)

A Commonwealth officer who maintains AEMIS arrangements within defined group of export meat establishments and has responsibility for the operational supervision and performance management of on-plant departmental staff in those establishments.

Director, Veterinary and Export Meat (VEMB)

A Commonwealth officer who has responsibility for the overall regional management of VEMB Assistant Directors and on-plant departmental staff.