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May

2023

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Export Meat Operational Guideline

# 6.5 Manual meat descriptions

**Purpose**

This document outlines the department’s operational processes regarding the use of manual meat descriptions on export certification.

**Scope**

This document relates to the use of manual meat descriptions on export certification for:

* meat and meat products
* poultry and poultry meat products
* rabbit and ratite meat and rabbit and ratite meat products
* wild game meat and wild game meat products.

**Legislative basis**

Under the *Export Control Act 2020* and its associated rules including the Export Control (Meat and Meat Products) Rules 2021, the Export Control (Wild Game Meat and Wild Game Meat Products) Rules 2021, the Export Control (Poultry Meat and Poultry Meat Products) Rules 2021 and the Export Control (Poultry Meat and Poultry Meat Products) Rules 2021, establishments are bound to comply with their approved arrangement.

The compliance of establishments with their approved arrangement is verified and audited by the department.

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## Policy statement

The department, as the competent authority, issues export certificates to import authorities that attests that certified product meets relevant importation requirements such as:

* food safety
* biosecurity
* product integrity
* product claims.

Departmental policy in regard to the use of manual meat descriptions on export certificates is that manual meat descriptions must:

* be consistent with labelling approved under an establishment’s approved arrangement
* not introduce claims that have not been verified and approved by the department in an establishment’s approved arrangement
* comply with importing country requirements.

The department’s export certification policies do not preclude establishments having statements such as [[animal raising claims](bookmark://_Attachment_2:_Definitions)](bookmark://_Attachment_2:_Definitions) associated with products, such as a sticker on the product or on an import permit (where agreed with the importing country authority).

Note, where a meat description claim clashes with an alternate definition for such a claim by an importing country, such a disparity must be brought to the department’s attention for final decision as to whether the claim may be used in the specific market.

## Manual meat descriptions

### English only

Manual meat descriptions must be provided in English only.

### Examples of claims that cannot be used

Claims that cannot be used in a manual meat description field, unless approved by the department in the establishment’s approved arrangement’s product labelling component, include but are not limited to:

* reference to standards such as ‘MSA’ (Meat Standards Australia)
* breed of animal such as ‘angus’ or ‘wagyu’
* [animal raising claims](#_Attachment_2:_Definitions) such as ‘100-day grain fed’
* quality statements such as ‘EQG’ (Eating Quality Graded).

Organic claims are not permitted to be used in manual meat descriptions.

## Verification at audit

During an establishment audit:

* records including issued export certification will be reviewed
* manual meat descriptions will be reviewed against approved product labels
* statements of claims will be verified.

Other verification checks may occur, as required, to ensure domestic standards and importing country requirements are being met.

### Non-compliance by establishments

Where a manual meat description on issued certification includes a claim that has not been included on the approved product labelling:

* regulatory action including, but not limited to, a corrective action request may be issued for the establishment.

### Non-compliance by exporters

* Exporters, under their meat licence, may be issued a show-cause letter where they have submitted manual meat descriptions (within the request for permit (RFP)) that are inconsistent with the product label.
* Further regulatory action may be taken, including revocation of a meat licence.

## Related material

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

* Webpage: [Approved arrangement guidelines – Meat](https://www.awe.gov.au/biosecurity-trade/export/controlled-goods/meat/elmer-3/aa-guidelines-meat)
* Webpage: [Approved arrangement guidelines – Wild game meat](https://www.awe.gov.au/biosecurity-trade/export/controlled-goods/meat/elmer-3/aa-wildgame)
* Webpage: [Approved arrangement guidelines – Poultry](https://www.awe.gov.au/biosecurity-trade/export/controlled-goods/meat/elmer-3/aa-guidelines-poultry)

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 (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: [Export Control (Wild Game Meat and Wild Game Meat Products) Rules 2021](https://www.legislation.gov.au/Series/F2021L00313)

## Attachment 1: Roles and responsibilities

### The occupier

* Label product as approved by the department under the approved arrangement.

### Departmental auditor

* Reviews a selection of export certificates including examination of manual meat descriptions used.

### Exporter submitting request for permit

* Ensure that manual meat descriptions entered are consistent with the product label.

### Validator for the request for permit

* Check the manual meat descriptions in RFPs to ensure it is consistent with the product label.

## 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.

**Animal raising claims**

Claims made about the animal or supply chain specifically relating to animal husbandry conditions, feeding, handling, drug treatments and/or geographical reference.

**Manual meat description**

A product description that is entered by a person raising a request for export certification for meat or meat products, that is not a pre-set description made available by the department. The manual meat description will feature on export certification that is issued, on the product line.