



Meat Notice

Meat notice number:	2023/04		
Meat notice title:	Regulation of Shipping Marks – USA		
Category:	Regulatory Compliance		
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Contact officers	Distribution categories		
Brett Evans Export Meat Program Meat Exports Branch Exports and Veterinary Services Division exportmeatoperations@aff.gov.au	<input checked="" type="checkbox"/> Central and regional office <input checked="" type="checkbox"/> Departmental on-plant staff <input checked="" type="checkbox"/> Field Operational Managers; Area Technical Mangers <input checked="" type="checkbox"/> Audit Assurance Branch <input checked="" type="checkbox"/> Managers, export meat establishments <input checked="" type="checkbox"/> State/Territory regulatory authorities <input checked="" type="checkbox"/> Other; Export Meat Industry Advisory Committee		

1. Purpose

To inform all export registered establishments including abattoirs, independent boning rooms, cold storage facilities, freight forwarders, and non-packer exporters eligible to produce, store, and export meat and meat products for the United States of America (USA), of their ongoing requirements to correctly apply shipping marks on all consignments and to complete, entirely without error, all instances of export certification correctly.

This notice informs all impacted parties of the types of regulatory action to be expected in instances where failure to meet this Australian system and USA importing country requirement have been identified as being under their responsibility.

2. Scope

This notice applies to all export registered meat and meat product establishments listed for export operations to the USA.

This notice relates specifically to all entities responsible for the application of shipping marks to US consignments and those involved in the raising of Request for Permits (RFPs).

3. Background

The USA requires that a unique shipping mark is applied on all cartons of all shipments of edible meat and meat products for import to the USA. Shipping mark details are included on the health certificate and are used to support the identification and traceability of the meat and meat products.

One of the more common reasons for the rejection of exported edible meat and meat products to the USA is due to missing, incorrect, or illegible shipping marks. Consistent with the US entry in MICOR and FSIS Directive 9900.5 Rev 2, all instances of cartons presenting at point of entry with illegible, missing or incorrect shipping marks are formally considered an instance of certification failure, are treated as non-compliant and will not clear import inspection.

While US Barcoding and Meat Messaging may become an approved means of resolving and facilitating detained trade for all instances of shipping mark non-compliance, the underlying failure to apply shipping marks correctly in the first instance is still treated by both the Department of Agriculture, Fisheries and Forestry (DAFF) and the US FSIS as a health certificate non-compliance.

The FSIS records all instances of failure against the establishment of production, not the establishment of container loading, who often is a third party responsible for the processes covered in this Meat Notice. The Department observes that resultantly this may increase the processing establishment to commercial risk in relation to their market access.

4. Responsibilities

Note, this section only applies to those establishments approved for, and are conducting, the physical operation of packing US loads, and/or applying shipping marks to US loads, and/or raising RFPs for health certification for US loads.

4. 1. Establishment Management must:

- a) Conduct a full review of their Approved Arrangement (AA) as relates to US export operations, specifically reviewing for currency all shipping mark and export documentation arrangements.
 - If any areas for improvement are identified, liaise with relevant DAFF auditor regarding any amendments or improvements to AA to satisfy US importing country requirements.
- b) Ensure, within 90 days of this Meat Notice being released, **all** staff associated with US export operations (inc, RFP/shipping documentation clerks and loadout managers and their staff that apply shipping marks) have completed a formal review of US importing country requirements relating to shipping marks, their correct application, and health certification requirements.
 - Management will record this training and document it as per AA training requirements.
- c) Document and present evidence of one-off completion of points 4.1 a) and b) to the DAFF On-Plant Veterinarian (OPV).
- d) Ensure, for the next 12 months, inclusion in their **internal** audit schedule of a review of on-plant shipping mark and documentation processes.
- e) For establishments that conduct their own export operations, notify their OPV within 30 days if they become aware of any instances of a detainment by US FSIS due to incorrect shipping marks that were applied by their establishment's staff.
 - Discuss with their OPV the shipping mark failure at weekly OPV/Management meeting.

- Note this applies only to instances where the error could not be resolved through Meat Messaging.
- f) For establishments without an OPV – cold stores and export freight forwarders – management must direct evidence of compliance with points 4.1. a), b), d), and e) to their relevant Departmental Auditor.

4.2. Departmental on-plant officers (OPVs) will:

- a) Provide establishment management with a copy of this Meat Notice.
- b) Review their establishment’s training resources and learning materials that relate to instructing loadout staff and EXDOC users on US shipping mark requirements.
- c) Confirm establishment management declaration that all US export operations staff have completed refresher training material review (4.1 b).
- d) Record and discuss at weekly OPV/Management meeting all instances of establishment reported shipping mark failures for the US market where the establishment was responsible for the export operation.
- e) When there are numerous incidents of shipping mark failures (>5 reported occurrences per calendar month where a unique lot was failed by FSIS), direct establishment management to develop a root cause analysis (RCA) of the failure.
- f) Review establishment management RCA and, if required, issue a corrective action request (CAR) for establishment to develop correct action to prevent reoccurrence of failure.
- g) Monitor delivery of CAR and work with establishment auditor in closing out CAR.

4.3. Departmental Auditors (Area Technical Managers) will:

- a) Review the occupier’s declaration and evidence of compliance within their AA for US export operations (process 4.1 a).
 - If required, process submitted EX26B to amend and incorporate any improvements identified by occupier.
- b) Monitor progress of establishment in closure of any outstanding CARs/CAPs associated with this MN.
- c) Ensure, at EMSAP audits, that process 4.1 d) is being delivered by establishment.
- d) Verify through audit at least once per year that the Establishment Management is complying with this MN.

4.4. Departmental Auditors (Audit Assurance Branch) will:

- a) Review the occupier’s declaration and evidence of compliance within their AA for US export operations (process 4.1 a).
- b) Review at audit and confirm currency of establishment staff training under 4.1 b.
- c) Review and audit and confirm 4.1 d) is being delivered by the establishment.
- d) Receive and monitor establishment point of entry (POE) failure for shipping mark and certification failures under 4.1 e).
- e) Following the same process as 4.2 f, in instances of repeat shipping mark failure (>5 reported occurrences per calendar month where a unique lot was failed by FSIS), direct establishment management to develop a root cause analysis (RCA) of the failure.

- f) Review establishment management RCA and, if required, issue a corrective action request for establishment to develop a corrective action plan (CAP) to prevent reoccurrence of failure.
- g) Monitor delivery of CAP and work with establishment auditor in closing out CAP.
- h) Verify through audit at least twice annually that the Establishment Management is complying with this MN.
- i) For recurring shipping mark failures, ensure that outstanding corrective action is promptly addressed and closed out, including out of audit cycle, through the Est SFAS/ATM/FOM if requested by the Department.

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Export Meat Program

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