



Australian Government
Department of Agriculture

Meat notice

Meat notice number:	2020/03		
Meat notice title:	Establishment sourcing of stock to comply with importing country requirements for cadmium levels in offal		
Category:	Legal requirements including market access requirements		
NSFS reference	Issue date	Date of effect	Review date
12	24 January 2020	31 January 2020	January 2022
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Implementation schedule (to be completed by the departmental on-plant officer)

Date received: _____ Date discussed with est. management: _____

Initial implementation date: _____ Date completed: _____

Management representative initials: _____ Dept. on-plant officer initials: _____

1. Purpose

The purpose of this meat notice is to:

- reinforce and clarify the national requirements for the management of cadmium in liver and kidney produced in export registered cattle and sheep slaughter establishments.
- formally notify industry that the production testing option as outlined in meat notice 2018/05 will cease from 31 January 2020.

- provide updated disposition tables for sheep and cattle.

This notice supersedes meat notice 2018/05.

2. Scope

This notice applies to all export registered cattle and sheep slaughter establishments.

3. Background

The Department of Agriculture (the department) can only certify liver and kidney exports where appropriate systems are in place to provide the department with confidence that relevant standards are being met.

The department considers that for contaminants ubiquitous in the environment, management programs based on sourcing will be acceptable where the National Residue Survey (NRS) results show that the offal has historically met specified market requirements. Table 1 lists relevant standards for major markets for Australian liver and kidney.

Table 1: Maximum levels for cadmium in liver and kidney

Country/region	Maximum Level (mg/kg)	
	Liver	Kidney
Singapore	0.2	0.2
Eurasian Economic Union: Armenia, Belarus, Kazakhstan, Kyrgyzstan, Russia	0.3	1
EU and similar: China/Hong Kong, Egypt, EU, EU accession countries, GCC members (Bahrain, Kuwait, Oman, Qatar, Kingdom of Saudi Arabia, United Arab Emirates), Israel, Republic of Korea (ROK), Taiwan, Turkey, Vietnam	0.5	1
Malaysia	1	1
Australia*	1.25	2.5
Codex	Not set	Not set

* In accordance with the Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption AS4696:2007 and the Australia New Zealand Food Standards Code.

Standards in markets have been divided into three broad categories to assist establishments in managing residues:

- Eurasian Economic Union (liver 0.3 mg/kg, kidney 1 mg/kg);
- EU and similar (liver 0.5 mg/kg, kidney 1 mg/kg); and

- Australia (applies to all countries other than those that have maximum limits that are lower than Australia. The *Export Control (Meat and Meat Products) Orders 2005* require product for export complies with the Australia New Zealand Foods Standards Code).

In response to concerns expressed by importing countries about reliance on commercial sourcing programs developed by individual establishments, the Department of Agriculture together with industry have implemented a national program.

A number of options have been developed that can be used by an establishment to provide the department with the necessary confidence that product complies with the relevant standards. More than one option can be used, for example option 2 might be used for mature animals and option 1 for the rest.

Option 1. Disposition tables

Test results for cadmium in sheep and cattle liver from the NRS random monitoring program were used to develop state-based dispositions in order to provide confidence that the derived product complies with the relevant market standards (Appendix 1 and 2).

When using this option, slaughter establishments are required to use the tables in Appendix 1 for cattle and Appendix 2 for sheep when making decisions about sourcing liver (as well as pluck where liver is included) and kidney where markets have identified maximum levels for cadmium in these offal. Where the table indicates the product is not suitable for “All other countries” the product is not suitable for human consumption.

Option 2. Alternative procedure

Slaughter establishments that wish to use an alternative procedure (for example an establishment testing based program) to ensure liver and kidney meet relevant market standards, must apply for consideration of that procedure as outlined in the department’s “*Policy for approval of alternative procedures and new technologies in export registered meat establishments*”. This policy is found on the department’s website in [ELMER 3](#). In their application the establishment must demonstrate that the alternative procedure delivers at least the same confidence that the product is compliant with market standards. For example, an establishment might wish to conduct lot testing. Testing is on a test and hold basis. The department considers 10 individual cores or 10 individual liver or kidney samples, analysed separately (no aggregating/combining samples) would provide an appropriate level of confidence for compliance. A single result above the market maximum level would mean the whole retained, sampled lot could not be certified for that market. A single level above the Australian standard would mean the whole retained, sampled lot is not suitable for human consumption.

Any alternative procedure should provide adequate confidence that no more than 1.5% of liver or kidney are non-compliant for the age groups of animals as listed in the disposition tables.

For option 2, establishments are responsible for the arrangement and funding of testing at a laboratory accredited by NATA for testing cadmium in offal. **NRS consumables MUST NOT be used for testing under option 2.**

4. Responsibilities

1. Export-registered establishments:

Establishment management must:

- a. ensure the sourcing policy within their approved arrangement includes specific requirements for liver and kidney as set out in this notice.
- b. where required, amend their approved arrangement to reflect changes to their sourcing policy.
- c. where establishments choose to develop and validate an alternative procedure for the sourcing of animals to produce product compliant with importing country requirements, the submission should be submitted in accordance with the department's *"Policy for approval of alternative procedures and new technologies in export registered meat establishments"*.
- d. undertake testing of liver and kidney samples if the establishment elects to implement option 2 as described above.
- e. Retain the tested product and only release to commerce to an eligible market based on the test results and in accordance with the Maximum Levels for cadmium in Table 1 above.

2. Tier 2 establishments: Department of Agriculture On-Plant Veterinarian (OPV) must:

- a. review alternate procedure applications and/or any amendments to the establishment's Approved Arrangement (AA) and recommend to the Area Technical Manager (ATM) for approval as appropriate.
- b. verify that the company is complying with the requirements of this meat notice.
- c. oversee any alternate procedure sample collection by company personnel.
- d. where a detection has occurred above the Australian Standard, notify the ATM and ensure that the establishment has taken the necessary measures to prevent the affected product from entering commerce as fit for human consumption.

3. Tier 2 establishments: Department of Agriculture ATM must:

- a. approve amendments to the establishment's AA.
- b. review and process any alternate procedure applications.
- c. verify that the amended AA describe the necessary measures to prevent product with levels higher than the Australian standard from entering commerce as fit for human consumption and to ensure only liver and kidneys that meet importing country requirements are exported.
- d. verify through audits, the establishment's continued compliance with the requirements of this notice.

4. State Regulatory Authority – Food:

- a. as per the service level agreement with the department, audit Tier 1 establishments to assess compliance with the requirements of this notice.
- b. notify the department through the Certification Integrity Unit (CIU) of any non-compliance with the requirement of this notice.

Jason Lucas

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Export Meat Program

24/01/2020