Australian Government
Department of Agriculture and Water Resources

Meat notice

Meat notice number:	2017 / 05
Meat notice title:	**Establishments sourcing of livestock to comply with importing country Hormonal Growth Promotant free requirements (HGP FREE)**
Category:	Reinforcement of existing requirement

NSFS reference	Issue date	Date of effect	Review date
13.2	22 Dec 2017	Immediate	22 Dec 2019

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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

This notice provides export registered establishments with information about the sourcing, slaughter, processing, storing of product destined for non-EU HGP free markets and re-enforces the reporting requirements for animals detected with HGP implants but declared as HGP free on the National Vendor Declaration (NVD).

2. Scope

This notice applies to all export-registered abattoirs producing, processing and storing bovine meat and meat products for countries (other than EU countries) which require that meat is produced from HGP free animals as referenced in the Manual of Importing Country Requirements (MICoR)

This notice supersedes and replaces meat notice 2015/06.

3. Background

Whilst Australia permits the use of Hormonal Growth promotants (HGPs) in cattle, a number of trading partners require that meat and meat products are produced from HGP free animals.

The Department of Agriculture and Water Resources (the department) can only certify exports of bovine meat and meat products to countries requiring HGP free product where appropriate systems are in place to provide confidence that this importing country requirement is satisfied.

4. Tier 1 establishments

Tier 1 establishments operate under the supervision of the relevant State Regulatory Authority (SRA) which provides audit services to these establishments to assess continued compliance with the Australian Standard (AS 4696) and applicable export legislations.

Some Tier 1 markets require bovine meat and meat products to come from HGP free animals. Tier 1 establishments exporting bovine meat and bovine meat products to such markets are required to verify the HGP treatment status of **all** cattle declared on the National Vendor Declaration (NVD) as HGP free by palpating all animals consigned under the NVD for the presence of palpable markers and examination for other indications of HGP use such as the triangular ear punch or other markers indicative of a possible HGP implant.

At the time of writing this meat notice, Tier 1 countries requesting HGP freedom are listed below:

Country Code	Country
EG	EGYPT
NC	NEW CALEDONIA

As this list may change in the future it is the establishment's responsibility to regularly check the Manual of Importing Country Requirements (MICoR) to ensure they produce product which complies with market access requirements.

5. Sourcing of HGP FREE cattle

Establishments producing bovine meat and meat products for export to non-EU HGP free market(s) must have a system in place to ensure the sourcing, identification and segregation of HGP free cattle when producing for such markets.

The establishment program must include establishment verification that cattle presented for slaughter as HGP free are accompanied by a National Vendor Declaration (NVD), or other document(s) based on a system of equivalent surety indicating that they have not been treated with HGPs.

6. Segregation of HGP free product

Establishments producing bovine meat and meat products for export to non-EU HGP free market(s) are required to maintain controls to ensure the segregation prior to slaughter of cattle declared by the consignor as HGP free from other cattle not declared as HGP free.

Procedures and controls must be in place to ensure that this segregation is maintained throughout the slaughter, processing and storing of product identified as HGP free and to ensure that it was derived only from HGP free cattle (this may require the application of an establishment specific identifying mark).

7. Establishment's verification - Palpation for HGP implants

Establishments must verify the HGP treatment status of **all** cattle declared on the National Vendor Declaration (NVD) as HGP free by palpating all animals consigned under the NVD for the presence of palpable markers and examination for other indications of HGP use such as the triangular ear punch or other markers indicative of a possible HGP implant.

The palpation of cattle must be carried out by competent staff to ensure compliance with importing country requirements. Staff palpating cattle to verify their HGP free status must be able to demonstrate proficiency in detecting HGP markers.

The establishment must have a HGP implant detection training program in place which includes an assessment component where staff are requested to palpate cattle known to have been treated with HGPs and detecting the markers in all of these animals.

If a failure is identified in the palpation process then staff should be retrained and reassessed for competency in this task to ensure that all future presentations of animals treated with HGPs are detected.

8. Detection of implant or triangular ear punch in cattle declared as HGP free cattle

Where it is identified that animal(s) declared as HGP free, has been treated with a HGP product by either palpation of a marker or detection of a triangular ear punch, then the affected animal(s) must be segregated and excluded from processing as HGP free product.

A risk assessment of the remainder of the animals on the same NVD must be conducted by the establishment. If the risk assessment demonstrates that the detection was not systemic, then only product from the identified animal(s) is excluded from the HGP free market. Records of the risk assessment are assembled and maintained on file by the establishment management.

9. Reporting of HGP detections

The detection of an implant or triangular ear punch in HGP free declared cattle must be subject to a HGP compliance critical incident report (See attachment 1).

All detections must be reported to the department through the Export Meat Program via foodsafetyunit@agriculture.gov.au.The Export Meat Program will in turn notify the relevant State Authority.

Evidence must be collected to support the HGP compliance critical incident report including the following:

- Photographs of the hide intact with both ears and the NLIS identification and any other identifying brands or marks.
- Close up photograph of the NLIS identification and any other brands or identifying marks.

- After photographing, retain both ears intact with a skin flap and the NLIS device as physical evidence.
- Copy of the NVD

Note: HGP implant and NLIS identification should not be removed from the ear

Note: Physical evidence should be retained for 6 months or until otherwise advised by the Export Meat Program.

Refer to attachment 2 for a list of the responsibilities for handling and reporting a HGP detection.

10. Transfer of HGP free product

HGP free product must travel under a separate Meat Transfer Certificate (MTC) when being transferred between export registered establishments. The normal market eligibility statement on the MTC must be endorsed "HGP free". The integrity of the product must be maintained during the transfer process.

The following exporter declaration must appear in the Request For Permit (RFP): "*The meat is sourced from HGP free cattle slaughtered in an establishment conducting regular HGP freedom verification activities*".

11. Participation in monthly HGP sampling and verification testing program

Slaughtering establishments that produce bovine meat and meat products for a non-EU Tier 2 HGP free market must participate in a monthly verification and testing program.

A monthly verification sample is required regardless of whether the establishment is producing for such market(s) during that month or not*.

One liver sample must be collected each month from establishments slaughtering cattle and producing HGP free meat and meat products eligible for export to HGP free markets other than the EU. The liver sample must be tested for the presence of residues of hormones from HGP implants. Costs of this verification testing are to be borne by the establishment.

Any detection of a residue from an implanted HGP will result in a residue detection investigation by the relevant State Authority and a follow up audit of LPA accredited properties by AUS-MEAT.

To maintain the integrity of the test, liver samples from non-EU HGP free declared cattle will be collected using NRS sampling, packaging and transporting consumables.

- the OPV will select a carcase which arrived on an NVD declared as HGP free, collect the required liver sample or request a company personnel to collect the sample under his/her supervision, the OPV will then take control of the sample after collection and send directly to the testing laboratory (attachment 3).

*where the establishment does not have access (e.g. either temporary or prolonged suspension) to a non-EU market requiring HGP freedom at a particular month(s) they are not required to collect the monthly verification sample for that period.

Sample collection:

- Collect 500g of liver from an animal that has been declared as HGP free on the NVD.
- Enter relevant sample details into the National Residue Survey (NRS) Information Management System (IMS)
- Package the sample in NRS security satchels and NRS packaging and transporting consumables and despatch directly to the laboratory (attachment 3) as specified in the latest edition of the NRS sample collection manual, for testing.
- Once the results are received, NRS will create and supply the non-EU HGP report back to the OPV for immediate distribution to the establishment management.

For positive test result, NRS will notify the Export Meat Program. All detections will result in an investigation by the establishment. Outcome of investigations must be reported to the OPV.

The NRS will notify the relevant State Regulatory Authority of positive test results.

Establishments will be required to conduct a risk assessment of affected product and other products from the same consignor.

12. Requirements for independent boning rooms, cold storage establishments and further processing establishments intending to prepare HGP free products.

Where these establishments handle product for which HGP free certification will be sought, they must have a program in their approved arrangement which includes:

a) The sourcing of HGP free product from establishments processing the required approved non-EU HGP free program.
b) The handling and segregation of product identified by the slaughtering establishment as HGP FREE (this may require the application of an establishment specific identifying mark as product from various sources may have different identifying marks).
c) Product must be clearly identifiable and separated from other product.
d) Monitoring procedures for the implementing corrective actions when required.

13. Responsibilities

Tier 1 export-registered establishments

a) Amend the Approved Arrangement (AA) to comply with the requirements of this meat notice.

b) For cattle declared as HGP free on the National Vendor Declaration (NVD), palpate all animals and check for triangular ear punches.

c) Immediately notify the relevant State Regulatory Authority in the event of HGP detection (either a HGP marker or a triangular ear punch).

d) For all HGP markers and triangular ear punch detections, collect the required evidence and complete a HGP compliance critical incident report (attachment 1), forward the incident report to the State Regulatory Authority and the Export Meat Program.

e) Securely retain the physical evidence for a period of 6 months or until otherwise advised by the Export Meat Program.

Tier 2 export-registered establishments

a) Amend the Approved Arrangement (AA) to comply with the requirements of this meat notice.

b) For cattle declared as HGP free on the National Vendor Declaration (NVD), palpate all animals and check for triangular ear punches.

c) Participate in the monthly HGP sampling and verification testing program.

d) Immediately notify the OPV in the event of HGP detection (either a HGP marker or a triangular ear punch).

e) For all HGP markers and triangular ear punch detections, collect the required evidence and complete a HGP compliance critical incident report (attachment 1), forward the incident report to the OPV.

f) Provide the physical evidence to the OPV to securely retain under his/her control.

g) In the event of a residue detection in the monthly verification sample, conduct an investigation into the circumstances of the detection and provide a report to the OPV.

Department of Agriculture and Water Resources On-Plant Veterinarian (OPV)

a) Review 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 including; palpating all animals declared as HGP free on NVD and raising HGP compliance critical incident report for all HGP marker and triangular ear punch detections.

c) In consultation with the QA manager, arrange the collection of a monthly **500g** liver sample and send directly to the testing laboratory as specified in the latest edition of the NRS sample collection manual (see attachment 3).

d) Where a detection has occurred, ensure that the establishment has completed an incident report and send a copy of the completed HGP compliance critical incident report to the Export Meat Program together with photographic evidence.

e) Securely retain the physical evidence for a period of 6 months or until otherwise advised by the Export Meat Program.

f) Examine the establishment's investigation report for confirmed positive detections from the monthly verification sample, and in consultation with the Area Technical Manager (ATM) may issue a corrective action request (CAR) as appropriate based on the investigation findings (e.g. failure in the establishment's palpation procedures).

Area Technical Manager (ATM)

a) Assess the establishment's application for variation of the Approved Arrangement (AA) and either request modifications or approve if satisfied that requirement has been met.

b) Advise NRS of changes to the establishments listing to allow the addition and/or removal of establishments from the monthly HGP testing program.

Export Meat Program

a) Record the HGP detection and all relevant information on the national HGP register.

b) Forward the HGP compliance critical incident report together with supporting photographic evidence to the relevant State Regulatory Authority within 48 hours of receiving it.

c) Update the HGP incident register with the outcome of the State Authority assessment of the incident report and their decision regarding the investigation.

d) During the first week of each month, provide a summary of HGP incidents which occurred during the previous month to NRS.

e) Advise the OPV and NRS with the State Authority decision and investigation outcome within a week from receiving it.

f) Liaise with the relevant State Authority as required

State Regulatory Authority - Agriculture

a) Examine HGP compliance critical incident report together with supporting evidence and all related information and make a decision on course of action(s) to be taken.

b) Advise the Export Meat Program of proposed/intended actions within 2 weeks of receiving the HGP incident detection notification.

c) Advise the department whether the physical evidence (both ears attached with skin flap) needs to be retained pending investigation or be discarded.

d) Advise the department on the outcome of investigations conducted in response to reported incidents.

State Regulatory Authority - Food

a) As per the service delivery agreement with the department, audit Tier 1 establishments to assess compliance with the requirements of this notice.

b) In consultation with the department's Field Operations Manager (FOM) conduct an investigation into any HGP residue detection from samples collected under NRS random HGP sampling program to assess the establishment's ongoing ability to meet this importing country requirement.

c) Notify the department through the Certification Integrity Unit (CIU) of any non-compliance with the requirement of this notice.

National Residue Survey (NRS)

a) Notify the Export Meat Program of positive test results from the monthly verification samples collected at Tier 2 establishments and from samples collected under their random HGP sampling program at Tier 1 establishments.

b) Liaise with AUS-MEAT to undertake an LPA audit of the offending PIC within 6 months after the state investigation has been completed.

c) Provide a copy of the LPA audit report to the Export Meat Program.

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22 December 2017

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Attachment 1:HGP compliance critical incident report

Refer to attached form "HGP compliance critical incident report"

Attachment 2: Summary of responsibilities for handling and reporting a non-EU HGP implant detection

Responsible party	Actions
Establishment	Palpate all animals arriving for slaughter on NVD declared as HGP free.
	At Tier 2 establishments notify the On Plant Veterinarian (OPV) of any HGP implant detections.
	At Tier 1 establishments notify the relevant State Authority of any HGP implant detections.
	Collect the required evidence, this includes: **Photographic evidence:** a. Photographs of the hides with identification and both ears intact. b. Photographs of both ears attached with a skin flap with implant in situ and the animal identification. **Physical evidence:** c. both ears attached with a skin flap with implant in situ. d. copy of the NVD.
	Provide the physical evidence described in "c" above to the OPV to retain under their control. At Tier 1 establishments securely retain physical evidence.
	Complete a HGP compliance critical incident report and send to the OPV. Tier 1 establishments to send report to the relevant State Authority and Export Meat Program.
	Tier 2 Establishments Conduct an investigation into any positive detections in the monthly verification sample and provide a report to the OPV.
On Plant Veterinarian	Forward the completed incident report together with photographic evidence to the Export Meat Program.
	Notify the establishment management of the State's investigation outcome.
	Examine investigation report for detections in monthly verification samples and in consultation with the ATM may issue a corrective action request (CAR) as appropriate based on the investigation findings.
Export Meat Program	Record the HGP detection and all relevant information on the HGP register and forward the incident report together with supporting evidence to the relevant State Authority within 48 hours of receiving it.
	Update the HGP incident register with the State's decision and advise the OPV and NRS with State Authority decision and investigation outcome within a week from receiving it.

State Authority - Agriculture	Examine the incident report together with supporting evidence and all related information and make a decision on actions to be taken.
	Advise the Department of Agriculture and Water Resources of proposed/intended action within 2 weeks of receiving the notification.
	Advise the Department of Agriculture and Water Resources whether the physical evidence needs to be retained pending investigation or be discarded.
	Advise the Department of Agriculture and Water Resources on outcome of investigation conducted in response to reported incidents.
National Residue Survey	Liaise with AUS-MEAT to undertake an LPA audit of the offending Property Identification Code (PIC) after the State investigation has been completed.
Field Operations Manager and State Authority - Food	Verify through audit that the establishment is complying with the requirements of this meat notice.

Attachment 3: NRS contract laboratory for HGP samples

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