



DAFF MEAT NOTICE NUMBER: 2013/02		Product Integrity and Certification Requirements	
NSFS Ref 20			
Issue Date: 21.05.2013		Contact Officers:	
Date of Effect: 21.05.2013 to 15.07.2013	Date of Expiry: TBA	Christine Coulson Director, Product Integrity Export Meat Program Ph 02 6272 4167 Email: Christine.Coulson@daff.gov.au	Jason Ollington Field Operations Manager Food Exports Ph: 03 8318 6709 Email : Jason.Ollington@daff.gov.au
Distribution Categories		Last notice on this issue	
<input type="checkbox"/> Central & Regional Office	<input type="checkbox"/> OIC Inspection Staff Meat Establishments	<input type="checkbox"/> Managers, Export Meat Establishments	2012/05 Product Integrity and Certification Requirements
IMPLEMENTATION SCHEDULE (to be completed by the On Plant Supervisor on the DAFF file copy)			
Date Received: _____ Date Discussed With Management: _____			
Initial Implementation Date: _____ Date Completed: _____			
Management Representative Initials: _____ DAFF OPS Initials: _____			

1. Purpose

In line with the objectives of the *Export Control (Meat and Meat Products) Orders 2005*, *Export Control (Wild Game Meat and Wild Game Meat Products) Orders 2010* and *Export Control (Poultry Meat and Poultry Meat Products) Orders 2010*, the purpose of this notice is:

- To detail and reinforce the requirements for product integrity and export certification systems at export registered establishments.
- To inform and remind establishment personnel and DAFF officers of the actions required to verify Approved Arrangement (AA) procedures for ensuring the information recorded on export documentation is accurate and export permits are issued in accordance with legislative provisions.
- To require and reinforce that there is an auditable trail of records supporting the information provided on health certification and the validation of the Request for Permit (RFP).
- To introduce the requirement that all Export Permit Validators are required to be authorised.

2. Scope

This Notice applies to all export registered establishments. In particular, this notice should be read by:

- all establishment persons, authorised export permit validators and DAFF authorised officers who carry out tasks relating to the creation and completion of the RFPs, export permits and supporting documentation and
- DAFF officers responsible for verification of establishment approved arrangements, especially the procedures concerning product identification and traceability, and export permits.

3. Actions and Responsibilities

3.1 Establishment Management

- Ensure that Export Permit Validators are authorised in line with the guideline for appointing and utilising Authorised Officers to undertake prescribed functions within the Australian Meat Industry.
- Immediately review the establishment AA against the contents of this Notice and the product identification and traceability requirements for verification of compliance as set out in the relevant Orders, and specific to,
 - validation of the export permit (i.e. RFP validation);
 - Meat Transfer Certificate (MTC) signing procedures.
- Prepare and implement any necessary amendments to the AA and present them to DAFF for approval by 15 July 2013.
- Ensure all Authorised Export Permit Validators and MTC designated signatories understand their legal responsibilities when performing their tasks and have received training relevant to their tasks.
- Records of training need to be made available to DAFF upon request.

3.2 DAFF On-Plant Supervisors

- Review any AA amendments and recommend to Area Technical Manager (ATM) for approval.
- If validating requests for permits ensure that they have completed training to attain the competence certificate by 15 July 2013.
- Conduct verification activities in accordance with OPMS WI 3.02.08 IPPE- Load-in Load out and OPMS SOP 4.02 Export Documentation.
- Conduct export permit validation in accordance with OPMS WI 4.02.05 RFP Validation.

3.3 DAFF Food Safety Auditors, Senior Food Safety Auditors, Area Technical Managers, State Regulator Authority Auditors

- Review and approve establishment AA amendments.
- Include product integrity and export certification systems in the scope of the next periodic audit scheduled or the periodic audit scheduled post any approved amendments to the AA of the establishment. Where inaccuracies are found in the establishment product integrity and certification system that may lead to inaccurate RFPs take action to ensure the integrity of Australian government health certification is maintained.

- If validating requests for permits ensure that they have completed training to attain the competence certificate by 15 July 2013.

4. Background

The certification of export meat forms the basis of Australia's reputation as a reliable supplier of meat and meat products.

Inaccuracies in the RFP or MTC data are in breach of the Orders and can jeopardise the integrity of the health certificate, eroding confidence in Australian government health certification. This has the potential to lead to market access failure for Australian meat and meat products.

Product integrity and certification requirements are legislated in the *Export Control (Meat and Meat Products) Orders 2005*, *Export Control (Poultry Meat and Poultry Meat Products) Orders 2010* and *Export Control (Wild Game Meat and Wild Game Meat Products) Orders 2010*.

Export legislation allows DAFF to

- authorise company persons to provide a written verification that the product described in the RFP complies with the relevant conditions and restrictions on export and importing country requirements – i.e. validate RFPs, and
- approve designated signatories for MTCs

provided the performance of the tasks is included in the establishment's AA.

The accuracy of data in RFPs and in MTCs representing the product to be exported (RFP) or transferred to another establishment (MTC) is underpinned by the establishment's systems for product integrity and traceability.

5. Requirements

5.1 Issuing export permits, signing MTCs and Product identification & traceability

- AA procedures for product traceability and export documentation must describe the application and operation of the establishment's product traceability and documentation system.
- AA procedures for product traceability and export documentation must meet the legislative requirements.
- Establishment and DAFF on-plant personnel must be able to explain and demonstrate the workings of the establishment product integrity and traceability system to auditors.
- Information on export documentation must be true and correct.
- Slaughter dates in the RFP must contain the correct date or range of dates and must be supported by product source documents.
- Slaughter dates on product labels must be supported by product source documents.
 - Where there is a range of slaughter dates for the meat packed with-in a production run of cartons it is acceptable for the oldest date to be used.

Any deficiencies in these areas have the potential to cause market access failure.

5.1.1 Approved Arrangement requirements

- The requirements for product integrity and export certification are detailed in the *Approved Arrangement Guideline* Version 1.01 March 2011, Part 3 Product Integrity and Certification Requirements.
- The AA Guideline can be downloaded from www.daff.gov.au.
- The AA Guideline requires that product is identifiable at each stage of production, products are traceable through all stages of production (one step forward, one step back), and identification and traceability systems allow product market eligibility to be readily ascertained.
- The AA Guideline should be read in conjunction with this notice.
- Performance checklists and targets are provided in the AA Guideline to assist establishments when preparing and reviewing AA procedures.
- In addition to the detailed description of the various system elements and procedures, included within the AA a general description of the overall product supply chain from receipt to load-out. (This could be included in the general section on organisational structure). See appendix 1 for an example.

The information that follows is designed to assist establishments when reviewing their current AA procedures.

5.1.2 Export Permit Validation Procedures

- The validation of an export permit can be legally performed by an Authorised Export Permit Validators. (For this document the term Export Permit Validator is either a DAFF Authorised Officer or Authorised Export Permit Validators.)
- The procedures used to validate export permits, including load out inspection, must be detailed in the AA.
- The Export Permit Validator must verify that the information contained in the application for an export permit matches the details of the product intended for export and that the product is eligible for the intended destination.
- Export Permit Validators are required to ensure the content of the RFP is accurate and auditable to the load inspected. This must be described within the AA.
- The load out inspection report for the product must accurately describe the product in the RFP; verify that the product complies with the relevant conditions and restrictions on export and importing country requirements.
- When using EXDOC, this load out inspection report forms part of the RFP validation process.
- The Export Permit Validator must only validate the export permit when they have reasonable and documented evidence to believe that all requirements, including the accuracy of permit information, have been met.
- The Export Permit Validator is legally responsible for the accuracy of all information in the written verification i.e. RFP (including the product's compliance with legislative and importing country requirements).¹

¹ Under the Criminal Code Act 1995 Chapter 7, Part 7.4, Division 137.1-False or misleading information the Penalty is imprisonment for 12 months.

- The establishment AA must include documented procedures that detail the export permit validation process used. These procedures must satisfy the following performance indicators:
 - a) All legislative and importing country requirements are met.
 - b) The system by which RFP fields are completed must be described (where is the information in each field derived from).
 - c) Independent procedures for the written verification i.e. export permit validation and for the request for permit.
 - d) Validated export permits sent to DAFF for issuing the export permit must be accurate, true and complete.
 - e) All meat exported has a valid export permit.
- Refer to Appendix 2 for the information required to be included in an AA regarding Export Permit validation procedures.

5.1.3 MTC Verification and Signing Procedures

- When products intended for export are transferred between export registered establishments, information about the consignment must be given to the receiving export registered establishment (e.g. by using an MTC).
- The MTC acts as an official document that confirms the product's eligibility for export as the product moves along the production and supply chain within Australia.
- Information required on a MTC includes:
 - Full description of the meat and meat products
 - Details of the dispatching establishment
 - Details of the establishments where the goods were prepared
 - Quantities and kinds of packages
 - Transport journey and vehicle details
 - Market eligibility criteria and
 - Declaration that the goods being transferred comply with the conditions and restrictions for export and importing country requirements have been met.
- Declarations on MTCs are signed by designated signatories.
- The designated signatory is responsible for the accuracy of all information on the MTC.
- Establishment AA must include documented procedures that detail the MTC verification and signing process.
- Refer to Appendix 3 for the information required to be included in an AA regarding MTC verification and signing procedures.

5.1.4 Product Identification and Traceability Requirements

- The ability of Export Permit Validators and MTC designated signatories to make declarations that products have met the conditions and restrictions on export and importing country requirements, relies on establishments having effective and auditable product identification and traceability systems and those people being able to adequately understand and describe those systems.
- At each stage of production the process and product must comply with the relevant export legislative and importing country requirements.

- Establishments ensure export requirements are met during each stage through the implementation of AA procedures.
- Establishment monitoring and verification records provide documentary evidence of compliance with export requirements.
- Presence of the official mark on a carcass (or carcass tag attached to the carcass where importing country requirements allow) demonstrates product compliance and export eligibility.
- Product identification systems linked to product traceability systems provide a sound basis for verification that products being loaded for export or transferred between registered establishments have complied with legislative and importing country requirements.
- The establishment AA must include documented procedures that detail the product identification and traceability procedures at the establishment. The procedures must satisfy the following performance indicators:
 - a) Product is identified and accurately described at each stage of production.
 - b) Products and ingredients are traceable.
 - c) Product can be withdrawn and/or recalled.
 - d) The market eligibility of carcasses, meat and meat products can be readily ascertained at all times during processing and storage.
 - e) There is sufficient identification and segregation during processing and storage to preclude mixing of product with different eligibilities and inedible and condemned product.
 - f) Inventory systems enable the eligibility of product to be verified.
- Appendix 1 provides guidance regarding the various stages of product and the potential methods of product identification and recording that could be part of the establishment system.
- It is recommended that the establishment's AA for product identification and traceability include a flow chart that shows the various stages of production at the establishment and the product identification and recording system used at each step.
- Establishments should also include completed examples of records that are used in the traceability system in the AA explaining how the product information on the records are linked to the previous and subsequent production stage.



Elizabeth Wilcock

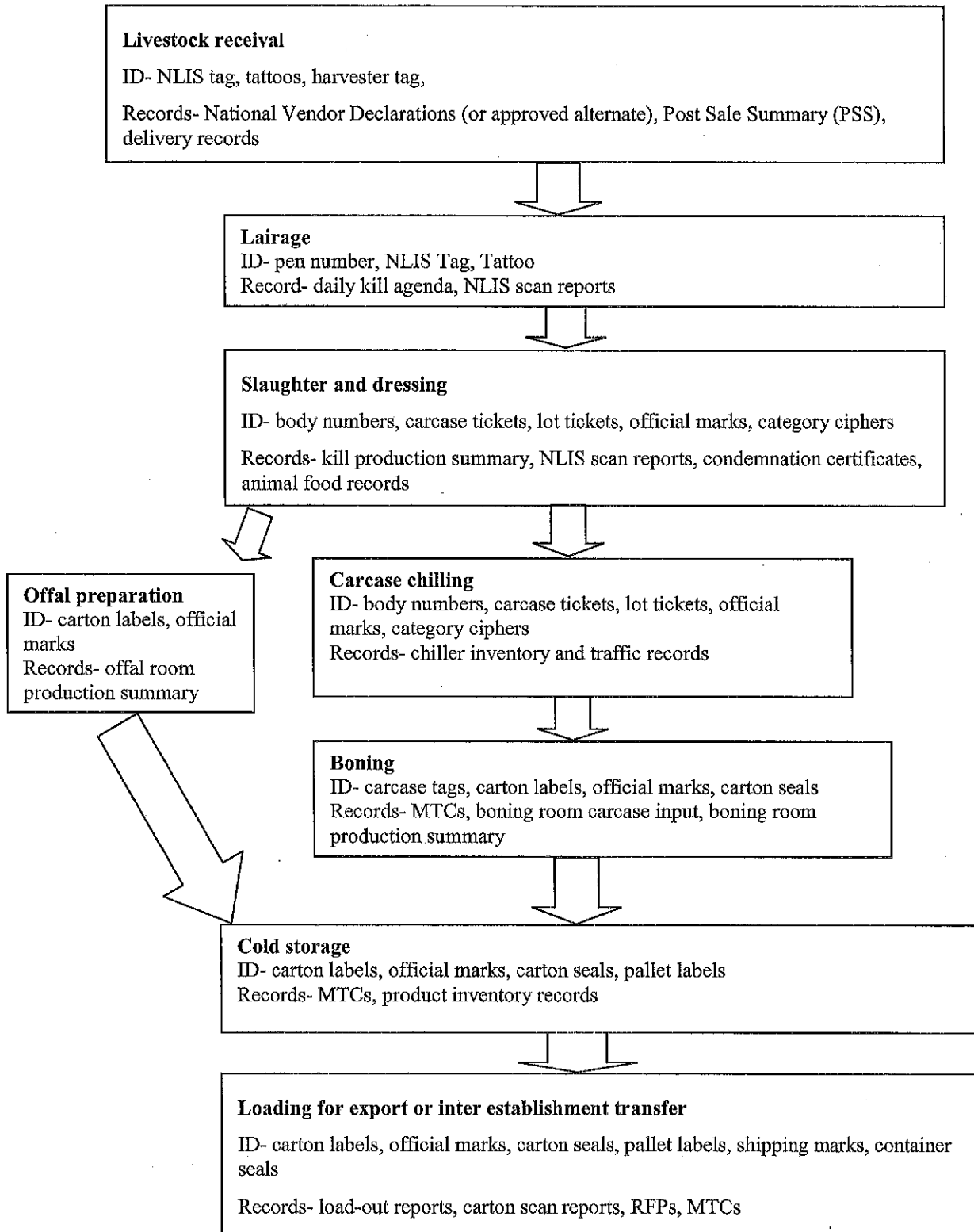
Principal Veterinarian
Food Division

21 May 2013

APPENDIX 1

Example of possible production stages and product identification and records.

The example given is for an integrated establishment, however the relevant stages can be used for independent establishments. For independent establishments the first stage would be product receipt with the incoming MTC being the first record.



APPENDIX 2

RFP validation procedures

The specific detail within the AA for RFP validation procedures may vary. The process must reflect the product integrity and traceability systems and operations used at the establishment.

Export Permit Validators must keep evidence/records of the verification activities they have undertaken to support their validating of the export permit.

The AA must include the following information:

1. The process for appointing persons as Export Permit Validators for the establishment and the removal of persons no longer acting in this capacity. This includes the training procedures for RFP validation.
2. A list of all establishment Export Permit Validators. Note: Export Permit Validators will be persons in management and control as nominated on the EX026, and thus listed on the establishment's Certificate of Registration.
3. The responsibilities of Export Permit Validators. These include:
 - a) Knowledge and understanding of the Export Control Act 1982 and its subordinate legislation, importing country requirements and the importing country listings of the establishment.
 - b) Maintaining the ability to use the required Information Technology systems (including EXDOC, ELMER 3 and MICoR) effectively.
 - c) Keeping RFP user IDs and passwords strictly confidential and not shared with others.
 - d) Understanding how the information in all the RFP fields is obtained for that processing/storage operation.
 - e) The Export Permit Validator should initial or sign documents used to verify the information in the RFP. These records should be kept with a copy of the validated RFP.
 - f) Keeping auditable records of the verification activities they have undertaken to support their validating of the export permit.
4. The process of RFP validation to be followed by the Export Permit Validator, and must include the following steps of RFP validation:
 - a) Inspection of the meat and meat products intended to be loaded for export, including:
 - who conducts this inspection;
 - how it is performed; and
 - how the results of the inspection are recorded.

NB. The physical inspection of the meat and meat products does not have to be performed by the Export Permit Validator provided the AA clearly describes how the results of product inspections are provided to the Export Permit Validator.

- b) Obtaining relevant company records relating to the product intended to be exported, including:
 - Detailing what records will be used by the Export Permit Validator as the basis of verifying the information in the RFP
e.g. load-out reports, product scan reports, product source documents (incoming MTCs), results of any required product tests for specific markets.
- c) Accessing EXDOC and viewing the RFP.
- d) Checking the product details (including market eligibility) on the RFP against the product information records to verify accuracy.
- e) The AA procedures to be followed when the RFP information is not accurate or the product is not eligible for the intended destination must be documented.

The following information on the RFP must be verified either at the time of the load-out or before. Export Permit Validators must keep evidence/records of the verification activities they have undertaken including access to records produced by others along the supply chain to support the issuing of the export permit.

- a) **Product type**
- b) **Product quantity**
- c) **Packing establishment(s) registration numbers**
- d) **Packing date(s)**
- e) **Slaughter dates(s)**
- f) **Importing country eligibility**
- g) **Container number and official mark container seal number**

APPENDIX 3

MTC verification and signing procedures

AA procedures for MTC completion and signing need to include the following information.

- The specific detail of the procedures will be different for each establishment due to differences in product integrity systems and operations conducted at individual establishments.
1. The process of appointment of persons as MTC designated signatories for the establishment and the removal of persons no longer acting in this capacity.
 - a) This includes the training procedures for MTC designated signatories.
 2. A list of all establishment MTC designated signatories.
 - a) This list should include sample signatures.
 3. The responsibilities of MTC designated signatories.
 - a) Knowledge and understanding of the Export Control Act 1982 and its subordinate legislation, importing country requirements and the importing country listings of the establishment.
 - b) Keeping auditable records used in the MTC completion and signing process.
 - c) Understanding how the information in all the MTC fields is obtained for that processing/storage operation
 - d) The MTC designated signatory should initial or sign documents used to verify the information in the MTC.
 4. The process of MTC verification and signing to be followed by the MTC designated signatory. The procedure should cover the following steps of MTC verification and signing:
 - a) Inspection of the meat and meat products at load out intended to be transferred, including:
 - who conducts this inspection,
 - how it is performed,
 - how the results of the inspection are recorded.

NB. The physical inspection of the meat and meat products does not have to be performed directly by the MTC designated signatory provided the AA clearly describes how the results of product inspections are provided to the MTC designated signatory.
 - b) Obtaining relevant company records relating to the product intended to be transferred.
 - The procedure needs to detail what records will be used by the MTC designated signatory as the basis of verifying the information in the MTC e.g. load-out reports, product scan reports, product source documents (incoming MTCs), results of any required product tests for specific markets.
 - c) Checking the product details on the MTC against the product information records to verify accuracy. The procedures to be followed when the MTC information is not accurate or the product is not eligible for the intended destination must be documented.

The following information needs to be verified either at the time of load-out or before.

- a) **Product type**
- b) **Product quantity**
- c) **Packing establishment(s) registration numbers**
- d) **Packing date(s)**
- e) **Slaughter dates(s)**
- f) **Importing country eligibility**
- g) **Transport vehicle identification details and any means of security applied seal**

