



January
2023

Export Meat Operational Guideline

3.12 Trade descriptions



Purpose

This guideline:

- outlines development of trade description requirements documented in an export-registered meat establishment's approved arrangement (AA)
- supplements the approved arrangement guidelines
- outlines the trade description demarcation of responsibilities, including the distribution of compliance responsibilities, between the department and AUS-MEAT Ltd at registered abattoir and independent boning room¹ establishments under the Export Control (Meat and Meat Products) Rules 2021.

Scope

This document applies to the following establishment types:

- registered abattoir and independent boning room establishments under the Export Control (Meat and Meat Products) Rules 2021 and accredited with AUS-MEAT Ltd (shared trade description compliance responsibility with AUS-MEAT Ltd)
- all other registered establishments under the Export Control (Meat and Meat Products) Rules 2021 (department has trade description compliance responsibility)
- all registered establishments under the Export Control (Poultry Meat and Poultry Meat Products) Rules 2021, Export Control (Wild Game Meat and Wild Game Meat Products) Rules 2021, and Export Control (Rabbit and Ratite Meat and Rabbit and Ratite Meat Products) Rules 2021 (department has trade description compliance responsibility).

Legislative basis

The following list outlines the legislation that applies to this guideline:

- *Export Control Act 2020*
 - Chapter 8, Part 2—Trade descriptions for prescribed goods
 - Chapter 6—Export licences
- Export Control (Meat and Meat Products) Rules 2021 (Meat Rules)
 - Chapter 1, Part 2, Division 1, Section 1–5 Definitions (Section 1–5 defines the Australian Meat Industry Classification System and notes that AUS-MEAT Limited is the body responsible for setting trade description and classification standards for meat and

¹ includes Food Service Operations

- meat products derived from bovine, caprine or ovine animals for export from Australian territory).
 - Chapter 5, Part 1, Division 2, Subdivision D—Trade descriptions
 - Chapter 6—Meat export licences (Chapter 6 requires accreditation by AUS-MEAT Limited)
 - Chapter 8, Part 2—Trade descriptions
- Export Control (Poultry Meat and Poultry Meat Products) Rules 2021
 - Chapter 5, Part 2, Division 4—Trade descriptions
 - Chapter 8, Part 2—Trade descriptions
- Export Control (Rabbit and Ratite Meat and Rabbit and Ratite Meat Products) Rules 2021
 - Chapter 5, Part 2, Division 4—Trade descriptions
 - Chapter 8, Part 2—Trade descriptions
- Export Control (Wild Game Meat and Wild Game Meat Products) Rules 2021
 - Chapter 5, Part 2, Subdivision 4—Trade descriptions
 - Chapter 8, Part 2—Trade descriptions.

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Principles

Meat and meat products for export produced under the export control rules, must have a trade description applied no later than at the time they are packaged.

The occupier of the registered establishment is also the holder of the establishment's approved arrangement (AA). The AA must have a documented procedure for managing trade description applications, label approvals, changes to trade description and procedures for monitoring, verification and taking corrective action when non-compliance is identified.

The use of animal raising claims (ARCs) in trade descriptions must also be documented in the AA. The claim must be supported by an independent verification of compliance with the claim.

The aim of trade description compliance management is to ensure that the holder's AA is effective and operates in accordance with Australian export legislation to ensure that meat and meat products intended for export for food meet all the following requirements:

- are identified for further processing before export for food
- meet requirements to have an accurate trade description
- meet the importing country requirements necessary to maintain market eligibility
- are traceable, can be recalled if required and their integrity is assured.

Regardless of whether a registered establishment is AUS-MEAT accredited or not, any change to trade description on product must be approved by the department.

Jurisdictions for trade description compliance

Under the *Export Control Act 2020* and the subordinate legislation, truth-in-labelling of meat for export is under the jurisdictional responsibility of the department, including applying sanctions where required.

The department directly administers trade description regulatory responsibility at:

- all establishments that are not AUS-MEAT accredited
- all non-eligible AUS-MEAT accredited registered establishments.

Eligible AUS-MEAT accredited registered establishments are defined in Attachment 3: [Definitions](#) as either:

- abattoirs and independent boning rooms (includes Food Service Operations) that process meat derived from beef, sheep or goats (mandatory accreditation)
- any pork abattoirs and independent boning rooms that process pork (voluntary accreditation).

Through an agreed arrangement, AUS-MEAT (on behalf of the department) manages the day-to-day operational responsibilities for trade description at eligible AUS-MEAT accredited registered establishments. This includes non-compliance management, for trade description other than basic trade descriptions that importing countries may require the department to oversee.

The Meat Rules recognise AUS-MEAT Limited as the Australian Meat Industry Classification Body for setting trade description and classification standards. AUS-MEAT, through the Australian Meat Industry Language and Standards Committee (AMILSC), is responsible for the publication and management of the Australian Meat Classification System (the AUS-MEAT language).

AUS-MEAT maintains an accreditation regime under the AUS-MEAT National Accreditation Standards for accredited enterprises, including registered establishments.

AUS-MEAT provides summary reports of accreditation audits and language issues to the AMILSC. The department is a member of the AMILSC.

The department's Certification and Integrity Unit (CIU) audits AUS-MEAT on an annual basis to assess compliance with the agreed arrangements for managing trade description assessment of goods inspection requirements.

AUS-MEAT trade description jurisdiction at eligible AUS-MEAT accredited registered establishments

Registered abattoir and independent boning room establishments that process meat derived from cattle, sheep or goat species must be accredited by AUS-MEAT.

Registered establishments that process pigs may elect to be accredited by AUS-MEAT.

A detailed list of the distribution of jurisdictions between the department and AUS-MEAT in relation to the different elements of trade descriptions at eligible accredited AUS-MEAT establishments is available at Attachment 1. The purpose of this attachment is to provide guidance for establishment management of AUS-MEAT accredited registered establishments to the correct point of contact regarding enquires about trade description as well as what is required to be covered in the AA. This attachment should also be read in conjunction with the Australian Meat Industry Classification System.

Area Technical Manager (ATM) (authorised officer)

- Approving amendments to parts of the AA that relate to trade description, following AUS-MEAT recommendation for approval.
- Verifying compliance with basic trade descriptions (i.e. species, meat and offal) of trade description through department audits.
- Approve changes to trade description applied on product.
- Confirm compliance of trade description label approval applications following AUS-MEAT endorsement where required.

AUS-MEAT third-party authorised officer

- Recommendation of amendments to the AA that relate to trade description, to the ATM for approval (Note: the registered establishment management applies directly to the department for variation to the AA for the AUS-MEAT recommended variation).
- Verifying trade description compliance with the AA during assessment of goods inspection (see Attachment 2).
- Confirm compliance of trade description label approval where required
- Ensuring corrective action is undertaken when non-compliance is identified during assessment of goods inspection.
- Notify the OPV immediately of all major and critical trade description non-compliances.

AUS-MEAT Program Manager

- Initial approval of an AUS-MEAT approved Quality Management System² (QMS).

Holder of the establishment's AA

- Development and implementation of trade description requirements in the AA.
- Address corrective actions issued by AUS-MEAT authorised officers.
- Address corrective actions issued by department authorised officers.

On-Plant Veterinarian (OPV) or Food Safety Meat Assessor (FSMA)

- Collection of species testing samples.
- Verify the application of basic trade descriptions.

Department trade description jurisdiction

The department is responsible for approving, verifying and auditing all aspects of trade description at the following establishments:

- Article I. All red meat further processing registered establishments (i.e. all non-eligible AUS-MEAT accredited registered establishments).
- Article II. All non-accredited meat commodity registered establishments, for example registered establishments preparing meat from the following animal types:
 - pig
 - wild game
 - poultry
 - buffalo
 - rabbit
 - ratite
 - horse and/or donkey
 - camel and/or llama
 - deer.

² Following the initial approval of the AUS-MEAT QMS by AUS-MEAT, the holder of the establishment AA must seek department approval of the QMS portion of the AA through the EX26 application form process.

The department is responsible for species testing at all meat commodity registered establishments.

Roles and responsibilities for trade description requirements on non-AUS-MEAT accredited commodity registered establishments and all non-eligible AUS-MEAT accredited establishments

Area Technical Manager (ATM) or Food Safety Auditor (FSA) (authorised officers)

- Approve changes to trade description applied on product
- Approve amendments to parts of the AA that relate to trade description
- Verifying trade description compliance with the AA at audit
- Ensuring corrective action is undertaken when non-compliance is identified at audit

Holder of Establishment AA

- Development and implementation of trade description requirements in the AA, including obtaining department approval of AA
- Addressing corrective actions issued by department authorised officers (e.g. ATM, OPV)

On-Plant Veterinarian (OPV) or Food Safety Meat Assessor (FSMA) (Commonwealth authorised officers)

- Collection of species testing samples
- Verify the application of basic trade descriptions

Animal Raising Claims

Animal raising claims (ARCs) are generally a commercial arrangement, with some being an importing country requirement, in which case the department is responsible for verification activities to ensure importing country requirements are met.

Commercial arrangements

When a registered establishment uses a commercial ARC in a trade description, then establishment management is responsible for verifying a livestock producer declared animal raising claim. The process for verifying that the commercial ARC is compliant with trade description requirements must be described in the AA.

In relation to beef, the AMILSC has developed and approved the Animal Raising Claim Framework for Beef Production Systems in Australia. This document provides guidance on how the various raising claims can be verified for beef production systems. It is available on the AUS-MEAT website.

Animal raising claim verification

Animal raising claims must be supported by verification of compliance with the claim(s). Where animal raising claims are an importing country requirement and/or are certified by the department, then the verification of the claims must be by third-party auditing protocols unless otherwise stated (e.g. HGP freedom claim verified using palpation and residue testing).

The following table provides some examples (but not limited to) of claims and verification.

Animal raising claim	Verifications
breed claim	phenotype verification at ante-mortem
feeding claim	independent farm audit
no antibiotic treatment claim (e.g. 'never ever')	independent farm audit
HGP free	palpation of all declared free cattle for implants and monthly residue testing program

Animal raising claim	Verifications
organic production	for example, USDA National Organic Program (NOP)
sheep production raising claims	see AUS-MEAT Animal raising claim framework for sheep production systems in Australia 20/8/19

Animal raising claim compliance requirements

Registered abattoir establishments must be able to substantiate the integrity of their livestock sourcing arrangements in order to ensure their legal responsibilities are discharged. Under usual arrangements, while it is the export abattoir seeking certification from the department, the legal relationship is between the department and the supplier of the stock. However, when a point of slaughter certification program (PSCP) is used, then the registered abattoir establishment takes direct, legal responsibility for the integrity of the livestock sourcing requirements for trade description.

To meet the ARC requirements, registered abattoir establishments must either source livestock:

- from suppliers who have a third-party certified quality assurance program (QAP); or
- by using a second party PSCP.

In both cases the sourcing program must be documented in AA.

For AUS-MEAT accredited export abattoirs that use a PSCP, the program must first be approved by AUS-MEAT and then by the department. At non-AUS-MEAT accredited establishments, the department is solely responsible for approving the PSCP in the AA.

Point of Slaughter Certification Program

The AA PSCP must document how the registered abattoir establishment:

- sources ARC compliant livestock,
- certifies compliance at point of slaughter, and
- maintains segregation from livestock receipt to packing.

Livestock sourcing programs

In relation to verification of the AA PSCP, the program must include verification procedures for the livestock sourcing program including audit of the livestock suppliers.

Audit arrangements can take different forms; from documentation checks done and recorded at every sale by buyers, to comprehensive periodic audits of the saleyard or producer, or a combination of these.

Where registered abattoir establishments provide service kills on behalf of other livestock buyers, it remains incumbent on the abattoir, as the holder of the AA, to communicate the sourcing requirements and to audit their clients as part of the PSCP verification procedures.

Point of slaughter certification

Point of slaughter certification must be provided to the OPV during ante-mortem inspection. All other supporting documentation (e.g. post-sales summaries and supplier audit reports) must be made available during audit of the AA PSCP or upon request.

This certificate must be on company letterhead or included within the ante-mortem (kill) sheet and include:

- the number of animals for which the certification is given

- the lot or pen number of the animals
- the ARC that is being certified
- a statement that the certification is supported by appropriate documentation and verification as documented within the AA.

Separation program

The AA must document how the registered abattoir establishment ensures that carcasses, carcase parts (including offal) and carton meat are adequately identified and segregated from non-compliant meat. It must include inventory controls.

Related material

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

- Webpage: [Construction and equipment guidelines for export meat establishments](#)
- Webpage: [Approved arrangement guidelines – Meat](#)
- Webpage: [Approved arrangement guidelines – Wild game meat](#)
- Webpage: [Approved arrangement guidelines – Poultry](#)

The following related material is available on the internet:

- Webpage: [Export Control Act 2020](#)
- Webpage: [Export Control \(Meat and Meat Products\) Rules 2021](#)
- Webpage: [Export Control \(Wild Game Meat and Wild Game Meat Products\) Rules 2021](#)
- Webpage: [Export Control \(Rabbit and Ratite Meat and Rabbit and Ratite Meat Products\) Rules 2021](#)
- Webpage: [Export Control \(Poultry Meat and Poultry Meat Products\) Rules 2021](#)

Attachment 1: Distribution of responsibilities in use of trade descriptions at AUS-MEAT accredited registered abattoir and independent boning room establishments

Responsibilities between the department and AUS-MEAT

Department responsibilities align with the Export Control (Meat and Meat Products) Rules 2021 subsection 5-21(3).

AUS-MEAT responsibilities align with Export Control (Meat and Meat Products) Rules 2021 section 8-6 'General requirements for trade descriptions'.

The Australian Meat Industry Classification System provides further guidance on responsibilities.

Department of Agriculture, Fisheries and Forestry responsibilities

Basic categories – meat and offal

The following table provides a list of basic categories for meat and offal that the department has responsibility for.

Species	Basic Categories - Meat	Basic Categories - Offal
Bovine	Rosé Veal Veal Bull Beef	Beef/bovine
Ovine	Lamb Mutton Ram	Sheep/ovine
Porcine	Pork Sow Pork Boar Pork	Pig/porcine
Caprine	Goat	Goat
Bubaline	Buffalo	Buffalo

Other compulsory trade description elements

The following table provides a list of other compulsory trade description elements that the department has responsibility for.

Health and Hygiene	Market Access	Integrity/Security
Net weight	Customer country markings	Registration number
Refrigeration statements (e.g. keep frozen) except where shelf stable	Bilingual label approvals	Country of Origin
Date of packaging	Trade descriptions other than those in the Rules (e.g. grain-fed high-quality beef (GF-HQB) and Hilton Beef)	Australia Inspected (AI) stamp: <ul style="list-style-type: none"> • monitoring application • security
Identity of batch		Alteration of trade descriptions
Ingredient statements (where more than 1 ingredient)		Trade Description requirements for: <ul style="list-style-type: none"> • meat fractions • mechanically separated meat (MSM)

Health and Hygiene	Market Access	Integrity/Security
		<ul style="list-style-type: none"> • pharmaceutical products • animal food
		Name and address of occupier or exporter or consignee
		Permanently affixed prescribed tag approvals
		Identification of product 'for further processing before export'

AUS-MEAT responsibilities

Alternative categories – meat

The following table provides a list of alternative categories for meat that AUS-MEAT has responsibility for.

Bovine	Ovine	Porcine	Caprine
Yearling steer	Young lamb	Sucker pork	Kid
Yearling beef	Hogget	Gilt pork	Capra
Young steer	Ewe	Gilt light pork	Doe
Young beef	Wether	Gilt heavy pork	Goat wether
Young prime steer			
Young prime beef			
Prime steer		Barrow pork	
Prime beef		Barrow light pork	Buck
Steer		Barrow heavy pork	
Ox		Male light pork	
Cow		Male heavy pork	
Yearling entire			
Young entire			
Young bull			

Alternative categories – offal

The following table provides a list of alternative categories for offal that AUS-MEAT has responsibility for.

Bovine	Ovine	Porcine
Veal/calf	Lamb	Pork
Bull	Ram	Sow Pork
	Mutton	Boar pork

Other trade description elements

The following table provides a list of other trade description elements that AUS-MEAT has responsibility for.

Compulsory Commercial/Marketing	Customer/Additional Commercial/Marketing	Supplementary Specifications/Minimum Standards
Product of Australia	Fat depth range	Grain fed beef
Establishment number	Weight range	Accelerated conditioning
Name and address	Fat class	Skin-on (goats)
Bone-in/boneless	Weight class	Skin-off (pigs)
Chiller assessment (fat/meat exclusion colour)	Chemical lean content (CL content)	Halal (management of identification cards)
Location of trade description on carton/bag	Cut/item description (including common code cipher)	Grain fed lamb and hogget
Size of print		
Logos	Number of cuts/portions	
Contrast and obscured printing	Type of packaging	
Tolerances	Original untrimmed fat class	
Net weight	Original weight class	
	Weight related fat class	
	Expiry date/shelf life	
	Temperature statement in conjunction with refrigeration statement (e.g. store at 0°C)	
	Animal raising claims	
	MSA Eating Quality information and EQG cipher	

Notes:

- MSA stands for Meat Standards Australia.
- EQG stands for eating quality grade.
- Regarding 'net weight', weights and measures are enforced by the National Measurement Institute.

Attachment 2: Roles and responsibilities

Roles and responsibilities for trade description requirements on eligible AUS-MEAT accredited registered establishments

Area Technical Manager (ATM) (authorised officer)

- Approve amendments to parts of the AA that relate to the trade description, following AUS-MEAT recommendation for approval.
- Verify compliance of the trade description with basic trade descriptions (i.e. species, meat and offal) through department audits.
- Approve changes to the trade description applied on product.
- Confirm compliance of trade description label approval applications following AUS-MEAT endorsement, where required.

AUS-MEAT third-party authorised officer

- Recommend amendments to the AA that relate to the trade description, to be supplied to the ATM for approval (Note: the registered establishment management applies directly to the department for the AUS-MEAT recommended variation).
- Verify that the trade description complies with the AA during assessment of goods inspection (see Attachment 1).
- Confirm compliance of trade description label approval, where required.
- Ensuring corrective action is undertaken when non-compliance is identified during assessment of goods inspection
- Notify the OPV immediately of all major and critical trade description non-compliances.

AUS-MEAT Program Manager

- Initial approval of an AUS-MEAT approved Quality Management System³ (QMS)

Holder of the establishment's AA

- Development and implementation of trade description requirements in the AA
- Address corrective actions issued by AUS-MEAT authorised officers
- Address corrective actions issued by department authorised officers

On-Plant Veterinarian (OPV) or Food Safety Meat Assessor (FSMA)

- Collection of species testing samples
- Verify the application of basic trade descriptions

Roles and responsibilities for trade description requirements on non-AUS-MEAT accredited commodity registered establishments

Area Technical Manager (ATM) or Food Safety Auditor (FSA) (authorised officers)

- Approve changes to trade description applied on product
- Approve amendments to parts of the AA that relate to trade description
- Verifying trade description compliance with the AA at audit
- Ensuring corrective action is undertaken when non-compliance is identified at audit

Holder of establishment AA

- Development and implementation of trade description requirements in the AA, including obtaining department approval of AA
- Addressing corrective actions issued by department authorised officers (for example, ATM or OPV)

³ Following the initial approval of the AUS-MEAT QMS by AUS-MEAT, the holder of the establishment AA must seek department approval of the QMS portion of the AA through the EX26 application form process.

On-Plant Veterinarian (OPV) or Food Safety Meat Assessor (FSMA) (Commonwealth authorised officers)

- Collection of species testing samples
- Verify the application of basic trade descriptions

Attachment 3: Definitions

Approved arrangement

An arrangement for a kind of export operations in relation to a kind of prescribed goods, approved by the Secretary of the Department of Agriculture, Fisheries and Forestry (the Secretary).

An AA documents the controls and processes to be followed when undertaking export operations in relation to prescribed goods for export.

See Chapter 5 of the *Export Control Act 2020* and the respective export commodity (for example, the Export Control (Meat and Meat Products) Rules 2021) rules.

Approved arrangement (AA) holder

The holder of an establishment's AA is the occupier of the registered establishment.

Animal raising claims (ARCs)

Animal raising claims are claims made in the trade description or export documentation about the animal or supply chain specifically relating to animal husbandry conditions, feeding, handling, drug treatments and/or geographical reference which are required by an importing country or importer.

Area technical manager (ATM) (authorised officer)

A person who is authorised under section 291 of Chapter 9 of the *Export Control Act 2020* and exercises powers as it applies in relation to the *Export Control Act 2020* and the respective meat commodity rules.

The ATM has responsibility for technical support, performance, assessment and verification of technical standards and operations in a defined group of export meat establishments.

AUS-MEAT Limited

AUS-MEAT Limited ABN 44 082 528 881 is a company owned by Australian meat and livestock industries. It is primarily responsible for the development, approval and maintenance of standards for meat trade description.

Australian Meat Industry Language and Standards Committee

The Committee, through AUS-Meat Limited, is responsible for the development, approval and maintenance of standards for trade description through the AUS-MEAT Language and AUS-MEAT National Accreditation Standards.

Eligible AUS-MEAT accredited registered establishments

Registered establishments under Chapter 4 of the *Export Control Act 2020* and comprise of:

- abattoirs and independent boning rooms (includes food service operations) that process meat derived from beef, sheep or goats (mandatory accreditation); and any
- pork abattoirs and independent boning rooms that process pork (voluntary accreditation).

AUS-MEAT authorised officer

An officer employed by AUS-MEAT Limited ABN 44082528881 and authorised under section 291 of the *Export Control Act 2020* as a third-party authorised officer with powers and functions to conduct assessment of goods inspections of trade description, including reviewing AAs.

AUS-MEAT National Accreditation Standards

Accreditation standards for abattoirs, boning rooms, non-packer exporters, further processors and other accredited enterprises.

Australian Meat Industry Classification System

The Australian Meat Industry Classification System published by AUS-MEAT Limited, as that System exists at the commencement of the Export Control (Meat and Meat Products) Rules 2021 – 28 March 2021.

They are the meat industry standards for trade description. It is also known as the AUS-MEAT Language.

Certification Integrity Unit (CIU) auditor

A department authorised officer, authorised under section 291 of the *Export Control Act 2020*.

The CIU auditor undertakes verification audits of AUS-MEAT in relation to the agreed arrangements for managing the responsibilities for trade description assessment of goods inspection requirements.

Food Safety Meat Assessor (FSMA) (authorised officer)

A department authorised officer who has meat inspection qualifications and works on export-registered meat establishments. FSMAs are authorised as authorised officers under section 291 of the *Export Control Act 2020*.

Point of slaughter certification (PSC)

A legally binding declaration provided by an establishment at ante-mortem inspection that livestock have been sourced under the AA livestock sourcing program and meet the market access requirements for specified raising claims to which the department will be asked to provide certification.

Livestock Sourcing Program

An AA program that describes how a registered establishment that is an export abattoir maintains the integrity of its supply chain, including livestock sourcing, in relation to a specific animal raising claim.

Occupier

The individual, corporation or other legal entity (or any combination of these) in whose name the establishment is registered.

On-Plant Veterinarian (OPV)

An On-Plant Veterinarian is a Commonwealth veterinary authorised officer employed by the department to conduct ante-mortem inspection and to provide daily supervision of post-mortem inspection and verification of the registered establishment's AA.

Quality assurance program (QAP) (third-party certified)

Means the quality assurance program (QAP) used by the registered establishment's suppliers, a PSCP supplier.

The PSCP supplier's QAP is independently verified by a third-party (e.g. Angus Verified – Angus Australia, Global Animal Partnership and LPA-QA).

The QAP may also be referred to as a Quality Management System.

Second party PSCP

Means a QAP used by a PSCP supplier that is verified (audited) by the holder of the establishment AA.