Information about chemicals and/or chemical compounds (hazardous substances) to be used at export registered establishments

Disclaimer: The information provided in this Appendix, and subject to this Disclaimer is only intended to be general information to Industry. It is not intended to take the place of, or to represent other official guidelines or requirements. Industry is reminded that it is their responsibility to ensure that a given chemical is fit for its purpose for the intended use in the establishment.
1. **Background**

Up until 30 June 2011 the Export Meat Program of the Department of Agriculture and Water Resources issued Instruments of Approval (IoA) and Letters of Acceptance (LoA) for the use of chemicals (hazardous substances) at export registered establishments.

The department has ceased providing IoAs and LoAs for the use of hazardous substances at export registered establishments as market access requirements ceased to apply and that there was no legal basis for continuation.

2. **Purpose**

   a. To detail a system where vendors of hazardous substances to the export meat, game and poultry industries may provide assurances to the industry using a ‘DECLARATION OF ASSURANCE FOR HAZARDOUS SUBSTANCE USE IN DEPARTMENT OF AGRICULTURE AND WATER RESOURCES EXPORT REGISTERED ESTABLISHMENTS’ (Appendix 2)

   b. To identify responsibilities in relation to the supply, management, use and storage of hazardous substances at export registered establishments.

3. **Information**

   a. General information regarding use of acceptable and non acceptable hazardous substances is provided in Appendix 1.

   b. Hazardous substances must be stored and handled so as not to jeopardise the integrity and wholesomeness of meat or meat products.

   c. Before using a Hazardous Substance (listed in Point 2. Of Appendix 1) establishments must obtain:

      i) A declaration of assurance from the vendor, which has been signed and dated by a qualified chemist.

      ii) A copy of a Material Safety Data Sheet (MSDS) or a Safety Data Sheet (SDS) for each hazardous substance used at the establishment. (See Appendix 2)

      iii) Any necessary evidence to substantiate fit for purpose of any hazardous substance such as list of ingredients, instructions for use and/or evidence of general acceptance

   d. The Australia New Zealand Food Standards Code (the Code) sets out requirements with regard to Processing Aids and Food Additives that may be used in the manufacture of food in Australia. Part 1.3 Substances Added to Food of the Code should be read in conjunction with other relevant parts of the code.

      o The Code is published on the Food Standards Australia New Zealand website at www.foodstandards.gov.au/foodstandards/foodstandardscode
4. Responsibilities

Export Registered Establishments

a. The occupier of export registered establishments is responsible for ensuring their Approved Arrangement (AA) is maintained and approved and includes:
   i) A documented system for the use of hazardous substances at their establishment.
   ii) Procedures to ensure that hazardous substances are fit for purpose.
   iii) Procedures to ensure hazardous substances do not contaminate animals and/or their meat and their meat products.
   iv) Compliance with the Australian standards relevant to their establishment relating to use, management and storage of hazardous substances.
   v) Any importing country requirements relating to use and storage of hazardous substances.

   o Section 8 of Part 2 of the departments Approved Arrangement Guidelines sets out elements to be covered in the occupiers approved arrangement for the control of hazardous substances.

b. Establishment management must ensure copies of declarations, instructions for use, associated MSDS or SDS and/or other evidence of fitness for purpose is held on establishment files accessible to departmental officers for verification purposes.

Vendors of Hazardous Substances

a. Vendors of hazardous substances need to:
   i) Consider providing assurances, by way of a declaration, of fitness for purpose of hazardous substances to export meat establishments
      o Refer to Appendix 2 for example of declaration format
   ii) Provide instructions, list of ingredients and/or any other relevant information necessary to substantiate the declaration and provide appropriate details relating to the hazardous substance

Departmental officers

a. Departmental on-plant officers must:
   i) Monitor the establishment’s implementation and on-going compliance, control and use of hazardous substances.
   ii) Conduct regular and independent verification checks and record results.
   iii) Report any non-compliance through AMS/NEVS.

b. Departmental Area Technical Managers must:
   i) Ensure that the occupiers approved arrangement has a documented system to effectively manage the use and storage of each hazardous substance in use and/or stored at the export registered establishment.
   ii) Verify during audits ongoing compliance in the use, management and storage of hazardous substances to maintain the integrity and wholesomeness of export product.
Appendix 1

1. Processing Aids and Food Additives

Although a substance may be permitted for use in a particular type of food by the Code, export registered establishments must also meet any relevant importing country requirements e.g. certain destinations do not accept the use of anti microbial washes (the substances used in such washes are processing aids). Refer to relevant country entry in MICoR

2. Hazardous Substances that previously required Department of Agriculture and Water Resources acceptance

Hazardous Substances, which include chemical compounds that need vendor declaration, include the following:

| Chemical compounds for use in areas where edible food products are prepared, handled or stored (chemical compounds used as an ingredient for edible products are not included in this requirement) |
| Cleaning compounds |
| Sanitising compounds |
| Compounds provided for personnel care |
| Pesticides |
| Cooling and retort water treatments |
| Boiler treatments |
| Compounds for steam lines (where steam contacts edible products directly or indirectly) or primary water cooling loops |
| Pig scald treatments |
| Tripe processing chemicals (hazardous substances) |
| Lubricants for use in areas where incidental or no contact with edible product may occur |
| Branding or marking inks |
| Odour neutralising agents |

3. Chemical compounds that did not require Department of Agriculture and Water Resources acceptance

a. Chemical compounds for use solely:
   - as ingredients in prescribed goods
   - as ingredients
   - as denaturants
   - in laboratories for analytical and similar use
   - in offices or areas in an export registered meat establishment where prescribed goods are not prepared
   - in cafeterias or other retail food service areas
   - in space heating systems or cooling towers
   - in treating materials such as skins and hides
   - for use solely in holding pens, stock trucks and the like (except insecticides)
   - in sewage or waste water systems outside buildings
4. **Hazardous substances in common use with general acceptance**

A number of hazardous substances in common use are marketed as pure chemicals using the generic name rather than a trade name. A manufacturer’s declaration may not be required for these substances as general acceptance of common use exists. Substances in this category include:

<table>
<thead>
<tr>
<th>Acetic acid</th>
<th>Sodium bicarbonate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Calcium carbonate</td>
<td>Sodium carbonate (soda ash)</td>
</tr>
<tr>
<td>Calcium hydroxide</td>
<td>Sodium hydroxide (caustic soda)</td>
</tr>
<tr>
<td>Calcium hypochlorite</td>
<td>Sodium hypochlorite</td>
</tr>
<tr>
<td>Citric acid</td>
<td>Sodium metasilicate</td>
</tr>
<tr>
<td>Hydrochloric acid</td>
<td>Sodium tripolyphosphate</td>
</tr>
<tr>
<td>Hydrogen peroxide</td>
<td>Sulfuric acid</td>
</tr>
<tr>
<td>Lactic acid</td>
<td>Tetrasodium pyrophosphate</td>
</tr>
<tr>
<td>Phosphoric acid</td>
<td>Trisodium phosphate</td>
</tr>
<tr>
<td>Potassium hypochlorite</td>
<td></td>
</tr>
</tbody>
</table>

5. **Edible oils**

Edible oils that meet the requirements of the Australian Food Standards Code may be used for lubrication purposes without restriction or need of a manufacturer’s declaration.

<table>
<thead>
<tr>
<th>Arachis oil (Peanut oil)</th>
<th>Rapeseed oil</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cottonseed oil</td>
<td>Safflower oil</td>
</tr>
<tr>
<td>Maize or Corn oil</td>
<td>Soyabean oil</td>
</tr>
<tr>
<td>Olive oil</td>
<td>Sunflower oil</td>
</tr>
</tbody>
</table>

6. **Hazardous substances not acceptable for use in export registered establishments include:**

   a. Preparations containing antimony, arsenic, cadmium, lead, mercury, selenium, or other materials such as carcinogens, mutagens, and teratogens classified as hazardous substances may not be used for any purpose anywhere within an establishment.

   b. Specific exceptions, such as the use of lead in solders or other alloys used in the fabrication and/or maintenance of plant facilities, may be used where it can be demonstrated that there is no hazard created to edible product.
7. Potentially harmful compounds
   a. Potentially harmful compounds such as chromic acid, formaldehyde, hydrofluoric acid, hydrofluosilicic acid, oxalic acid, or the salts of those compounds are not generally permitted for use.
   b. Establishments proposing to use any potentially harmful compound must obtain a Manufacturers declaration for fitness and safety of use and be able to demonstrate that product integrity and wholesomeness is not compromised before any potentially harmful compound is brought onto the establishment premise.

8. Odorous compounds
   a. Establishments must not use odorous compounds in food production areas such as:
      i) Preparations containing heavy perfumes, isomers of dichlorobenzene, pine oil etc.
      ii) Hand care preparations which leave a residual fragrance on the hands after rinsing
Appendix 2

DECLARATION OF ASSURANCE FOR HAZARDOUS SUBSTANCE USE IN DEPARTMENT OF AGRICULTURE AND WATER RESOURCES EXPORT REGISTERED ESTABLISHMENTS

<Vendor name>

<Vendor address>
<Vendor telephone No>
<Manufacturer of Hazardous Substance>

<Name of Hazardous Substance>

<Category of use of Hazardous Substance> (as per Appendix 1 Information for chemicals (hazardous substances) used in export meat industry at export registered establishments)

<Intended use of Hazardous Substance>
<Insert the description of food preparation areas or other areas in which the Hazardous Substance is to be used>

I <insert vendor management name> the vendor of the above hazardous substance declare the above hazardous substance is suitable for use in export registered meat or meat product establishments for the purposes stated in this application, that I have supplied a copy of the label and MSDS or SDS with this declaration and acknowledge that this declaration is subject to the following conditions:

This declaration is rendered invalid by:

1. Any change in the formulation of the following hazardous substance
2. Any change in the instructions for use in the following hazardous substance
3. Any incorrect and/or unintended use of the following hazardous substance.

Signature of vendor ................................................................................Date. ....../....../......

Declaration of qualified chemist

The hazardous substance identified above, when used in accordance with the directions on the label:

- is fit for the purpose for which they are to be used
- will not contaminate animals, meat and meat products

Printed name of qualified chemist:

Qualifications of qualified chemist:

Signature of qualified chemist:................................................................. Date..../...../......