Australian Government

Department of Agriculture, Fisheries and Forestry

October 2022

Export Meat Operational Guideline

5.2 Export Meat Systems Audit Program (EMSAP)

Purpose

The purpose of this guideline is to:

- assist those regulated under the *Export Control Act 2020* and the relevant Rules through the provision of a guideline that translates legislative requirements into export operational settings. This document's focus is the Export Meat System Audit Program (EMSAP)
- outline the Department of Agriculture, Fisheries and Forestry's (the department's) system audit methodology to ensure the department has the appropriate level of confidence in the effectiveness of export-registered meat establishment, wild game establishment, and independent boning room systems and processes, ensuring ongoing compliance with the Act, Rules, Australian standards and importing country requirements
- establish the management framework for the department's systems audit program.

Scope

The Export Meat System Audit Program (EMSAP) applies to Tier 2 export-registered abattoirs, export-registered wild game processing establishments and independent boning rooms.

Legislative basis

Under the *Export Control Act 2020* ('the Act') and its subordinate legislation:

- export abattoirs are regulated by the Commonwealth government through the Australian Government Department of Agriculture, Fisheries and Forestry (the department).

Under the Export Control (Meat and Meat Products) Rules 2021, export abattoirs are bound to comply with:

- their approved arrangement (including animal welfare standard operating procedures)
- the Australian standard for the hygienic production and transportation of meat and meat products for human consumption (Australian standard AS4696).

Under the Export Control (Wild Game Meat and Wild Game Meat Products) Rules 2021, export-registered wild game processors are bound to comply with:

- their approved arrangement (including animal welfare standard operating procedures)
- the Australian standard for the hygienic production of wild game meat for human consumption (Australian standard AS4464).

The compliance of establishments with their approved arrangement and with the relevant Australian standard, is verified and audited by the department.

In this document

Principles

The principles of audit management as applied by the department are outlined in AS/NZS ISO 19011:2003 Guidelines for quality and/or environmental management systems auditing. This guideline also aligns with the principles and requirements of ISO/IEC 17021:2011 and A/NZS ISO 19011-2003, Codex Alimentarius, the OIE Terrestrial Code and the National Regulatory Food Safety Auditor Policy and Guidelines.

Principles for inspiring confidence include:

- impartiality
- competence
- responsibility
- openness
- confidentiality
- responsiveness to complaints
- effective risk management.

General requirements

Legal and Contractual Matters

Legal responsibility

The department has the legislative authority for the purposes of providing audit services and export certification under the *Export Control Act 2020.*

The Export Control (Meat and Meat Products) Rules 2021; the Export Control (Wild Game Meat and Wild Game Meat Products) Rules 2021; and the Export Control (Poultry Meat and Poultry Meat Products) Rules 2021 provide the Secretary of the department legal authority for audits to be conducted at export-registered establishments producing meat and meat products for export, wild game meat and wild game meat products for export, and poultry meat and poultry meat products for export.

Certification agreement

Under the *Export Control Act 2020*, the department has the legislative authority for export certification.

Management of impartiality

Departmental auditors will be engaged under terms of employment that require their compliance with the Australian Public Service (APS) Code of Conduct, which requires APS officers to discharge their duties to the highest standard of professional behaviour.

Departmental auditors will disclose, and take reasonable steps to avoid, any conflict of interest (real or perceived) in connection with their APS employment. An Area Technical Manager (ATM) will not be appointed as an EMSAP ATM to conduct a system audit at an export-registered establishment unless a minimum period of two years has elapsed since that ATM has been in a position of responsibility for the supervision of technical standards at that establishment (i.e. held position as the Establishment ATM).

Liability and financing

The department has arrangements to manage risks in relation to audit activities (including personal and public liability indemnity insurance and reserves) and to cover liabilities arising from its operations.

The department as a government agency does not allow commercial, financial or other pressures to compromise the impartiality of its decisions.

Structural requirements

Organisational structure

The Export Meat Program within the Exports and Veterinary Services Division of the department has responsibility for developing and reviewing this audit management guideline.

The responsibilities in relation to this guideline within the organisational structure are detailed in Attachment 1: Roles and responsibilities.

Resource requirements

Management of auditor competence

Determination of competence criteria

The competence criteria for Commonwealth authorised officers involved in the management and performance of systems audits is specified in Attachment 2: Table of knowledge and skills – systems audits.

The National Regulatory Food Safety Auditor Guideline (2009) requires that all regulatory food safety auditors must be trained and assessed as competent against the national units of competency. Bodies that may conduct training and assessment are those bodies formally registered to deliver these competencies.

These bodies may be personnel certification bodies (PCB) such as Exemplar Global, or tertiary education bodies such as technical and further education, registered training organisations.

Commercial and personnel certification will be regarded as equivalent to nationally endorsed units of competency for the purposes of auditing abattoirs and boning rooms only.

The workplace assessor skill set issued under the current training and education training package is comparable to the skill examiner certificate issued by Exemplar Global.

Upon attaining lead auditor competencies, auditors may be accredited, licensed, or certified as a competent auditor.

Evaluation processes

The initial competence evaluation for ATM Auditors will be conducted by a departmental Field Operations Manager (FOM) or an ATM with full workplace place assessor/lead auditor qualifications who will observe the Commonwealth authorised officer conducting a lead auditor role. This initial competence evaluation shall include the auditor's ability to apply the required knowledge and skills during the audit.

FOMs must be qualified workplace assessors, having attained the required units of competency for skills assessment from the current training and education package.

FOMs will conduct on-going monitoring of competence and performance of ATM Auditors by reviewing audit reports within their geographic area of responsibility and by further periodic observations of on-site audits.

On-going monitoring of competence and performance of all officers involved in the management and performance of system audits will also be conducted through the department's performance appraisal process to ensure alignment to policy and operational objectives.

Personnel involved in the audit activities

The duties and responsibilities of ATM Auditors are specified in the department's instructional material under this guideline.

The delegations of ATM Auditors conferred by the Secretary under the Export Control Act are specified in the department's delegations intranet page.

ATM Auditors will be selected from the team of departmental ATMs qualified for supervision of technical standards at export-registered meat slaughter, wild game processing and boning establishments.

Each ATM will have the appropriate qualifications, required knowledge and skills to conduct the audit as specified in Attachment 2: Table of knowledge and skills – systems audit.

The identification of the training needs of ATM Auditors and the provision of access to specific training to ensure the competency of auditors will be through the department's performance appraisal process and Export Meat Program's technical training and instructional material.

The FOMs will monitor the performance of auditors through a combination of periodic on-site observations and review of audit reports and feedback from clients or from overseas country reviewers/auditors.

The frequency of the periodic on-site observations of each ATM Auditor by a FOM will be based on the results of the assessment of audit reports completed by the auditor and the outcome of the department's performance appraisal process.

Personnel records

The department will maintain up-to-date personnel records for each ATM Auditor, including relevant qualifications, training, experience, affiliations, professional status and competency assessments.

Information requirements

Publicly accessible information

Departmental Export Meat Program audit policies will be made publicly available on the department's website.

Information in relation to registration and approval, variation, suspension, and revocation of an approved arrangement and/or overseas listings will be provided as necessary to the appropriate state regulatory and importing country authority.

Establishment approved arrangement certificates

A certificate for an occupier's approved arrangement (AA) will be issued, by the department on an annual basis, to the occupier of export-registered meat establishments unless regulatory non-compliance justifies otherwise.

In response to adverse audit outcomes, the delegate may make decisions and take action to grant, maintain, renew, extend, reduce, suspend and/or withdraw export registration, market listings, or the AA accordingly. These decisions/actions will be consistent with sanction provisions specified in the Export Meat Regulatory Action and Sanctions Policy.

Directory of export-registered establishments

Records for export-registered establishments will be maintained electronically on the department's Establishment Registration (ER) database.

Confidentiality

Information obtained by departmental auditors will be subject to 'Protected' security classification.

Information exchange between the department and export establishments in regard to EMSAP

Information on the department's auditing activity and requirements

The department's audit policy and information on auditing fees and charges will be made publicly available on the department's website.

Establishments will be notified in writing by the EMSAP ATM of arrangements to conduct an EMSAP audit in accordance with subsection 270(2) of the *Export Control Act 2020*.

The EMSAP ATM will advise the occupier of the establishment at the audit exit meeting of the findings of the audit.

Notice of changes to auditing requirements

The department will advise the occupier of export-registered establishments with due notice of any changes to departmental audit policy and/or requirements by means of Meat Notices, Market Access Advices, or by direct communication in writing.

Management system requirements

General management system requirements

Control of records

Audit Reports will be securely stored electronically on the department's Audit Management System (AMS).

Other departmental records relevant to the application of this guideline will be stored under conditions of 'Government in Confidence' security level.

Management review

General

The Export Meat Program will review AMS at least once a year to ensure its continuing suitability, adequacy, and effectiveness; including the stated policies and objectives and compliance with ISO/IEC 17021:2011.

Review inputs

The input to the review shall include the following information:

- analysis of AMS database audit reports including assessment of audit conclusions, audit findings, audit ratings, and corrective action requests (CARs)
- results of internal audits by the department's Certification Integrity Unit and external audits by importing country reviewers
- feedback from clients and interested parties
- results of importing country audits of the export system
- feedback from the Export Meat Industry Advisory Committee (EMIAC)
- the status of preventive and corrective actions
- follow-up actions from previous management reviews
- the fulfilment of objectives
- changes that could affect the management system
- appeals and complaints.

Review outputs

The outputs from the management review will include decisions and actions related to:

- improvement of the effectiveness of the systems audit program and its processes
- improvement of the audit services related to the compliance with respect to ISO/IEC 17021:2011

- resource needs.

Internal audits

The application of this guideline shall be subject to internal audit on an annual basis by the department's Certification Integrity Unit (CIU).

Corrective and Preventive Actions

Where non-compliance is identified in the AMS processes (for example, from complaints or internal audits) the department will:

- determine the cause of the non-compliance
- take measures to correct the non-compliance
- implement any necessary preventive action to ensure the non-compliance does not recur
- record the results of action taken
- review the effectiveness of the actions taken.

Review

This document is to be reviewed on at least a biennial basis, commencing 12 months from the initial rollout date for the systems audit.

Methods

Systems audit

General guidelines for systems audit:

- The purpose of a systems audit is to determine if systems as documented within the occupier's approved arrangement are fully complied with by the occupier.
- The scope of the systems audit will be the occupier's approved arrangement.
- Systems' audits are scheduled every six months. After **three successive** acceptable audit outcomes, an establishment may apply for an annual audit frequency. In addition to audit outcome there are five other criteria that must be met to qualify for an annual regime (refer to Eligibility criteria for Tier 2 export establishments to move to an annual audit frequency).
- The FOM, in consultation with the relevant ATMs, will oversee the scheduling of systems audits in their geographic region.
- For slaughter establishments the duration of a systems audit (six-monthly or annually), will be approximately 4 days. Each audit day will take approximately 8 hours, with a half hour deducted for a meal break.
- For wild game and independent boning establishments, duration of a systems audit, (six-monthly or annually) will be approximately 3 days. Each audit day will take approximately 8 hours, with half hour deducted for a meal break.
- The audit will be conducted by the EMSAP ATM.
- The OPV/FSA will not be part of the audit but may assist as required.

Audit specifications

Audit plans and checklists

Audit plans will be developed by the EMSAP ATM prior to audits.

Audit plans will be provided to export-registered establishment management prior to the entry meeting and include:

- the audit criteria and audit scope
- the prospective timetable for auditing the relevant areas of the establishment including the approved arrangement documentation (this is to allow

management to have the appropriate personnel and records ready for the audit).

The EMSAP ATM will use standard checklists as a guide to audit the approved arrangement. The checklists will be based on the approved arrangement guidelines (available on ELMER 3 – Electronic legislation, manuals and essential references).

Audit findings will be based on evidence collected by, and the observations of, the EMSAP ATM.

Entry meetings

Entry meetings will be conducted before the start of the audit.

Entry meetings will be chaired by the EMSAP ATM and establishment management should be represented by at least the Quality Assurance Manager (QAM), Production Manager and/or General Manager.

At entry meetings, the ESMAP ATM will:

- confirm the purpose of the audit
- define the audit scope and criteria
- identify the likely finish times for the day's production and production breaks that are to occur
- invite comment/discussion from/with establishment representatives
- propose a time and date for the exit meeting.

Audits

Audits will assess both the establishment's documentation and records in the context of its AA, and operational performance and outcomes. The audit component comprising the documentation and record review may be conducted remotely.

Documentation, product standards and process compliance will be assessed and verified during the audit. This will be achieved by conducting a desk audit of each element of the approved arrangement followed by product/process evaluation within the various areas of the establishment. Product/process evaluation will include check-the-checker of establishment employees at operations where product hygiene index (PHI) key performance indicators and hazard analysis critical control point (HACCP) critical control points are monitored.

Assessment of the establishment's operational performance will be conducted by a physical review of operational procedures at the establishment.

Where critical non-compliance has been identified during the audit, the EMSAP ATM may direct that product or goods be retained or recalled for further testing or assessment.

Audit conclusions

At the completion of the audit, the audit team will develop audit findings based on the audit evidence. The EMSAP ATM will then rate each activity and raise the initial audit report in AMS. Guidelines for ratings:

- Ratings for each activity will be on a scale from 0 to 10.
- Any activity which has a critical non-compliance identified during an audit will be rated a zero (0).

After the audit report has been uploaded into the AMS, it will generate an overall audit rating. The overall rating will be based on a summation of the ratings allocated to each activity included in the scope of the audit, multiplied by a weighting factor based on an assessment of significance of the activity in terms of food safety, animal welfare, market access, product integrity or other legislative requirements.

- An overall audit rating of ≥80% is acceptable, 70 to < 80% is marginal, and less than 70% is unacceptable.

Exit meetings and audit reports

Exit meetings guidelines:

- Exit meetings will be held with management to discuss the audit findings, the details of any CARs issued during the audit, the audit conclusions, and the audit outcome. CARs will also be provided to establishment management at the exit meeting. The auditee will have the opportunity to ask questions or challenge findings.
- The initial audit report will be reviewed and approved for finalization by a Field Operations Manager (FOM). Once approved, the EMSAP ATM will send the final report to the occupier within 14 business days of the conclusion of the audit.
- The establishment will be required to provide a written response to the department that details the corrective and preventive actions taken to address the audit findings.
- The time frame for the written response for an acceptable audit will be determined by the nature of the findings. The Establishment ATM and the OPV will be responsible for verifying that corrective actions have been effective.
- Where the audit outcome is marginal or unacceptable, the EMSAP ATM will outline further responses required by the establishment.

Corrective action plan verification audits

For a description of corrective action plan (CAP) verification audits as applied to a systems audit, refer to the [Export Meat Regulatory Action and Sanctions Policy](#).

Related Material

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

- Webpage: [ELMER 3 – Electronic legislation, manuals and essential references](#)
- Webpage: [Approved arrangement guidelines – Meat](#)
- Webpage: [Approved arrangement guidelines – Wild game meat](#)
- Webpage: [Approved arrangement guidelines – Poultry](#)
- Webpage: [Export Meat Regulatory Action and Sanctions Policy](#)
- Webpage: [Eligibility criteria for Tier 2 export establishments to move to an annual audit frequency](#)

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](#)
- Webpage: [AS/NZS ISO 19011-2003 Guidelines for quality and/or environmental management systems auditing](#)
- Webpage: *[Public Service Act 1999](#)*
- Webpage: [APS Values and Code of Conduct in practice](#)

Relevant standards, guidelines and obligations may include, but are not limited to:

- Webpage: [Codex Alimentarius](#)
- PDF: [CAC/GL 26-1997 Guidelines for the design, operation, assessment and accreditation of food import and export inspection and certification systems](#)

- PDF: [CAC/GL 34-1999 Guidelines for the development or equivalence agreements regarding food import and export inspection and certification systems](#)
- Webpage: [ISO 19011:2018 Guidelines for auditing management systems](#)
- Webpage: [World Organisation for Animal Health (OIE) Terrestrial Manual Online Access](#)
- Webpage: [National Regulatory Food Safety Audit Policy](#)
- PDF: [National Regulatory Food Safety Auditor Guideline (2009)](#)
- Webpage: [ISO/IEC 17021:2011 – Conformity assessment – Requirements for bodies providing audit and certification of management systems](#)
- Webpage: [ISO/IEC 17021-1:2015 – Conformity assessment – Requirements for bodies providing audit and certification of management systems – Part 1: Requirements](#)
- Webpage: [ISO/IEC 17024:2012 - Conformity assessment - General requirements for bodies operating certification of persons](#)
- Webpage: [AS/NZS 19011:2019 Guidelines for auditing management systems](#)
- Webpage: [AS ISO 31000:2018 Risk management - Guidelines](#)
- Webpage: [AS ISO 22000-2005 Food safety management systems – Requirements for any organization in the food chain](#)
- Website: [AS/NZS ISO 9001:2016 Quality Management Systems - Requirements](#)
- PDF: [Safe Quality Food (SQF) Institute Code Edition 7.1 (July 2013)](#)

Attachment 1: Roles and responsibilities

The department

- Conducting audits as defined in this guideline.

The occupier

- Complying with relevant export legislation, importing country requirements and Australian standards as reflected in the establishment's AA
- Implementing corrective and preventive action within agreed timeframes.

Assistant Secretary, Meat Exports Branch

- Monitor the performance and effectiveness of the Export Meat Program operations.

Director, Export Meat Program

- Coordinates and communicates audit policy.
- Provide advice in relation to audit policy matters.

Field Operations Managers (FOM)

- Verification of the performance and effectiveness of system audits by assessing audit reports and periodically observing the performance of auditors.
- Provide technical advice to senior division management in relation to audit policy matters.

Area Technical Manager (ATM)

- A Commonwealth authorised officer with veterinary qualifications who has responsibility for the supervision, technical performance, assessment and verification of technical standards and operations in a defined group of export meat establishments.

Establishment ATM

- ATM with day-to-day on-plant responsibilities, on-plant staff technical review responsibilities and an establishment critical incident response audit (CIRA) audit role.
- Approves the establishment's approved arrangement and/or any amendments made to it.

EMSAP ATM

- ATM conducting the EMSAP audit at the establishment. This individual has not been the ATM with day-to-day on-plant responsibilities at the establishment being audited during the previous two years (i.e. held the establishment ATM role).

Certification Integrity Unit (CIU)

- Provide independent internal audits conducted by, or on behalf of, the department's Exports and Veterinary Services Division.

Attachment 2: Table of knowledge and skills – systems audit

Description	Director Audit Services, Food Services Group	Field Operations Manager	Auditor
System audit function and responsibilities	Select the audit team members and schedule audits	Determine audit team competence required, reviewing audit reports, and making certification decisions	Auditing
Knowledge of department management practices	X	X+	X
NFSA auditor certification		X	X+
Knowledge of system audit policies	X	X	X+
Knowledge of departments meat systems audit IM and other relevant IM	X	X+	X+
Knowledge of export meat sector/industry	X	X	X+
Note-taking and report writing skills		X	X
Presentation skills		X	X
Interviewing skills		X	X
Audit-management skills		X	X

X+ = need deeper knowledge and skills

Attachment 3: Definitions

Audit Management System (AMS)

The department's Audit Management System used to manage, monitor, and report on the performance of export-registered establishments.

Auditor

A person who under Chapter 9 Part 1 of the Export Control (Meat and Meat Products) Rules 2021 may conduct an audit.

Certification

Attestation by the competent authority that export product meets importing country requirements, and other requirements as specified in the Export Control Act and Rules.

Critical Incident Response Audit (CIRA)

An audit scheduled by the department's Assistant Secretary Meat Exports Branch, in response to an identified critical incident triggered by non-compliance of export legislation, Australian standards, and/or importing country requirements

Departmental Food Safety Auditor (FSA)

A Commonwealth authorised officer who undertakes inspections and audits of export-registered establishments.

Equivalence

The capability of different systems to meet the same objectives.

Exemplar Global

Formerly known as the Registration Accreditation Bureau and Quality Society of Australasia (RABQSA) is an internationally recognized commercial, personnel and training certification body.

Export Meat Industry Advisory Committee (EMIAC)

A joint Department/industry consultative committee.

The Export Meat Industry Advisory Committee (EMIAC) was created as a consultative body between the export meat industry and the department. EMIAC's terms of reference are broad but its main function is to consider technical issues affecting the export meat sector. It also provides policy advice on many major issues such as residues, pathogens, international requirements including market access and food safety issues affecting meat.

EMIAC is not a statutory body but it has a high profile within the industry.

ISO19011:2018

An international standard which provides guidance for the management of audit programs, the external audits of quality systems and evaluation of auditor competence.

Non-compliance

Failure to comply with export legislation and/or importing country requirements.

On-Plant Veterinarian (OPV)

A Commonwealth authorised officer (veterinarian) employed by the Department to conduct ante-mortem inspection and to provide daily supervision of post-mortem inspection and verification of the establishment's approved arrangement.

Planning and Governance Meat

A senior management group within the department's Export Meat Program.

Product Hygiene Indicators

A weighted score out of 100 generated from agreed KPIs that is used to compare the performance of a plant against similar establishments and as an input into risk-based government oversight.

Product Hygiene Indicator program

Measures hygienic meat production at individual establishments through the collection and analysis of individual KPIs.

Show Cause Letter

A letter issued by the Department of Agriculture to the occupier of a registered establishment requesting the occupier to give reasons why sanctions under the Export Control Act should not be applied to that establishment.

Systems audit

An audit of systems under an occupier's approved arrangement.

Tier 2 export-registered establishment

An establishment operating under the Export-Registered Australian Standard Meat Establishment (Tier 2) Scheme. Tier 2 establishments have a full-time departmental on-plant presence to ensure maintained compliance.