Australian Government



Department of Agriculture, Fisheries and Forestry

October 2022

Export Meat Operational Guideline

9.2 Meat Establishment Verification System (MEVS) -Establishments



Purpose

The purpose of this guideline is to:

- provide clarity on the inspection and verification system employed at export-registered meat establishments to support Australian Government certification for red meat, wild game, poultry, and rabbit and ratite prescribed export commodities
- meet legislative and importing country requirements for the export of meat and meat products.

Scope

This guideline applies to export-registered meat establishments under the direct control and supervision of the Department of Agriculture, Fisheries and Forestry.

Legislative basis

Under the *Export Control Act 2020* ('the Act') and its subordinate legislation there are legislative requirements relating to:

- inspection (ante-mortem)
- verification (post-mortem, food safety, animal welfare, market access requirements and product integrity/certification).

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Meat Establishment Verification System (MEVS) components

The Meat Establishment Verification System (MEVS) has two key components that are linked to specific legislative requirements of the *Export Control Act 2020* and its subordinate legislation:

- Inspection (ante-mortem, post-mortem)
- Verification (post-mortem, food safety, animal welfare, market access requirements and product integrity/certification).

Ante-mortem inspection

Ante-mortem inspection is regulated by Chapter 9 of the:

- Export Control (Meat and Meat Products) Rules 2021,
- Export Control (Poultry Meat and Poultry Meat Products) Rules 2021
- Chapter 9 of the Export Control (Rabbit and Ratite Meat and Rabbit and Ratite Meat Products) Rules 2021.

Specifically, it is performed in accordance with:

- section 9-23 (Inspections of animals for slaughter and applying ante-mortem dispositions) of the Export Control (Meat and Meat Products) Rules 2021 and Part 3 (Ante-mortem and Post-mortem Dispositions) of the Australian Meat Standard (AS4696) for meat and meat products
- section 9-22 (Inspections of poultry for slaughter and applying ante-mortem dispositions) of the Export Control (Poultry Meat and Poultry Meat Products) Rules 2021 and Section 16 (Ante-mortem inspection) of the Australian standard for construction of premises and hygienic production of poultry meat for human consumption (AS4465) for poultry and poultry meat products
- section 9-23 (Inspections of animals for slaughter and applying ante-mortem dispositions) of the Export Control (Rabbit and Ratite Meat and Rabbit and Ratite Meat Products) Rules 2021 and Chapter 10 (Ante-Mortem Inspection) of the Australian standard for hygienic production of rabbit meat for human consumption (AS4466) for rabbit meat and rabbit meat products
- section 9-23 (Inspections of animals for slaughter and applying ante-mortem dispositions) of the Export Control (Rabbit and Ratite Meat and Rabbit and Ratite Meat Products) Rules 2021 and Chapter 7 (Ante-Mortem Inspection) of the Australian standard for hygienic production of ratite (Emu/Ostrich) meat for human consumption for ratite meat and ratite meat products (AS5010).

The purpose of ante-mortem inspection is to ensure that the appropriate disposition is applied so that only animals fit for the purpose of producing meat and meat products for human consumption are slaughtered.

The On-Plant Veterinarian (OPV) undertakes ante-mortem inspection in accordance with the relevant departmental instructional material.

Animal welfare verification

Animal welfare verification is performed to assess the effectiveness of the establishment's procedures and practices that are designed to minimise the risk of injury, pain and suffering to animals and cause the least practical disturbance to animals.

OPVs undertake animal welfare verification in accordance with departmental instruction material.

On those establishments that are accredited with the Australian Animal Welfare Certification System (AAWCS), the OPV will be invited by the establishment to attend the exit meetings during the annual animal welfare audit conducted by AUS-MEAT. Animal welfare verification is undertaken:

- during ante-mortem inspection
- through monthly check-the-checker verification of animal handling during production (e.g. in lairage facilities, unloading, etc.)
- during the monthly check-the-checker verification of slaughter floor procedures that encompasses both animal handling (i.e. knocking box/restraint procedures) and slaughter (i.e. stunning and sticking)
- in accordance with departmental instructional material, OPVs report animal welfare incidents to the relevant State Regulatory Authority responsible for animal welfare legislation.

Post-mortem inspection verification

Part 3, Clause 10 of the Australian Meat Standard (AS4696) stipulates the requirements for post-mortem inspection, correlation and post-mortem disposition.

The Australian Meat Standard (AS4696) states that the outcome for post-mortem inspection and disposition is that unwholesome meat is excluded from the human food chain and disposed of separately.

Schedule 2 of the Australian Meat Standard (AS4696) sets out the procedures that must be followed by a meat safety inspector.

OPVs supervise post-mortem inspection in accordance with the relevant department instructional material and the responsibilities outlined in this guideline.

Post-mortem inspection verification is performed by an OPV and/or a roving Food Safety Meat Assessor (FSMA) as per departmental instructional material relevant to the species, and the approved arrangement as it relates to Australian Government Authorised Officer (AAO)/FSMA activities.

Food safety verification

Department verification of food safety is aimed at ensuring that the establishment procedures, required to maintain food wholesomeness, are working effectively through the application of hazard analysis critical control point (HACCP) and the associated good hygienic practices (GHP)/ pre-requisite programs; including microbiological and residue surveillance programs.

The frequency of food safety verification is dependent upon the procedure/process being monitored and market access requirements. MEVS food safety covers:

- HACCP plan critical control points (CCPs)
- GHP/pre-requisite programs
- sanitary standard operating procedures (SSOPs)
- microbiological testing programs
- residue sampling programs.

Importing country requirements verification

The outcome of market access requirement verification is that product intended for a particular market complies with all the requirements for that market.

Importing country requirements are specified in the department's Manual of Importing Country Requirements (Micor) database and changes to importing country requirements are notified to industry through Market Access Advice notices.

The OPV's responsibility is their familiarity with the registered operations and specific overseas listings at their establishment to ensure verification of importing country requirements is effective.

Product integrity and certification verification

Department verification of product integrity and certification requirements is to ensure that the establishment procedures and practices are meeting the required outcomes:

- All incoming products are traceable back to the supplier, and meat and meat products can be traced forward to facilitate recall if necessary.
- Product is accurately and permanently identified.
- Edible meat and meat products maintain their integrity and are kept separate from inedible or condemned meat products and by-products.
- Official marks are only applied to eligible product and official marks and seals are only used in accordance with the Rules.
- Meat and meat products are only exported from Australia when certification requirements are accurately met.

Product integrity and certification requirements include:

- product traceability and recall
- trade description
- export security/integrity
- control of official marks
- export documentation.

Verification method

The aim of verification is to determine whether an establishment's operations are implemented, monitored, verified, controlled, recorded and amended in accordance with the details provided in the occupier's approved arrangement.

The occupier's approved arrangement must comply with the relevant legislation, Australian standards and importing country requirements to ensure that meat and meat products are wholesome and fit for human consumption.

In the context of the responsibilities of the OPV, meeting verification obligations requires:

- conducting animal welfare verification
- conducting inspections of meat and meat products at various stages of production
- measuring various parameters applicable to processing
- reviewing activities conducted and examining documents produced to assess compliance with the processes and outcomes detailed in an occupier's approved arrangement.

Department verification activities are focused on:

• verification of establishment control of the implementation of its approved arrangement through the establishment's internal monitoring, verification and corrective action processes.

Verification outcomes

Verification outcomes are rated on food safety, legislative compliance or market access requirements and the ratings will be either:

- acceptable an acceptable outcome will be recorded if the activity complies with the approved arrangement and there is no adverse impact on food safety, product wholesomeness, product integrity and/or importing country requirements
- marginal a marginal outcome is considered a breach of compliance of the approved arrangement and a marginal rating would be given if there was

potential to cause an adverse effect on food safety, product wholesomeness, product integrity and/or importing country requirements

unacceptable – an unacceptable rating would be applied if the non-compliance
of the approved arrangement is reasonably likely to adversely affect food safety,
product wholesomeness or product integrity and/or importing country
requirements.

Non-compliance issues and corrective action requests

A non-compliance issue (NCI) is a written record (generated in the Audit Management System (AMS)) made by department on-plant staff of an identified non-compliance that had the potential to affect food safety, product wholesomeness, animal welfare, product integrity or market access requirements. The intent of an NCI is to record details of non-compliance and the associated corrective and preventive actions which can assist in decision making regarding the issuance of a corrective action request (CAR) for future non-compliance. NCIs are issued when a formal verification activity is rated marginal. Depending on the frequency of the verification activity (daily, weekly or monthly), no more than two consecutive NCIs can be issued for the same verification activity. More than two NCIs will trigger a CAR.

Resolving marginal or unacceptable outcomes with approved arrangements

Where the verified activity is found to be marginal or unacceptable and the activity:

- complies with the approved arrangement the department requires the establishment to review the relevant section of the approved arrangement to make appropriate amendment, and the activity to be brought into compliance with the amended approved arrangement
- does not comply with the approved arrangement the department requires the establishment to bring the activity into compliance with the approved arrangement
- does not comply with the approved arrangement and compliance would not remove adverse effects the department requires the approved arrangement to be reviewed for amendment, and the activity to be brought into compliance with the amended approved arrangement.

Process to resolve marginal or unacceptable outcomes

All marginal and unacceptable verification outcomes must:

- be reported to the establishment management (after completing the verification activity) so that the establishment can take responsibility for corrective action (i.e. the relevant production supervisor and the quality assurance officer):
 - in the first instance this is done in person, and then added to the Weekly Meeting Agenda
- have corrective action taken by the establishment:
 - to prevent adversely affected product from entering commerce until it can be demonstrated that the product is safe and eligible for its intended use and intended market
 - where an animal welfare breach has occurred, and the corrective action must involve immediate alleviation of suffering of any affected animals and immediate prevention of suffering to other animals
 - where establishment corrective actions are not effective, a department officer may apply an appropriate disposition to ensure the required outcome.

Marginal or unacceptable outcome rules

The rules for dealing with marginal verification outcomes:

- The establishment is given 5 working days to implement effective corrective action.
- If the corrective action by the establishment is found to be acceptable through department verification, the issue is closed.
- If the corrective action by the establishment is found to be unacceptable, a CAR is raised.
- Repetitive marginal findings (i.e. if more than two consecutive marginal verification outcomes are rated for an activity), will result in the NCI being elevated to a CAR.
- An unacceptable department verification finding will result in a CAR.

Corrective Action Requests (CARs)

Rules for use of CARs:

- A CAR against the occupier is raised through AMS for unacceptable verification outcomes or repetitive marginal outcomes.
- A CAR clearly states the legislative reference for the non-compliance and includes an accurate description of the overall findings, observations and any objective evidence collected to support the findings.
- A CAR is discussed between the department officer and a senior establishment representative and where possible, agreed upon.
- Once the agreed close out date is determined both parties sign the CAR.
- The documentation provided by the establishment as evidence of effective corrective action will be attached to the relevant CAR records.
- The department officer who raised the CAR or their delegate will record their verification findings when closing out the CAR.
- A copy of the signed closed CAR is given to the establishment.
- The original closed CAR will be retained securely on department on-plant files.

General process for CARs

General guidelines for CARs:

- The maximum time permitted for CAR closure is one month, however depending on the nature of the CAR, a longer timeframe can be negotiated between the OPV and establishment management.
- Food safety and wholesomeness issues would have a short time frame for close out.
- Product integrity issues or importing country issues may have a longer time for close out.
- CARs are either closed (acceptable) or rejected (unclosed).

Rejected CARs

Rejected CARs:

- indicate systemic non-compliance with the approved arrangement
- are referred to the <u>Establishment ATM</u> for final decision. The ATM can either accept the rejection or approve extension of the CAR.

If the Establishment ATM approves rejection of the CAR, then the ATM can issue a show cause letter asking the occupier why they should not recommend a Critical Incident Response Audit to be conducted.

CAR extensions

CAR extensions:

- are only granted on one occasion
- are based on written evidence from the establishment to support their claim
- are to be discussed with the Establishment ATM
- have the final decision (on whether an extension is granted) made by the Establishment ATM.

Weekly Meetings

The OPV chairs a weekly meeting with establishment management.

Issues relating to, but not limited to, ante-mortem inspection, post-mortem inspection, food safety, animal welfare, market access requirements and product integrity will be discussed.

The meeting will be used as an opportunity to:

- discuss the results of the MEVS verification
- discuss results of product hygiene indicator (PHI) and post-mortem verification (PMV)
- review corrective actions on unclosed non-compliance issues
- be the vehicle through which new Market Access Advice and Meat Notices are discussed
- convey other relevant department information to the establishment and vice versa e.g. resource issues and/or performance of AAOs/FSMAs
- discuss any work, health and safety (WHS) issues impacting department on-plant officers.

The department officer present at the meeting is responsible for minute taking. Once the minutes of the meeting are agreed between all parties the department officer and establishment representative will sign and date the minutes (signing and dating can be met by electronic communication in accordance with the principles of the Rules 2021).

Then, the signed minutes will be uploaded and securely retained centrally (AMS and National Standard Filing System); and for hard copies, in department on-plant files.

At establishments where there is more than one shift, each OPV is responsible for ensuring that all meeting agenda items are added to the weekly meeting. Ideally:

- both OPVs should attend the weekly meeting to ensure consistency
- the chair role is to be rotated between the OPVs.

If both OPVs cannot be present, it is the responsibility of the OPV to give their apology and ensure that the chair (their delegate) has a comprehensive understanding of any issues to be raised at the meeting.

Where a shift changeover limits availability of both OPVs being present at the meeting, other arrangements for a weekly meeting format can be negotiated between the establishment and the Establishment ATM.

A weekly report is sent to the Establishment ATM advising them of key issues discussed during the weekly meeting.

Guideline verification

Establishment ATMs will verify OPVs adherence to this guideline and underlying instructional material through remote monitoring of AMS records, PHI records and OPV Weekly Reports.

Establishment ATMs will verify department records at the establishment during the technical support visits that are conducted every two months.

Records

Records maintained within the MEVS include:

- verification records
- weekly meeting agenda and minutes
- weekly report
- NCI register
- CARs
- post-mortem verification records
- ante-mortem inspection records
- animal welfare incident reports
- product hygiene indicator/post-mortem verification records
- condemn certificates
- conditional slaughter cards
- emergency kill cards
- daily kill sheet reconciliation.

All records directly related to verification are maintained on the AMS including verification records, NCI register, CARs and weekly meeting minutes.

Hard copies of all relevant documentation relating to department on-plant inspection and verification activities are maintained securely in department on-plant files.

Records relating to ante-mortem inspection (i.e. conditional slaughter cards, emergency kill cards, daily kill sheet reconciliation and condemn certificates) are kept as hard copies in department on-plant files.

Related Materials

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

- Webpage: <u>Approved arrangement guidelines Meat</u>
- Webpage: <u>Approved arrangement guidelines Wild game meat</u>
- Webpage: <u>Approved arrangement guidelines Poultry</u>
- Webpage: Export Meat Regulatory Action and Sanctions Policy
- Webpage: <u>Australian Livestock Processing Industry Animal Welfare Certification</u> <u>System (AAWCS) Conditions of Recognition</u>

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)
 <u>Rules 2021</u>
- Webpage: Export Control (Rabbit and Ratite Meat and Rabbit and Ratite Meat <u>Products) Rules 2021</u>
- Webpage: Export Control (Poultry Meat and Poultry Meat Products) Rules 2021
- Webpage: <u>Australian standard for the hygienic production and transportation of</u> <u>meat and meat products for human consumption (AS4696:2007)</u>
- Webpage: <u>Construction of premises and hygienic production of poultry meat for</u> <u>human consumption (AS4465)</u>
- Webpage: Hygienic production of rabbit meat for human consumption (AS4466)
- Webpage: <u>Hygienic production of ratite (emu/ostrich) meat for human</u> <u>consumption (AS5010)</u>

Attachment 1: Roles and responsibilities

On-Plant Veterinarian (OPV)

- All export-registered abattoirs are required to have a department OPV on-site to manage the animal health, animal welfare, food safety, product integrity/certification and market access requirement outcomes in conjunction with the occupier's approved arrangement.
- Operates within the Export Meat section of the Veterinary and Export Meat Branch (VEMB).
- Reports to the Export Meat Assistant Director of VEMB, depending on the location of the establishment.
- Has six key technical areas of responsibility:
 - ante-mortem inspection
 - post-mortem inspection verification
 - animal welfare verification
 - food safety verification
 - product integrity and certification verification
 - importing country requirements verification.
- Undertakes ante-mortem inspection or verifies ante-mortem inspection conducted by authorised officers at pig abattoirs.
- Verifies that the establishment complies with its approved arrangement.
- Ensures inspection and verification tasks are done at the correct frequency.
- Ensures critical non-compliance by the establishment is handled and reported in the AMS non-compliance issue (NCI) register and/or CAR records.
- Manages weekly meetings with establishment management.
- Provides a weekly report to the Establishment ATM and Assistant Director informing them of relevant issues relating to the 6 key technical areas of responsibility.
- Maintains the Audit Management System (AMS) records.
- Participates in the ATM technical review.
- OPV's performance is managed through the department's performance management scheme in line with the Department's Enterprise Agreement.

Food Safety Meat Assessor (FSMA)

- Operates within the Export Meat section of VEMB.
- Supervised by an Export Meat Operations Manager in VEMB.
- Roving FSMAs undertake verification tasks under the direction of the OPV.
- On-line FSMAs undertake post-mortem inspection.
- End-of-chain FSMAs undertake carcase-by-carcase assessment.

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).

Field Operations Manager

- Operates within the Meat Inspection Program Management section of the Meat Exports Branch.
- Supervised by the Assistant Secretary Meat Exports Branch (MEB).
- Is responsible for supervision of the ATMs within their region.

Attachment 2: Definitions

Approved arrangement

As per the Export Control (Meat and Meat Products) Rules 2021, means an arrangement approved under Chapter 5 of the Export Control (Meat and Meat Products) Rules 2021.

As per the Export Control (Wild Game Meat and Wild Game Meat Products) Rules 2021, means an arrangement approved under Chapter 5 of the Export Control (Wild Game Meat and Wild Game Meat Products) Rules 2021.

As per the Export Control (Poultry Meat and Poultry Meat Products) Rules 2021, means an arrangement approved under Chapter 5 of the Export Control (Poultry Meat and Poultry Meat Products) Rules 2021.

As per the Export control (Rabbit and Ratite Meat and Rabbit and Ratite Meat Products) Rules 2021, means an arrangement approved under Chapter 5 of the Export Control (Rabbit and Ratite Meat and Rabbit and Ratite Meat Products) Rules 2021.

Audit Management System (AMS)

The department's web-based record management system for holding on-plant Verification records, non-compliance issues (NCIs), corrective action requests (CARS, weekly meeting records and audit reports.

Australian Government Authorised Officer (AAO)

Means a Meat Safety Inspector who is authorised under Chapter 9 Part 4 of the Export Control (Meat and Meat Products) Rules 2021 to perform the services for the purposes of the Australian Export Meat Inspection System (AEMIS).

Food Safety Meat Assessor (FSMA)

Commonwealth authorised officer who has meat inspection qualifications and works on export-registered slaughtering establishments.

Non-compliance

A failure to comply with legislative or importing country requirements.

On-Plant Veterinarian (OPV)

A Commonwealth authorised officer with veterinary qualifications registrable in a state or territory of Australia who is based on an export-registered slaughtering establishment.

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