Australian Government
Department of Agriculture, Fisheries and Forestry

November 2022

Export Meat Operational Guideline

9.3 Meat Establishment Verification System (MEVS) – Independent boning rooms

Purpose

The purpose of this guideline is to assist those regulated under the *Export Control Act 2020* ('the Act') and the Export Control (Meat and Meat Products Rules) 2021 ('the Rules') by providing clarity on the inspection and verification system employed at export-registered independent boning rooms.

Legislative basis

The *Export Control Act 2020* and the Export Control (Meat and Meat Products) Rules 2021.

In this document

Meat Establishment Verification System components

The Department of Agriculture, Fisheries and Forestry's (the department's) Meat Establishment Verification System (MEVS) is regulated under the Act and Rules, and for independent boning rooms (IBR) ensures ongoing verification of compliance with the Australian standard for the hygienic production and transportation of meat and meat products for human consumption (AS 4696); meeting food safety, importing country requirements; and product integrity.

This verification process provides the Australian Government assurance that product meets export certification requirements.

Food safety requirements

The approved arrangement (AA) for IBRs will meet all the requirements necessary as prescribed in AS 4696, and as approved by the department. The Department verification of food safety programs operating in IBRs is undertaken to provide the assurance levels necessary that the AA is being applied consistently as described. Compliance with AS 4696 will ensure outcomes such as food safety and food wholesomeness are maintained through the application of hazard analysis critical control points (HACCP) and the associated good hygienic practices (GHP)/ pre-requisite programs including microbiological testing programs, etc.

The frequency of food safety verification is dependent upon the MEVS requirements of the IBR and market access requirements.

Under MEVS and as reflected in the IBR's AA, food safety covers:

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

Meeting importing country requirements

It is critical that IBRs consistently meet all importing country requirements for each export certificate issued and it is the legislative obligation of the exporter to ensure all importing country requirements are consistently met. Issuance of the export certificate is the official government to government assurance that importing country requirements have been met in the export consignment.

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.

Product integrity and certification verification

The Act and Rules are clear regarding segregation, identification, security, traceability and integrity. All of these requirements will be reflected in the AA of the IBR as approved by the department. Unless the IBR operates a robust quality system, addressing these elements as described in its AA, then the department will be unable to issue an export certificate.

In general terms, IBR integrity systems must be in place sufficiently to ensure:

- all incoming products are traceable back to the supplier and forward to the next customer in the export chain
- product is accurately and permanently identified
- edible meat and meat products maintain their integrity and are kept separate from inedible, condemned meat products and by-products

- official marks and seals are only applied to eligible product and are only used in accordance with legislation
- meat and meat products are 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 responsibilities of the Food Safety Assessor

The aim of verification is to provide the department with the assurance levels necessary to conclude whether an establishment's operations are implemented, monitored, verified, controlled, recorded and amended in accordance with its AA.

Importing countries and the department require regular attendance at an IBR for a specified period of time by a government-employed Food Safety Assessor (FSA). Some importing countries have specific requirements in this regard as identified in Micor. During this prescribed attendance, the verification procedure for FSAs includes:

- conducting inspections of meat and meat products at various stages of production and processing
- reviewing activities conducted, and examining documents produced, as a result of the implementation of the occupier's AA to assess compliance with the processes and outcomes detailed in the AA
- conducting other regulatory requirements as required by importing countries.

Verification outcomes

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

- Acceptable – An acceptable outcome will be recorded if the activity complies with the AA 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 AA 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 AA is reasonably likely to adversely affect food safety, product wholesomeness, product integrity and/or importing country requirements.

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 AA: The department will require the establishment to review the relevant section of the AA to make appropriate amendments
- does not comply with the AA: The department will require the establishment to bring the activity into compliance with the AA
- does not comply with the AA and compliance would not remove adverse effects: The department will require the AA to be reviewed and amended, and the activity to be brought into compliance with the amended AA.

Process to resolve marginal or unacceptable outcomes

All marginal and unacceptable verification outcomes must:

- be reported to the establishment management (the relevant production supervisor and the quality assurance officer) as soon as possible so that the establishment can take responsibility for corrective action
  - 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 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 are:

- The establishment is given one week 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 corrective action request (CAR) is raised.
- Repetitive marginal findings (if more than two consecutive marginal verification outcomes are rated for an activity) will result in the non-compliance issue being elevated to a CAR.
- An unacceptable department verification finding will result in a CAR.

Corrective action requests

General rules for CARs:

- A CAR against the occupier is raised through the Audit Management System (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.
- CARs are attached to the relevant AMS record and securely retained on department on-plant files.
- 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.

Duration of corrective action requests

In regard to the durations of 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 FSA and establishment management.

- Food safety and wholesomeness issues could have a short time frame for close out.
- Product integrity issue or importing country issues may have a longer time for close out.
- If the FSA is unsure, they should consult the Establishment ATM.

Rejected corrective action request responses

CAR responses rejected by the FSAs are referred to the Establishment ATM for final decision. The Establishment ATM can either accept the rejection or approve extension of the CAR.

If the Establishment ATM approves rejection of the CAR, then a 'show cause' letter asking the occupier why they should not recommend a critical incident response audit (CIRA), or other appropriate sanction may be considered.

Corrective action request extensions

CAR extensions are:

- only granted on one occasion
- based on written evidence from the establishment to support their claim
- to be discussed with the Establishment ATM.

The final decision on whether an extension is granted is the responsibility of the Establishment ATM.

Weekly Meetings

The FSA chairs a weekly meeting with establishment management.

Issues relating to, but not limited to, food safety, market access requirements, certification and product integrity will be discussed.

The meeting will be used as an opportunity to:

- discuss the results of the MEVS verification
- review corrective actions on unclosed non-compliance issues
- discuss new Market Access Advice and Meat Notices
- convey other relevant department information to the establishment and vice versa
- discuss any work health and safety (WHS) issues impacting department 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.

The original copy of the signed minutes will be attached to the relevant weekly meeting in AMS and securely retained in department on-plant files.

A weekly report is sent to the Establishment ATM and Assistant Director, Veterinary and Export Meat Branch (VEMB) informing them of the key issues discussed during the weekly meeting.

Guideline compliance

The Establishment ATM will verify the FSA's application of this guideline and underlying instructional material through remote monitoring of AMS records, product hygiene index (PHI) records and FSA weekly reports.

The Establishment ATM will verify department records at the establishment during technical reviews.

Records

Records maintained within the MEVS include:

- verification checklists
- weekly meeting agenda and minutes
- weekly reports
- non-compliance issue (NCI) register
- corrective action requests.

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.

Related Materials

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

- 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

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: Australian standard for the hygienic production and transportation of meat and meat products for human consumption (AS4696:2007)

Attachment 1: Roles and responsibilities

Food Safety Assessor (FSA)

- All export-registered independent boning rooms are required to have regular presence of a departmental FSA who will undertake verification against the IBR's AA to ensure it is meeting its regulatory obligations regarding food safety, market access requirements, product integrity and certification obligations.
- Report to the Establishment ATM on all technical matters.
- Have three key technical areas of responsibility:
  - food safety verification
  - product integrity and certification verification
  - importing country requirements verification.
- Verify that the occupier complies with their AA.
- Ensure verification tasks are done at the correct frequency.
- Ensure critical non-compliance by the establishment is handled and reported in the AMS CAR records.
- Review AA amendments and provide recommendations for approval to the Establishment ATM.
- Manage weekly meetings with establishment management.
- Provide a weekly report to the Establishment ATM and Assistant Director (Veterinary and Export Meat Branch) informing them of relevant issues relating to the 3 key areas of responsibility.
- Maintain the audit management system (AMS) records.
- Participate in the Establishment ATM technical review.
- FSA performance is managed through the department's performance management scheme in line with the Enterprise Agreement.

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 AA and/or any amendments made to it.
- Is assigned a group of export-registered independent boning rooms and FSAs in a particular geographic area.
- Provides technical oversight of FSA verification.

Field Operations Manager

- Responsible for technical oversight of a group of ATMs either within a region or across regions.

Attachment 2: Definitions

Approved arrangement

An arrangement approved under export legislation and includes variation of such an arrangement.

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.

Non-compliance

A failure to comply with legislative requirements.

Export Meat Operations Manager

A department officer in the Veterinary and Export Meat Branch responsible for the performance management of FSAs.