



Meat notice

Meat notice number:	2020/04		
Meat notice title:	CHINA – REINFORCED IMPORTING COUNTRY REQUIREMENT COMPLIANCE		
Category:	Legal requirements including market access requirements		
NSFS reference	Issue date	Date of effect	Review date
13.2	28 August 2020	Immediate	August 2022
Contact officers		Distribution categories	
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Implementation schedule (to be completed by the departmental on-plant officer, or departmental auditor)

Date received: _____ **Date discussed with est. management:** _____

Initial implementation date: _____ **Date completed:** _____

Management representative initials: _____ **Dept. officer initials:** _____

1. Purpose

This meat notice is to advise export registered establishments and departmental staff about the requirement to implement enhanced verification and reporting procedures at establishments listed, or involved in, the export of meat and meat products to China.

The enhanced verification and audit procedures outlined in this notice are intended to provide increased assurance that China's importing country requirements are met, with specific reference to the accuracy of certification, consistency in labelling and ensuring product loading is consistent with certification (i.e. number of cartons loaded and cut type).

The notice supersedes the meat notice distributed by the department 6 October 2017 titled: 2017/04 CHINA – ENHANCED VERIFICATION AND AUDIT PROCEDURES.

2. Scope

All registered establishments that produce, export or are involved in the export of edible meat or meat products to China. This includes integrated abattoirs, independent cold stores and freight forwarding establishments.

3. Background

China has clear importing country requirements relating to the accuracy of labelling, product descriptions and product load-out outcomes. Failure to meet these requirements increases the risk of the establishment who produced the product being suspended from this market and reputational damage to, or access to China for, Australia's meat export system more broadly.

4. Responsibilities

4.1 Establishment management must, by 30 September 2020:

- Review their Approved Arrangement and confirm that it enables the production system to maintain compliance with China's importing country requirements. Ensure that Chinese requirements for labelling and trade description are clearly documented (including the system of controls used to ensure compliance). Approved Arrangement documentation should include, but not be limited to, procedures for ensuring certification and labeling of meat and meat products exported to China is accurate. This includes:
 - Both inner and outer packaging labels are accurate (packing establishments only)
 - The trade description(s) on the inner and outer carton labels, including batch numbers match the trade description(s) on the export documentation
 - The number of cartons of each product and volumes in the consignment match the details on the export documentation
 - Only meat and meat products for which China has granted access are included in the consignment and certified on the export health certificate.
- Review the Management Review component of their Approved Arrangement to ensure that:
 - Inputs include feedback regarding any non-compliances or issues with meat prepared at the establishment and/or load out facility, received and proactively sought from, entities such as:
 - the General Administration of Customs China (GACC) (received from only)
 - Exporters, including non-packer exporters
 - Chinese importers and/or customers
 - Independent cold stores
 - Other supply chain participants.
 - Outputs are to include records of the non-compliance (including where possible, the associated product health certificate), associated investigations, including any decisions, corrective actions undertaken by the establishment and associated verification records and evidence ensuring the sustainable correction of the root cause of the non-compliance.
- Review the Management Review component of their Approved Arrangement to ensure feedback to the relevant China listed abattoir and relevant cold store (if applicable) of any identified non-compliance occurs within 7 days of notification.

4.2 From the date of this notice, Establishment management must also:

- Notify the department within 7 days of any point of entry notification about non-compliance and the outcomes of the establishments corrective action response, that have been received from any of the following:
 - GACC
 - Exporters, including non-packer exporters
 - Chinese importers and/or customers
 - Other supply chain participants.
- Actively seek information from commercial sources to identify the affected products and nature of the non-compliance.

For integrated abattoirs the notification to the department is to be through the weekly meeting with the On-Plant Veterinary Officer (OPV).

For independent cold stores and freight forwarding establishments, notification is to be to the export meat program through mid.opscoord@awe.gov.au

- Conduct regular verification activities and internal audits of Chinese importing country requirements, including those requirements relating to production and labelling and ensure any identified non-conformances as part of the verification and internal audit and corrective actions put in place are communicated to the OPV at the weekly meeting. The nature and frequency of the verification activities must be documented in the approved arrangement.
- Conduct an investigation into the root cause of any point of entry notifications that have been received from any of the following:
 - GACC
 - The Department
 - Exporters,
 - Chinese importers and/or customers; and
 - Other supply chain participants.
- On completion of the investigation, a detailed report providing the notification details, investigation outcomes, corrective, preventative and verification actions conducted is to be provided to the Department through the abovementioned notification contacts (OPV or Export Meat Program (mid.opscoord@awe.gov.au)).

Note: It is expected establishments will retain comprehensive records of any actions undertaken to address China non-compliances.

4.3 Departmental OPVs must:

- As a standing item of their weekly meeting, discuss non-compliances identified by the establishment.
- Notify mid.opscoord@awe.gov.au, Field Operations Manager (FOM) and Area Technical Manager (ATM) about notifications of non-compliance received from establishment management.

- Conduct verification checks of the implementation of Chinese labelling requirements during the weekly product integrity verification and, as part of the Meat Establishment Verification (MEVS) activities, in the scope of the monthly check the checker for:
 - boning room process monitoring
 - load-out load-in
 - chiller freezer store process monitoring
 - monitoring of offal and other China-destined products

Verification checks must include target checks on any reported non-compliances to ensure the establishment has investigated the root cause, implemented appropriate correct actions and comprehensively recorded these actions. Corrective Action Requests (CAR) will be issued where this has not occurred.

Record the results of the verification checks on the weekly verification checklist. Ensure the recording demonstrates that Chinese labelling requirements had been verified.

- If any CAR have been issued to the establishment for non-compliance with Chinese importing country requirements, review the corrective and preventive actions taken to close-out the CAR to ensure the actions have been effective and sustained.
- Include the results of the review of verification of Chinese importing country requirements and sustainability of any corrective and preventive actions in the weekly report to the ATM. Reports should contain detailed information required to report to GACC i.e. identification of root cause, clearly identified corrective actions and future monitoring activities.

4.4 Departmental Area Technical Managers must:

- Escalate any reports of non-compliances to the FOM.
- Verify that any corrective and preventive actions taken by the establishment management in response to any non-compliance has been effective and sustained.
- Verify compliance with China's importing country requirements, including those for certification, labelling and trade description.

4.5 Departmental Field Operations Managers must:

- Conduct a Critical Incident Response Audit (CIRA) for notifications of non-compliance on a case by case determination, in accordance with the Department's Critical Incident Response Guidelines.
- Verify that investigation had been undertaken into reported non-compliances and, where required, corrective and preventive actions are implemented by the establishment.
- Note: Where a suspension is applied by Chinese authorities the departmental Critical Incident Response Procedures apply.

4.6 Food Safety Auditors must:

- As a standing audit item, discuss non-compliances identified by the establishment. Where non-compliances have not been reported to the department, notify mid.opscoord@awe.gov.au
- Conduct verification checks of the implementation of Chinese requirements. Verification checks must include target checks on any reported non-compliances to ensure the establishment has investigated the root cause, implemented appropriate correct actions and recorded these actions. Further, that the establishment has provided feedback to the relevant China listed abattoir and relevant cold store (if

applicable) of any identified non-compliance occurs within 7 days of notification. Corrective Action Requests will be issued for where this has not occurred.

- Verify that any corrective and preventive actions taken by the establishment management in response to any non-compliance has been effective and sustained.
- Include the results of the review of verification of Chinese importing country requirements and sustainability of any corrective and preventive actions in the audit report. Reports should contain detailed information required to report to GACC i.e. identification of root cause, clearly identified corrective actions and future monitoring activities.

4.7 The department must:

- Monitor the GACC website for reports of non-compliances with China's importing country requirements and advise export establishments for their follow up and action.
- Require an investigation to be undertaken by the establishment on each non-compliance identified on the GACC website, with any corrective actions verified by the department.
- Report back to GACC the outcomes of investigation and corrective action verification biannually.
- Monitor and report to industry any potential market access issues.

4.8 Legislation

Relevant export legislation includes:

- Export Control (Meat and Meat Products) Orders 2005
 - Export Control (Meat and Meat Products) Orders, Part 3, Division II, Order 34 specifies the legislative requirement to meet importing country requirements.
 - Export Control (Meat and Meat Products) Orders, Schedule 2, Part 2, Division I, Sub-Orders 11.1(c) and (d) specify the requirements for registered establishments to document in their Approved Arrangement the applicable importing country requirements and the system of controls used to ensure compliance with those requirements.
- Further information regarding China's importing country requirements for exported meat and meat products can be found on the Manual of Importing Country Requirements (MICoR).

Jason Lucas

Director

Export Meat Program