Appendix 1 – Approved cotton gins information

Excerpt from the Memorandum of Understanding Between Australian Cotton Industry and Australian Beef Cattle Industry, October 2018:

Attachment 2 (to the MOU)

Requirements for Cotton Gins to be on "Approved Supplier List" for the supply of cotton trash for mulch or stockfeed.

Cotton gins must agree to the following conditions to be listed on the "Approved Suppliers List".

- Cotton gins supplying cotton trash must have had nil residues for organochlorine and endosulfan during National Residue Survey testing program in 2015 and subsequent testing programs.
- Cotton gins which have positive organochlorine or endosulfan test results will be not be eligible to be on the "Approved Supplier List" until they produce negative organochlorine and endosulfan test results.
- Cotton gins will undergo annual testing for residues, unless a positive residue result is achieved, whereby testing will occur four times per year until four consecutive negative results are achieved.
- Cotton gins must check on the Livestock Production Assurance (LPA) accreditation database (https://lpa.nlis.com.au/search) to ascertain that a producer is currently accredited to LPA to ensure that cotton trash is only supplied to accredited producers regardless of whether it is to be used for mulch or stock feed.
- Cotton gins must ensure that a copy of a fully completed and signed "Producer Accessing Cotton Trash Agreement" is on hand before any cotton trash is released / delivered to a producer.
- Cotton gins must transmit to NLIS Limited the details of the property / PIC / management / ownership /that cotton trash is being delivered to.
- Cotton gins will supply a completed By-products Vendor Declaration form for each consignment to the producer obtaining cotton trash.
- Cotton gins will retain copies of the Producer Accessing Cotton Trash Agreement and Byproducts Vendor Declaration form for a period of three (3) years.
- Failure to conform to the above requirements will result in a cotton gin being removed from the "Approved Supplier List".
- Cotton gins must only supply cotton trash from 2017 crop onwards.

Excerpt from the Memorandum of Understanding Between Australian Cotton Industry and Australian Beef Cattle Industry, October 2018:

Producer Accessing Cotton Trash Agreement

This form **must** be completed and signed by the owner/manager of the property for each consignment of cotton trash **before** the cotton trash is despatched from the gin or cotton trash storage site.

Name and address of cotton gin that is	
supplying cotton trash to the property	
identified below.	
Name of the property where cotton trash is to be delivered to.	
Property Identification Numbers (PIC) of	
the properties where cotton trash is to be delivered.	
Trading name of entity that owns the PIC	
and property where cotton trash is to be	
delivered.	
Full name of Owner / Manager of	
property and PIC where cotton trash is	
to be delivered.	
Address of property where cotton trash	
is to be delivered.	
Delivery date of cotton trash onto the	
property identified above.	
Amount of cotton trash in this	
consignment to be delivered to property	
identified above.	
	Declaration

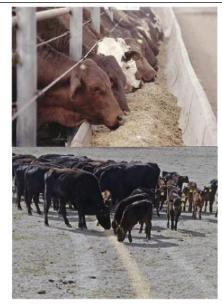
- I have been advised of the residue and commercial risks associated with having cotton trash delivered to my property.
- I am aware that in accepting delivery of cotton trash to the property named above the Property Identification Code (PIC) for that property will have an "Accessed Cotton Trash" status applied to the PIC which will be disclosed on the NLIS database.
- Livestock that have had or may have had access to cotton trash either as stock feed or mulch will be grazed on clean feed for a period of at least 60 days prior to dispatch for slaughter.
- Cattle resident on the property will have an "Accessed Cotton Trash" Device Based Status
 applied to the individual NLIS devices attached to the cattle and the status will be disclosed on
 the NLIS database; this status will remain until the cattle have completed 60 days grazing on
 clean feed. If the cattle are moved to another PIC prior to the 60 day grazing on clean feed
 requirement having been completed the status will remain until the 60 days grazing on clean
 feed period has been completed.
- Movements of any cattle from the property whilst within the 60 day grazing on clean feed period requirement that have or may have accessed cotton gin trash are notified to the NLIS database within 2 days and any subsequent movements are notified to NLIS within 2 days.
- I will disclose at Question 9 of the NVD that the cattle have or may have accessed cotton gin trash if moving cattle to another PIC prior to the "60 days on clean feed" period has elapsed.
- The commencement of the 60 day "grazing on clean feed" period must be verified by either a

- Livestock Production Assurance auditor, local stock inspector or Local Land Services Vet or Ranger, who will verify the commencement date of cattle grazing only clean feed.
- I have a management plan in place to ensure the production system allows access to clean feed for 60 days, and I acknowledge that I will be subject to a random audit process to ensure a management plan is in place.
- I authorise the gin to provide to NLIS Limited, the address, PIC number, legal entity to whom
 the PIC is registered and the owner/managers name of the property where the cotton trash is
 to be used.

to be used.	to be used.				
Date:	Signed:				

The producer must retain a copy of this Producer Agreement for three years for audit purposes

Appendix 2 – NLIS cotton trash statuses*



PIC based status - CTP

Assigned to properties that have had cotton trash delivered for use as mulch or stock feed.

- Assigned on receipt of advice from cotton gin that the PIC has taken delivery of cotton trash to be used as mulch or stock feed.
- May be removed by Integrity Systems Company (ISC Ltd) after confirmation by LPA auditor, LLS Ranger or veterinarian, or Qld stock inspector that cotton trash is no longer available to livestock.



Device based status - CTA

Assigned to cattle that have or may have accessed cotton trash

- Assigned to devices on a CTP status PIC
- Status remains until 60 days after commencement of grazing on feed not containing cotton trash.





PIC based status - CTW

Assigned to Producer and Feedlot PICs when livestock that have a CTA status are moved on to the PIC and that PIC does not have **CTP status**

- Automatically applied when CTA status livestock move on to
- Automatically removed when:
 - o the last CTA status animal is moved off the
 - the 60 day on feed not containing cotton trash period has expired for the last animal with CTA status

Note: while the CTW status is active there are likely to be animals with no CTA status on the PIC, i.e. animals that have never accessed cotton trash or have passed the 60 day period on feed not containing cotton trash.

^{*} Refer to NLIS Terms of Use, Edition 1.23, section 14.9 Statuses. Terms of use PDF available at the NLIS website (https://www.nlis.com.au/NLISDocuments/NLIS%20Terms%20of%20Use%20(Ed%201.23).pdf)

Appendix 3 - Livestock receival assessment and handling

Relevant establishment personnel in the livestock receiving area and/or lairage must carry out pre-slaughter documentation reviews and NLIS database PIC early warning status checks. The following should apply:

Step	Action			
1.	When examining the	for receiving livestock		
	documentation If	Then		
	the animals are from a PIC with an active CTP status	withhold the animals from slaughter until after the animals have completed 60 days on feed not containing cotton trash*		
	the animals' RFID NLIS devices have a CTA status	withhold the animals from slaughter until after the animals have completed 60 days on feed not containing cotton trash*		
	the cotton trash status is unclear or cannot be determined due to lack of documentation or	withhold the animals from slaughter until the documentation and NLIS status can be properly determined		
	inadequacy of documentation	Note : adequate source documentation is an Australian Meat Standard (AS4696:2007) requirement, regardless of cotton trash status.		
	the animals are from a PIC with a CTW status	withhold the animals from slaughter until each animal's individual device status can be determined by:		
		 scanning the RFID devices and querying the NLIS database for the status of the device, or querying the database for the status of each animal's NLIS number, or confirmation of status from the vendor (i.e. from the CTW PIC) 		
	animals from a PIC with CTW status that have a CTA device status	withhold each individual animal with a CTA status until the animals have completed 60 days on feed not containing cotton trash *.		
	animals from a PIC with a CTW status that do not have a cotton trash device status.	these animals may be slaughtered without any restrictions associated with cotton trash.		

^{*}Animals withheld due to not completing the 60 day feeding period after access to cotton trash may be removed from the export abattoir provided the removal is in accordance with relevant state and territory regulations. It is the establishment's responsibility to liaise with state/territory authorities and ensure all requirements are met. The OPV must be informed of all intended movement of livestock off the establishment.

Appendix 4 – Sampling, testing and disposition

The intention of the cotton trash protocol is that animals with a Cotton Trash Accessed (CTA) status still active on their NLIS device **are not slaughtered**. The following sampling and testing advice is provided for situations where such animals have been inadvertently slaughtered. Although approved cotton gins supplying cotton trash under the protocol are expected to provide a product that is a low risk of resulting in violative residues in livestock consuming it, the testing program provides added assurance that there are no violative residues present in the meat of animals that have not yet completed the required 60 day on feed not containing cotton trash.

Tier 1 abattoirs are advised to liaise with the relevant state/territory regulatory authority if CTA status animals are inadvertently slaughtered.

A. Sampling requirements

Carcase(s) and carcase parts from slaughtered animals with an active CTA status must be retained and tested for the presence of residues in accordance with the sampling plan detailed below.

Testing and freight costs are subject to commercial arrangements between the vendor and the establishment as specified by NLIS Terms of Use Table 14.9.

Carcase(s) and carcase parts can be released for human consumption only when test results indicate no violative chemical residues.

Fat samples (500g) are collected from carcase(s) and sent directly to the approved laboratory (Symbio Laboratory, 52 Brandl Street, Eight Mile Plains QLD 4113) for testing. Samples must be collected randomly from the affected consignment, sampling frequency is undertaken as per the below table.

Number of animals in consignment*	Less than 10 animals	10 – 20 animals	More than 20 animals
Number of carcases to be sampled	2 carcases	4 carcases	6 carcases

^{*}Where a mixed consignment includes animals with individual NLIS devices, only those with an active CTA status need to be considered for testing. For example, in a lot of 24 slaughtered cattle where 8 have an individual CTA status then two carcases are required to be sampled, i.e. in this example the consignment size for testing purposes is considered to be 8, i.e. less than 10 animals, and all 8 carcases are retained until the test results are known and the OPV provides a disposition.

The establishment is responsible for:

- retaining all carcases that have a CTA status (note: establishment management may optionally elect to condemn, or downgrade as not fit for human consumption, carcase parts, such as offal, rather than retain them.)
- recording body number(s) and correlation with the NLIS device(s) (Note: the device(s) must be retained to provide to the OPV.)
- collection of samples, including identifying each sample to correlate to the source carcase
- packing, freezing and storing samples

 providing packed, hard-frozen samples, body number(s) and corresponding NLIS device(s) to the OPV

The OPV is responsible for:

- oversight of the retention, correlation and sample collection procedures
- Keep records and booking the courier collection

B. Laboratory testing and result reporting

Approved laboratory for cotton-trash sample testing is:

Symbio Laboratory, 52 Brandl Street, Eight Mile Plains QLD 4113

Samples are to be dispatched direct to the laboratory. Samples must only be sent on a Monday, Tuesday or Wednesday.

The laboratory provides the test results to establishments.

Testing and freight costs are subject to commercial arrangements between the vendor and the establishment. NRS sampling equipment or NRS My Toll account are NOT to be used.

C. Final Carcase Disposition

All carcases and carcase parts from animals with active CTA device status are held pending the results of testing of the sampled carcases, for example: if 8 slaughtered animals in a consignment have CTA status, two carcases require sampling and all 8 are retained until the test results are returned (note: establishment management may optionally elect to condemn, or downgrade as not fit for human consumption, carcase parts, such as offal, rather than retain them).

The disposition is made by the OPV in consultation with the ATM with reference to relevant MRLs. A list of MRLs, current at the time of publication of this notice, is at Appendix 5.

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Refer to Appendix 6

Appendix 5 – Maximum Residue Limits (MRLs)

The following table lists MRLs (mg/kg) in place for a number of markets at the time of publication of this notice. This table may be used as guidance by the OPV and ATM when determining disposition if there has been a detection in testing. Up to date MRL information should be sought to confirm a disposition.

Note: where an importing country has not set a MRL for a particular chemical the corresponding cell in this table shows a horizontal dash (-). In this case any amount of the chemical detected at or above LOR is a violation of the MRL for that country for that chemical.

Pesticide	LOR (mg/kg)	Australian MRL	Codex MRL	EU MRL	Japan MRL	US MRL
aldrin/dieldrin	0.01	0.2	0.2	0.2	0.2	-
bifenthrin	0.01	2	3	3	3	1
carbaryl	0.01	0.07	0.05	0.05	0.1	0.5
chlorantraniliprole	0.01	0.02	0.2	0.2	0.3	0.1
chlordane	0.01	0.2	0.05	0.05	0.05	-
chlorfenapyr	0.01	0.05	-	-	0.05	-
chlorpyrifos	0.01	0.5	1	1	1	0.3
chlorpyrifos- methyl	0.01	0.05	0.1	0.1	0.05	0.5
clothianidin	0.01	0.02	0.02	0.02	0.02	-
cyantraniliprole	0.01	0.01	0.5	0.5	-	0.01
cyfluthrin	0.01	0.5	0.2	0.05	0.2	2
cyhalothrin	0.01	0.5	3	0.5	0.4	3
cypermethrin	0.01	0.5	2	0.2	0.2	2
DDT	0.02	5	5	1	5	-
deltamethrin	0.01	0.5	0.5	0.5	0.5	0.05
diafenthiuron	0.01	0.02	-	-	0.02	-
Diazinon	0.01	0.7	2	0.7	2	0.5
dicofol	0.01	-	-	0.02	3	-
dimethoate	0.01	0.05	0.05	-	0.05	0.02
dinotefuran	0.01	0.02	0.1	-	0.1	0.05
endrin	0.01	-	-	0.05	0.05	-
ethion	0.01	2.5	-	0.01	2	-
fenvalerate	0.01	1	1	0.25	1	1.5
fipronil	0.01	0.1	0.5	0.06	0.5	0.4
flonicamid	0.01	0.02	0.15	0.05	0.03	0.08
flubendiamide	0.01	0.05	2	2	2	0.7
fludioxonil	0.01	0.05	0.05	0.2	0.05	0.05
НСВ	0.01	1	-	0.01	0.6	-

Pesticide	LOR (mg/kg)	Australian MRL	Codex MRL	EU MRL	Japan MRL	US MRL
HCH (alpha)	0.01	0.3	-	0.01	-	-
HCH (beta)	0.01	0.3	-	0.01	-	-
heptachlor	0.02	0.2	0.2	0.2	0.2	-
imidacloprid	0.01	0.05	0.1	0.05	0.3	0.3
indoxacarb	0.01	1	2	2	1	1.5
lindane (gamma HCH)	0.01	2	0.01	0.2	3	-
Methidathion	0.01	0.5	0.02	0.02	0.02	-
Metolachlor	0.01	0.05	-	0.01	-	0.02
Spirotetramat	0.01	0.02	0.05	0.01	0.02	0.02
Sulfoxaflor	0.01	0.2	0.2	0.1	0.1	0.1
Tebuconazole	0.01	0.1	0.05	0.1	0.05	0.2
Trifloxystrobin	0.01	0.01	0.05	0.06	0.05	0.1

The following websites contain additional information such as residue definitions applicable to the MRLs:

Australia

https://apvma.gov.au/node/10806 and click on the link to the ComLaw website

Codex

http://www.fao.org/fao-who-codexalimentarius/codex-texts/dbs/pestres/pesticides/en/

EU

http://ec.europa.eu/food/plant/pesticides/eu-pesticides-

database/public/?event=pesticide.residue.selection&language=EN

Japan

http://db.ffcr.or.jp/front/

USA

https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr180 main 02.tpl

Appendix 6 – Carcase dispositions

The intention of the cotton trash protocol is that animals with an active Cotton Trash Accessed (CTA) status attached to their NLIS device are not slaughtered. The following disposition advice is provided for situations where such animals have been inadvertently slaughtered.

Carcase dispositions

Where animals with a CTA status are inadvertently slaughtered, the sampling requirements allow for testing of a subset of the carcases with a CTA status in a consignment (see <u>Appendix</u> 4). When the test results become available dispositions will be made on the tested carcases, and associated parts, and also on the untested CTA status carcase and parts that were retained. The following tables detail the appropriate dispositions.

Tested/sampled carcase(s)

Step	Action						
1.	For the each retained carcase that was sampled for testing, check the laboratory result(s) against the list of Australian and proposed importing country MRLs in the table in Appendix 5 (or seek advice from the department on up to date MRLs).						
	If	Then					
	the result is greater than the Australian MRL (irrespective of the proposed importing country MRL)	the carcase and all its parts are to be condemned and disposed of under department supervision.					
	the result is greater than the MRL of the proposed importing country, but less than the Australian MRL	the carcase and its parts may be released to the domestic market or to another importing country for which the test result is less than the MRL.					
	Note : Where the importing country has not set a MRL for a particular chemical, any amount of that chemical detected above the level of reporting (>LOR) is a violation for that country.						
	less than the MRL of the proposed importing country and the Australian MRL	the carcase and its parts may be released to the domestic market, for export or for further processing					

Untested, retained cohort carcases

Step	Action					
1.	For the each retained carcase that was not sampled for testing, check the laboratory results for the tested carcases against the list of Australian and proposed importing country MRLs in the table in Appendix 5 (or seek advice from the department on up to date MRLs).					
	If	Then				
	the results for all tested carcases are less than the MRL of the proposed importing country and the Australian MRL	all retained carcases and parts may be released to the domestic market, for export or for further processing.				
	laboratory results for one or more of the tested carcases are greater than the MRL of the proposed importing	 i. the retained untested carcases and their parts may be released to the domestic market, or 				
	country, but no result is greater than the Australian MRL	ii. the retained untested carcases may be individually sampled and tested, and subsequently disposed of in accordance with the individual laboratory result.				
	Note: Where the importing country has not set a MRL for a particular chemical, any amount of that chemical detected above the level of reporting (>LOR) is a violation for that country.	Note: the original tested carcases may each be disposed of in accordance with the individual test result.				
	laboratory results for one or more sampled carcases are greater than the Australian MRL.	 i. carcase(s) and parts of retained cohort animals are condemned and disposed of under department supervision, or 				
		ii. the retained untested carcases may be individually sampled and tested, and subsequently disposed of in accordance with the individual laboratory result.				
		Note: the original tested carcases may each be disposed of in accordance with the individual test result.				

See the following pages for an example of how the dispositions should be applied.

Example of disposition application:

<u>Disclaimer</u>: this example is entirely hypothetical and is intended to show all possible dispositions in a single event scenario. The hypothetical lab results shown in this example are unlikely to occur from consumption of cotton trash supplied under the protocol.

A consignment of 250 cattle received at a US-listed export abattoir is declared as being from a NSW property with one PIC shown on the NVD. The PIC does not have an associated CTP or CTW status. After about one third of the consignment has been slaughtered the slaughter floor RFID reader shows a message beginning, "CTA – this animal may have accessed cotton trash...". Slaughter of that lot is terminated and production switches to another lot. However, there are quite a few carcases hanging between the RFID scanner and the knocking box. Once all of the RFID NLIS devices for the animals slaughtered in the offending lot have been scanned it is discovered that 12 slaughtered animals had devices with a CTA status.

Although more than 80 animals from the original consignment of 250 have been slaughtered, only 12 slaughtered animals have CTA device status. Consequently, the consignment size for sampling purposes is set at 12. All 12 carcases and their associated parts, including offal, are retained and kept correlated by company retain tags numbered with this establishment's internal system of alphanumeric codes. The retained carcases are numbered sequentially from A001 to A012.

From the sampling table this consignment falls within the *10-20 animals* band and fat samples must be taken from at least 4 of the 12 carcases. Fat samples are taken from 4 of the carcases chosen at random from the consignment of 12 CTA retained carcases. The retain tag numbers of the sampled carcases are: A004, A006, A009 and A010. Only bifenthrin is found in any of the samples, all other test results are below the level of reporting (LOR).

The laboratory test results are returned with the following results for bifenthrin:

Carcase	Bifenthrin (mg/kg)
A004	0.05
A006	1.5
A009	< LOR
A010	2.1

The Australian MRL for bifenthrin is 2 mg/kg. The US MRL is 1 mg/kg. The MRL is 3 mg/kg for EU, Japan and Codex. The meat was originally intended for export to the US.

The following dispositions apply to the **tested carcases** and correlated carcase parts:

Carcase	Bifenthrin (mg/kg)	Disposition
A004	0.05	Eligible for export or domestic (i.e. below all MRLs)
A006	1.5	Ineligible for US. May be exported to EU, Japan and other countries, or sold to the domestic market.
A009	< LOR	Eligible for export or domestic (i.e. below all MRLs)
A010	2.1	Must be condemned and disposed of under department supervision (>Australian MRL, even though it is less than EU, Japan and Codex MRL)

For the remaining **retained**, **untested**, CTA status carcases from that consignment, i.e. A001, A002, A003, A005, A007, A008, A011, A012 the disposition is either:

 All carcases and parts condemned and disposed of under department supervision (i.e. the most restrictive disposition that applies to any one of the sampled carcases – carcase A010 was above Australian MRL),

OR

 Individual carcases are sampled and tested and disposition is in accordance with the laboratory results

The establishment decides that the carcase with retain tag A003 is not worth testing because it has a poor condition score and has already had one hind leg condemned and removed on the slaughter floor for arthritis. The rest of the carcases are sampled and, along with correlated parts, retained until the laboratory results are returned. The laboratory results are again mixed. This time one of the carcases also returns a result for chlorfenapyr, and another carcase is positive for dicofol.

The following dispositions apply to the CTA status retained carcases and parts:

Carcase	Bifenthrin (mg/kg)	Chlorfenapyr (mg/kg)	Dicofol (mg/kg)	Disposition
A001	0.5	<lor< td=""><td><lor< td=""><td>Eligible for export or domestic (i.e. below all MRLs)</td></lor<></td></lor<>	<lor< td=""><td>Eligible for export or domestic (i.e. below all MRLs)</td></lor<>	Eligible for export or domestic (i.e. below all MRLs)
A002	<lor< td=""><td><lor< td=""><td><lor< td=""><td>Eligible for export or domestic (i.e. below all MRLs)</td></lor<></td></lor<></td></lor<>	<lor< td=""><td><lor< td=""><td>Eligible for export or domestic (i.e. below all MRLs)</td></lor<></td></lor<>	<lor< td=""><td>Eligible for export or domestic (i.e. below all MRLs)</td></lor<>	Eligible for export or domestic (i.e. below all MRLs)
A003	Not tested	Not tested	Not tested	Must be condemned and disposed of under department supervision (because of the violative lab result for carcase A010 in the first round of testing, any of the carcases with CTA status in the consignment that are not tested must be condemned).
A005	2.8	<lor< td=""><td><lor< td=""><td>Must be condemned and disposed of under department supervision (>Australian MRL for bifenthrin, even though it is less than EU, Japan and Codex MRL)</td></lor<></td></lor<>	<lor< td=""><td>Must be condemned and disposed of under department supervision (>Australian MRL for bifenthrin, even though it is less than EU, Japan and Codex MRL)</td></lor<>	Must be condemned and disposed of under department supervision (>Australian MRL for bifenthrin, even though it is less than EU, Japan and Codex MRL)
A007	0.1	0.01	<lor< td=""><td>Ineligible for US, EU and countries that use the Codex MRLs (these countries have not set a MRL for chlorfenapyr, therefore any amount at or above LOR is a violation).</td></lor<>	Ineligible for US, EU and countries that use the Codex MRLs (these countries have not set a MRL for chlorfenapyr, therefore any amount at or above LOR is a violation).
				May be exported to Japan, or sold to the domestic market because Australia and Japan have set a MRL of 0.05 mg/kg for chlorfenapyr, the bifenthrin result is also under the respective Japan and Australia MRLs, and no dicofol was reported.
A008	3.1	<lor< td=""><td><lor< td=""><td>Must be condemned and disposed of under department supervision (>Australian MRL for bifenthrin)</td></lor<></td></lor<>	<lor< td=""><td>Must be condemned and disposed of under department supervision (>Australian MRL for bifenthrin)</td></lor<>	Must be condemned and disposed of under department supervision (>Australian MRL for bifenthrin)
A011	1.05	<lor< td=""><td><lor< td=""><td>Ineligible for US (bifenthrin >US MRL). May be exported to EU, Japan and other countries, or sold to the domestic market.</td></lor<></td></lor<>	<lor< td=""><td>Ineligible for US (bifenthrin >US MRL). May be exported to EU, Japan and other countries, or sold to the domestic market.</td></lor<>	Ineligible for US (bifenthrin >US MRL). May be exported to EU, Japan and other countries, or sold to the domestic market.
A012	0.1	<lor< td=""><td>0.01</td><td>Must be condemned and disposed of under department supervision (even though it is less than EU and Japan MRLs, Australia has not set a MRL for dicofol so any detection at or above LOR is a violation)</td></lor<>	0.01	Must be condemned and disposed of under department supervision (even though it is less than EU and Japan MRLs, Australia has not set a MRL for dicofol so any detection at or above LOR is a violation)