



Information relating to the use of liner-less cartons at export registered establishments

1. **General criteria applying to use of cartons at export registered establishments**

- a. A carton shall not be deemed acceptable for packaging prescribed goods unless it complies with the following criteria in that the carton:
 - i) Protects the product and the product wrap from external contamination
 - ii) Is not detrimental to temperature status of chilled or frozen prescribed goods
 - iii) Permits detection of penetrating foreign objects once carton has been closed and/or sealed
 - iv) Complies with the Australian standard (AS 3724)
 - v) Is inscribed with the Australian standard (AS 3724 compliance logo
- b. Trade descriptions, labels and marks applied to cartons of prescribed goods for export must be in accordance with the relevant Orders under the Export Control Act.

2. **Liner-less carton approval and specifications**

- a. Liner-less cartons (1 and 2 piece) have been approved have been approved by the Department of Agriculture (the department) for use in export meat establishments and provide an option to assist in overcoming the problem of plastic entrapment encountered in frozen bulk packed manufacturing meat.
- b. The liner-less cartons are to have a plastic laminated film attached to the internal surface of the carton during manufacturing.
- c. The plastic is to extend over the entire inner surface.
- d. The base usually has flaps folded over the outside so that the corrugated cut edge of the carton base is not exposed to any moisture or product contact.
- e. The carton must carry a statement that it complies with Australian Standard AS 3724 or that the carton has been approved by the department for export and identified with an approval number.
- f. The carton is to be leak proof when sitting on its base no exposed cut edge on the inner surface which could contaminate or lead to adhesion to the contents.
- g. The product contact surface must comply with AS 2070 or be approved by the department as a food grade plastic.

3. **Control Procedures**

Precautions must be observed with the use of liner-less cartons to safeguard the product from contamination. The following are to be addressed between the department on-plant officers and the establishment:

- a. **Delivery of cartons**
 - i) The palletised cartons are to be wrapped with plastic or cardboard on all sides, top and bottom so that the cartons are protected from dust and other contaminants.
 - ii) Liner-less cartons are to be segregated from non liner-less cartons.

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b. Storage of cartons

- i) On delivery the palletised cartons must be put into an approved carton storage facility and not held in the open.
- ii) Storage areas for liner-less cartons must be clearly distinguished from areas for other carton types.
 - o The AS 3724 does not specify that liner-less carton blanks be imprinted with a statement indicating that plastic liners are not required to be used with the assembled carton. Therefore establishments must ensure segregation of bulk supplies of liner-less cartons from non liner-less cartons
- iii) When the pallet is opened, the cartons must be protected to the same level of control provided to plastic liners e.g. that cartons are covered, not held unprotected on racks and good handling practices employed.
- iv) Cartons remaining on the pallet must be shrouded.
- v) The cartons must be covered/protected during delivery to the production room(s)
- vi) Where plastic coating is exposed e.g. lids, the cartons are to be layered so that there is plastic to plastic contact between cartons, ensuring plastic to fibreboard does not occur at anytime

c. Production rooms

- i) Only enough cartons for the production should be brought into the production room so that the need to return unused cartons to the carton store is minimised
- ii) Cartons must be checked before packing of product for incidental contamination by carton fibres and if present the contamination must be removed in a way that doesn't cause the direct or indirect contamination of prescribed goods
- iii) The cartons must be protected from water splash by LSUs, hand-basins or spray guns
- iv) Care is to be taken when filling the cartons so the carton does not bulge in the centre which would increase the possibility of carton damage and breakage
- v) The establishment must have procedures under its approved arrangement for the handling of cartons (used or unused) and these must be complied with.

d. Cartoned meat storage

- i) Special care will be needed when handling filled cartons at any production stage.
- ii) Immediately following blast refrigeration and marshalling onto pallets; pallets of packed liner-less cartons should be plastic shrink-wrapped to lessen the risk of condensation or mechanical damage to cartons.
- ii) Where carton breakage occurs the product may be transferred to a new carton provided the product is not contaminated in anyway e.g. as a result of carton breakage or transference.

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- e. Temperature checks
 - i) Temperature checks of carton contents should be done after undoing the carton straps and opening the carton.
 - o Fibreboard cartons may not be drilled to allow temperature checks to be undertaken. Departmental officers will verify if this occurs and advise the establishment to take corrective action.
- f. Load Out
 - i) Cartons containing meat must be checked by the establishment at Load-out.
 - ii) Damaged cartons where the meat is liable to be exposed is to be rejected from loading
 - iii) Removal of any contaminated meat is to be done prior to re-cartoning of product from damaged cartons
 - o The occupier should have procedures under their approved arrangement to cover this type of incident.
- h. Shipping damage
 - i) Establishments must be careful that overseas rejections are not increased as a result of exposed or contaminated meat in liner-less cartons.
 - o Where carton damage has occurred but the liner remains intact importing country authorities may permit entry of the product. However this situation is unlikely to apply to damaged liner-less cartons.
- i. Specific requirements apply for the EU
 - i) Unless specific permission has been given to an establishment based on the establishments ability to meet EU carton handling requirements use of liner-less cartons for product to the EU is not permitted.

4. Establishment Responsibility

The establishment must:

- a) Have a documented procedure in place under its approved arrangement to cover the control procedures for liner-less cartons.
- b) Monitor the control procedures as part of process control.
- c) Include liner-less carton handling procedures in the plants internal audit schedule.
- d) Have handling procedures for product packed in liner-less cartons in place including specific handling of liner-less cartons that have been damaged.

5. Departmental Responsibility

Departmental officers responsible for verifying the process control at export registered establishments will:

- a) Verify that the company have developed documented procedures for liner-less carton control.
- b) Verify that the occupiers are conducting process control checks of those procedures and where necessary taking appropriate corrective and preventive action.

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- c) Conduct independent checks of the process control through Independent Process checks.
- d) Follow-up and record findings of non-compliance through the AMS

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