Export Meat System Audit Program Management Policy

Summary of Main points

This document outlines:

- Why the Department of Agriculture Food Exports Branch has a structured export meat system audit management
- The Department of Agriculture export meat system audit program (EMSAP) management:
  - Principles
  - Structure
  - General requirements
  - Resource requirements
  - Information requirements
  - Processing requirements

1 Introduction

The Department of Agriculture undertakes system audits on export meat establishments to support inspection, verification and certification requirement.

2 Purpose

This policy provides the management framework for the department’s systems audit program to ensure that audits:

2.1 comply with internationally recognised and accepted standards

2.2 Are capable of consistently achieving stated policy and objectives as defined in the audit scope impartial

2.2 undertaken effectively and competently

3 Scope

3.1 The policy applies to the management of systems audits conducted at all export registered slaughter establishments and independent boning rooms

3.2 This policy is in accordance with the principles and requirements of ISO/IEC 17021:2011 and A/NZS ISO 19011:2003, Codex Alimentarius, OIE Terrestrial Code and the National Regulatory Food Safety Auditor Policy and Guidelines
4 Definitions

For the purposes of this document the following apply

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Auditor</td>
<td>Person who conducts an audit</td>
</tr>
<tr>
<td>Certification</td>
<td>Assertion by the competent authority that the product, process or system has been assessed as meeting specified criteria under the Export Control Act and its subordinate legislation.</td>
</tr>
<tr>
<td>Competence</td>
<td>Ability to apply knowledge and skills to achieve intended results</td>
</tr>
</tbody>
</table>
| EMIAC             | Export Meat Industry Advisory Committee - a joint Department/industry consultative committee  

The Export Meat Industry Advisory Committee (EMIAC) was created as a consultative body between the export meat industry and the department. EMIAC’s terms of reference are broad but its main function is to consider technical issues affecting the export meat sector. It also provides policy advice on many major issues such as residues, pathogens, international requirements including market access and food safety issues affecting meat. EMIAC is not a statutory body but it has a high profile within the industry.  

| Equivalence       | Is the capability of different systems to meet the same objectives                                                                                                                                                                                                                                                                  |
| Impartiality      | Actual and perceived presence of objectivity  

- Objectivity means that conflicts of interest do not exist or are resolved so as not to adversely influence subsequent activities of the certification body.  
- Other terms that are useful in conveying the element of impartiality are: objectivity, independence, freedom from conflict of interests, freedom from bias, lack of prejudice, neutrality, fairness, open-mindedness, even-handedness, detachment, balance  

| Planning and Governance Meat | A senior management group within the department's Export Meat Program                                                                                                                                                                                                                                                                     |
| Exemplar Global     | Formerly known as the Registration Accreditation Bureau and Quality Society of Australasia (RABQSA)  

is an internationally recognised commercial, personnel and training certification body
5 Roles and responsibilities

<table>
<thead>
<tr>
<th>Department of Agriculture Role</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Assistant Secretary, Food Division</td>
<td>provide high level advice to the Secretary of the department&lt;br&gt;provide endorsement for Export Food Division policies and Instructional Material</td>
</tr>
<tr>
<td>Assistant Secretary, Food Exports</td>
<td>monitor the performance and effectiveness of the Export Meat Program operations</td>
</tr>
<tr>
<td>Director, Export Meat Program</td>
<td>co-ordinate audit policy through the Planning and Governance – Meat committee&lt;br&gt;coordinates and communicates audit policy to the department’s Food Services Group (FSG) and&lt;br&gt;provide advice in relation to audit policy matters</td>
</tr>
<tr>
<td>Field Operations Managers (FOM)</td>
<td>annual verification of the performance and effectiveness of system audits by assessing audit reports and periodically observing the performance of auditors&lt;br&gt;provide technical advice to senior division management in relation to audit policy matters</td>
</tr>
<tr>
<td>National Service Delivery (NSD) Manager, Food Services Group (FSG)</td>
<td>provide leadership to and management of the FSG stream across Australia including audit, inspection, documentation and management functions</td>
</tr>
<tr>
<td>Director Audit Services</td>
<td>manage the planning scheduling and resources for system audits&lt;br&gt;assure the competence of auditors&lt;br&gt;select appropriate audit teams</td>
</tr>
<tr>
<td>Area Technical Manager (ATM)</td>
<td>perform Export Meat System Lead Auditor and Auditor roles</td>
</tr>
<tr>
<td>Planning and Governance Meat</td>
<td>provides guidance in relation to Export Meat Program (EMP) Activities&lt;br&gt;comprises department FOMs, Director EMP, NSD Manager and/or FSG Representatives and invited technical and central office EMP Assistant Directors&lt;br&gt;monitor the performance and effectiveness of the Export Meat System Audit Program&lt;br&gt;report to senior department management on the effectiveness and overall achievements of the Export Meat System Audit Management program</td>
</tr>
<tr>
<td>Certification Integrity Unit (CIU)</td>
<td>provide independent internal audits conducted by or on behalf of the department’s Food Division</td>
</tr>
</tbody>
</table>
6 Principles

6.1 General

a) The overall aim of the approved arrangement certificate is to give confidence to all parties that a management system fulfils specified requirements. The value of certification is the degree of public confidence and trust that is established by an impartial and competent assessment by a third-party. Parties that have an interest in certification include, but are not limited to:

i) Clients of the certification bodies
ii) Customers of the organisations whose management systems are certified
iii) Government authorities
iv) Non-government organisations
v) Australian public and consumers

b) Principles for inspiring confidence include:

i) Impartiality
ii) Competence
iii) Responsibility
iv) Openness
v) Confidentiality
vi) Responsiveness to complaints
vii) Effective risk management

7 General Requirements

7.1 Legal and Contractual Matters

a) Legal Responsibility

The Department of Agriculture, as a government certification body, is deemed to be the legal entity for the purposes of providing audit services and export certification under the Export Control Act 1982.

The Export Control (Meat and Meat Product) Orders give the Secretary of the department legal authority for audits to be conducted at export registered establishments producing meat and meat products for export.

b) Certification Agreement

Under the Export Control Act 1982 the Department of Agriculture is the legally recognised authority for export certification.

c) Responsibility for Certification Decisions

As the certification body, the department is responsible for, and shall retain authority for, its decisions relating to certification, including the granting, maintaining, renewing, extending, reducing, suspending and withdrawing of certification.
7.2 Management of Impartiality

a) Departmental auditors will be employed under terms of employment that require compliance with the Australian Public Service (APS) Code of Conduct.

b) Departmental auditors will disclose, and take reasonable steps to avoid, any conflict of interest (real or apparent) in connection with APS employment.

c) Departmental auditors will not make improper use of:

i) inside information, or

ii) the employee’s duties, status, power or authority in order to gain, or seek to gain, a benefit or advantage for the employee or for any other person.

d) To further reduce any perception of bias, an ATM will not be appointed as a Lead Auditor to conduct a system audit at an export registered establishment unless a minimum period of two years has elapsed since that ATM has been in a position of responsibility for the supervision of technical standards at that establishment.

7.3 Liability and Financing

a) The department has arrangements to manage risks in relation to audit activities (including personal and public liability indemnity insurance and reserves) and to cover liabilities arising from its operations

o In part this is provided under the Commonwealth Comcare Insurance Scheme that protects public servants from liability when undertaking activities and making decisions in good faith.

b) The department, as a government agency does not allow commercial financial or other pressures to compromise the impartiality of its decisions.

8 Structural requirements

8.1 Organisational Structure

a) The Export Meat Program within the Food Division of the department has responsibility for formulating and reviewing this audit management policy

o The relevant parts of the Export Meat Program structure are detailed in Attachment 1 of this policy

o The Food Services Group within the Food Division has responsibility for implementing the policy.

b) The relevant parts of the Food Services Group structure are detailed in attachment 2 of this policy.

c) The responsibilities in relation to this policy within the organisational structure are detailed in section 5 of this policy.

8.2 Committee for Safeguarding Impartiality

a) As part of its responsibilities, EMIAC assist in developing the policies relating to impartiality of audit activities, including policies to:

i) Counteract any tendency to allow commercial or other considerations to prevent the consistent objective provision of audit activities

ii) Advise on matters affecting confidence in audit outcomes, including openness and public perception

iii) review, at least once annually, the impartiality of the audit, certification and decision-making processes of the department.

1 Australian Public Service Act 1999, Section 10.
b) The terms of reference of the EMIAC committee is formally documented and authorized by the department’s First Assistant Secretary Food Division and maintained by the Export Meat Program.

9 Resource Requirements

9.1 Management of auditor competence

a) General considerations

Departmental officers responsible for undertaking audits will be trained to have appropriate knowledge and technical competence.

The OIE Terrestrial Code Chapter 5.1 – General Obligations Related to Certification, article 5.1.3 (2) states that Veterinary Authorities of exporting countries should:

i) Have official procedures for authorisation of certifying veterinarians, defining their functions and duties as well as conditions of oversight and accountability, including possible suspension and termination of the authorisation

ii) Ensure that the relevant instructions and training are provided to certifying veterinarians

iii) Monitor the activities of the certifying veterinarians to verify their integrity and impartiality

Further 5.1.3 (3) states:

iv) The veterinary authority of the exporting country is ultimately accountable for veterinary certification used in international trade.

b) Determination of Competence Criteria

i) The competence criteria for departmental officers involved in the management and performance of systems audits is specified in Attachment 3

ii) The National Regulatory Food Safety Auditor Guidelines (2006) requires that all regulatory food safety auditors must be trained and assessed as competent against the national units of competency. Bodies that may conduct training and assessment are those bodies formally registered to deliver these competencies

iii) These bodies may be Personnel Certification Bodies (PCB) e.g. Exemplar Global or tertiary education bodies e.g. technical and further education, registered training organisations

vi) Commercial and personnel certification will be regarded as equivalent to nationally endorsed units of competency for the purposes of auditing abattoirs and boning rooms only

   o The workplace assessor skill-set issued under the current Training and Education training package is comparable to the skill examiner certificate issued by Exemplar Global

v) Upon attaining lead auditor competencies, auditors may be accredited, licensed or certified as a competent auditor.

c) Evaluation Processes

i) The initial competence evaluation for ATM Lead Auditors will be conducted by a departmental Field Operations Manager (FOM) or an ATM with full workplace place assessor/lead auditor qualifications who will observe the departmental officer
conducting a lead auditor role. This initial competence evaluation shall include the auditor’s ability to apply the required knowledge and skills during the audit

- FOMs must be qualified workplace assessors, having attained the required units of competency for skills assessment from the current Training and Education training package

ii) FOMs will conduct on-going monitoring of competence and performance of ATM Auditors by reviewing audit reports within their geographic area of responsibility and by further periodic observations of on-site audits

iii) Verification of skills assessment undertaken by the FOMs will be provided by Food Export officers with a current Certificate IV training and assessment qualification who demonstrate relevant skills and knowledge within the export meat environment

iii) On-going monitoring of competence and performance of all officers involved in the management and performance of system audits will also be conducted through the department’s performance appraisal process to ensure alignment to policy and operational objectives.

9.2 Personnel Involved in the Audit Activities

a) The department’s Director of Audit Services shall ensure that sufficient numbers of ATMs are employed by the department to cover the scope and volume of audits required to be performed

b) The duties and responsibilities of ATM Auditors are specified in the department’s Instructional Material under this policy

c) The delegations of ATM auditors and lead auditors conferred by the secretary under the Export Control Act are specified in the department’s Delegate database

d) ATM lead auditors and auditors will be selected from the team of departmental ATMs qualified for supervision of technical standards at export registered meat slaughter and boning establishments

- Each ATM will have the appropriate qualifications, required knowledge and skills to conduct the audit as specified in Attachment 3 of this policy

e) The identification of the training needs of ATM auditors and the provision of access to specific training to ensure the competency of auditors will be through the department’s performance appraisal process and the Export Meat Program’s Technical Training team

f) In response to audit outcomes, the delegate will make decisions and take action to grant, maintain, renew, extend, reduce, suspend and/or withdraw export registration, market listings. These decisions/actions will be consistent with sanctions provisions specified in the Export Meat Systems Audit Sanctions Policy

g) The FOMs will monitor the performance of auditors through combination of periodic on-site observations and review of audit reports (as specified in 9.3 of this policy) and feedback from clients or from overseas country reviewers/auditors

h) The frequency of the periodic on-site observations of each ATM Auditor by a FOM will be based on the results of the assessment of audit reports completed by the auditor and the outcome of the Department’s performance appraisal process.
9.3 Personnel Records
   a) The department will maintain up-to-date personnel records for each ATM Auditor, including relevant qualifications, training, experience, affiliations, professional status and competency assessments.

10 Information requirements

10.1 Publicly accessible information
   a) Departmental Export Meat Program audit policies will be made publicly available on the department’s website
   b) Information in relation to registration and approval, variation, suspension and revocation of an approved arrangement and/or overseas listings will be provided as necessary to the appropriate state regulatory and importing country authorities.

10.2 Establishment approved arrangement certificates
   a) A certificate for an occupier’s approved arrangement will be issued, by the department on an annual basis, to the occupier of export registered meat establishment, provided acceptable outcomes of system audits are achieved by the establishment
   b) Should the audit outcome result in a decision by Assistant Secretary Food Exports to vary the registration of the establishment or the scope of the approved arrangement sanctions will be applied and previous registration and approved arrangement certificates shall be revoked and new certificates issued.

10.3 Directory of Export Registered Establishments
   a) Records for export registered establishments will be maintained electronically on the department’s Establishment Registration (ER) database.

10.4 Confidentiality
   a) Information obtained by departmental auditors will be subject to ‘Protected’ security classification.

10.5 Information exchange between the department and its clients
   a) Information on the department’s auditing activity and requirements
      i) The department’s audit policy and information on auditing fees and charges will be made publicly available on the department’s website
      ii) Establishments will be notified in writing by the ATM Lead Auditor of arrangements to conduct of audits under this export meat systems audit policy
      iii) ATM Lead Auditors will advise the occupier of the establishment at the audit exit meeting of the procedures for applying for reconsideration and review of the audit decisions
          o This will be in accordance with Part 10 of the Export Control (Meat and Meat Products) Orders 2005
   b) Notice of changes to auditing requirements
      i) The department will advise the occupier of export registered establishments with due notice of any changes to departmental audit policy and/or requirements by
means of Meat Notices, Market Access Advises, or by direct communication in writing.

c) Notice of changes by a registered establishment

i) To vary an export registered establishment’s approved arrangement the occupier is required to apply in writing to the Secretary of the department for approval

   o This is in accordance with Schedule 1 Part 2 of the Export Control (Meat and Meat Products) Orders 2005.

11 Process requirements

11.1 Relevant departmental Instructional Material should be read in conjunction with this policy.

12 Management system requirements

12.1 General Management System Requirements

a) This policy is supported by the relevant Assistant Secretary of the department.

b) The terms of reference of the Planning and Governance – Meat committee will allow for:

i) Ensuring that processes and procedures of the systems audit program are established, implemented and maintained

ii) Reporting performance of the systems audit program and recommending change of the system to the Assistant Secretary of the Food Division.

c) Management and Control of Instructional Material (IM)

i) Instructional Material under this policy will be developed and published on the department Instructional Material Library (IML) according to IML policy and protocols e.g. The IM will be:

   • developed and reviewed through consultation with field and regional office representatives as appropriate
   • include document control measures and contained the IM version history
   • passed through appropriate clearance processes before publication
   • reviewed and updated within the IML timeframes.

d) Control of records

i) Audit Reports will be securely stored electronically on the department’s Audit Management System (AMS)

ii) Other departmental records relevant to the application of this policy will be stored under conditions of ‘Government in Confidence’ security level.

12.2 Management Review

a) General

The Export Meat Program will establish a committee to review the audit management system at least once a year to ensure its continuing suitability, adequacy and effectiveness, including the stated policies and objectives and compliance with ISO/IEC 17021:2011

b) Review inputs: The input to the management review shall include the following information:

i) Analysis of AMS database audit reports including assessment of:

   a. Audit Conclusions
   b. Audit Findings
   c. Audit Ratings
d. CARs
   ii) Results of internal audits by the department’s Certification Integrity Unit and external audits by importing country reviewers
   iii) Feedback from clients and interested parties
   iv) Feedback from EMIAC
   v) The status of preventive and corrective actions
   vi) Follow-up actions from previous management reviews
   vii) The fulfilment of objectives
   viii) Changes that could affect the management system
   ix) Appeals and complaints.

c) Review outputs
   The outputs from the management review will include decisions and actions related to:
   i) Improvement of the effectiveness of the systems audit program and its processes
   ii) Improvement of the audit services related to the compliance with respect to ISO/IEC 17021:2011
   iii) Resource needs.

d) Internal audits
   The application of this policy shall be subject to internal audit on an annual basis by the department’s Certification Integrity Unit (CIU).

e) Corrective and Preventive Actions
   Where non-compliance is identified in the System Audit Management processes (e.g. from complaints or internal audits) the committee will:
   i) Determine the cause of the non-compliance
   ii) Take measures to correct the non-compliance
   iii) Implement any necessary preventive action to ensure the non-compliance does not recur
   iv) Record the results of action taken
   v) Review the effectiveness of the actions taken

13 Review
   This document is to be reviewed on at least a biennial basis, commencing 12 months from the initial rollout date for the systems-based audit.

14 Related material

14.1 Departmental related material
   a) Export Control Act 1982
   b) Export Control (Meat and Meat Products) Orders
   c) Export Meat Systems Audit Policy
   d) Department Work Level Standards
   e) Export Meat Instructional Material relevant to establishment operations

14.2 External related material
   a) Australian Public Service Act 1999
b) APS Values and Code of Conduct

c) Relevant standards, guidelines and obligations may include, but are not limited to:

i) Codex Alimentarius
   - CAC/GL 26-1997 Guidelines for the design, operation, assessment and accreditation of food import and export inspection and certification systems
   - CAC/GL 34-1999 Guidelines for the development or equivalence agreements regarding food import and export inspection and certification systems

ii) World Organisation for Animal Health (OIE)
   - Terrestrial Manual
     - Chapter 3.1 – Veterinary Services
     - Chapter 3.2 – Evaluation of Veterinary Services
     - Chapter 3.4 – Veterinary Legislation
     - Chapter 5.1 – Veterinary Obligations Related to Certification
     - Chapter 6.1 – The Role of the Veterinary Services in Food Safety

iii) National Regulatory Food Safety Audit Policy

iv) National Regulatory Food Safety Auditor Guidelines

v) ISO/IEC 17021:2011(E) - Conformity Assessment - Requirements for Bodies Providing Audit and Certification of Management Systems

vi) ISO/IEC 17024:2012 – Conformity assessment – General requirements for bodies operating certification of persons

vii) AS/NZS ISO 19011:2003

viii) AS/NZS ISO 31000:2009

ix) AS/NZS ISO 22000:2005

x) AS/NZS ISO 9001:2008


xii) British Retail Consortium (BRC) Standards and Guidelines Edition 6

# 15 Detailed version history

<table>
<thead>
<tr>
<th>Version Number</th>
<th>Version Date</th>
<th>Amendment Details</th>
<th>Document Owner/ Reviewer</th>
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<tbody>
<tr>
<td>1</td>
<td>24/6/2014</td>
<td>Development of new policy document to cover Management of the Departmental Export Meat System Audit</td>
<td>Export Meat Program</td>
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## TABLE OF KNOWLEDGE AND SKILLS – SYSTEMS AUDITS

<table>
<thead>
<tr>
<th>Description</th>
<th>DIRECTOR AUDIT SERVICES Food Services Group</th>
<th>FIELD OPERATIONS MANAGER</th>
<th>LEAD AUDITOR</th>
<th>AUDITOR</th>
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<tr>
<td>System Audit Function and responsibilities</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Select the audit team members and schedule audits</td>
<td></td>
<td>Determine audit team competence required, Reviewing audit reports and making certification decisions</td>
<td>Leading the audit team</td>
<td>Auditing</td>
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### Knowledge and Skills

<table>
<thead>
<tr>
<th>Knowledge of department management practices</th>
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<tr>
<td>NFSA auditor certification</td>
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<td>X+</td>
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<tr>
<td>Knowledge of system audit policies</td>
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<td>X</td>
<td>X+</td>
<td>X+</td>
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<tr>
<td>Knowledge of departments meat systems audit IM and other relevant IM</td>
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<td>Knowledge of export meat sector/industry</td>
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<td>Note-taking and report-writing skills</td>
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<td>Presentation skills</td>
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<td>Interviewing skills</td>
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<td>Audit-management skills</td>
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X+ = need deeper knowledge and skills