Australian Government
Department of Agriculture

Operational Policy

EXPORT MEAT SYSTEMS AUDIT PROGRAM (EMSAP) POLICY

1. PURPOSE

1.1 This policy provides a standard approach to export meat system audits to verify if the processes and practices at export registered meat establishments comply with relevant export legislation, Australian standards and importing country requirements.

2. SCOPE

2.1 The policy applies to Department of Agriculture auditors performing export meat system audits at export meat registered slaughter and independent boning establishments.

2.2 This policy should be read in conjunction with the departmental Export Meat Systems Audit Management Policy.

2.3 The policy is based on the principles of audit management outlined in AS/NZS ISO 19011:2003 Guidelines for quality and/or environmental management systems auditing.

3. DEFINITIONS

Term	Definition
Approved arrangement:	means an arrangement approved under clause 5 of Schedule 1 or under subclause 22.1 of Schedule 7 and includes variation of such an arrangement in the circumstances specified in clause 17 of Schedule 1 or clause 27 of Schedule 7. EC(M&MP)O The purpose of the approved arrangement is to clearly describe those processes and practices which, when correctly applied by the occupier, will underpin departmental certification of meat and meat products for export: (Approved Arrangement Guidelines -Meat)
AMS	The department's Audit Management System used to manage, monitor and report on the performance of export registered establishments
ATM	Area Technical Manager
Auditor	means a person who under order 56 of the EC(M&MP)O may conduct an audit

CAP	Corrective Action Plan: A documented plan that ensures non-compliance is effectively addressed. It must be agreed to by the department and the occupier of an export registered establishment
CAR	Corrective Action Request: A written direction from department to an establishment to correct non-compliance
Critical non-compliance	when used in relation to the audit of operations means a failure (or a combination of the failures) to comply with any applicable requirement referred to in EC(MMP)O order 57 that: (a) results in or is likely to result in the preparation, export or certification (as the case may be) of meat or meat products that: (i) are not fit for human consumption or their integrity is compromised; or (ii) do not comply with the applicable importing country requirements, or (b) prevents an accurate assessment being made as to whether the meat and meat products: (i) are fit for human consumption and their integrity is assured; or (ii) comply with the applicable the importing country requirements (EC(M&MP)O Order 60.3
Critical Incident Response Audit	An audit scheduled by the department's Assistant Secretary Food Exports, in response to an identified critical incident triggered by non-compliance of export legislation, Australian standards, and/or importing country requirements
EC(M&MP)O	Export Control (Meat and Meat Product) Orders
FOM	Field Operations Manager
FSA	Departmental Food Safety Auditor
ISO19011:2003	An international standard which provides guidance for the management of audit programs, the external audits of quality systems and evaluation of auditor competence
Independent ATM auditor	An ATM auditor that is not directly responsible for technical standards or supervision of departmental officers at the establishment being audited
Non-compliance	Failure to comply with export legislation and/or importing country requirements
OPV	On-Plant Veterinarian
Product Hygiene Indicators	a weighted score out of 100 generated from agreed KPIs that is used to compare the performance of a plant against similar establishments and as an input into risk based government oversight
Product Hygiene Indicator program	measures hygienic meat production at individual establishments through the collection and analysis of individual KPI's

Show Cause Letter	A letter issued by the Department of Agriculture to the occupier of a registered establishment requesting the occupier to give reasons why sanctions under the Export Control Act should not be applied to that establishment
Systems Audit	An audit of systems under an occupier's approved arrangement

4. Roles and Responsibilities

4.1 The department is responsible for:

i) Conducting audits as defined in this policy and providing outcomes of those audits to the occupier
ii) Verifying that relevant export legislation and Australian requirements are met
iii) Raising CARs and/or applying sanctions against the occupier for non-compliance with export legislation and Australian requirements

4.2 The occupier is responsible for:

i) Complying with relevant export legislation and Australian standards and importing country requirements
ii) Implementing corrective and preventive action within any agreed timeframes
iii) Notifying the department of adverse findings in relation to microbiological, residue test results and/or detection of any notifiable disease or of importing country rejections of product

5. Methods

5.1 **System Audits**

a) Purpose
The purpose of the systems audit is to determine if systems documented under the occupier's approved arrangement are effectively implemented to comply with legislative and importing country requirements

b) Scope
The scope for audits will include verification of all of an occupier's approved arrangement

c) Upon implementation of this policy export registered slaughter and independent boning establishments will be scheduled for an initial systems audit of the occupier's approved arrangement

d) The departmental Audit Services Manager, in consultation with the relevant ATMs, will schedule audits. The approximate audit duration for:

- Slaughter establishments is 2.5 days
- Boning establishments is 1.5 days

e) Systems audit teams will consist of an independent ATM as the lead auditor, and the establishment ATM as auditor

- The OPV/FSA will not be part of the audit team, but may assist the audit team as required

5.2 **Audit Specifications**

a) Audit Plans and checklists

i) Audit plans will be developed by the audit team prior to audits

ii) Audit plans will include assignment of responsibilities for each audit team member

iii) Audit plans will be provided to export registered establishment management prior to the entry meeting and include:

a. The audit criteria and audit scope

b. The prospective timetable for auditing the relevant areas of the establishment and/or the approved arrangement documentation

- This is to allow management to have the appropriate personnel and records ready for the audit

iv) Auditors will use standard checklists as a guide to audit the approved arrangement

- The checklists will be based on the Approved Arrangement Guidelines

v) Audit findings will be based on evidence collected by and the observations of departmental auditors

b) Entry meetings

i) Entry meetings will be conducted before the start of audits

ii) Entry meetings will be chaired by the lead auditors and establishment management should be represented by at least the Quality Assurance Manager (QAM), Production Manager and/or General Manager

iii) At entry meetings lead auditors will:

a. Confirm the purpose of the audit

b. Define the audit scope and criteria

c. Identify the likely finish times for the day's production and production breaks that are to occur

d. Invite comment/discussion from/with establishment representatives

e. Propose a time and date for the exit meeting

c) Audits

i) The lead auditor will assign each audit team member specific elements of the occupier's approved arrangement to audit

ii) Audits will consist of both an assessment and evaluation of establishment documentation and records and an assessment of the operational performance of the establishment

iii) Documentation, product standards and process compliance will be assessed and verified during the audit. This will be achieved by conducting a desk audit of each element of the approved arrangement, followed by product/ process evaluation within the various areas of the establishment, including check–the–checker of establishment employees at operations where PHI key performance indicators and HACCP critical control points are monitored

iv) Assessment of the establishment's operational performance will be conducted by a physical review of operational procedures at the establishment

v) Where critical non-compliance have been identified during the audit, the lead Auditor may direct that product or goods be retained or recalled for further testing or assessment

d) Audit conclusions

i) At the completion of the audit, the audit team will caucus and determine audit findings based on the evidence collected. The lead auditor will then rate each activity and finalise the audit report in AMS

- Ratings for each activity will be on a scale from 0 to 10
- Any activity which has a critical non-compliance identified during an audit will be rated a zero (0)

ii) After the audit report has been finalised by the lead auditor, the AMS will generate an overall audit rating. The overall rating will be based on a summation of the ratings allocated to each activity included in the scope of the audit, multiplied by a weighting factor based on an assessment of significance of the activity in terms of food safety, animal welfare, market access, product integrity or other legislative requirements

- An overall audit rating of ≥80% is acceptable, 70-80% is marginal, and less than 70% is unacceptable

e) Exit Meetings

i) Exit meetings will be held with management to discuss the audit findings, the details of any CARs issued during the audit, the audit conclusions and the audit outcome

ii) Audit reports will be provided to establishment management at exit meetings

iii) The establishment will be required to provide a written response to the department that details the corrective and preventive actions taken to address the audit findings

iv) The time frame for the written response for an acceptable audit will be determined by the nature of the findings, but should not exceed one month. The ATM and OPV will be responsible for verifying the actions have been effective

f) Where the audit outcome is marginal or unacceptable, the lead auditor will outline further responses required by the establishment (refer to section 5.3 – Audit Ratings)

5.3 **Audit Ratings**

a) Acceptable Audit Rating

i) Following an acceptable audit rating the department will certify that the occupier's approved arrangement has been audited and found to comply with relevant export legislation and importing country requirements

ii) Systems audits will be scheduled each 6 months to verify that systems under the occupier's approved arrangement continue to operate at an acceptable level

iii) Establishments must continue to achieve an acceptable system audit rating to remain on the minimum 6 monthly system audit frequency

b) Marginal Audit Ratings

i) Following a marginal audit rating the Lead Auditor will issue a CAR requiring the occupier to develop a CAP within 10 working days of the CAR being issued

ii) The establishment's investigative team, with the involvement of the departmental on-plant officers, are to:

a. Address immediate corrective action relating to food safety issues

b. Undertake a comprehensive assessment of all operations at the establishment

- This may take the form of a series of internal audits

c. Re-examine the occupier's HACCP & QA programs in the context of the findings of the assessment

d. Agree on (Investigative team and departmental on-plant officer(s)) and sign a CAP within 10 working days of the generation of the CAR

e. Ensure the investigation determines the "underlying cause" for the accumulation of deficiencies that led to a marginal rating

- Previous CARs can be collated and used in the investigation process

f. Implement the CAP within 4 weeks (20 working days) from the date it was agreed to and signed

iii) Upon agreement of the CAP by the departmental on-plant officer(s) and the occupier the CAP is to be given/sent to ATM Lead Auditor

iv) The ATM will carry out a desk-audit of the CAP and if acceptable will approve the CAP and return it to the occupier through the appropriate departmental on-plant officer

c) Unacceptable Audit Ratings

i) Following an unacceptable audit rating at a system audit or a CAP verification audit the department will issue a 'show cause' letter to the occupier

ii) Following an assessment of the occupier's response to the show cause letter the department will consider:

a. Undertaking Critical Incident Response Audits at the establishment

b. Applying sanctions under the Export Control Act against the occupier

5.4 **CAP Verification Audits**

a) Verification audits of the CAP implementation will be scheduled within 3 months of the date of a marginal audit

b) The audit team for this audit will consist of a FOM as the lead Auditor, and the establishment ATM as auditor

c) The scope of the CAP verification audit will focus on the effectiveness and sustainability of the corrective and preventive actions documented in the CAP

d) The outcome of this audit will be either acceptable or unacceptable

- An acceptable audit outcome will result in the plant re-entering the 6 monthly systems audit cycle
- An unacceptable audit outcome will result a show cause letter being issued by the department
- Following an assessment of the occupier's response to the show cause letter the department will consider applying sanctions under the Export Control Act against the occupier

5.5 **Approved arrangement certificate**

a) Approved arrangement certificates will be issued to the occupier on approval of the arrangement, on an annual basis provided audit outcomes are acceptable or when there has been a change of occupier name

b) The approved arrangement and covering certificate is subject to acceptable audit outcomes

6. Related Material

a) Approved Arrangement Guidelines

b) Export Control Act 1982
c) Export Control (Meat and Meat Products) Orders 2005
d) Export Meat System Audit Management Policy
e) AS/NZS ISO 19011:2003 Guidelines for quality and/or environmental management systems auditing

7. Detailed Version history

Version Number	Version Date	Amendment Details	Document Owner/ Reviewers
1	26/3/2014 –	Development of new policy document to cover Dept. Of Ag. Policy for the Export Meat System Audit Program	Export Meat Program - Sam Allan - Ed Dunn - Malcolm Fowler - Jill Gordon
2	28/3/14	Minor font change – correction to definitions for FSA and PHI	Export Meat Program - Malcolm Fowler - Jill Gordon