



GUIDELINE

Trade Descriptions

Direction

This document is intended as an operational guideline for the development of trade description requirements documented in an export registered meat establishment’s Approved Arrangement. It is supplementary to the Approved Arrangement Guidelines.

Summary of main points

This guideline outlines the responsibilities of the Department of Agriculture and Water Resources (the department) and AUS-MEAT in relation to:

- Delegation of trade description operational responsibilities to AUS-MEAT
 - Roles and responsibilities for trade description on AUS-MEAT accredited abattoirs and independent boning rooms
 - Roles and responsibilities for trade description on non-AUS-MEAT accredited export meat establishments
 - Approved arrangement requirements for market access animal raising claims.
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Purpose of this document

The purpose of this guideline is to outline the requirements for export meat and meat product trade description, including the distribution of compliance responsibilities, between the department and AUS-MEAT on export registered abattoirs and independent boning rooms.

Definitions

The following table defines terms used in this guideline.

Term	Definition
Approved arrangement	An arrangement approved under clause 5 of Schedule 1 and includes variation of such an arrangement in the circumstances specified in clause 17 of Schedule 1 of the <i>Export Control (Meat and Meat Products) Orders 2005</i> .
Animal raising claims	Are claims made in the trade description or export documentation about the animal or supply chain specifically relating to animal husbandry conditions, feeding, handling, drug treatments and/or geographical reference which is required by an importing country.
Area technical manager (ATM)	A departmental authorised officer with responsibility for the supervision, performance, assessment and verification of technical standards and operations in a defined group of export meat establishments. ATMs are appointed as authorised officers under section 20 of the <i>Export Control Act 1982</i> .
AUS-MEAT Limited	AUS-MEAT Limited ABN 44 082 528 881 is a company owned by Australian meat and livestock industries. It is primarily responsible for the development, approval and maintenance of standards for meat trade description.
Australian Meat Industry Language and Standards Committee	The Committee responsible for the development, approval and maintenance of standards for trade description through the AUS-MEAT Language and AUS-MEAT National Accreditation Standards.
Eligible AUS-MEAT accredited establishments	Abattoirs and independent boning rooms that process meat derived from beef, sheep or goats (mandatory accreditation). Pork abattoirs and independent boning rooms that process pork (voluntary accreditation).
AUS-MEAT authorised officer	An officer employed by AUS-MEAT Limited ABN 44082528881 and appointed under section 20 of the <i>Export Control Act 1982</i> as authorised officers with powers and functions to conduct audits of trade description.

Term	Definition
AUS-MEAT National Accreditation Standards	Accreditation standards for Abattoirs, Boning Rooms, Non Packer Exporters, Further Processors and other Accredited Enterprises.
Australian Meat Industry Classification System	The meat industry standards for trade description. It is also known as the AUS-MEAT Language.
Certification Integrity Unit auditor	A departmental authorised officer, appointed under section 20 of the <i>Export Control Act 1982</i> , who undertakes audits of AUS-MEAT in relation to the delegated responsibilities for trade description.
Food Safety Meat Assessor (FSMA)	A departmental authorised officer who has meat inspection qualifications and works on export registered meat establishments. FSMAs are appointed as authorised officers under section 20 of the <i>Export Control Act 1982</i> .
Point of Slaughter Certification	A legally binding declaration provided by an establishment at ante-mortem inspection that livestock have been sourced under the AA Livestock Sourcing Program and meet the market access requirements for specified raising claims to which the department will be asked to provide certification.
Livestock Sourcing Program	An AA program that describes how an export abattoir maintains integrity of its supply chain, including livestock sourcing, in relation to a specific animal raising claim.
On-Plant Veterinarian (OPV)	A veterinarian employed by the department to provide daily supervision of ante- and post-mortem inspection and verification of the establishment's approved arrangement.
Quality Assurance Program	Means the quality assurance system prepared and adopted by an establishment. Also referred to as a Quality Management System.

Principle statement

Meat and meat products for export, must have a trade description applied no later than at the time they are packaged.

An occupier of an export registered meat establishment must have a documented approved arrangement (AA) procedure for managing trade description applications, label approvals, changes to trade description and procedures for monitoring, verification and taking corrective action when non-compliance is identified.

The use of animal raising claims (ARCs) in trade descriptions must also be documented in the AA. The claim must be supported by an independent verification of compliance with the claim.

The aim of trade description compliance management is to ensure that an occupier's AA is effective and operates in accordance with Australian export legislation to ensure that meat and meat products intended for export for food:

- are wholesome or are identified for export for further processing for food;
- meet requirements to have an accurate trade description;
- meet the importing country requirements necessary to maintain market eligibility; and
- are traceable, can be recalled if required and their integrity is assured.

Regardless of whether an establishment is AUS-MEAT accredited or not, any change to trade description on product must be approved by the department.

Legislative framework

The following list outlines the legislation that applies to this guideline:

- *Export Control (Meat and Meat Products) Orders 2005*
 - Order 32 Occupier must comply with the Australian Meat Standard
 - Order 33 Occupier must comply with export standards
 - Order 34 Occupier must comply with importing country requirements
 - Order 44 Trade descriptions
 - Schedule 6 Part 1
 - The Australian Meat Industry Classification System Manual.
- *Australian Meat and Livestock Industry (Export Licencing) Regulations 1998*
 - Regulation 3 – meaning of expressions
 - prescribes AUS-MEAT as standards body
 - Regulation 9 – Further condition to which licences are subject
 - Prescribes standards body (AUS-MEAT) to conduct audits of accreditation holder's quality assurance system
 - Requires accreditation holder to provide reasonable assistance and access to documents or records and take corrective actions to any deficiencies found by auditor.

Roles and responsibilities for trade description compliance

Under the *Export Control Act 1982* and the *Export Control (Meat and Meat Products) Orders 2005* (the Orders), truth-in-labelling of meat for export is under the jurisdictional responsibility of the department, including applying sanctions where required.

The department has delegated to AUS-MEAT the operational responsibilities, including non-compliance management, for trade description other than basic descriptions that importing countries may require the department to oversee.

Through the Australian Meat Industry Language and Standards Committee (AMILSC), AUS-MEAT must:

- Fulfil requirements of legislated responsibility for meat trade description language through the Australian Meat Industry Classification System (AUS-MEAT Language); and
- Maintain an accreditation regime under the AUS-MEAT National Accreditation Standards for accredited enterprises.

AUS-MEAT provides summary reports of trade description audits and language issues to the AMILSC. The department is a member of the AMILSC.

The department's Certification and Integrity Unit (CIU) audits AUS-MEAT on an annual basis to assess compliance with the delegated trade description requirements.

AUS-MEAT trade description responsibilities

Export abattoirs and independent boning rooms that process meat derived from beef, sheep or goat species must be accredited by AUS-MEAT. Pig establishments may elect to be accredited by AUS-MEAT.

Appendix A provides a detailed list of the distribution of responsibilities between department and AUS-MEAT in relation to the different elements of trade description. The purpose of this appendix is to provide guidance for establishment management to the correct point of contact regarding enquires about trade description as well as what is required to be covered in the AA. This appendix should also be read in conjunction with the Australian Meat Industry Classification System Manual.

The following table outlines the roles and responsibilities for trade description requirements on AUS-MEAT accredited establishments.

Role	Responsibilities
Area Technical Manager	<ul style="list-style-type: none"> • Approving amendments to parts of the AA that relate to trade description, following AUS-MEAT recommendation for approval • Verifying compliance with basic trade descriptions (i.e. species, meat and offal) of trade description through department audits • Approve changes to trade description applied on product • Confirm compliance of trade description label approval applications following AUS-MEAT endorsement where required
AUS-MEAT Auditor	<ul style="list-style-type: none"> • Recommendation of amendments to the AA that relate to trade description, to the ATM for approval • Verifying trade description compliance with the AA at audit (see Appendix A) • Ensuring corrective action is undertaken when non-compliance is identified at audit • Confirm compliance of trade description label approval where required
AUS-MEAT Program Manager	<ul style="list-style-type: none"> • Initial approval of an AUS-MEAT approved Quality Management Program
Establishment Management	<ul style="list-style-type: none"> • Development and implementation of trade description requirements in the AA • Address corrective actions issued by AUS-MEAT Auditors
On-Plant Veterinarian or Food Safety Meat Assessor	<ul style="list-style-type: none"> • Collection of species testing samples

Department trade description responsibilities

The department is responsible for approving, verifying and auditing all aspects of trade description at the following establishments:

- All further processing establishments
 - Export abattoirs and independent boning rooms that are not accredited with AUS-MEAT:
 - Pigs
 - Wild game
 - Poultry
 - Buffalo
 - Rabbit
 - Ratites
 - Horses and donkeys
 - Camel and llamas
 - Deer.

The department is responsible for species testing at all export registered establishments.

The following table outlines the roles and responsibilities for trade description requirements on non-AUS-MEAT accredited establishments.

Role	Responsibilities
Area Technical Manager or Food Safety Auditor	<ul style="list-style-type: none">• Approve changes to trade description applied on product• Approve amendments to parts of the AA that relate to trade description• Verifying trade description compliance with the AA at audit (see Appendix A)• Ensuring corrective action is undertaken when non-compliance is identified at audit
Establishment Management	<ul style="list-style-type: none">• Development and implementation of trade description requirements in the AA• Addressing corrective actions issued by ATM Auditors
On-Plant Veterinarian or Food Safety Meat Assessor	<ul style="list-style-type: none">• Collection of species testing samples

Animal raising claims

Animal Raising Claims (ARCs) are generally a commercial arrangement, with some being an importing country requirement, in which case the department is responsible for verification activities to ensure importing country requirements are met.

Commercial arrangements

When an export establishment uses a commercial ARC in a trade description, then establishment management is responsible for verifying a livestock producer declared animal raising claim. The process for verifying that the commercial ARC is compliant with trade description requirements must be described in the AA.

In relation to beef, the AMILSC has developed and approved the *Animal Raising Claim Framework for Beef Production Systems in Australia*. This document provides guidance on how the various raising claims can be verified for beef production systems. It is available on the AUS-MEAT website.

Importing country requirement ARCs

Animal raising claims must be supported by verification of compliance with the claim(s). Some examples of (but not limited to) claims and verification are as follows:

- Breed claim – Phenotype verification at ante-mortem
- Feeding claim – independent farm audit
- HGP free – palpation of all declared free cattle for implants and monthly residue testing program
- Organic production – for example USDA National Organic Program (NOP).

ARC compliance requirements

Export abattoirs must be able to substantiate the integrity of their livestock sourcing arrangements in order to ensure their legal responsibilities are discharged. Under usual arrangements, while it is the export abattoir seeking certification from the department, the legal relationship is between the department and the supplier of the stock. However, when a Point of Slaughter Certification Program (PSCP) is used, then the export abattoir takes direct, legal responsibility for the integrity of the livestock sourcing requirements for trade description.

In order to meet the ARC requirements, export abattoirs must either source livestock:

- from suppliers who have a third party certified Quality Assurance Program (QAP); or
- by using a second party PSCP.

In both cases the sourcing program must be documented in AA.

For AUS-MEAT accredited export abattoirs that use a PSCP, the program must first be approved by AUS-MEAT and then by the department. At non AUS-MEAT accredited establishments, the department is solely responsible for approving the PSCP in the AA.

Point of Slaughter Certification Program

The AA PSCP must document how the export abattoir:

- sources ARC compliant livestock;
- certifies compliance at point of slaughter; and
- maintains segregation from livestock receipt to packing.

Livestock sourcing programs

In relation to verification of the AA PSCP, the program must include verification procedures for the livestock sourcing program including audit of the livestock suppliers.

Audit arrangements can take different forms, from documentation checks done and recorded at every sale by buyers, to comprehensive periodic audits of the saleyard or producer, or a combination of these.

Where export abattoirs provide service kills on behalf of other livestock buyers, it remains incumbent on the abattoir as the holder of the AA, to communicate the sourcing requirements and to audit their clients as part of the PSCP verification procedures.

Point of slaughter certification

Point of slaughter certification must be provided to the OPV during ante-mortem inspection. All other supporting documentation (e.g. post-sales summaries and supplier audit reports) must be made available during audit of the AA PSCP.

This certificate must be on company letterhead or included within the ante-mortem (kill) sheet and include:

1. The number of animals for which the certification is given;
2. The lot or pen number of the animals;
3. The ARC that is being certified;
4. A statement that the certification is supported by appropriate documentation and verification as documented within the AA.

Separation Program

The AA must document how the export abattoir ensures that carcasses, carcase parts (including offals) and carton meat are adequately identified and segregated from non-compliant meat. It must include inventory controls.

Version history

The following table details the published date and amendment details for this document.

Version	Date	Amendment details
1.0	1 Dec 2018	First publication of this guideline.

Attachment A:

Distribution of responsibilities at AUS-MEAT accredited establishments (abattoirs and independent boning rooms) between the department and AUS-MEAT

Notes:

Department responsibilities align with the Export Control (Meat and Meat Products) Orders Schedule 6 Sub-clause 1.2

AUS-MEAT responsibilities align with Export Control (Meat and Meat Products) Orders Schedule 6 Sub-clause 4.1:

For further guidance see the Australian Meat Industry Classification System Manual.

Department of Agriculture and Water Resources

Basic Categories – Meat and Offal

Species	Basic Categories - Meat	Basic Categories - Offal
Bovine	Veal Bull Beef	Beef/bovine
Ovine	Lamb Mutton Ram	Sheep/ovine
Porcine	Pork Sow Pork Boar Pork	Pig/porcine
Caprine	Goat	Goat
Bubaline	Buffalo	Buffalo

Other Compulsory Trade Description Elements

Health and Hygiene	Market Access	Integrity/Security
Net weight	Customer country markings	Registration number
Refrigeration statements (e.g. keep frozen) except where shelf stable	Bilingual label approvals	Country of Origin
Date of packaging	Trade descriptions other than those in the Orders (e.g. GF-HQB* and Hilton Beef)	AI stamp: <ul style="list-style-type: none"> • monitoring application • security
Identity of batch		Alteration of trade descriptions
Ingredient statements (where more than 1 ingredient)		Trade Description requirements for: <ul style="list-style-type: none"> • meat fractions • mechanically separated meat (MSM) • pharmaceutical products • animal food
		Name and address of occupier or exporter or consignee
		Permanently affixed prescribed tag approvals
		Identification of product "for further processing before export"

* Note: GF-HQB means Grain-fed High Quality Beef

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Alternative Categories - Meat

Bovine	Ovine	Porcine	Caprine
Yearling steer	Young lamb	Sucker pork	Kid
Yearling beef	Hogget	Gilt pork	Capra
Young steer	Ewe	Gilt light pork	Doe
Young beef	Wether	Gilt heavy pork	Goat wether
Young prime steer			
Young prime beef			
Prime steer		Barrow pork	Buck
Prime beef		Barrow light pork	
Steer		Barrow heavy pork	
Ox		Male light pork	
Cow		Male heavy pork	
Yearling entire			
Young entire			
Young bull			
Rose veal			

Alternate Categories – Offal

Same details as shown above for meat with the following additional descriptions

Bovine	Ovine	Porcine
Veal/calf	Lamb	Pork
Bull	Ram	Sow Pork
	Mutton	Boar Pork

Other Trade Description Elements

Compulsory Commercial/Marketing	Customer/Additional Commercial/Marketing	Supplementary Specifications/Minimum Standards
Product of Australia	Fat depth range	Grain fed beef
Establishment number	Weight range	Accelerated conditioning
Name and address	Fat class	Skin-on (goats)
Bone-in/boneless	Weight class	Skin-off (pigs)
Chiller assessment (fat/meat exclusion colour)	CL content	Halal (management of identification cards)
Location of trade description on carton/bag	Cut/item description (including common code cipher)	Grain fed lamb and hogget
Size of Print		
Logos	Number of cuts/portions	
Contrast and obscured printing	Type of packaging	
Tolerances	Original untrimmed fat class	
Net weight*	Original weight class	
	Weight related fat class	
	Expiry date/shelf life	
	Temperature statement in conjunction with refrigeration statement (e.g. Store at 0°C)	
	Animal raising claims	
	MSA Eating Quality information and EQG ⁺ cipher	

* Note: weights and measures are enforced by the National Measurement Institute

+ Note: eating quality grade