Australian Government
Department of Agriculture

Operational Policy

Meat Establishment Verification System (MEVS) – Independent Boning Room Policy

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1. Purpose

This policy provides a national approach to the Department of Agriculture (the department) inspection and verification of export registered independent boning rooms to support Australian Government health certification for export meat and meat products

2. Scope

This policy applies to department officers who undertake inspection, verification and audit activities at export registered independent boning rooms

3. Definitions

Term	Definition
Approved arrangement	As per the Export Control (Meat and Meat Products) Orders 2005, means an arrangement approved under clause 5 of Schedule 1 or under sub-clause 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
Audit Management System(AMS)	The department's web-based record management system for holding on-plant Verification records, Non-Compliance Issues (NCIs), Corrective Action Requests (CARS), Weekly Meeting records and Audit Reports
Area Technical Manager (ATM)	: Department veterinary officers who are responsible for the overall supervision of On-Plant System and the OPVs/FSAs at export registered slaughtering establishments/independent boning rooms in a defined geographical location
Field Operations Manager (FOM)	: A senior supervising veterinary officer that has responsibility for technical supervision of ATMs within a defined geographic area
Food Safety Auditor(FSA)	Department authorised officer who undertakes verification and audit of export registered independent boning rooms
Non-compliance	A failure to comply with legislative requirements
Staff Resources Officer (SRO)	A department officer responsible for the performance management of FSAs

4. Roles and Responsibilities

4.1. Food Safety Auditor

i) All export registered independent boning rooms are required to have a department FSA undertake verification to manage the food safety, market access requirements, product integrity and certification outcomes in conjunction with the occupier's approved arrangement
ii) Operates within the Export Meat Program (EMP) Food Services Group (FSG)
iii) Supervised by a Staff Resources Officer
iv) Report to an ATM on all technical matters
v) Report to the Staff Resources Officer on all non-technical matters.
vi) Have three key technical areas of responsibility:
    1. Food safety verification
    2. Product integrity and certification verification
    3. Importing country requirements verification
vii) Verify that the occupier complies with their approved arrangement.
viii) Ensure verification tasks are done at the correct frequency
ix) Ensure critical non-compliance by the establishment is handled and reported in the AMS CAR Records
x) Review approved arrangement amendments and provide recommendations for approval to the establishment ATM
xi) Manage weekly meetings with establishment management
xii) Manage monthly periodic audit process
xiii) Provide a weekly report to the ATM and Assistant Director Inspection Services informing them of relevant issues relating to the 3 key areas of responsibility
xiv) Maintain the Audit Management System (AMS) records
xv) Participate in the ATM Supervisory Visit
xvi) FSA performance is managed through the department's performance management scheme in line with the Enterprise Agreement

4.3. Area Technical Manager
- i) Operates within the FSG Audit Services
- ii) Supervised by the Director Audit Services together with the appropriate regional FOM
- iii) Is assigned a group of export registered independent boning rooms and FSAs in a particular geographic area
- iv) Provides technical oversight of FSA verification
- v) Approval of CAR extensions
- vi) Manages rejected CARs
- vii) Manages marginal and unacceptable FSA Monthly Periodic Audit outcomes
- viii) Approves the occupier's approved arrangement and/or any amendments made to it following recommendation from the OPV
- ix) Assesses and approves changes to trade description

4.4. Field Operations Manager
- i) Operates within the Export Meat Program
- ii) Supervised by the Assistant Secretary Food Exports Branch
- iii) Are responsible for technical oversight of a group of ATMs either within a region or across regions
- iv) Liaise with FSG to enable effective implementation of the regulatory requirements to underpin export certification

5. Method

The Meat Establishment Verification System (MEVS) at independent boning rooms has one key component that is linked to specific legislative requirements of the Export Control Act 1982 and its subordinate legislation, namely:

- verification of food safety, importing country requirements, and product integrity

This process of verification underpins the integrity of the export certification issued by the department

5.1 Food Safety Verification

Department verification of food safety is aimed at ensuring that the establishment procedures, required to maintain food wholesomeness, are working effectively through the application of HACCP and the associated Good Hygienic Practices (GHP)/ Pre-Requisite Programs including Microbiological testing programs

The frequency of food safety verification is dependent upon the procedure/process being monitored and market access requirements. Under MEVS food safety covers:

i) HACCP plan CCPs
ii) GHP/Pre-Requisite Programs
iii) Sanitary Standard Operating Procedures (SSOPs)
iv) Microbiological Testing Programs

5.2 Importing Country Requirements Verification

The outcome of market access requirement verification is that product intended for a particular market complies with all the requirements for that market

Importing country requirements are specified in the department's MICoR database and changes to importing country requirements are notified to industry through Market Access Advices

The FSA has a responsibility to be familiar with the registered operations and specific overseas listings at their establishment to ensure on verification of importing country requirements is effective

5.3 Product Integrity and Certification Verification

i) Department verification of product integrity and certification requirements is to ensure that the establishment procedures and practices are meeting the required outcomes:
   a. All incoming products are traceable back to the supplier and meat and meat products can be traced forward to facilitate recall if necessary
   b. Product is accurately and permanently identified
   c. Edible meat and meat products maintain their integrity and are kept separate from inedible, condemned meat products and by products
   d. Official marks and seals are only applied to eligible product and are only used in accordance with the Orders
   e. Meat and meat products are exported from Australia when certification requirements are accurately met

ii) Product integrity and certification requirements include:

i) Product traceability and recall
ii) Trade description
iii) Export Security/integrity
iv) Control of official marks
v) Export documentation

6. Verification

i) The aim of verification is to determine whether an establishment's operations are implemented, monitored, verified, controlled, recorded and amended in accordance with the details provided in the occupier's approved arrangement
ii) The occupier's approved arrangement must comply with the relevant legislation and importing country requirements to ensure that meat and meat products are wholesome and fit for human consumption
iii) In the context of the responsibilities of the FSA verification means:
    a. Conducting inspections of meat and meat products at various stages of production
    b. Measuring various parameters applicable to processing
    c. Reviewing activities conducted and examining documents produced as a result of the implementation of the occupier's approved arrangement to assess compliance with the processes and outcomes detailed in the approved arrangement
iv) Department verification activities are focused on:
    a. Performance of specific verification activities required by relevant importing countries
    b. Verification of establishment control of the implementation of the approved arrangement through the establishment's internal monitoring, verification and corrective action processes

6.1 Verification Outcomes

i) Verification outcomes are rated on the basis of food safety, animal welfare, legislative compliance or market access requirements and the ratings will be one of the following:

- Acceptable
- Marginal
- Unacceptable

a. Acceptable
An acceptable outcome will be recorded if the activity complies with the approved arrangement and there is no adverse impact on food safety, product wholesomeness, product integrity and/or importing country requirements

b. Marginal
A marginal outcome is considered a breach of compliance of the approved arrangement and a marginal rating would be given if there was *potential to cause adverse affect* on food safety, product wholesomeness, product integrity and/or importing country requirements

c. Unacceptable
An unacceptable rating would be applied if the non-compliance of the approved arrangement is reasonably likely to adversely affect food safety, product wholeness or product integrity and/or importing country requirements

ii) Where the verified activity is found to be marginal or unacceptable and the activity:

a. Complies with the approved arrangement:
- The department will require the establishment to review the relevant section of the approved arrangement to make appropriate amendments

b. Does not comply with the approved arrangement:
- The department will require the establishment to bring the activity into compliance with the approved arrangement

c. Does not comply with the approved arrangement and compliance would not remove adverse effects:
- The department will require the approved arrangement to be reviewed for amendment and the activity to be brought into compliance with the amended approved arrangement

iii) All marginal and unacceptable verification outcomes must:
   a. On completing the audit or the verification activity, be reported to the establishment management so that the establishment can take responsibility for corrective action i.e. the relevant production supervisor and the quality assurance officer
      - In the first instance this is done in person and then recorded in the AMS NCI Register and Weekly Meeting Agenda
   b. Have corrective action taken by the establishment:
      - To prevent adversely affected product from entering commerce until it can be demonstrated that the product is safe and eligible for its intended use and intended market
      - Where establishment corrective actions are not effective, a department officer may apply an appropriate disposition to ensure the required outcome

iv) The rules for dealing with marginal verification outcomes are:
   a. The establishment is given one week to implement effective corrective action
   b. If the corrective action by the establishment is found to be acceptable through department verification the issue is closed.
   c. If the corrective action by the establishment is found to be unacceptable a CAR is raised
   d. Repetitive marginal findings i.e. If more than two consecutive marginal verification outcomes are rated for an activity, this will result in the non-compliance issue being elevated to a CAR.

v) An unacceptable department verification finding will result in a CAR

6.2 Corrective Action Requests (CAR)

i) A CAR against the occupier is raised through AMS for unacceptable verification outcomes or repetitive marginal outcomes

ii) A CAR clearly states the legislative reference for the non-compliance and includes an accurate description of the overall findings, observations and any objective evidence collected to support the findings

iii) A CAR is discussed between the department officer and a senior establishment representative and where possible agreed upon

iv) Once the agreed close out date is determined both parties sign the CAR

v) CARs are attached to the relevant AMS record and securely retained on department on-plant files

vi) The documentation provided by the establishment as evidence of effective corrective action will be attached to the relevant CAR records.

vii) The department officer who raised the CAR or their delegate will record their verification findings when closing out the CAR

viii) A copy of the signed closed CAR is given to the establishment.

ix) The original closed CAR will be retained securely on department on-plant files

x) General guidelines for CARs
   a. The maximum time permitted for CAR closure is one month, however depending on the nature of the CAR, a longer timeframe can be negotiated between the FSA and establishment management
   b. Food safety and wholesomeness issues would have a short time frame for close out.
   c. Product integrity issue or importing country issues may have a longer time for close out
   d. Where the FSA is unsure they should consult their ATM

xi) Rejected CARs:
   a. Indicate systemic non-compliance with the approved arrangement
   b. Are referred to the ATM for final decision. The ATM can either accept the rejection or approve extension of the CAR
   c. If the ATM approves rejection of the CAR then the associated monthly periodic audit is rated unacceptable and the ATM can issue a show cause letter asking the occupier why they should not recommend an additional Systems Audit

xii) CAR extensions:
   a. Are only granted on one occasion
   b. Are based on written evidence from the establishment to support their claim
   c. Are to be discussed with the establishment ATM
   d. The final decision on whether an extension is granted is the responsibility of the establishment ATM

6.3 Weekly Meetings

i) The FSA chairs a weekly meeting with establishment management

ii) Issues relating to, but not limited to, food safety, market access requirements, certification and product integrity will be discussed

iii) The meeting will be used as an opportunity to:
   a. Discuss the results of the MEVS Verification
   b. Review corrective actions on unclosed non-compliance issues
   c. Be the vehicle through which new Market Access Advice and Meat Notices are discussed
   d. Convey other relevant department information to the establishment and vice versa
   e. Discuss any WHS issues impacting department officers

iv) The department officer present at the meeting is responsible for minute taking. Once the minutes of the meeting are agreed between all parties the department officer and establishment representative will sign and date the minutes

v) Then original copy of the signed minutes will be attached to relevant Weekly Meeting in AMS and securely retained in department on-plant files

vi) A Weekly Report is sent to the Supervisory ATM and Assistant Director Inspection Services informing them of the key issues discussed during the weekly meeting

6.4 Monthly Audits

i) MEVS operates a Monthly Periodic Audit (MPA) process
ii) MPAs are managed through AMS by the FSA
iii) The scope of the MPA is determined by the verification activities that are verified within the month. These are based on the AMS Verification Records
iv) All marginal and unacceptable verification activities are transferred to the MPA Audit Findings under the associated activity type
v) CARs raised in the month are attached to the MPA
vi) The MPA is rated as Acceptable, Marginal or Unacceptable. Ratings are determined by the outcomes of the individual Audit Findings Activity ratings
vii) The MPA is finalised in the last week of the month
viii) The MPA audit report:
    a. Contains a conclusion regarding the overall outcome for the month's verification activities
    b. Contains a list of the Audit Findings
    c. Contains associated CARs
    d. Is presented and discussed with establishment management at the weekly meeting for the week in which it occurs
    e. Hard copy is signed and dated by the FSA and a management representative
    f. Follow up is undertaken through the weekly meeting process

6.5 Marginal and Unacceptable MPAs: Are considered a serious breach of an occupier's approved arrangement:

a. They indicate systemic non-compliance with the approved arrangement
b. The maximum number of marginal MPAs between Systems Audits is two
c. The maximum number of unacceptable MPAs between Systems Audits is one
d. The FSA must notify a senior establishment management representative that an MPA is likely to be rated Marginal or Unacceptable
e. Are escalated to the ATM for further assessment
f. The ATM can issue a show cause letter asking the occupier why they should not recommend an additional Systems Audit

7. Policy verification

i) ATMs will verify FSAs management of this policy and underlying instructional material through remote monitoring of AMS records, PHI records and FSA Weekly Reports

ii) ATMs will verify department records at the establishment during bimonthly supervisory visits

8. Records

i) Records maintained within the MEVS include:
   1. Verification Checklists
   2. Weekly Meeting Agenda and Minutes
   3. Weekly Report
   4. NCI Register
   5. Corrective Action Requests
   6. Monthly Audit Reports

ii) All records directly related to verification are maintained on the AMS including Verification Records, NCI Register, CARs and Weekly Meeting Minutes and Periodic Audits

iii) Hard copies of all relevant documentation relating to department on-plant inspection and verification activities are maintained securely in department on-plant files

9. Related Materials/References

i) Export Control Act 1982

ii) Export Control (Prescribed Goods – General) Orders

iii) Export Control (Meat and Meat Product) Orders

iv) Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption (AS4696)

v) Approved Arrangement Guideline – Meat

vi) Instructional Material relevant to establishment operations on IML

vii) Reference documents on ELMER

10. Detailed Version History

Date Published	Version	Detail reason for issue or amendments	Document owner (Program)/ Developer/reviewers
30/4/2014	1	New policy document for to cover DAFF Inspection and Verification activities	Food Division- Export Meat - Samantha Allan - John Ryan - Jill Gordon
01/08/2014	2	Amendment to Section 6.1.iv.d – clarification of escalating a non-conformance issue to a corrective action request	Exports Division