Export meat update seminar



Shiga toxin-producing Escherichia coli (STEC) requirements for exporting to the USA

and

Hazard Analysis Critical Control Point (HACCP) overview



February 2025

Agenda



10:30	Welcome Dr Ann McDonald
10:40	STEC
12:40	Lunch
13:10	HACCP
14:10	Action Plans and evaluation
14:30	Frozen supply chain project
15:00	Close

Your action plan



Export meat update seminar

ACTION PLAN

What aspect of	What needs to change?	What action will I
our operation		take to get the
needs to		change process
change?		started?
e.g. Hazard analysis	We need to consider all the hazards, biological, physical and chemical - not just the obvious ones - and provide data, reports etc. to back up our decisions	Call a meeting of the HACCP team





Welcome

Dr Ann McDonald

STEC

Ms Michelle Robertson, Dr Mark Salter, Dr Glen Edmunds

DAFF Export Standards Branch

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USA: Market Access Requirements

February 2025

Ms Michelle Robertson Dr Mark Salter Dr Glen Edmunds

Export Standards Branch, Department of Agriculture, Fisheries and Forestry



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Department of Agriculture, Fisheries and Forestry



What the US wants

Background, US directives and regulations

Michelle Robertson

Director, Meat Market Access Export Standards Branch, Department of Agriculture, Fisheries and Forestry

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Why is US an important market?

Strong US demand for Australian beef expected for 2024-2025

- Declining US production
- Falling world supply
- Preferential market access for Australian beef
- Relatively weak Australian dollar



Value of Australian beef export to USA, China, and Japan (2018-2024)



Department of Agriculture, Fisheries and Forestry

Source: ABARES 2024, <u>Agricultural Commodities Report: December quarter 2024</u>, Australian Bureau of Agricultural a **CFFICIAL** Source: DAFF 2024, <u>Trade dashboard</u>, Department of Agriculture, Fisheries and Forestry, Canberra, accessed 12 Resource Economics and Sciences, Canberra, DOI: 10.25814/82b5-tg66, accessed December 2024.

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Why are we here?

Next US audit is confirmed for September 2025 – getting prepared

Government microbiological testing programs and HACCP were highlighted in Food Safety Inspection Service (FSIS) 2018 and 2022 audit reports.

Shiga toxin-producing *E. coli* (STEC)

- Incorrect sampling technique observed by the auditors
- Questions around Australian lotting system



Source: FSIS 2024, Australia: Foreign Audit Report, Food Safety and Inspection Service, Washington D.C., accessed December 2024.

What is equivalence?

Equivalence allows market access to the US

What is it? Equivalence is how FSIS ensures that the Australian food safety inspection system provides an equivalent level of public health protection to that of the US.

How do we get it?

Equivalence is achieved through reviews of Australian food safety legislations and processes, on-site audits, and ongoing demonstration of compliance to approved processes.

Why do we need it?

Equivalence allows market access and Australia can export meat/products to the US using our own processes.

Obtaining and maintaining equivalence depends on our performance

Equivalence for Australian national raw beef O157 program was initially achieved in 2007.

Work to obtain equivalence included demonstrating Australia's low prevalence of *E. coli*.

Three-month rolling average of confirmed % positive *E. coli* O157 and non-O157 tests (on-plant), 2015 – Dec 2024



*From March 2023, only US and Canada data was used in the three-month rolling graph

Relevant FSIS directives



FSIS uses directives to instruct their staff on how to perform their duties. They are useful for practical interpretation of legislation. Directives contain references to US Code of Federal Regulations (CFR).

STEC

10010.1

Sampling Verification Activities for Shiga Toxin-Producing Escherichia Coli (STEC) in Raw Beef Products -Revision 6

10010.2

Verification Activities for Shiga Toxin-Producing Escherichia Coli (STEC) in Raw Beef Products - Revision 1

HACCP

5000.1 *Verifying an Establishment's Food Safety System - Revision 8*

5000.6

Performance of the Hazard Analysis Verification Task -Revision 2

6420.2

Verification of Procedures for Controlling Fecal Material, Ingesta, and Milk in Livestock Slaughter Operations - Revision 2

POE rejections

9900.8

Meat, Poultry, and Egg Products Refused Entry Into the United States (U.S.) -Revision 2

8080.1

Managing Adulterated or Misbranded Meat, Poultry, and Egg Products - Revision 8

US Import STEC testing

FSIS Directive 10010.1 Rev. 6



Department of Agriculture, Fisheries and Forestry

Source: FSIS 2024, Sampling Verification Activities for Shiga Toxin-Producing Escherichia Coli (STEC) in Raw Beef Pro OFFICIAtion 6, Food Safety and Inspection Services, Washington D.C., accessed December 2024.

HACCP findings from past US audits

Hazards were not identified in the HACCP design

Establishments must consider any food safety hazards which might occur in the production process.

The hazards may vary between products, depending on e.g. incoming materials or production steps.

9 CFR 417.2(a), FSIS Directive 5000.1, Chapter III, Part I, II. A.

Monitoring documentation was inadequate

The HACCP plan must include a written monitoring procedure, to be implemented by establishment employees at specified frequency.

Monitoring records must be made at the time of the procedure, and must include the time, date, and signature/initials of the employee making the entry.

9 CFR 417.2(c)(4), 417.2(b), FSIS Directive 5000.1, Chapter III, Part I, III. B. 3 & 5

HACCP verification and validation were deficient

Establishments must list all verification procedures and the frequency at which they'll be performed.

Verification procedures include calibration of monitoring instruments, direct observation of monitoring activities, and HACCP records review.

9 CFR 417.2(c)(7), 417.4(a)(2), FSIS Directive 5000.1, Chapter III, Part I, III. B. 4

HACCP plan contents were erroneous or missing

The HACCP plan flowchart must accurately reflect the process and product flow in the establishment. It must include the intended use/customers of each product.

The hazard analysis must reflect all the steps of the flowchart.

9 CFR 417.2(a)(2), FSIS Directive 5000.6 V. STEP 1 & Step 2, C.

Shiga toxin-producing *Escherichia coli* (STEC)

Lotting, sampling, testing

Dr Mark Salter

Principal, Microbiology and Laboratory Oversight Export Standards Branch, Department of Agriculture, Fisheries and Forestry

Department of Agriculture, Fisheries and Forestry

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What is STEC?



E. coli are a group of bacteria commonly found in the intestines of humans and animals

E. coli enters meat production through cross-contamination with intestinal contents, hide, etc.

'STEC' refers to a particular subgroup of *E. coli* strains which produce toxin that lead to serious illness

The US Food Safety and Inspection Service (FSIS) have identified 7 'adulterant STEC serogroups' and routinely conduct surveillance

Adulterated products

21 USC 601(m)(1) defines meat and meat products contaminated with the 7 STEC serogroups to be adulterated.

Exporting countries are expected to take steps to be reasonably confident that their products are not adulterated.

Source: FR 2022, Expansion of FSIS Shiga Toxin-Producing Escherichia coli (STEC) Testing to Additional Raw Beef Pro 😡 🕂 🖟 🗛 Register, Washington D.C., January 2025.

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STEC testing in Australia



Lot determination and identification

Establishments need to justify their lotting decisions

Sample collection and submission

Samples are collected and dispatched to department-approved labs

Sample analysis

Samples are analysed using department-approved methods

Analysis result

When confirmed negative for STEC, the products are released

Monthly department verification

Collected sample controlled by the department and analysed at an independent lab

Detailed information on STEC testing is available in the department's *Microbiological Manual for Sampling and Testing of Export Meat and Meat Products* (the manual).



STEC testing is a **market requirement** for raw beef ground components (RBGC) and raw beef ground products (RBGP) to US (and Canada) for all export registered establishments.

A lot is **ineligible for export** to US (or Canada) if any of its products test positive for STEC. The lot may undergo heat treatment to regain eligibility.

Source: DAFF 2023, Microbiological Manual for Sampling and Testing of Export Meat and Meat Products, Departme of DFA grialure, Fisheries and Forestry, Canberra, accessed December 2024.

Department of Agriculture, Fisheries and Forestry

Lot determination and identification overview



US requirements

Establishments are responsible for defining the lots and supporting their basis for the definitions.

Establishments should consider:

How productions are distinguished

- Micro sampling programs
- **Production periods**

How STEC contamination is controlled

- Standard Operating Procedures/other programs
- **Processing interventions**

Australian equivalent

Establishments are responsible for defining the lots within the parameters in detailed the manual.

Origin & identification



- From a single packing establishment
- 'Microbiologically independent'
- Not redefined after sampling and testing
- Identified with a single port mark
- Sampled using a robust N60 plan

Size

- \leq 700 cartons (or equivalent)
- Must fit into one container

Source: FSIS 2024, Sampling Verification Activities for Shiga Toxin-Producing Escherichia Coli (STEC) in Raw Beef Pro CEFIC Asion 6, Food Safety and Inspection Service, Washington D.C., accessed December 2024. Source: DAFF 2023, Microbiological Manual for Sampling and Testing of Export Meat and Meat Products, Department of Agriculture, Fisheries and Forestry, Canberra, accessed December 2024.

Microbiological independence



Establishments are responsible for **defining** and **validating** microbiological independence between lots, and their method must be included in the establishment's Approved Arrangement.

Establishments must be able to **justify** their definition of microbiological independence through consideration of the following examples (not exhaustive):

- 1. Lot testing for STEC
- 2. Sanitation SOPs/other programs used to control STEC cross-contamination
- 3. Processing interventions that have been validated to limit/control STEC contamination
- 4. Reworked/carried-over products; commonality of source materials

FSIS does not recognise 'clean-up to clean-up' alone as a supportable basis for distinguishing raw beef productions, as STEC are generally not environmental contaminants.

Microbiological independence



1. Lot testing for STEC

- Any scientific, statistically-based sampling programs for STEC that the establishment uses to distinguish between segments of production
- In the event of a positive result, FSIS considers all same source materials to be positive unless the establishment has a scientific basis to distinguish production lots using same source materials, i.e.
 - robust sampling of source materials or finished product, or
 - e.g. the application of a validated antimicrobial intervention to source materials or finished product

Microbiological independence

2. Sanitation SOPs/other programs used to control STEC cross-contamination

For example, controls to prevent:

- Improper sanitary dressing
- Cross-contamination from insanitary contact surfaces on equipment
- Improper employee hygiene

Microbiological independence



3. Processing interventions that have been validated to limit/control STEC contamination

Common examples:

- Steam vacuuming
- Hot water washing
- Steam pasteurisation
- Organic acid washes

Microbiological independence



4. Reworked/carried-over products; commonality of source materials

Consideration of:

- Use of meat products or rework carried over from one production period to another
- Use of same source materials during different production periods

Production dates

Currently there is no limit imposed by Australia or US on the number of production dates within a sampled lot (however, commercial customers may impose their own limits).

FSIS has raised questions around justification for allowing multiple dates (sometimes >10 individual dates) within a single lot.

Having a large number of production dates in a lot exposes you to risk, especially in cases when a date may not be selected for N60 sampling.

Establishments must have a supportable basis that a lot comprising multiple pack dates are microbiologically independent.



We need **YOU** to help maintain the equivalence!

Sample collection and submission

Sampling (RGBC)

Choosing samples

- Samples are collected from lots determined by establishments
- Samples can be taken during production or when consolidating lots for export
- Full range of RGBC for US/Canada should have equal opportunity to be sampled

Collecting samples

- 'N60' method: 5 (5-10 g) pieces x 12 cartons
- Pieces should represent **surface** of the carcase
- Maximum depth of 3 mm for frozen trimming cartons

Core-drilling is not an acceptable method for STEC testing



Submission

- Samples must be stored at 0°C to ≤7°C, and samples must at ≤7°C on reaching the lab
- Ensure that samples are labelled and the details are provided to the lab:
 - Est number
 - ✓ Date of sampling
 - ✓ Packing line (if applicable)
 - ✓ Unique identifier of the sampled lot
 - ✓ Product description
 - ✓ The name of the approved testing laboratory

Sample analysis and results

STEC samples are analysed:



only at

department-approved labs

(Scan QR code for list)



only using

department-approved methods

(Scan QR code for list)

Sample analysis must commence on or before the second day following sample collection.

Reporting of results

All (commercial and department verification) results are reported to the DAFF On-Plant Veterinarian/circuit inspector immediately and results entered into MEDC.

All commercial results from independent cold stores are reported back to the packing establishment and the respective department officer.

Certificates of analysis for all department verification results and positive commercial results are provided to the department's Food Safety Unit who verify results in MEDC.

Actions

ΠS



Products released

Potential positive

Further confirmatory testing using same enriched broth at an approved confirmation laboratory



Confirmed positive

= any STEC/O157 colony isolated

Retained and condemned, or Department-approved heat treatment (Investigate and report to department)

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Summary: STEC testing for products to US

	RGBC (e.g. trims)	RGBP (e.g. patties)
Sampling frequency	Every lot for US (or Canada)	Daily
Sampling method	Surface excision Grab	Grab Core
Min sample amount	5 pieces (5-10 g each) 12 cartons 375 ± 37.5 g	65 g 5 cartons 325 g
Department verification	All 7 STEC serotypes At least 1 x per calendar month Department supervision of sampling Department control of sample Independent lab	

The current system – how do we do better?

Dr Glen Edmunds

Director, Strategic Market Access Export Standards Branch, Department of Agriculture, Fisheries and Forestry

Department of Agriculture, Fisheries and Forestry

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Point of Entry STEC detections

- What does this mean?
- Actions taken industry & department
- What can be improved?



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What has been agreed?

Establishments are responsible for defining the lots





What must the industry do?

Before export

Lots

- Define
- Test
- Segregate & maintain integrity

Comply with Australian and FSIS requirements

After POE STEC detection

Investigate

- Identify related lots
- Identify root causes/gaps
- Implement corrective & preventative actions

Demonstrate

- Provide relevant supporting records
- Critical Incidence Response Audit

Consider potential for high incident event

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What must the department do?



What happens next?

What else can the industry do?

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Discussions

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Lunch

HACCP

Dr Stewart Lowden and FOMs

DAFF Meat Exports Branch



Hazard Analysis <u>and</u> Critical Control Points (HACCP)

US audit findings

February 2025



Stew Lowden (NVTM)

Meat Export Branch

The HACCP concept

"A system that identifies, evaluates and controls hazards that are significant for food safety." AS4696:2023

Is about preventing failure rather than detecting failure



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Key Goals of HACCP

 identification of all sources of hazards in the production of product and deciding which are significant for food safety (hazard analysis)

AND

 the development of procedures and controls to eliminate, prevent or reduce hazards significant to food safety (HA + CCP)

Introduction to a HACCP system

The <u>7 HACCP principles</u>:

- 1. Conduct a Hazard Analysis
- 2. Identify the Critical Control Points
- 3. Establish Critical Limits with each CCP
- 4. Establish Monitoring Procedures
- 5. Establish Corrective Actions
- 6. Establish Procedures to Verify System
- 7. Establish Effective Documentation & Record Keeping

Validation, Verification & Monitoring



Validation, Verification & Monitoring



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US audit findings

"DAFF inspection system did not effectively verify the adequacy of design and implementation of HACCP systems"

HACCP • Establishments must have **proper recording** of CCP monitoring records, **Principle 7** effectiveness of corrective actions, and measures to prevent recurrence

HACCP • Establishments must adhere to agreed HACCP plan verification and Principles 1 and 6 hazard analysis procedures

HACCP • Establishments must adhere to agreed HACCP monitoring procedures Principle 4

US audit findings

HACCP 'Verification' and 'Records'..... CFR Directives



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US audit findings

9 CFR 417.4 'Validation, Verification, Reassessment

HACCP plan -Initial validation HACCP plan -Ongoing verification activities

HACCP plan – Reassessment 9 CTR 417 A lap to date and Y 2220204 Validation, Networkington, Neurosement, 9 CTR 417 A (Jan. 22, 2024 7 no content is from the aCPT and is anthonisme had unofitiest. Title 9 – Animals and Animal Products Chapter III – Pool Safety and Inspection Service, Department of Agriculture

§ 417.4 Validation, Verification, Reassessment

(a) Every establishment shall validate the HACCP plan's adequacy in controlling the food safety hazards identified during the hazard analysis, and shall verify that the plan is being effectively implemented.

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(2) Ongoing verification activities. Ongoing verification activities include, but are not limited to

(i) The calibration of process-monitoring instruments;

(ii) Direct observations of monitoring activities and corrective actions; and
 (iii) The review of records generated and maintained in accordance with § 417.5(a)(3) of this part

(i) examined the MACGS plane is a set of the MACGS plan

(ii) Each establishment must make a record of each reassessment required by paragraph (a)(0) of this section and must document the reasons for any changes to the HACCP plan based on the reassessment, or the reasons for not changing the HACCP plan based on the reassessment. For annual reassessment; if the establishment determines that no changes are needed to its HACCP plan, its not required to document the basis for this determination.

(b) Reseases ment of the hazerd analysis. Any establishment that does not have a HACCP plan because a hazerd analysis has revealed no food safety hazards that are reasonably likely to occur shall reases the adequecy of the hazerd analysis whenever a change occurs that could reasonably affect whether a food

(display)

Verification to be undertaken:

- Check-the-checker (*direct observation of monitoring*)
- Daily record review (pre-shipment review)
- Calibration of measuring equipment (process monitoring instruments)



Daily review of product monitoring records

Establishment requirements for sending product to the US:

- Confirm that critical limits are met at each CCP on <u>at least a daily basis</u>. If not, ensure appropriate CA and PA action taken and proper disposition made on affected product.
- Review monitoring or verification records for inter-establishment transfer and loading for export on at least daily basis.
- Wherever possible, the record review is carried out by employees trained in HACCP (someone other than the person who created the record).
- Make the record review a single consolidated document listing CCPs and various daily monitoring records. It must be signed and dated and have a comment on acceptability or otherwise.
- Make the record review summary available to departmental officers on request.

HACCP requirements for US listed establishments

Published on Elmer 3 – November 2024



Export Meat Operational Guideline: 3.19 HACCP requirements for US listed establishments

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Attachment 1: Implementation of establishment verification activities)
Attachment 2: Definitions)

HACCP reassessment determination	Testing requirement			
Non-O157 STEC are <mark>likely</mark> to occur; or control measures are inadequate to control the risk.	Establishments must test for ' Top 7' STEC in each lot for export.			
	Establishments may test for <i>E. coli</i> -0157 only in each lot for export.			
Non-O157 STEC are not likely to occur; or control measures are adequate to control the risk.	If establishments are testing for <i>E. coli</i> -0157 only, they must provide justification resulting from the reassessment. Monthly departmental verification sample results may contribute to HACCP reassessment determination.			

Table 1: HACCP reassessments of predominant STEC serotypes

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Meat establishment verification system

These activities include the following:

- Zero tolerance CCP verification activities are undertaken to objectively measure the
 physical standards of meat hygiene and verify that processes are being undertaken in
 accordance with good manufacturing practice (GMP). Verification of the slaughter floor
 CCP's by the department must include weasand, head and cheek meat.
- Five (5) establishment daily record reviews (pre-shipment reviews) are verified monthly to ensure all CCP's have been complied with.
- Monthly STEC department verification testing. See section: Microbial sampling and testing verification.

OPV work instruction for daily record review verification

Published for OPVs – January 2025

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OPV work instruction for daily record review verification

Step	Action							
2.	Ensure that critical limits at each CCP were met on each review.							
	Critical limits were Then							
	met	continue to step 3.						
	not met, but corrective action has been applied	continue to step 3.						
	not met, and corrective action has not been applied• rate the activity as unacceptable • refer to work instruction: Raising and managing corrective <u>action requests (CARs) for export meat establishments</u> • continue to step 3.							
3.	 Ensure each review being verified contains the following: a comment as to the acceptability (or otherwise) a date that the review was undertaken a signature of the person who carried out the review. 							
	and signatures are.	Inen						
	present	 rate the activity as acceptable continue to step 4. 						
	 not present or inaccurate 	 record evidence of review rate the activity as marginal refer to work instruction: <u>Issuing a Meat Establishment</u> <u>Verification System (MEVS) non-compliance issue (NCI)</u> continue to step 4. 						
4.	Record your findings in the	e relevant MEVS checklist in AMS.						
5.	End of procedure.							

US audit findings

9 CFR 417.5 (1an. 22, 2024

page 1 of 2



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'Real world' (POE rejections) linked to physical hazards - input

Below, **mesh glove safety tensioner**, found by FSIS during inspection of a carton of boneless beef



Establishment had an effective HACCP plan to identify the risk. However, staff deviated from adhering to the Loose Item Control Procedure.



'Real world' (POE rejections) linked to physical hazards – non-input

Below, a nylon "oilon" cuff used on a beef hook to prevent metal on metal contact. Found in a carton of boneless beef trimmings by FSIS inspectors



Item not documented in HACCP. Controlled by Loose Item Control Procedure – expectation staff to inspect all cartons for foreign material. Outcome, HACCP re-worked and beef book had a weld point added to catch cuff if it fractures in future.



'Real world' (POE rejections) linked to physical hazards – non input

Below, multiple small hard pieces of plastic; found during FSIS inspection of a random carton



Culprit: Temporarily trialled face masks used during COVID – prone to fracturing during use and quickly withdrawn from trial



Hazard analysis table

P	rocess Step	Pote	ntial Hazard		Risk Leve	c el	CCF) Deci	sion	Tree	CCP Y/N	Justification	Control Measures	
No	Description	Code	Hazard	L	S	R	Q1	Q2	Q3	Q4				
133	DROPPED MEAT	с	Nil									No hazards identified	Nil	
77177163		Р	Nil									No hazards identified	Nil	
1		В	Contamination of product through contacting a non-food surface (floor).	В	2	5	Y	N	Y	Y	N	Contamination of products through contacting a non-food surface. Boning room floor is a source of microbiological contamination. Dropped meat could become contaminated with grit/pathogens from the floor. Hygienic procedures used to recondition dropped meat by full trimming of all surfaces or disposal to inedible rendering. Incident level is low due to training of employees in correct meat handling procedures.	Operators are fully trained in the requirements of the task description and as illustrated at the Dropped Meat trimming table Dropped meat procedures are monitored by the FSQA Officers on a daily basis.	
TITLE - SOUTHING THE T		A	Allergens	D	2	12	-	-	-	-	N	Hazard controlled by GMP Employees can come into contact with Allergens unknowingly when having routine breaks.	Operators are fully trained in the requirements of the task description It is a requirement when entering production areas that hands are washed with anti-bacterial soap.	

Input = Plastic sheet

Dropped meat - hazard inputs

Chemical - residues from materials used in the production of plastic material



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Introduction to a HACCP system

The <u>7 HACCP principles</u>:

- 1. Conduct a Hazard Analysis
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- 7. Establish Effective Documentation & Record Keeping

HACCP Audit Table - Complete

Г н	Principle azard Anal ↓	1 lysis	l Cr	Principle 3 ritical Limi ↓	ts	Principle 5 Corrective Actions		
Process Step and Name	Hazard	Control Measure(s)	ССР	Critical Limit	Monitoring procedure	Corrective Action	HACCP Verification	HACCP Records
Step #. Carcase chilling	Biological hazard: Salmonella Verotoxigenic <u>E.coli</u>	Reduction of carcase surface temperature to ≤7°C within 24 hours after sticking. Establish refrigeration parameters (e.g. air flow, suction pressure, coil temperature, etc.) for equipment operation to achieve Critical Limit. Effective carcase spacing	2	Meat surface temp ≤ 7° C within 24 hrs of sticking.	 What Surface temperature of 3 randomly selected carcases in each chiller. Chiller thermograph daily. How Calibrated hand-held thermometer at site of microbiological concern When Within 24 hrs of slaughter daily prior to boning/loadout Who QA technician 	Contact maintenance to repair chiller problem. Identify and retain affected product. Transfer to alternative chiller if available, maintain retention. Download any temp. logger data and run temp. profile on RI calculator. Sample affected carcases for micro analysis to determine wholesomeness. Make disposition in liaison with DAWE. Investigate cause of non- conformance. Implement preventive measures. Conduct follow up on effectiveness of preventive measures. Pacord actions	Random micro-testing in accordance with ESAM protocol. Daily review of CCP records prior to loadout by QAM. QAM observation of QA Technician monitoring. Management review of CCP records and customer feedback. Internal audit of CCP's. External audit findings. Thermometer calibration records.	Chiller thermograph Daily carcase surface temp records F7.5.5 QA monitoring records of chiller procedures F7.5.5 Chiller maintenance records F6.3.1 Corrective action records F8.5.2 RI calculations Calibration records F8.2.3 All records should be signed, dated and the specific results recorded.
Pri Ider			t inciple ntify (e 2 CCP	Principle 4 Monitoring OFFICIAL		† Principle 6 Verification	1

HACCP – FSIS Guidance

Dr Ian Jenson

FIRST Management



FSIS Guidance documents

Dr lan Jenson





Outline



- FSIS is our customer!
- FSIS produce a lot of guidance materials
 - Where are they?
 - What's in them?
- How to use the FSIS Guidance to keep on top of HACCP System





USDA Food Safety and Inspection Service U.S. DEPARTMENT OF AGRICULTURE



- Import control
 - Does the product get into the country?
- FSIS is another 'customer'
 - Products and processes (systems) need to meet FSIS requirements before product is released into commerce Port-of-Entry rejection
 - Conducts audits

System audits of Australia, including processing establishments

 Looking at the customer's specification and guidance will help to understand their requirements

HACCP Guidance



HACCP Guidance | Food Safety and Inspection Service

https://www.fsis.usda.gov/inspection/compliance-guidance/haccp

- Australia does not need to implement every aspect of food safety exactly as it is done in the USA
 - Our system is different and "equivalent"
 BUT
- HACCP is internationally accepted and defined
 - No option to define an alternative approach
 - Some aspects of 'regulatory HACCP' may vary from 'scientific/technical HACCP' – defined by history, becomes part of the system, the customer is always right!
- Guidebook for the Preparation of HACCP Plans | Food Safety and Inspection Service
- <u>https://www.fsis.usda.gov/guidelines/2020-0008</u>

Hazards and Controls guidance



• Meat and Poultry Hazards and Controls Guide

https://www.fsis.usda.gov/sites/defau	ult/files/import/Meat	and Poultry	Hazards	Controls	Guide	10042005.pdf
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Hazards and Controls guidance



- General verification questions (partial list)
 - Is this step in the hazard analysis and flow chart?
 - Have any hazards been identified associated with this step?
 - Is this process step a CCP?
 - Can the establishment support that the hazard is not reasonably likely to occur (NRLTO)?
 - Are all procedures (pre-requisite or other programs) identified in the hazard analysis?
 - Are records associated with this step required to be kept?

Hazards and Controls guidance



• Potential hazards and frequently used controls (examples)

Process step	Potential Hazards	Frequently used controls
Animal receipt and holding	SRMs	Procedures to identify animals 30 months of age and older
	Chemical – residues, antibiotics	Residue certification presented for live animals
		Residue control program designed to control residue violations
	Physical – sharp objects or foreign materials	Visual examination of carcass, parts and viscera

• Plus suggested verification questions

HACCP Systems Validation Guidance



• FSIS Compliance Guideline HACCP Systems Validation - April 2015

https://www.fsis.usda.gov/sites/default/files/import/HACCP_Systems_Validation.pdf

This guidance document is designed to help very small meat and poultry establishments meet the **initial validation** requirements in 9 CFR 417.4

- The difference between initial validation and ongoing verification;
- How to identify **scientific support** relevant to their process;
- What are **critical operational parameters** and how to identify them in the scientific or technical support;
- How to demonstrate that the critical operational parameters are being met during initial validation (i.e., through the collection of **in-plant validation data**); and
- How an existing establishment can **incorporate this guidance into their HACCP system**.

NOTE: The establishment should develop the appropriate in-plant data during the initial 90 days of implementing a new HACCP system, or **whenever a new or modified food safety hazard control is introduced** into an existing HACCP system (e.g., as implemented after a HACCP plan reassessment).

HACCP Model for Beef Slaughter



- <u>HACCP Model for Beef Slaughter | Food Safety and Inspection Service</u> <u>https://www.fsis.usda.gov/guidelines/2021-0009</u>
- Generic model: example of how to meet regulatory requirements
- Tailored to meet an establishment's operation
- Includes (2 out of the first 5 of the 12) steps of HACCP
 [Assemble HACCP team]
 Product description
 Ingredients and incoming materials
 [Intended use]
 Process Flow Chart
 [on-site confirmation of flow chart]
- Includes 7 principles

Guidance for manufacturing beef



• FSIS Industry Guideline for Minimizing the Risk of Shiga Toxin-Producing Escherichia coli (STEC) in Beef (including Veal) Slaughter Operations | Food Safety and Inspection Service

https://www.fsis.usda.gov/guidelines/2021-0008

- This guideline helps establishments that slaughter beef (including veal) to implement effective sanitary dressing procedures designed to prevent carcass contamination; implement effective decontamination and antimicrobial interventions; properly assess microbial testing results; and use the results to assess the effectiveness of the overall HACCP system.
- <u>Compliance Guideline for Establishments Sampling Beef Trimmings for Shiga Toxin-Producing Escherichia coli</u> (STEC) Organisms or Virulence Markers | Food Safety and Inspection Service

https://www.fsis.usda.gov/guidelines/2014-0009

- The guidance provides information about procedures for testing for STEC organisms (or virulence markers) using the N60 sample collection method on beef manufacturing trimmings. It applies to official establishments that slaughter or fabricate beef and their ongoing activities to ensure the intended functioning of their food safety programs.
- Probably better covered by DAFF *Microbiological Manual* because STEC testing is covered by an equivalence agreement.

Advice



- Know what is in your customer's (FSIS) specifications and guidance
- Use the FSIS guidance (in addition to EMOG 3.19 HACCP requirements for US listed establishments) to make sure you are on the right track to meeting DAFF requirements
 - Discuss with your OPV and ATM if there seem to be discrepancies they will advise
- Use FSIS guidance when conducting the annual review of your HACCP system
 - e.g., verification questions (US auditors seem to ask the same questions)





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Action plan and evaluation

Your action plan and evaluation - Melbourne

What aspect of our operation needs to change?	What needs to change?	What action will I take to get the change process started?
e.g. Hazard analysis	We need to consider all the hazards, biological, physical and chemical - not just the obvious ones - and provide data, reports etc. to back up our decisions	Call a meeting of the HACCP team



Your action plan and evaluation - Sydney

What aspect of our operation needs to change?	What needs to change?	What action will I take to get the change process started?
e.g. Hazard analysis	We need to consider all the hazards, biological, physical and chemical - not just the obvious ones - and provide data, reports etc. to back up our decisions	Call a meeting of the HACCP team



Your action plan and evaluation - Brisbane

What aspect of our operation needs to change?	What needs to change?	What action will I take to get the change process started?
e.g. Hazard analysis	We need to consider all the hazards, biological, physical and chemical - not just the obvious ones - and provide data, reports etc. to back up our decisions	Call a meeting of the HACCP team



Your action plan and evaluation - Perth

What aspect of our operation needs to change?	What needs to change?	What action will I take to get the change process started?
e.g. Hazard analysis	We need to consider all the hazards, biological, physical and chemical - not just the obvious ones - and provide data, reports etc. to back up our decisions	Call a meeting of the HACCP team







Frozen supply chain project

Dr Ian Jenson

FIRST Management



Warming the frozen meat supply chain: how to make it happen

Dr lan Jenson



AMPC 1024-1058

- Likelihood of permission to increase temperature
- Energy, environmental benefits
- Regulatory environment
- Promoting acceptance

AMPC Final Report- 2024 1058.pdf

Final Repor	t		
War mea Reducing e to -12°C	ming the from It supply char energy consumption and emiss	zen lin ^{ions (-18°C}	
Project Code 2024-1058	Prepared by Dr Ian Jenson, Max Barnes, Dr Gareth Forde, Christian James Published by XXXXXXX	Date Submitted 15/08/2024 Date Published XX/XX/XX	



- Frozen meat shelf life
- Ice cream
- UN Climate Change COP28



• Stakeholder acceptance and international regulatory change

Will product shelf life be affected at warmer temperatures?

Shelf life assessment – beef (striploin, manufacturing) and lamb (short loin, manufacturing)



The practical storage life of Australian frozen boxed beef and lamb

Christian James ^{a,1,6}^(a), Stephen J. James ^a, Graham Purnell ^a^(b), Luke Talbot ^a^(b), Essam Hebishy ^{b,2}^(b), Sophie Bowers ^b, Bukola A. Onarinde ^b, Long Huynh ^{c,3}, Ian Jenson ^{c,4,5,*}^(b)

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^b National Centre for Food Manufacturing (NCFM), University of Lincoln, South Lincolnshire Food Enterprise Zone, Peppermint Way, Holbeach, PE12 7FJ, UK

^c Meat & Livestock Australia, PO Box 1961, North Sydney, NSW 2059, Australia

James, C. et al. (2022) The shelf-life of Australian frozen red meat MLA Final Report V.MFS.0428

James, C et al., (2025) International Journal of Refrigeration 171:51-65

Shelf life assessment – beef (striploin, manufacturing) and lamb (short loin, manufacturing)

- Commercial shipping to Grimsby (United Kingdom)
- Store -12°C, -18° C and -24°C
- Sensory cooked product appearance, odour, flavour, juiciness, tenderness
- Physical drip, colour, texture
- Chemical peroxide value, TBARS (measures of fat degradation)
- Microbiological Aerobic colony counts

Will product shelf life be affected at warmer temperatures?

Shelf life assessment – beef (striploin, manufacturing) and lamb (short loin, manufacturing)

- Beef and lamb loin and beef trim in vacuum packs can be stored at -12°C, -18°C, or -24°C without significant sensory degradation for a period of over 36 months.
- Frozen boxed lamb wrapped in plastic did not frequently produce unacceptable sensory scores until more than 28 months of frozen storage.



James, C. et al. (2022) The shelf-life of Australian frozen red meat MLA Final Report V.MFS.0428 James, C et al., (2025) International Journal of Refrigeration 171:51-65

Will product shelf life be affected at warmer temperatures?

Shelf life assessment – microbiology



James, C. et al. (2022) The shelf-life of Australian frozen red meat MLA Final Report V.MFS.0428 James, C et al., (2025) International Journal of Refrigeration 171:51-65

Ice cream



Warming up the Freezer Cabinets can be part of the solution





in addition to making them more efficient & using green energy

Warmer ice cream for a cooler planet?

Published: 21 September 2022

Find out how we're working to lower the climate impact of the

industry.

Good for Planet 20-30% GHG reduction* from freezer cabinets

Good for Outlets 20-30% energy savings

Unilever to share reformulation patents with ice cream industry to tackle freezer emissions

Beginning

Published: 9 November 2023 () Average read time: 2 minutes

Unilever has announced it will grant a free non-exclusive license to the ice cream industry for 12 reformulation patents, following two successful pilots to warm up its last mile ice cream freezer cabinets.





United Nations Climate Change



Three Degrees Of Change

FROZEN FOOD IN A RESILIENT AND SUSTAINABLE FOOD SYSTEM

Summary report & initial findings November 2023

The savings that can be achieved by shifting frozen food set-point temperatures from -18°C to -15°C ...estimate electrical energy savings of approximately 10%

International Institute of Refrigeration Centre for Sustainable Cooling



DP WORLD

Home > News > Thought Leadership > How the climate crisis discussions could reshape Asia Pacific trade

HOW THE CLIMATE CRISIS DISCUSSIONS COULD RESHAPE ASIA PACIFIC TRADE

DP World | 12/12/2023

^{The} Move to 15°

Is a campaign to build a coalition of industry partners to change the temperature that frozen food is stored and transported at around the world.

Environmental benefits: Emissions in frozen meat trade



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AMPC 1024-1058 Warming the frozen meat supply chain

Emissions – at different cold chain temperatures







CAC/RCP 8- 1976

Page 1 of 14

World Health

Organizatior

CODE OF PRACTICE FOR THE PROCESSING AND HANDLING OF QUICK FROZEN FOODS (CAC/RCP 8-1976)

- The product temperature should be at -18°C or colder at the beginning of the transport
- Any rise above -18°C be kept to a minimum ...not...be warmer than -12°C
- Many countries set -18°C as the maximum temperature for frozen food



• Regulator and stakeholder agreement to raise the frozen food supply chain temperature

The way forward...

- Move to -15 coalition
- Stakeholders the whole supply chain, consumers, and hardware vendors
- Product owners need to know about the quality of their product at warmer temperatures and the shelf life DONE
- Supply chains need to know about their performance and how to control to new specifications New AMPC Project
- Regulators need to consider product safety and nutrition (will require technical advice) review on food safety is being commissioned
- All move in step together

A project about frozen cold chain performance (AMPC 2025-1061)

What temperature control can we expect from frozen supply chains?

- variables
 - Product, air temperatures
 - Defrost cycles
 - Ambient conditions
 - Specification of transport / cold stores
 - Specification of loading / unloading docks
 - National / international
- Measure temperature of cartons (centre, corners, surface) in typical transport and correlate with cold store/transport air temperature

Frozen meat cold chain – and measurements



Frozen meat cold chain – and measurements



Friday 17 January:

Expression of Interest

Calling for expressions of interest Performance of frozen meat supply chains at warmer temperatures

- Select product and receiver/customer (national and international)
- OPTIONAL cold chain operating at -12°C
- Install data loggers in the shipment (data loggers supplied)
- Record the truck number, the route to the receiver etc
- Supply this information to lan Jenson
- Ian will obtain set point temperature and operating temperature for transport and intermediate storage
- Data will be collated to provide a picture of the industry no identifiable information
- You will be provided with an analysis of data for your own product





Acknowledgements





AUSTRALIAN MEAT PROCESSOR CORPORATION









Thank you for coming! Apply what you have learned

