Australian Johne's Disease Market Assurance Program

Guidelines for External Auditors

Version 2

Updated June 2012

1. Introduction

1.1 Purpose

These guidelines aim to assist you in undertaking your role as an auditor working with managers of flocks and herds enrolled in the National Johne's Disease Market Assurance Program (MAP). In particular the guidelines will:

- Provide further information on your role in relation to carrying out external audits of flocks and herds, and
- Provide detail on your obligations to flock/herd managers and to regulatory authorities at state and national levels.

The MAP manuals have been written for the flock or herd manager and only provide the level of detail about external audits that the manager needs. This document explains in greater detail the processes for external audits. It is designed to be used in conjunction with the current MAP manual for each species and generally does not repeat the information in it.

These audit guidelines may be made available to MAP producers and their approved veterinarians if they wish to better understand the role of external auditors.

As a quality assurance program, the MAPs are focussed on conformance with procedures. The external audit is a key part of the process of continuous review and improvement. This guideline focuses on the activities you need to undertake when conducting an external audit of the MAP program on any property.

Audit requirements are determined by the MAP Reference Group which comprises representatives of the key national livestock industry bodies involved with the MAPs as well as State MAP coordinators and administrators. States may determine administrative arrangements within their jurisdiction consistent with national guidelines.

This document describes the role of quality auditors undertaking the external audit of a herd or flock enrolled in the MAP. Veterinarians may also be subject to audit, but this would normally be arranged by the state authority.

1.2 Governance

Audit requirements are determined by the MAP Reference Group which comprises representatives of the key national livestock industry bodies involved with the MAPs as well as State MAP coordinators and administrators. States may determine administrative arrangements within their jurisdiction consistent with national guidelines.

1.3 Structure

This guideline includes information about:

- Approval as a MAP auditor
- Reviews and audits.
- Conducting an external review, including defects, reports and commercial arrangements
- An audit process flow chart, checklist, audit summary/cover sheet, and Corrective Action Request (CAR) form.

2. Approval as a MAP auditor

Approval to undertake MAP audits must be obtained from Animal Health Australia (AHA) before any audit of MAP herds or flocks is undertaken. The applicant must be:

- A recognised quality auditor who is registered with the Joint Accreditation System of Australia and New Zealand (JAS-ANZ), or equivalent, and
- Has experience with auditing in the agriculture or food industry sectors, and
- Has attended a MAP information session or completed the MAP on line training program for veterinarians.

Prospective applicants should contact the Manager Endemic Disease, AHA.

A list of approved MAP auditors is maintained by AHA on the web at <u>www.animalhealthaustralia.com.au</u> > Programs and Projects > Johne's Disease > Market Assurance Programs (MAPs).

3. Reviews and audits

3.1 Terminology

The MAP uses the terms 'review' and 'audit' to describe processes that ensure the integrity of the program as a quality assurance program.

'Review' is used to refer to processes used by the flock or herd manager ('internal review') and the approved veterinarian ('annual veterinary review') to regularly check conformance with program requirements. These reviews focus on internal processes within the flock or herd. The term 'audit' is still used to describe these processes in older manuals.

'Audit' now applies to examinations of compliance that are conducted by independent external parties including quality auditors and state authorities. The focus is on the MAP system as a whole as well as the flock or herd being audited at that time.

Some flock or herd managers may be unfamiliar with this terminology and you may be able to help them understand the three levels of review/auditing and encourage them to make continual improvements to their operations so they are more effective, efficient and compliant *before* they are audited externally. However, it is not the auditor's role to provide technical advice and the producer should be encouraged to contact their approved veterinarian for this advice.

3.2 Internal reviews

The flock or herd manager or a member of their staff is expected to conduct an internal review of procedures and records every six months. The aims of the review are to identify any areas where systems or practices are not compliant with the MAP, take corrective action and look for opportunities for improvement.

The compulsory review and audit checklist is provided in the resources and forms section of each manual:

- Cattle MAP manual 2008 Element 7 Form C.07.19.08C
- SheepMAP manual 2005 Appendix 3 Form S080205C
- AlpacaMAP manual 2005 Section 9.1 and use Cattle or GoatMAP form

• Goat MAP manual 2002 Form MG2a/02.

3.3 Annual veterinary review

The approved veterinarian conducts an annual veterinary review every year which must be done within two months of the expiry date of the current status certificate. In the SheepMAP it also includes testing (post-mortem) of thin sheep (if any) if there has been no sample or maintenance test of the flock or herd in the preceding 12 months.

The purpose of this review is essentially the same as the flock or herd manager's own internal review – to identify defects and propose corrective action and improvements. The approved veterinarian is expected to cover all the areas listed on the review/audit checklist. A veterinarian may decide to concentrate on areas where there have previously been defects or those where the risk of defects is higher because of activity during the year, for example permanent identification of introduced animals if animals from lower status flock or herds have been introduced in accordance with the MAP rules so they can be more easily included in the next round of testing.

The approved veterinarian must be satisfied that any major or critical defects have been resolved *before* submitting a notification form to the State MAP administrator. If a major or critical defect cannot be resolved within two months after the current certificate expiry date, the veterinarian must recommend a lower or non-assessed status on the notification.

3.4 External (third party) audits

These audits focus on the compliance of flock or herd managers and their approved veterinarians with the requirements of the program. A third of the flock or herds in the MAP are selected for audit each year so each flock or herd is audited once every three years. A herd or flock that has recently joined the MAP is audited in its second year.

The quality auditor is expected to cover all the areas listed on the review/audit checklist. An auditor may decide to concentrate on areas where there has previously been a defect or those where the risk of defects is higher because of activity during the year, for example introduced animals. While compliance with the requirements of the MAP program is very important, the MAP Reference Group recognises the principle of continuous improvement as the basis for achieving the outcomes of the MAP, and you are encouraged you to take a positive and constructive approach in the conduct of audits.

4. Conducting an External Audit

Flock and herd managers are contacted by Animal Health Australia or the State MAP administrator when an external audit is due. Audits must be completed within six months of this notification. It is the responsibility of the flock or herd manager to contact a quality auditor of their choice and arrange a suitable time for the audit.

All MAPs operating on a property for different species should be audited at the same time, if the producer agrees, even if one is not yet due an external audit. All future herd/flock audits will then be synchronised.

MAP audits may be undertaken at the same time as other quality audits such as Livestock Production Assurance (LPA) or dairy audits. This should be encouraged as the MAP Reference Group considers that links between the MAP and other industry quality assurance programs are beneficial, and it may help to reduce the client's costs.

You should use the review/audit checklist from the relevant MAP manual to carry out the external audit.

4.1 Conformance and Defects

When an external audit is conducted, four results are possible.

The first is that the systems, practices and procedures are found to **conform** to the requirements of MAP and no further action is required. The other three indicate varying levels of non-conformance through the presence of **defects** characterised as **critical, major or minor**.

Any defects detected during the audit must be noted and discussed with the herd/flock manager at the time of the audit.

- For critical and major defects, corrective action and timeframe is agreed and documented in the form of a **corrective action request (CAR)** (also referred to as Corrective Action and Improvement request or CAIR).
- Minor defects and corrective action may be noted on the review/audit checklist.

An auditor may contact the State MAP administrator or coordinator to clarify the grading and/or process for resolution of a particular CAR.

It is not the auditor's role to provide technical advice about Johne's disease risk or herd/flock management, or to determine herd or flock status. The corrective action for a particular defect might be for producer to contact their approved veterinarian for advice or to resolve the problem through, say, risk assessment or further testing.

4.1.1 Critical defects

Critical defects are events, actions or omissions which present a significant risk of Johne's disease not being detected or being introduced into the herd or flock, and/or which undermine the integrity or credibility of the MAP as a whole. Examples of critical defects include:

- Failure to report signs of Johne's disease or positive test results
- No records of the origin of introduced animals, and/or introduced livestock which do not meet the MAP rules and/or have been introduced without veterinary approval
- Continuous or uncontrolled grazing, walking or straying of assessed animals on non-assessed land, or of non-assessed animals on the MAP property, without veterinary risk assessment and approval
- No records of testing where required for maintenance or progression; insufficient or not all eligible animals tested; or incorrect animals tested
- No records of vaccination (SheepMAP vaccinated flocks)
- Use of a non-approved veterinarian
- No annual veterinary review
- Falsification of records
- Any deliberate omission or fraudulent activity
- Declining to be audited.

Critical defects must be resolved by the herd/flock manager within **one month** of the audit. This may be done with the assistance of the approved veterinarian who may be able to provide further information or

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determine a course of action to resolve the status of, say, introduced animals.

4.1.2 Major defects

Major defects are events, actions or omissions which adversely impact on or compromise the operation of the MAP as a quality assurance system. Examples of major defects include:

- No up-to-date flock or herd management plan, or record of annual flock and property risk assessment
- Animals introduced in accordance with the MAP rules are not identified and included in the next round of testing
- Once-off grazing/drinking of assessed animals on non-assessed land, or non-assessed animals on the MAP property, without veterinary risk assessment and approval
- Movement to and back from an un-segregated show
- Neighbour status unknown
- Not having access to a current MAP manual (on-line access is acceptable provided the producer can demonstrate how they would look up or download a current copy)
- No internal reviews
- Incomplete or poorly documented records for a particular activity or event

Major defects must be resolved by the herd/flock manager, in consultation as appropriate with their approved veterinarian, within **three months** of the audit.

4.1.3 Minor defects

Minor defects are omissions or inaccuracies which present a low disease risk and have minimal impact on the system, but when rectified will enhance the operation of the MAP on that property. Examples of minor defects include:

- Not recording internal reviews or other activities (but all systems appear to be in place and working satisfactorily)
- Not signing or dating forms (provided this is merely an oversight and not evidence of fraudulent activity)
- Not recording neighbouring property status (but status is known and low risk)
- Not having a copy of the current MAP status certificate.

Some minor defects may be able to be closed at the conclusion of the audit. Otherwise, minor defects should be resolved by the herd/flock manager, in consultation if required with their approved veterinarian, before or at the next internal or annual veterinary review. The external auditor does not need to take any further action with respect to minor defects.

4.2 Reports

After the audit, the auditor completes:

- A cover sheet summarising the herd/flock details, the date of audit, overall assessment and recommendation about the suitability or otherwise of the business to continue in the MAP, and
- A CAR for each critical and major defect found during the audit.

Examples of a summary/cover sheet and CAR form are attached, although auditors may use their usual forms provided they contain similar information.

These documents are sent to the:

- Flock/herd manager at the conclusion of the audit or within one week,
- Approved veterinarian within one week so they are aware of the problem and can better assist their client to resolve it, and
- State MAP administrator within 28 days so that the herd/flock records can be updated, to allow the herd/flock manager to claim an audit subsidy if available, and to avoid any further correspondence about outstanding audits.

A copy of the review/audit checklist noting minor CARs is provided to the producer but does not need to be sent to the veterinarian or State MAP administrator.

Reports may be sent by email. The veterinarian's email address should be available on the manager's copy of the most recent annual veterinary review notification form.

4.3 Resolving Defects and Closing CARs

The herd/flock manager is responsible for correcting all defects in a timely manner. This might require the advice and assistance of their MAP veterinarian.

The external auditor is responsible for following-up and closing all critical and major CARs, where possible, within the designated timeframe. This may be done by correspondence or phone but, if necessary, another on-site visit should be arranged with the herd/flock manager. The cost of this follow-up action is a commercial matter between the auditor and the herd/flock manager.

In some cases, a major or critical CAR may be partly resolved and downgraded to a lower rating. For example, a critical CAR may have been raised because the status of recently introduced stock was unknown at the time of audit. The manager subsequently provides documentation confirming that the stock was of equivalent status, and the CAR is changed to minor for not keeping up to date records.

In other cases, it might not be possible for the auditor to determine whether the CAR has been resolved. For example, the auditor might be unable to contact the manager or arrange a follow-up visit in time.

Once the auditor has confirmed that critical and major defects have been resolved, or that to the best of their knowledge some defects have not or cannot been resolved within the designated timeframe, the auditor notes this on each CAR, updates the summary/cover sheet, and sends final copies to the:

- Herd/flock manager, so they understand whether they have ongoing problems and for their records,
- Approved veterinarian, to assist them reassess and recommend a change of status if appropriate, and

• State MAP administrator, to resolve the herd/flock status if required and update the state and national databases.

Flocks or herds with an unresolved critical or major defect are downgraded in status or assigned a nonassessed (NA) status (effectively removing them from the MAP) as recommended by the approved veterinarian or as otherwise determined by the State MAP coordinator in consultation with the approved veterinarian.

4.3 Commercial arrangements

The conduct of the external audit, including closing out of CARs, is a commercial arrangement between the flock or herd manager and the quality auditor. Please advise your client in advance if you intend to hold the audit report until payment is received.

The beef cattle, alpaca and goat industries have agreed to provide a partial rebate to producers whose principal enterprise is beef cattle, alpaca or goat breeding or production. The rebate is payable on completion of the audit and irrespective of whether the audit has been done in conjunction with other audits or there are any outstanding CARs. This rebate is claimed by the producer from AHA upon production of a claim form certified by the State MAP administrator accompanied by supporting evidence.

The rebate claim form should be provided by the auditor to the manager of eligible herds (only) at the time of the audit. The form and further information about the level of current rebates is available from <u>mmw.animalbealthaustralia.com.au</u> > Programs and Projects > Johne's Disease > Market Assurance Programs (MAPs).

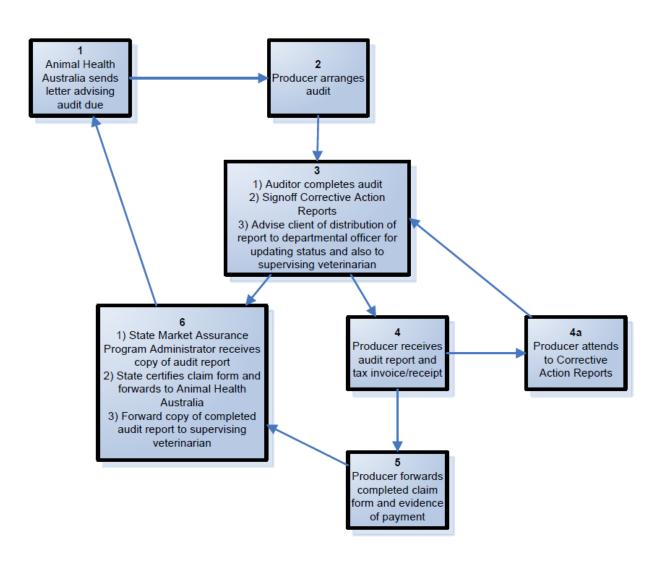
5. State MAP Contacts

For a list of current State MAP contacts, go to

www.animalhealthaustralia.com.au > Programs and Projects > Johne's Disease > Market Assurance Programs (MAPs) > MAP State Contacts

or contact Animal Health Australia 02) 6232 5522.

Market Assurance Program External Audit Process



AUSTRALIAN JOHNE'S DISEASE MARKET ASSURANCE PROGRAM

Auditor's Checklist

BEFORE THE AUDIT:

CHECK THAT THE SUPERVISING VETERINARIAN IS APAV ACCREDITED AND MAP APPROVED

CONFIRM THE AUDIT AND WHICH MAPS AND PROPERTIES ARE TO BE AUDITED

TAKE COPIES OF:

- REVIEW/AUDIT CHECKLIST FROM RELEVANT MAP MANUAL
- SUMMARY/COVER SHEET
- CAR FORMS
- SUBSIDY CLAIM FORM (beef cattle, alpaca and goats only)
- THIS CHECKLIST

AT THE AUDIT:

- □ WORK THROUGH REVIEW/AUDIT CHECKLIST WITH HERD/FLOCK MANAGER, NOTING ANY PROBLEMS ON THE FORM
- □ DISCUSS ANY DEFECTS WITH MANAGER, AGREEING ON CORRECTIVE ACTION AND TIMEFRAME
- □ IF ELIGIBLE (beef cattle, alpaca and goats only), LEAVE SUBSIDY CLAIM FORM WITH MANAGER

IMMEDIATELY AFTER THE AUDIT:

- □ WRITE A CAR FOR EACH MAJOR AND CRITICAL DEFECT
- □ COMPLETE SUMMARY/COVER SHEET
- □ LEAVE/SEND COPY OF COMPLETED REVIEW/AUDIT CHECKLIST WITH MANAGER
- □ SEND CARS AND SUMMARY/COVER SHEET TO:
 - HERD/FLOCK MANAGER
 - APPROVED VETERINARIAN
 - STATE MAP ADMINISTRATOR

WITHIN 1 MONTH (CRITICAL CAR) OR 3 MONTHS (MAJOR CAR):

- CONTACT HERD/FLOCK MANAGER TO DETERMINE IF ALL MAJOR AND CRITICAL CARS HAVE BEEN RESOLVED
- UPDATE CARS, WHETHER RESOLVED OR UNRESOLVED
- □ UPDATE SUMMARY/COVER SHEET
- □ SEND FINAL SUMMARY/COVER SHEET AND CARS TO:
 - HERD/FLOCK MANAGER
 - APPROVED VETERINARIAN
 - STATE MAP ADMINISTRATOR

THE AUDIT IS NOW COMPLETE

AUSTRALIAN JOHNE'S DISEASE MARKET ASSURANCE PROGRAM

External Audit Summary / Cover Sheet

The External Audit cover sheet, summary report and checklist is currently being updated and revised into per species forms.

For copies of these forms please see www.animalhealthaustralia.com.au > Programs and Projects > Johne's Disease > Market Assurance Programs (MAPs). Or contact Animal Health Australia 02) 6232 5522. AUSTRALIAN JOHNE'S DISEASE MARKET ASSURANCE PROGRAM

Corrective Action Request (CAR)

□ CattleMAP □ SheepMAP □ AlpacaMAP □ GoatMAP

Audit reference:

Audit date:

Reaudit date:

Owner			
Manager			
Property / PIC			
Current Certificate No.			
CAR no. and initial rating	Critical	Major	□ Minor

Details of non-conformance (why has this CAR been raised?)

Proposed Corrective Action (how can this problem be resolved and the CAR closed?)

Proposed completion date

CAR resolution and closure (has this problem been resolved and how? If not, why not?)								
Follow up / close out date								
Final rating	□ Resolved/Closed	Unresolved	□ Minor	□ Major	Critical			

Auditor's Signature:

Date:

Please provide a copy of each CAR to the producer, the approved veterinarian and the State MAP administrator (i.e. 3 copies)