



**AUSTRALIAN
RUMINANT FEED BAN
NATIONAL UNIFORM GUIDELINES**

For ensuring compliance through inspection,
sampling and testing programs

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1. SUMMARY

Australia continues to be free of bovine spongiform encephalopathy (BSE), scrapie of sheep and goats, and chronic wasting disease (CWD) of deer. Australia has implemented a number of measures to prevent the introduction of these diseases their dissemination and amplification if they were to occur in Australia. The principal rationales for instituting these measures are protecting public and animal health, and the interests of trade.

Australia has an inclusive ban on the feeding to ruminants of all meals, including meat and bone meal (MBM), derived from all vertebrates, including fish and birds. This ban is established by statutory laws in each of Australia's jurisdictions and enforced by official inspections that also take into account quality assurance (QA) schemes that operate within Australia's ruminant livestock industries. These bans provide appropriate and conclusive 'stability' to Australia's theoretical 'BSE–cattle system'.¹ They act as a fail-safe control measure to rule out the possibility that feeding will amplify the BSE agent derived from any source.

A voluntary ban on the feeding of ruminant material to ruminants was adopted in Australia in 1996 to minimise the risk of recycling the BSE agent if it were introduced. This was a preliminary step towards laws to prohibit the feeding of ruminant material to ruminants. These laws were enacted in all of Australia's jurisdictions in 1997. In 1999, the prohibition was extended to the feeding of specified mammalian materials to ruminants. In March 2001, agricultural ministers agreed to introduce uniform legislation in all state and territories to extend this prohibition to include a ban on the feeding of meals containing 'only porcine, equine, or macropod materials; blood and blood products; inspected meat products (that have been cooked and offered for human food and further heat processed into animal food); poultry (offal and feather) meals; and fish meals'. Following on from this decision all state and territories have adopted in their respective legislation the term 'restricted animal material' (RAM) to describe animal meals that cannot be fed to ruminants, being any meal derived from animal origin including fish and birds.

Australia's enforceable and inclusive bans on the feeding of RAM to ruminant animals are part of a comprehensive national TSE Freedom Assurance Program (TSEFAP). The ruminant feed ban is supported by the following mechanisms:

- Quarantine measures to prevent entry into the country of the BSE agent. Since 1966, the importation of MBM into Australia has been prohibited from all countries other than New Zealand, which is also free of BSE and scrapie.
- A comprehensive, risk-based compliance inspection program undertaken by state and territory authorities that targets all sectors in the livestock feed chain from renderers, to stockfeed manufacturers, stockfeed resellers (retailers) and end-users. The ongoing program is modified in light of non-conformities identified and corrective actions that have been implemented.

¹ 'BSE-cattle system' is taken from the final opinion of the Scientific Steering Committee of the European Commission (EC) on Geographical Risk of Spongiform Encephalopathy (adopted on 6 July 2000). It means the population of cattle in which BSE might circulate if the disease were present.

- A range of quality management and assurance measures implemented by the ruminant livestock and stockfeed manufacturing industries in Australia, which complement the official regulatory and compliance inspection program.
- Education and training programs to create awareness and develop the necessary competencies and capacity regarding the legislative rules on animal feed and TSEs. Training and education of relevant groups such as farmers, renderers, stockfeed manufacturers and retailers and statutory bodies is ongoing.

These programs constitute Australia's effective ruminant feed ban, as part of its control measures to prevent the entry and establishment of the BSE agent in this country. The comprehensive risk-based approach for inspection for compliance with the ruminant feed ban in Australia is specifically outlined in this document.

2. INTRODUCTION

Since the initial diagnosis of bovine spongiform encephalopathy (BSE) in cattle in the United Kingdom (UK) in 1986, Australia has maintained a high degree of awareness of the evolving state of knowledge of BSE and international actions taken to control and prevent the spread of the disease. As the *Terrestrial Animal Health Code* of the World Organisation for Animal Health (OIE) (the *OIE Code*) has evolved to accommodate new scientific developments with respect to BSE, so has Australia kept up with, and often exceeded, approaches recommended by the World Health Organization (WHO) and OIE.

Australia has an inclusive ban on the feeding to ruminants of all meals, including MBM, derived from all vertebrates, including fish and birds. This ban is established by statutory laws in each of Australia's jurisdictions and enforced by official inspections which also take into account QA schemes that operate within Australia's ruminant livestock industries. These bans provide appropriate and conclusive 'stability' to Australia's theoretical 'BSE–cattle system'.² They provide a fail-safe control measure to prevent amplification of the BSE agent through feeding of infective material, derived from any source, to ruminants.

Prior to 2002, Australian authorities conducted three nationwide assessments to confirm the implementation and efficacy of the ruminant feed bans in each state and territory. These were conducted in collaboration with state and territory authorities and occurred initially in 1998, then from February to May 2000 and again in January to February 2001.

A statistically-based random selection process was employed to assess all sectors of the ruminant livestock industry including farms (dairy farms, sheep feedlots and beef feedlots), rendering establishments, stockfeed manufacturers and stockfeed retailers. A secondary objective of these assessments was to determine the extent of variation in the laws operating in Australia's states and territories.

These assessments detected no instances of prohibited material being included in ruminant feeds. Although compliance with the ruminant feed bans was generally satisfactory some areas were identified as requiring improvement, particularly stockfeed labelling and understanding of the legislation by livestock producers and manufacturers. Active and ongoing education programs have been implemented by state and territory authorities, with industry support, to ensure that all sectors of the industry fully understand the importance, and implications of, the ruminant feed bans.

To further ensure Australia has effective feed ban control measures, it was agreed at the March 2001 meeting of the Agricultural and Resource Management Council of Australia and New Zealand (ARMCANZ)³ that regular inspections be undertaken by each state and territory to verify compliance with the feed ban legislation by all parties from manufacture to end-use. This decision was further endorsed by the August 2001 ARMCANZ meeting.

A uniform national approach to compliance inspection, supported by the latest laboratory techniques for detecting RAM protein in ruminant feeds/precursor components, provides the greatest assurance of compliance with regulatory controls and affords the greatest opportunity to meet national and international requirements.

² 'BSE-cattle system' is taken from the final opinion of the Scientific Steering Committee of the EC on Geographical Risk of Spongiform Encephalopathy (adopted on 6 July 2000). It means the population of cattle in which BSE might circulate if the disease was present.

³ Now known as the Agricultural Ministers Forum (AGMIN).

These National Uniform Guidelines form the basis for this uniform national approach with the aim of increasing the consistency of approach to ruminant feed ban compliance and reporting activities in the States and Territories.

3. BACKGROUND

3.1 International Developments

BSE was first reported in Britain in November 1986. The origin of the British BSE outbreak is uncertain, but its spread was due to the feeding of cattle with MBM produced from BSE-infected cattle. In an attempt to contain the disease, the British government took a number of steps, including a ban on the feeding of MBM and slaughtering all cattle they believed to be infected.

In 1996 scientists reported a possible link between BSE and a disease in humans called variant Creutzfeldt - Jakob disease (vCJD). It is now widely accepted that humans acquired vCJD through the consumption of certain tissues derived from cattle infected with BSE. More recently there has been evidence of vCJD infection via blood transfusions.

In Geneva on 2-3 April 1996 the WHO Special Consultation on Bovine Spongiform Encephalopathy / Creutzfeldt - Jakob disease recommended that all member countries ban the feeding of ruminant tissues to ruminant animals. This recommendation was made in an attempt to prevent the recycling of TSE agents of animal origin, thereby avoiding amplification of any low levels of these diseases, which might arise in an animal population. Consequently, the relevant *OIE Code* chapter on BSE was amended so that it is consistent with the WHO recommendations.

3.2 Australian Response

Australia has a range of membership obligations to international organisations including the WHO, World Trade Organisation (WTO) and OIE. Australia must ensure that the sanitary measures it adopts are consistent with these obligations unless a scientific risk assessment supports adoption of alternative measures. In May 1996, Australian livestock industries adopted a voluntary ban on the feeding of ruminant-derived MBM to ruminants, in accordance with the WHO recommendations and ahead of modifications to the OIE Code. This voluntary ban on MBM changed a negligible use to a zero use and imposed little economic burden on the cattle and sheep industries.

Extensive consultation on converting the voluntary ruminant feed ban to a ban enforced by law was undertaken in Australia with national industry organisations and governments. Ministers at ARMCANZ⁴ reached early agreement about model legislation designed to meet international expectations and recommendations for controlling BSE. The legislation required specific labelling on bagged feedstuffs together with statements on invoices or other documents relating to the purchase of feed or meal. This measure allowed for the enforcement of the ban on feeding ruminant-derived MBM to ruminants. By October 1997, the necessary statutory law was passed in each of Australia's jurisdictions. The result was to give legal effect to the prohibition of the feeding of ruminant-derived material to ruminants in Australia.

After more consultation between Australia's governments and its livestock industries, the relevant laws were further amended. By June 1999, amendments to state/territory statutory law extended the feed ban to include MBM from all mammals except horses, pigs and macropods (mainly kangaroos). The extended ban was introduced for reasons of trade:

⁴ Now known as the Agricultural Ministers Forum (AGMIN).

some of Australia's major trading partners such as Canada and the United States having adopted a similar extended ban. The consequence of the extended ban was that Australia's regulations on the 'specified mammalian material to ruminant feed ban' were consistent with those of its major trading partners.

This amended situation had little impact on feeding practice in the ruminant livestock industry because MBM from any source could not compete economically with plant-derived protein. There were a number of exemptions to the ban such as tallow, gelatine, milk products, blood and porcine, equine and macropod meals.

3.3 National Legislation

In late 2000, and as a result of the changing BSE situation in Europe, the European Commission (EC) Council Decision 2000/766/EC introduced 'certain protection measures with regard to transmissible spongiform encephalopathies and the feeding of animal protein'. This extended the feed ban in the EU to cover the feeding of certain animal proteins to all farm livestock as a provisional measure. The extended feed ban aimed to ensure better control of the potential spread of BSE that might occur through the cross-contamination of feed for ruminants. At the same time, there was some concern in Australia about the exemptions to its feed ban that then applied to blood and porcine, equine and macropod meals and which served to complicate assessment of compliance with the ruminant feed ban.

A key step in the development of national legislation and controls on the feeding of animal meals to ruminants in Australia occurred in March 2001 and was taken with the support of the livestock industries. Resolution No. 1B of ARMCANZ extended the range of vertebrate materials that cannot be fed to ruminants in Australia. The extension covered 'meat and bone meals containing only porcine, equine, or macropod materials, blood and blood products, inspected meat products (that have been cooked and offered for human food and further heat processed into animal food) and poultry (offal and feather) meals and fish meals'. The justification for this extended ban was not that these new materials presented a risk for the transmission of the TSEs in themselves. Instead, it aimed at facilitating compliance with, and enforcement of, the previous bans. These changes were enacted between March 2001 and March 2002 in all jurisdictions in Australia. The measures that Australia currently has in place exceed the recommendations of both the WHO and OIE.

All state and territories have adopted in their respective legislation the term 'restricted animal material' known as RAM, to describe animal meals or tissues that cannot be fed to ruminants, being any meal or tissues derived from animal origin including fish and birds, unless specifically exempted.

Restricted Animal Material is

... any material taken from a vertebrate animal, other than tallow, gelatine, milk products or oils. It includes rendered products such as blood meal, meat meal, meat and bone meal, fish meal, poultry meal, feather meal, and compounded feeds made from these products.

All milk, milk products or milk by-products, either of Australian provenance or legally imported for stockfeed use into Australia, are exempt.

Gelatine and tallow have also been exempted from the feed ban.

Used cooking fats and oils used for stock feeds should meet the *National Standard for Recycling of Used Cooking Fats and Oils Intended for Animal Feeds* which was endorsed by PIMC in 2009.

The definition of tallow as agreed to by AHC (Meeting 6 OOS paper 32, 1 March 2006) is EITHER:

Tallow and Oils are

... any product (not limited to but including products known as tallow, yellow grease and acid oil), containing rendered fats and oils from any animal, or used cooking oil filtered or otherwise treated to remove visible particulate matter, and which complies with a specification of 2% maximum M+I (moisture plus insoluble impurities) as measured by American Oil Chemists' Society (AOCS) official methods⁵;

OR for jurisdictions which require a separate definition of used cooking oil

Tallow is defined as:

“any product (not limited to but including products known as tallow, yellow grease and acid oil), containing rendered fats and oils from any animal and which complies with a specification of 2% maximum M+I (moisture plus insoluble impurities) as measured by American Oil Chemists' Society (AOCS) official methods” and,

Used cooking oil is defined as:

“oil previously used for the purposes of cooking which has been filtered or otherwise treated to remove visible particulate matter and which complies with a specification of 2% M+I as measured by AOCS official methods”

Mineralised sea bird guano has also been excluded from the definition of RAM by AHC (Meeting 24 OOS paper, 5 August 2013).

All state and territory legislation requires all consignments of stockfeeds that contain RAM to include the following label warning:

**“This product contains restricted animal material –
DO NOT FEED TO CATTLE, SHEEP, GOATS, DEER OR OTHER RUMINANTS”**

Current statutory law covers those people or organisations involved in manufacturing, selling or supplying stockfeeds as well as users who feed manufactured feed to stock, particularly to ruminants. States and territories have provided educational material to stakeholders to raise awareness about the new measures and about stakeholder responsibilities that now apply.

A summary of the Australian state and territory legislation regulating the ruminant feed ban is included as Appendix 1.

⁵ AOCS official methods for determining M+I are described at the following website, and full details can be purchased there: <http://www.aocs.org/tech/onlinemethods/>. The relevant tests are for “moisture and volatile matter; hot plate method” and “insoluble impurities” and are conducted sequentially; with the results of the two tests being added to obtain the total M+I. NATA laboratory accreditation for conducting these tests is available in Australia.

Importation and distribution of imported stockfeeds is governed by policies developed by and legislation administered by Department of Agriculture, Animal Division (Biosecurity). Controls over imported stockfeeds are detailed in Section 5.8.

3.4 Mechanisms for an Effective Feed Ban

Australia's enforceable and inclusive bans on the feeding of RAM to ruminant animals are part of the comprehensive national TSEFAP. The ruminant feed ban is supported by the following mechanisms:

- **Biosecurity measures** to prevent entry into the country of the BSE agent. Since 1966, the importation of MBM into Australia has been prohibited from all countries other than New Zealand, which is also free of BSE and scrapie. Lifetime quarantine of cattle imported from countries that subsequently reported BSE prevents these animals entering the human food or animal feed chains.
- **A comprehensive, risk-based compliance inspection program** undertaken by state and territory authorities that targets all sectors in the livestock feed chain, from renderers, to stockfeed manufacturers, stockfeed retailers and end-users. The ongoing program is modified in light of non-conformities identified and corrective actions that have been implemented.
- A range of **quality management and assurance measures** implemented by the ruminant livestock and stockfeed manufacturing industries in Australia, which complement the official regulatory and compliance inspection programs.
- **Education and training programs** to create awareness and develop the necessary competencies and capacity regarding the legislative rules on animal feed and TSEs. Training and education of relevant groups such as farmers, renderers, stockfeed manufacturers and retailers and statutory bodies is a continuing process carried out by industry organisations and by state and territory departments.

4. MEASURES THAT COMPLEMENT THE GUIDELINES

In 1966 the importation into Australia of MBM, meat meal, greaves and stockfeeds of animal origin (other than fish) was prohibited from all countries except New Zealand (Proclamation 77A of the *Quarantine Act*, 28 July 1966). This import restriction was introduced because of potential concerns with the importation of anthrax spores in animal derived stockfeeds. The *Quarantine Act* has been replaced by the *Biosecurity Act 2015* and the *Biosecurity (Prohibited and Conditionally Non-prohibited Goods) Determination 2016* (subordinate legislation). The latter defines stockfeed of biological origin as a conditionally non-prohibited good, meaning that imported goods are subject to a risk assessment to determine whether products are likely to introduce a pest or disease into Australia. Section 179 of the *Biosecurity Act 2015* requires that the Director of Biosecurity consider the level of biosecurity risk⁶ associated with the importation of goods into Australia and, in doing so, must apply Australia's Appropriate Level of Protection i.e. a high level of sanitary and phytosanitary protection aimed at reducing biosecurity risks to a very low level, but not to zero.

Until a biosecurity import risk analysis has been undertaken, and with very few exceptions (e.g. fish meal), stockfeed of animal origin can only be imported from New Zealand. As both Australia and New Zealand are free of BSE and scrapie, the possibility that either of these agents have been introduced into the animal feed chain is negligible.

Current biosecurity measures address the concerns of inadvertent or intentional contamination of imported plant or fish based stockfeeds with MBM or diversion of meat-based products imported for other purposes but diverted to stockfeed use. These biosecurity measures for the importation of stockfeeds into Australia are outlined in the policy: [Importation of Stockfeed and Stockfeed Ingredients - Finalised Risk Management Measures for Transmissible Spongiform Encephalopathies \(September 2015\)](#) published by the Australian Government Department of Agriculture, Water and the Environment. This document details measures to manage the risk of introduction into Australia of BSE in imported stockfeed and stockfeed ingredients. The scope of this paper includes products imported for deliberate use in stockfeeds, and products that are imported for other uses but which may be diverted to stockfeed use, or have by-products suitable for use in stockfeeds. Examples are prepared plant-based stockfeeds, plant meals, whole grains, fish feeds, blood meal, dairy products, and meat meal. The likelihood that imported stockfeed or stockfeed ingredients may contain animal-derived materials is examined and appropriate risk management measures defined for the various classes of imports.

4.1 Quality Assurance Measures

4.1.1 Rendering

Since 1995, there has been significant development and implementation of QA programs within the rendering industry. Major initiatives include the development and implementation of the Australian Renderers' Association's (ARA) *Code of Practice for the Hygienic Rendering of Animal Products*. The Australian Renderers' Association has also

⁶ See section 9 of the *Biosecurity Act 2015* for the definition of 'biosecurity risk'.

undertaken accreditation workshops to provide training for individuals within the rendering industry and has established and is operating a scheme for accreditation of rendering establishments.

It is mandatory in Australia for rendered animal proteins to be produced in accordance with the *Australian Standard for Hygienic Rendering of Animal Products*. The standard requires that all rendering plants implement Hazard Analysis Critical Control Point (HACCP) plans. This national Standard includes processing parameters to control pathogens that may be present in meals and has requirements for labelling that are consistent with the Australian ruminant feed ban.

4.1.2 Stockfeed Manufacturing

As some therapeutic medications are illegal, toxic or anti-nutritive to species other than the target species, cross-contamination of feeds with ingredients from another ration is a matter that has always been taken seriously by stockfeed manufacturers in Australia. Precautions relating to RAM are an extension of existing procedures and include physical cleaning, flushing with feed materials and sequencing. In flushing, a feed ingredient for a non-ruminant species which does not contain RAM is passed through the mill before the preparation of ruminant feeds.

The majority of off-farm stockfeed is made by manufacturers affiliated with the Stock Feed Manufacturers' Council of Australia (SFMCA), which has established a *Code of Good Manufacturing Practice for the Feed Milling Industry*. This code provides a set of principles for the manufacture of safe animal feeding stuffs. It has been developed with the following broad objectives:

- to protect the health of human consumers of food products derived from livestock fed prepared stockfeeds;
- to contribute to the delivery of livestock products of consistent and appropriate quality to enable livestock producers to market food commodities that meet national food standards; and
- to protect the health of livestock and to enable livestock producers to achieve expected levels of performance by delivering stockfeeds of consistent quality to animals.

Industry, through the SFMCA, has implemented a HACCP-based QA program known as "FeedSafe". Individual sites are required to address the elements of the Code of Practice, particularly methods to ensure effective cleaning, flushing and sequencing between different types of stockfeeds to minimise the possibility of cross-contamination. The SFMCA has produced a guideline document "*Guidelines Preventing Contamination with Restricted Feed Ingredients*" (Appendix 2) to facilitate both the process and its audit as they relate to RAM. The industry QA program is independently audited. The effectiveness of the industry QA program is being verified by rapid tests and laboratory analyses of feed samples, which will be audited by government officers. Inspection of audit reports allows a risk-based approach to official inspections within the ruminant feed ban compliance scheme (RFBCS).

4.1.3 On-farm

SAFEMEAT⁷ has overseen the development of a totally integrated and industry-based QA scheme for feeds as an adjunct to inspection and audit. At the request of SAFEMEAT, Meat and Livestock Australia (MLA)⁸ has developed QA modules to be used by the livestock industry and to assist state and territories in the compliance inspection of the feed ban.

Over the past ten years, the Australian livestock industries have been progressively implementing on-farm QA programs to address food safety and quality issues. Programs such as *Livestock Production Assurance (LPA) Food Safety Program* and *LPA Quality Assurance*⁹ for cattle, sheep and goats and the *National Feedlot Accreditation Scheme (NFAS)*¹⁰ for feedlots, have been developed in accordance with ISO 9002 and HACCP principles.

LPA Food Safety and *LPA Quality Assurance* programs (Element 3 — Stockfeed) incorporate the following wording:

Feed fed to cattle (or sheep) does not contain animal products with the exception of exemptions that may be applied from time to time by statutory authorities.

Similarly, *NFAS Advice 01/2001* issued on 9 November 2001 by the Feedlot Industry Accreditation Committee¹¹ requires accredited feedlots to amend their quality systems to incorporate the same wording as in the LPA system.

National Vendor Declarations

National Vendor Declarations (NVDs) are an additional initiative used by the Australian livestock industries to make it possible for Australian livestock producers to confirm the integrity of its products to domestic and international customers. NVDs were introduced into the cattle industry in 1996. Since then, commercial pressures and an increasing reliance on the NVD by processors as an attestation of the 'status' of livestock in regard to residues and certain other criteria, have driven their uptake by producers. The NVD system provides buyers with important information including stock identification, identification of the property of the vendor, exposure to chemicals and recent grazing practices. It is used by all

⁷ SAFEMEAT is an industry/government partnership responsible for developing policy and running programs relevant to food safety aspects of the red meat industry. Membership includes the Secretary of DAWE, the Australian CVO, a representative of the Agricultural Senior Officials Committee and heads of industry bodies such as the Cattle Council of Australia, the peak producer organisation representing Australia's beef cattle producers.

⁸ MLA is responsible for administering research and development for the red meat industry as well as marketing initiatives.

⁹ The LPA Food Safety and Quality Assurance programs are an initiative of Meat & Livestock Australia. It is a QA system for cattle, sheep and goat producers. It helps farmers to supply meat of the quality demanded by today's increasingly critical markets - both here and overseas. Emphasis is placed on:

- minimal risk of chemical contamination through the safe, responsible use of chemicals
- minimised bruising and hide damage
- more effective management and herd improvement through better record keeping

¹⁰ NFAS, an initiative of the Australian Lot Feeders' Association and supported by Meat and Livestock Australia is a third party audited QA program for the feedlot industry in Australia. It ensures compliance with all national and state based legislation as well as compliance with animal welfare codes of practice, safe use of veterinary medicines and environmental codes of practice.

¹¹ The Feedlot Industry Accreditation Committee is a joint industry/government body that maintains and administers the quality assurance standards that form the basis of the NFAS. In addition, it oversees the auditing and administration process undertaken by AusMeat.

participants in the livestock production chain, from producer through to processor as an adjunct to the National Livestock Identification Scheme (NLIS).

Although the use of NVDs is currently voluntary, there is almost 100% uptake within the cattle, sheep and goat industries. Producers who provide false or misleading information on the NVDs may be prosecuted under state and territory legislation. Commercial processors generally choose not to purchase animals without accompanying NVDs.

All NVDs include a declaration that the cattle or sheep described have not been fed contrary to state and territory law that prohibits the feeding of RAM to ruminants. The relevant wording of the NVD (Cattle) is:

I also declare that I have read and understood all the questions that I have answered, that I have read and understood the explanatory notes, and that, while under my control, the cattle were not fed restricted animal material (including meat or bone meal) in breach of state or territory legislation.

The NVD (Sheep and lambs) contains a similar declaration.

4.2 Education and Awareness Programs

Active and ongoing education programs conducted by Australian Government agencies such as the Department of Agriculture, Water & Environment, and state/territory authorities, and the relevant industries, support and complement the compliance inspection process. The aim is to ensure that all sectors of those industries associated with the production of ruminant animals fully understand the implication and implementation of the ruminant feed bans. Those sectors include producers, renderers, stockfeed manufacturers and retailers.

Education and awareness programs also reach out to the wider community through school-based programs, media promotion and advertising, promotions at trade shows or industry field days and other appropriate means. The task of educating the community and relevant industries about the importance of the ruminant feed ban in ensuring Australia continues to meet the requirements of a *BSE Negligible Risk* and scrapie free country, and maintaining confidence in the safety of Australia's meat and dairy products, is ongoing. This strategy supports legislative provisions and compliance activity.

4.3 Communication between the Jurisdictions and Industry Quality Assurance Programs

The aim of this section is to provide a standard approach for the exchange of information between State and Territory jurisdictions with legislative responsibilities to administer the ruminant feed ban and industry quality assurance (QA) programs that include elements related to the ruminant feed ban.

By improving information transfer between the two sectors it will only strengthen the ruminant feed ban by enabling consistency of requirements imposed by industry QA programs with regulatory requirements imposed by State and Territory jurisdictions.

It has already been noted that the responsibility for enforcing compliance with legislation governing the ruminant feed ban rests with each State and Territory jurisdiction as well as the Australian Government via DoAWE Biosecurity. Industry QA programs can assist by providing practical benchmarks that will ensure their members comply with the intent of the

legislation. Where an audit under an industry QA program detects a high level non-compliance in manufacturing or product supply, or that ruminants have been fed or exposed to RAM, the relevant jurisdiction needs to be notified so that the circumstances can be investigated and legislative action can be taken if it is appropriate. Where audits or investigations by government agencies have detected cases of non-compliance with the ruminant feed ban, the administrators of relevant industry QA programs need to be informed (as appropriate), as non-compliance may affect the producer's membership benefits and the industry QA program can also assist with future monitoring.

It is important to note that all information is regarded as confidential.

If the information is to be discussed by a committee or governing body (e.g. LPA's Standards Advisory Committee) the contact person is responsible for de-identifying the information and for ensuring committee based decisions are carried out while only releasing personal details on a 'needs to know' basis if approval has been given by the producer.

The person suspected of non-compliance with the ruminant feed ban should be asked to approve the release of their details to the relevant QA program or informed up front that the appropriate government agency will be notified, and they can expect to be contacted by these.

Confidentiality of personal details is standard practice in government agencies and such details would not be released to anyone other than the nominated contact person in a relevant industry QA program (if approved) and only for the purposes of ensuring ongoing adherence to the principles of the ruminant feed ban.

The process is outlined below in Table 1. Each agency will administer its own process and the points where information exchange would be beneficial and the types of information that should be shared are indicated.

Table 1:

Rules of Engagement between Jurisdictions and Industry QA Programs for the exchange of information

Government Process		Confidential information		QA program process		
<p>Government compliance inspectors</p> <ul style="list-style-type: none"> • detect a possible legislative non-compliance with the ruminant feed ban • correct immediate problem • ask the person audited to approve notification to the organisation running the QA program they are participating in and advise them that they may be contacted by them • document the details of their findings • report up their usual management chain. 	Jurisdictional RFB contact person	<p style="text-align: center;">←</p> <p style="text-align: center;">Advice of possible legislative non-compliance</p> <p style="text-align: center;">←</p> <p style="text-align: center;">Request for advice on appropriate response</p>	QA program RFB contact person	<p>QA program auditors:</p> <ul style="list-style-type: none"> • detect non-compliances with program standards related to the ruminant feed ban • correct immediate problem • inform the person audited that the government agency in charge of ruminant feed ban issues will be notified and they can expect to be contacted by them • document all findings • report up their usual management chain. 		
<p>Each State or Territory jurisdiction must have an internal process whereby this information is relayed to the jurisdictional RFB contact person.</p>				<p style="text-align: center;">→</p>		<p>Each industry QA program must have an internal process whereby this information is relayed to the QA program RFB contact person.</p>
<p>An investigation is instigated and evidence collected.</p> <p>A senior supervising officer will:</p> <ul style="list-style-type: none"> • evaluate all evidence and decide on appropriate action after consultation with jurisdictional legal advisors and RFB policy advisors • instigate action e.g. prosecution proceedings, corrective directions 				<p style="text-align: center;">→</p> <p style="text-align: center;">Advice of incident details (and person if approved) and recommended action through the QA program (e.g. await completion of investigation, add to audit schedule)</p> <p style="text-align: center;">→</p> <p style="text-align: center;">Advice of progress of investigation</p> <p style="text-align: center;">→</p> <p style="text-align: center;">Advice of outcome of investigation e.g. successful prosecution</p> <p style="text-align: center;">→</p> <p style="text-align: center;">Advice of corrective directions issued</p> <p style="text-align: center;">←</p> <p style="text-align: center;">Advice of repeated non-conformance</p>		<p>QA program decision making body e.g. LPA Standards Advisory Committee, Feed Lot Industry Accreditation Committee, advised of jurisdictional activity with de-identified information on circumstances.</p> <p>QA program decision making body reviews case and jurisdictional actions in the light of their program objectives and decides appropriate action (depending on whether individuals have been identified) e.g.</p> <ul style="list-style-type: none"> • Note and no further action • Conduct of an independent audit/follow-up audit to ensure the situation remains resolved • Impose corrective actions that support jurisdictional directions • Rescind quality assurance program accreditation • Rescind selected quality assurance program benefits

5. NATIONAL UNIFORM GUIDELINES FOR ESTABLISHING A COMPREHENSIVE RISK BASED COMPLIANCE INSPECTION PROGRAM

These guidelines are designed to ensure that the Australian Government and each state and territory uses a consistent Australia-wide approach to the issue of compliance inspection, and sampling and testing of ruminant stockfeeds, to achieve an effective Australia-wide ruminant feed ban.

Each jurisdiction will adhere to these guidelines to the extent that their individual legislation permits. Legislation will be amended when necessary to achieve agreed national outcomes.

These guidelines may be revised from time to time as necessary to respond to relevant scientific developments and to meet future national requirements in relation to the ruminant feeding ban.

5.1 Scope of Compliance Inspection Programs

Compliance inspection, sampling and testing programs are to cover:

Domestically (undertaken by States and Territories)

- **Rendering Facilities** – the manufacturing of restricted animal material (RAM)
- **Stock Feed Manufacturers** - manufacturing of stockfeeds (both those containing RAM and those not containing RAM) including “manufacturing” by retailers
- **Retailers** – on selling of stockfeeds and re-packing by retailers
- **End Users** - producers whose livestock (particularly ruminant animals) consume stockfeeds
- **The suppliers of waste products containing RAM**, including waste pet foods, chicken litter, manures, etc.

At the Border (undertaken by DoA Biosecurity)

- **The importation of stockfeed (and ingredients) into Australia** – those materials that are used in the manufacturing of feed stuffs that may be contaminated with RAM.

A major critical control point for ensuring compliance with the Australian ruminant feed ban is to monitor the manufacture of ruminant stockfeeds at establishments where RAM is present. Sampling of ruminant stockfeeds and testing of these samples for the presence of RAM is an important component of the Ruminant Feed Ban Compliance Scheme.

5.2 Objective

The overall aims of the compliance inspection programs in each jurisdiction are to:

- **establish the level of compliance** with the legislative provisions associated with the ruminant feed ban including sampling and testing of stockfeeds for the presence of RAM on a routine basis and as required.

- **instigate corrective and/or legislative action** proportionate to the non-compliance, and in accordance with established policy, in those instances where non-compliance is detected.
- **record and report the outcomes of each compliance inspection carried out.**

State and Territories are to maintain a database of all known stockfeed manufacturing, stockfeed retailing and rendering plants located in their particular state or territory including all known pet food manufacturers or other establishments supplying RAM-based material as stockfeeds, and a record of the compliance activity carried out on those establishments. The objective is to be able to track the number of businesses inspected under the ruminant feed ban, their compliance trends over time, and their inspection, sampling and testing history. Accurate records are required to demonstrate that no businesses have been overlooked in inspection activity under the ruminant feed ban over a given time.

5.3 The Need for Nationally Agreed Compliance Inspection Guidelines

It was agreed by VetCom¹² 11 in 2001 that national guidelines for compliance inspection were necessary to achieve uniformity across all state and territory jurisdictions. Such guidelines provide a basis for each state and territory to participate in a nationally consistent program of inspection for compliance with the legislative provisions of their respective ruminant feed bans, including where necessary the sampling and testing of stockfeeds intended for feeding to ruminants. Such a nationally consistent compliance inspection program in concert with other programs, including quarantine import control measures and industry QA systems contribute in a meaningful way to Australia maintaining an effective feed-ban.

The first edition of these guidelines was adopted by VetCom 13 in October 2002. Subsequent editions have been revised and modified to meet changing national priorities associated with the Australian ruminant feed ban as these have arisen.

¹² Vet Com is the acronym for Veterinary Committee now known as Animal Health Committee

5.4 Compliance Inspection of Renderers - by States and Territories

Renderers are businesses that process raw animal materials to liberate fats and oils for further use. Renderers produce meals such as meat and bone meal as part of this process.

Programmed compliance inspection of all known renderers is to be carried out by inspectors approved by each state and territory.

New renderers whether they participate in a QA program or not, must receive an initial compliance inspection visit.

Renderers will be inspected at a rate determined by the risk posed by the type of operation and whether or not they incorporate third-party audited QA programs. Table 2 summarises the agreed inspection frequencies.

<i>Table 2:</i> Compliance Inspection Frequency – Renderers		
Establishment type	Non-QA	QA
Renderers	12 months	None

Rendering establishments must be inspected at least every 12 months (1 year) except for establishments with an externally audited QA program where no visit is required after an initial inspection has been undertaken. Annual checks must be made to confirm that external auditing has been carried out. A record of the check will be kept (entered on the jurisdiction's database). The annual check may be in the form of a phone call or visit.

For renderers the relevant QA program is ARA Accreditation that requires compliance with the current *Australian Standard for the Hygienic Rendering of Animal Products (AS5008)*. Where an establishment fails an external QA audit in regard to its RAM controls then the ARA will provide pertinent details of the establishment to the responsible jurisdiction. It is the jurisdiction's responsibility to ensure that legislated requirements are being met and that feedback to the ARA is provided.

The carrying out of the core inspection activities listed in this section will be in the form of questions and other appropriate means, including visual inspection, to determine the level or extent of compliance.

If questions asked require YES/NO answers supplementary questioning seeking reasons or further details for either YES or NO answers may be desirable.

The questions listed are additional to any introductory matters that need to be carried out such as obtaining the particulars of the person or company being interviewed during the inspection, e.g. name and address, contact details, property details etc, or approval for entry. These shall be recorded as required by each state or territory using Form One as a model. Entries on that form marked * are compulsory for record keeping by all jurisdictions.

In addition to carrying out interviews with the renderer, inspectors should carry out any inspections of the premises they consider necessary to validate to their satisfaction all answers provided to their questions.

Renderer compliance inspections are to be based on core inspection activities using the Renderer Compliance Inspection forms (see Form One) to ensure compliance with the legislation.

The inspection form incorporates the following minimum information:

- **the core activity to be inspected; and**
- **compliance or the degree of non-compliance.**

5.4.1 Compliance Inspection of Renderers

The following core activities seek to establish whether RAM products are appropriately labelled.

- (1) Determining whether the renderer is aware of the meaning of the term ‘restricted animal material (RAM)’ and the ruminant feed ban and its implications.

If they are not aware, an explanation by the inspector will be necessary before proceeding to further questioning. Relevant publications should be provided.

- (2) Checking how the products are to be supplied. Is RAM manufactured on the premises contained in packages or intended to be supplied in loose bulk?
- (3) Checking that the RAM is appropriately labelled. Is all RAM manufactured on the premises either labelled with a label on or attached to the bag (for packaged product) or a label incorporated in or attached to a delivery docket (or invoice if it is delivered at the same time as the RAM) for product supplied in loose bulk?

The inspector when checking the labels needs to be satisfied that:

- *the following required ruminant feed warning statement is included:*

**“This product contains restricted animal material –
DO NOT FEED TO CATTLE, SHEEP, GOATS, DEER OR OTHER RUMINANTS”**

- *if the required ruminant feed warning statement is included on the label or delivery docket (invoice), the statement:*
 - *has the correct wording;*
 - *is the correct print size (≥ 3mm on a label or 10mm on a woven bag);*
 - *is sufficiently contrasted e.g. dark print on light background (or vice-versa);*
 - *is in a prominent position on the face (front) of the label; and*
 - *is not marked or defaced in such a way that the statement is obscured.*
- *any manufactured stockfeed that does not contain RAM (as applicable under legislation applying at the time in the jurisdiction) has a label that includes the negative (not containing) RAM statement:*

“This product does not contain restricted animal material”

These activities are included as core activities that states and territories should carry out in the course of their inspections. They are not exhaustive – if other potential risks are identified states and territories should take appropriate action.

5.4.2 Compliance with State/Territory's Other Stockfeed Legislation

Each jurisdiction may incorporate additional questions and reporting mechanisms to deal with other issues covered by their own legislation such as statements of contents, statements of purpose or particular standards which are applied to stockfeeds.

5.4.3 Corrective Actions

The detection of non-compliances which may justify action under legislation should be investigated in accordance with established jurisdictional policy and using appropriate legal cautions.

The most likely non-compliances are identified on the inspection forms as either CAR Critical, CAR Ma (Major) or CAR Mi (Minor), though this interpretation may be varied by the inspector involved.

Examples of the types of non-compliance at the rendering level will include but need not be limited to:

Major:

- There has been non-compliance with a directed corrective action.
- Rendered product does not have a RAM ruminant feed warning statement at all.

Minor:

- Rendered product has a RAM ruminant feed warning statement that sets out the message intended but the statement is incorrectly worded, not in a prominent position, incorrectly sized, defaced or of poor contrast making it difficult to read.

The form of corrective or follow-up action will be in accord with the established enforcement policy and procedures in each jurisdiction. The use of CARs, completed on-site by the inspector and left with the person in charge, is strongly encouraged. Rendered products will be dealt with in accordance with State and Territory legislation to ensure that they are not used for feeding to ruminants. A model corrective action request form is included as part of Form One.

The following information should be noted:

- Where any deficiency is found when checking the numbered points in *Form One-Part B* then question 14 of *Form One-Part A* should be answered "Yes" and a CAR (*Form One-Part C*) completed.
- All details on *Form One – Part B* are to be completed, paying particular attention to the *Audit Document Ref* (which is simply that it is a renderer) and the *Question Number/s Involved* relevant to the breach detected.
- The breach is to be classified according to the categories given in *Form One-Part B*.
- A date for the CAR to be closed out is to be proposed based on the type of non-compliance. The following close-out periods should be used:
 - Major non-conformity – to be completed within 21 days
 - Minor non-conformity – to be completed within no more than 90 days.
- The inspector is to ensure the manager/company representative signs the CAR. The inspector is to make a copy and leave one with the manager/person in charge.

- Provided *Part A of the form* (Inspection Coversheet) has been signed in relation to making information available then the state/territory jurisdiction will notify the QA program administrator within seven days of receiving advice of a major or critical breach.
- When returning to the premises for the follow-up visit, the inspector is to take with him or her (a copy of) the original completed CAR.
- At the inspection, the inspector is to complete another copy of the Part A of the *Form* (Coversheet) and finalise the *CAR follow-up and close-out* details on the original CAR (*Form One-Part C*).
- If the non-conformity is not dealt with and cannot be closed-out by the inspector, and depending on the nature of the breach, the inspector is to:
 - Either issue another CAR, with a time frame of only half that allowed above; and/or
 - Collect information for possible issue of a penalty notice or to instigate prosecution proceedings in line with the policy of the relevant State or Territory.

Form One – Part A	
Australian Ruminant Feed Ban – Renderer Compliance Inspection Form	
1. Department site Code / Number	2. Registration / Property ID Number
3. Company name	
4. Company address (postal)	Company address (street)
Town:	State: Postcode
Telephone 1:	Telephone 2:
Facsimile:	Email:
5. Company approval to enter premises granted: yes no (circle one)	
6. Does the company participate in the industry QA program: : yes no (circle one)	
7. QA audited by:	
8. Company approval provided to contact QA program for results of their audit: : yes no (circle one)	
9. Company approval provided to divulge business name and contact details: yes no (circle one)	
10. Date of inspection:*	Date of previous inspection (if known):
Inspector:	Inspector location:
11. Reason for inspection: Programmed / Compliance / Follow up (circle one)	
12: Time of arrival:	Time of departure: Elapsed time:
13. CAR issued:* yes no (circle one) (To be entered after inspection) (If yes, forward with this sheet)	Type of non-compliance: major minor (circle)
(If CAR issued, return all inspection Appendix sheets as well as this cover sheet)	
Inspector signature: (To be entered after inspection)	Company representative: Name: Position: I acknowledge that the information provided during and/or arising from this inspection may be made available to any person or organisation involved in administering the Australian Ruminant Feed Ban (including industry and QA / Food Safety Programs) and authorise its release for that purpose. Representative signature: (To be entered after inspection) (If representing a company, include the company name and ABN)
Signing within the above is confirmation that the inspector was accompanied by a company representative during the inspection.	
Comments:	
*Information to be collected and reported nationally. Results of sample testing are also to be reported.	

Form One – Part B -Renderer:

Date:

No.	Question	Rating ¹³	Comments
ALL RENDERERS			
1	Do you understand the definition of “restricted animal material”?		If the renderer does not understand this term, an explanation by the inspector will be required. (Provide a copy of the AHA Renderer leaflet.)
2	Are you aware that there is legislation in place which bans the feeding of “restricted animal material” to ruminants and requires specific labelling for all manufactured stockfeeds (whether or not they contain RAM)?		Make reference to State or Territory legislation and handout material here.
3	Are all personnel employed at this plant and associated with the manufacture, storage, invoicing or transport of rendered material aware of these provisions?		
4	Does the plant have an externally audited Quality Assurance program, which specifically addresses all RAM labelling issues (e.g. compliance with ARA accreditation against the Australian Standard for the Hygienic Rendering of Animal Products under ARA Accreditation)?		If yes, provide details of the QA program and the auditors
5	If not an ARA member, do you agree to have your contact details provided to the Australian Renderers’ Association (ARA), to allow them to provide you with information about their services? <i>(This is not a legislated question.)</i>		<i>This allows the State/Territory to identify this business to the ARA to allow them to be contacted about membership.</i>
LABELLING			
6	When you supply any RAM what, if any, statement does it have on a label ¹⁴ ?		Examine labels on bags and statements on invoices. If there is no RAM statement no feeds should be moved off-site until appropriate labelling has been instituted.
			CAR Major RAM is supplied with a label but with minor non-compliances ¹⁵ in the RAM statement.

¹³ Enter as appropriate Y(es), N(o), NA(not applicable) or NFV (not fully verifiable)

¹⁴ “Label” means a label attached to, or printing directly onto, a container or package, or for loose bulk feed a delivery docket or invoice (if the invoice is delivered with the bulk feed).

¹⁵ Incorrect wording but which still gives the meaning, incorrect print size, contrast, location, defaced (but still legible).

No.	Question	Rating ¹³	Comments
			CAR Minor
MEAT MEAL SALES AND RECORDS			
7	Is the Renderer recording cash sale purchasers of Meat, Blood or Meat and Bone Meal (MBM) and providing advisory material to them? <i>(This is not a legislated question.)</i>		If not, encourage Renderer, particularly those not members of the Renderers' Association, to record sales for tracing purposes and provide copies of advisory material.
CORRECTIVE ACTION REQUESTS			
8	Has a corrective action request been issued for any non-compliance?		
9	Has there been any non-compliance with a previously served corrective action request?		Date and details of previous CAR (if applicable)
10	Is there any stockfeed not compliant with State/Territory legislation other than RAM controls?		<i>Provide details</i>

Form One - Part C - Model Ruminant Feed Ban Corrective Action Request

Business Owner

Business Address

Inspection Date

Non-conformance Details

Inspection Document Reference (Mfr / Rend / etc.)

Question Number/s involved

Description of each Non-conformity (Include Question(s)/number(s)) and corrective action required

Preventive action required

Classification Critical Major Minor
(Tick applicable box/es)

Proposed Follow-up Date

Acknowledgement of Nonconformity

Name (PLEASE PRINT)

Title / Position

Signature

Date

Inspector's Name (PLEASE PRINT)

Signature

Date

Follow-up and Close-out Details

Follow-up Inspection Date

Details

Corrective Action Request Closed Yes No If no, raise new CAR etc.

Inspector's Name (PLEASE PRINT)

Signature

Date

The issuing of, and any compliance with, this CAR do not mean that further regulatory action in relation to the identified offence may not be taken by the Department.

5.5 Compliance Inspection of Stockfeed Manufacturers – by States and Territories

Stockfeed Manufacturers are businesses or individuals that produce and sell food used or intended to be used as food for stock/animals that has undergone a manufacturing process, but does not include any such stock/animal food that consists entirely of, or any combination of, whole grains, or hay, straw, chaff, milk or products derived from milk.

It must be noted that those retailers and end-users that blend stockfeed for sale meet the definition of a stockfeed manufacturer for the purposes of the ruminant feed ban. An example of this is a lot feeder mixing feed and selling to a cattle producer during times of drought.

Programmed compliance inspection of all known stockfeed manufacturers is to be carried out by inspectors approved by each state and territory. Regular contact is also to be made with all pet food manufacturers, particularly manufacturers of dry pet foods, at least every two years in order to determine whether they supply any waste product as stockfeed. See 5.5.2 below.

Whenever new manufacturers are detected they must receive an initial compliance inspection visit.

Manufacturers will be inspected at a rate determined by the risk posed by their type of manufacture and whether or not they incorporate third-party audited QA programs. Table 3 summarises the inspection frequencies.

Table 3:

Compliance Inspection Frequency – Stockfeed Manufacturers		
Establishment type	Non-QA	QA
Monogastric feeds only (containing RAM)	24 months	48 months
Non-RAM feeds only (whether ruminant or monogastric or both)	24 months	48 months
Monogastric (containing RAM) & ruminant feeds in separate lines	24 months	48 months
Monogastric (containing RAM) & ruminant feeds in same lines	12 months	24 months

The manufacturer compliance inspections are to be conducted at a frequency of between 12 and 48 months (determined by the following risk-based approach taking into account the manufacturer type, the presence of RAM, use of dedicated production facilities and the use of QA programs). For stockfeed manufacturers the relevant QA program is the FeedSafe[®] program developed by the SFMCA. Where an establishment fails an external QA audit in regard to its RAM controls then the SFMCA will provide pertinent details of the establishment

to the responsible jurisdiction. It is the jurisdiction's responsibility to ensure that legislated requirements are being met and that feedback to the SFMCA is provided.

- Stockfeed manufacturers that produce only monogastric animal feeds (containing RAM) must be inspected at least every **24 months** (2 years) except for establishments with an externally audited QA program where visits every **48 months** are required. Annual checks must be made to confirm that no ruminant feeds are being manufactured and that external auditing has been carried out. A record of the check will be kept (entered on the database).
- Stockfeed manufacturing establishments that produce only non-RAM feeds (whether ruminant, monogastric or both) must be inspected at least every **24 months** (2 years) except for establishments with an externally audited QA program where visits every **48 months** are required. Annual checks must be made to confirm that no feeds with RAM are being manufactured and that external auditing has been carried out. A record of the check will be kept (entered on the database).
- Stockfeed manufacturing establishments that produce both non-RAM feeds for ruminants and feeds containing RAM for monogastric animals, and maintain completely separate production lines, including intake hoppers, storage bins and transport, must be inspected at least every **24 months** (2 years) except for establishments with an externally audited QA program where visits every **48 months** are required. Annual checks must be made to confirm that external auditing has been carried out. A record of the check will be kept (entered on the database).
- Stockfeed manufacturing establishments that produce both non-RAM feeds for ruminants and feeds containing RAM for monogastric animals, and which do not have completely separate production facilities, must be inspected at least every **12 months** (1 year) except for establishments with an externally audited QA program which must be visited at least once every **24 months** (2 years). Annual checks must be made to confirm that external auditing has been carried out. A record of the check will be kept (entered on the jurisdictional database).

Targeted sample testing, using approved tests (see Section 6.2) will be implemented on a risk based approach, particularly where inspection identifies potentially inadequate processes for separation of those stockfeeds which contain RAM, and ruminant stockfeeds which do not contain RAM. Targeted sample collection will involve checking the production records and collecting samples immediately or, if no feed is on hand, returning at the time such feed is being produced or after it has been produced.

The carrying out of the core inspection activities listed in this section will be in the form of questions and other appropriate means, including visual inspection, to determine the level or extent of compliance.

If questions asked require YES/NO answers supplementary questioning seeking reasons or further details for either YES or NO answers may be desirable.

The questions listed are additional to any introductory matters that need to be carried out such as obtaining the particulars of the person or company being interviewed during the inspection, e.g. name and address, contact details, property details etc., or approval for entry. These shall be recorded as required by each state or territory using *Form Two* as a model. Entries on that form marked * are compulsory for record keeping in all jurisdictions.

In addition to carrying out interviews with the manufacturer inspectors should carry out any inspections of the premises they consider necessary to validate to their satisfaction all answers provided to their questions.

Manufacturer compliance inspections are to be based on a series of core inspection activities using the *Manufacturer Compliance Inspection Form* (see *Form Two*) to ensure compliance with the legislation as it applies to:

- (a) RAM not being included in stockfeed labelled specifically for feeding to cattle, sheep, goats, deer or other ruminants.
- (b) Compliant labelling for manufactured stockfeed containing RAM showing the ruminant feed warning statement as required by state or territory legislation:

**“This product contains restricted animal material –
DO NOT FEED TO CATTLE, SHEEP, GOATS, DEER OR OTHER RUMINANTS”**

- (c) Compliant labelling for manufactured stockfeed that does not contain RAM (as applicable under legislation applying at the time in the jurisdiction) showing the negative (not containing) RAM statement:

“This product does not contain restricted animal material”

- (d) Ensuring that stockfeeds, particularly those manufactured for ruminants which are not supposed to contain RAM as an ingredient, are not contaminated with traces of RAM.

¹⁶*When conducting the site check, inspectors will seek confirmation that documented procedures are held on site that define sequencing and flushing procedures intended to prevent RAM cross contamination risk and that these are in accordance with the SFMCA document Guidelines: Preventing Contamination with Restricted Feed Ingredients (Appendix 2) or equivalent.*

Inspectors will seek to verify that such procedures are in use. This may be done through sighting of third party QA audit records and/or assessment, using the Guidelines in Appendix 2, of on-site documentation confirming that such procedures are in use.

The inspection forms incorporate the following minimum information:

- the core activity to be inspected
- compliance or the degree of non-compliance

5.5.1 Compliance Inspection of Stockfeed Manufacturers

The following core activities seek to establish whether:

- Stockfeeds being manufactured or sold for feeding to ruminants containing RAM,
 - Stockfeeds containing RAM are appropriately labelled, and
 - Products which do not include RAM as an ingredient are not contaminated with traces of RAM.
- (1) Determining whether the stockfeed manufacturer is aware of the meaning of the term ‘restricted animal material (RAM)’ and the ruminant feed ban and its implications.

¹⁶ The intent of these statements is to place the onus upon the manufacturer to demonstrate that they have adopted procedures to address the risk. The second paragraph is to identify that the procedures are actually in use at the manufacturing site. For companies who are FeedSafe[®] accredited this is part of the audit process which the auditor has assessed. For companies outside FeedSafe, or without any other HACCP accreditation, there needs to be confirmation that they are following the relevant procedures.

If they are not aware, an explanation by the inspector will be necessary before proceeding to further questioning. Relevant publications should be provided.

- (2) Establishing whether stockfeed containing RAM is manufactured on the premises.
- (3) If RAM is present or used on the premises, determine whether stockfeeds that do not contain RAM are also manufactured on site and for which species.
- (4) Checking how the products are to be supplied. Are stockfeeds manufactured on the premises contained in packages or intended to be supplied in loose, bulk or both?
- (5) Checking that the stockfeeds are labelled. Are all stockfeeds manufactured on the premises either labelled with a label on or attached to the bag (for packaged product) or a label incorporated in or attached to a delivery docket (or invoice if it is delivered at the same time as the stockfeed) for product supplied in loose bulk?
- (6) Checking the mandatory label information. Are the products labelled appropriately either on a label or on the delivery docket (or invoice)?

The inspector when checking the labels needs to be satisfied that:

- *if the product contains RAM, the following required ruminant feed warning statement is included*

**“This product contains restricted animal material –
DO NOT FEED TO CATTLE, SHEEP, GOATS, DEER OR OTHER RUMINANTS”**

- *if the required ruminant feed warning statement is included on the label or delivery docket (invoice), the statement:*
 - *has the correct wording*
 - *is the correct print size ($\geq 3\text{mm}$ on a label or 10mm on a woven bag)*
 - *is sufficiently contrasted e.g. dark print on light background (or vice-versa)*
 - *is in a prominent position on the face (front) of the label*
 - *is not marked or defaced in such a way that the statement is obscured*
- *if the product does not contain RAM, the statement below is included (with the same requirements as above):*

“This product does not contain restricted animal material”

Note some manufacturers may use a laminated Gravure printed bag. These should be considered as a labelled item, not a printed woven bag.

- (7) Giving special consideration to premises with mixed stockfeeds. If stockfeeds containing RAM and stockfeeds not intended to contain RAM but intended for ruminants are both manufactured on the same premises, determining whether adequate steps are in place:
 - a. to ensure that RAM cannot be included as an ingredient in the intended non-RAM (ruminant) stockfeeds
 - b. to prevent contamination with RAM of non-RAM stockfeeds intended for feeding to ruminants

Aspects in the manufacturing process that may need to be taken into consideration when carrying out this activity include but need not be limited to whether separate intake hoppers, storage areas, different machinery, mixing containers, augurs, baggers etc. are used in the manufacture of products containing RAM and those that do not contain RAM, whether separate trucks are used when delivering bulk lines for each, and assessing formulas and ingredients purchased in from other processors. Enquiring about the extent to which the manufacturer carries out sequencing and flushing of stockfeed lines will be necessary. Using the material in Appendix 2 will assist in this process. Obtaining information relating to QA systems in place will allow determination of the need for less frequent inspections.

These activities are included as core activities that state and territories should carry out in the course of their inspections. They are not exhaustive – if other potential risks are identified state and territories should take appropriate action.

5.5.2 Contact with manufacturers of dog and cat (pet) food

- (1) Contact should be made with all manufacturers of dog and cat (pet) food to establish how such manufacturers dispose of their waste product and whether they supply it as stockfeed. This should be at least every 24 months unless the manufacturer has a third party audited QA program which covers “waste” disposal, in which case it should be at least every 36 months. While legislation controlling pet food may not exist in a state or territory it is essential that all manufacturers be contacted in regard to their disposal of waste RAM products. Particularly in the case of dry products as it may be disposed of to stock producers, or to waste contractors who in turn may supply it to stock producers.
- (2) If waste material is sold as stockfeed the pet food manufacturer (or disposal agent) should be considered to be a stockfeed manufacturer and inspected and indicated as such in all records and returns.
- (3) Feeding imported biological materials (or derivatives of imported biological materials, including waste) to livestock is subject to approval from the Australian Government Department of Agriculture, Water and the Environment. Approval must be sought and received for individual imported components before diverting imported material for stockfeed use. (Contact: imports@awe.gov.au; 1800 900 090)

5.5.3 Compliance with State/Territory’s other Stockfeed Legislation

Each jurisdiction may incorporate additional questions and reporting mechanisms to deal with other issues covered by their own legislation such as statements of contents, statements of purpose or particular standards which are applied to stockfeeds other than those associated with the ruminant feed ban.

5.5.4 Corrective Actions

The detection of non-compliances which may justify action under legislation should be investigated in accordance with established jurisdictional policy and using appropriate legal cautions.

The most likely non-compliances are identified on the inspection forms as either CAR Critical, CAR Ma (Major) or CAR Mi (Minor), though this interpretation may be varied by the inspector involved.

Examples of the types of non-compliance at the manufacturing level will include but need not be limited to:

Critical:

- Manufacturers are found to have incorporated RAM into stockfeeds intended for ruminants.

Major:

- A stockfeed formulation (i.e. recipe) for ruminants includes RAM as an ingredient (but no feed has been made or is on hand).
- There appears to be inadequate separation of RAM in the manufacturing processes resulting in potentially contaminated feed for ruminants.
- Stockfeed containing RAM has been supplied, or is available for supply, without a RAM ruminant feed warning statement.
- RAM bags have been re-used for non-RAM feeds resulting in potentially contaminated feed for ruminants.
- There has been non-compliance with directed corrective action.

Minor:

- Stockfeed containing RAM has a RAM ruminant feed warning statement that sets out the message intended but the statement is incorrectly worded, not in a prominent position, incorrectly sized, defaced or of poor contrast making it difficult to read.
- Stockfeed not containing RAM has no negative RAM statement or the statement sets out the message intended but is incorrect, not in a prominent position, incorrectly sized, defaced or of poor contrast making it difficult to read.

The form of corrective or follow-up action will be in accord with the established enforcement policy and procedures in each jurisdiction. The use of CARs, completed on-site by the inspector and left with the person in charge, is strongly encouraged. Ruminant stockfeeds which include, or are suspected or found to be contaminated with, RAM will be dealt with in accordance with state and territory legislation to ensure that they are not used for feeding to ruminants. A model CAR is included at *Form Two-Part B*.

The following information should be noted:

- Where any deficiency is found when checking the numbered points in *Form Two* then question 51 of *Form Two – Part B* should be answered “Yes” and a CAR (*Form Two-Part C*) completed.
- All details on this form are to be completed, paying particular attention to the *Audit Document Ref* (which is simply the type of manufacturer) and the *Section/s Involved (Question Number/s)* relevant to the breach detected.
- The breach is to be classified according to the categories given in *Form Two – Part C*.
- A date for the CAR to be closed out is to be proposed based on the type of non-compliance. The following close-out periods should be used:
 - Critical non-conformity – immediate action
 - Major non-conformity – to be completed within 21 days
 - Minor non-conformity – to be completed within no more than 90 days.
- The inspector is to ensure the manager/company representative signs the CAR. The inspector is to make a copy and leave one with the manager/person in charge.
- Provided *Part A of the form* (Inspection Coversheet) has been signed in relation to making information available then the state/territory jurisdiction will notify the QA

program administrator within seven days of receiving advice of a major or critical breach.

- When returning to the premises for the follow-up visit the inspector is to take with him or her (a copy of) the original completed CAR (*Form Two – Part C*).
- At the inspection, the inspector is to finalise the CAR *follow-up and close-out Details* on the original CAR.
- If the non-conformity is not dealt with and cannot be closed-out by the inspector, and depending on the nature of the breach, the inspector is to:
 - Either issue another CAR, with a time frame of only half that allowed above, and/or
 - Collect information for possible issue of a penalty notice or prosecution in line with the policy of the state or territory.

Other state/territory breaches should be clearly identified in any CAR under the *Section/s Involved (Question Number/s)* i.e. 53 and followed up in line with the relevant jurisdiction's policy.

Form Two – Part A	
Australian Ruminant Feed Ban – Manufacturer Compliance Inspection Form	
1. Department site Code / Number	2. Registration / Property ID Number
3. Company name	
4. Company address (postal)	Company address (street)
Town:	State: Postcode
Telephone 1:	Telephone 2:
Facsimile:	Email:
5. Company approval to enter premises granted: yes no (circle one)	
6. Manufacturer type: RAM only / Non-RAM only / Mixed single line / Mixed separate lines (circle)	
7. Does the company participate in the SFMCA’s FeedSafe QA program : yes no (circle one) QA audited by:	
8. Company approval provided to contact QA program for results of their audit: : yes no (circle one)	
9. Company approval provided to divulge business name and contact details: yes no (circle one)	
10. Date of inspection:*	Date of previous inspection (if known):
Inspector:	Inspector location:
11. Reason for inspection: Programmed / Compliance / Follow up (circle one)	
12. Time of arrival: Time of departure: Elapsed time:	
13. CAR issued:* yes no (circle one) (To be entered after inspection) (If yes, forward with this sheet)	Type of non-compliance: critical major minor (circle one or more)
(If CAR issued, return all inspection Appendix sheets as well as this cover sheet)	
14. Feed samples collected:* yes no (circle one) Number of samples: (To be entered after inspection) Reason:	
Inspector signature: (To be entered after inspection)	Company representative: Name: Position: I acknowledge that the information provided during and/or arising from this inspection may be made available to any person or organisation involved in administering the Australian Ruminant Feed Ban (including industry and QA / Food Safety Programs) and authorise its release for that purpose. Representative signature: (To be entered after inspection) (If representing a company, include the company name and ABN)
Signing within the above is confirmation that the inspector was accompanied by a company representative during the inspection.	
Comments:	
*Information to be collected and reported nationally. Results of sample testing are also to be reported.	

Form Two – Part B - Manufacturer:

Date:

No.	Question	Rating ¹⁷	Comments
ALL MANUFACTURERS			
1	Do you understand the definition of “restricted animal material” (RAM)?		If the manufacturer does not understand this term, an explanation by the inspector will be required.
2	Are you aware that there is legislation in place which bans the feeding of “restricted animal material” to ruminants and requires specific labelling for all manufactured stockfeeds (whether or not they contain RAM)?		Make reference to State or Territory legislation and handout material here, including AHA leaflets.
3	Are all personnel employed at this plant and associated with the manufacture, storage, invoicing or transport of stockfeed aware of these provisions?		
4	Does the plant have an externally audited Quality Assurance program, which specifically addresses all RAM/non-RAM or ruminant feed separation and labelling issues (e.g. FeedSafe*)?		If yes, provide details:, including auditor’s name
5	Do you agree to have your contact details provided to the Stock Feed Manufacturers Council of Australia, to allow them to provide you with information about their services? <i>(This is not a legislated question.)</i>		<i>This allows the State/Territory to identify this business to the SFMCA to allow them to be contacted about membership.</i>
RAM-ONLY FEEDS MANUFACTURERS			
6	Has this mill ever produced ruminant feeds?		Examine a minimum of 30 invoices selected from those issued in the past 12 months (or since the last visit). If any ruminant feed invoices are detected then the MIXED FEEDS section from Q.25 must also be completed.
7	If yes, when was ruminant feed last produced in this mill?		
LABELLING			
8	Is stockfeed with RAM supplied in containers/bags? (Inspect to confirm)		
9	If yes, how many product lines are supplied?		
10	Is stockfeed with RAM supplied in bulk/1 tonne bags?		

¹⁷ Enter as appropriate Y(es), N(o), NA(not applicable) or NFV (not fully verifiable)

No.	Question	Rating ¹⁷	Comments
11	If yes, how many product lines are supplied?		
12	When you supply any stockfeed with RAM what, if any, statement does it have on a label ¹⁸ ?		Examine labels for all lines to a maximum of 30. If there is no RAM statement no feeds should be moved off-site until appropriate labelling has been instituted. CAR Major
			Stockfeed with RAM is supplied with a label but with minor non-compliances ¹⁹ in the RAM statement. CAR Minor
NO RAM FEEDS MANUFACTURER			
13	Has this mill ever produced non-ruminant feeds?		Examine a minimum of 30 invoices selected from those issued in the past 12 months (or since the last visit). If any non-ruminant feed invoices, or RAM, are detected then the MIXED FEEDS section must also be completed.
14	If yes, when was non-ruminant feed last produced in this mill?		
15	Is there any RAM (MBM, fishmeal, chicken feed etc.) on site (specify)? <i>This question is to determine whether they may in fact be mixed manufacturers or whether contamination is possible.</i>		
16	Is there any evidence of ruminant feeds being contaminated with RAM? Provide details. <i>No such feeds should be moved off-site until appropriate labelling has been instituted.</i>		CAR Major
17	Are all purchased products/inputs (including used cooking oil in relevant jurisdictions) assessed for, and correctly labelled in regard to, their RAM status?		Check a sample of delivery dockets / labels to confirm. If not obtain details on the type of feed, manufacturer, retailer and date of purchase for further investigation.

¹⁸ "Label" means a label attached to, or printing directly onto, a container, or for bulk feed a delivery docket or invoice (if the invoice is delivered with the bulk feed).

¹⁹ Incorrect wording but which still gives the meaning, incorrect print size, contrast, location, defaced (but still legible).

No.	Question	Rating ¹⁷	Comments
	LABELLING		
18	Is stockfeed without RAM supplied in containers/bags? (Inspect to confirm)		
19	If yes, how many product lines are supplied?		
20	Is stockfeed without RAM supplied in bulk/1 tonne bags?		
21	If yes, how many product lines are supplied?		
22	Is any stockfeed without RAM supplied without the negative RAM statement on a label? (As applicable.) <i>Examine labels for all lines to a maximum of 30.</i>		(As applicable in jurisdiction) CAR Minor
23	Is any stockfeed without RAM supplied with a label with minor non-compliances ²⁰ in the negative RAM statement? <i>Examine labels for all lines to a maximum of 30.</i>		(As applicable in jurisdiction) CAR Minor
24	Are any bags that have ever held feeds containing RAM re-used for ruminant feed?		CAR Major

²⁰ Incorrect wording, print size, contrast, location, defaced (but still gives the meaning and is legible).

No.	Question	Rating ¹⁷	Comments
MIXED FEEDS MANUFACTURER			
25	Are all purchased products/inputs (including used cooking oil in relevant jurisdictions) assessed for, and identified as being correctly labelled in regard to, their RAM status?		Check a sample of delivery dockets / labels to confirm.
26	Prior to production, are there separate, dedicated and identified areas for purchased feed ingredients containing RAM (including separate in-take hoppers)? #		# Refer to the FeedSafe Guidelines (Appendix 2) for assistance with these questions. CAR Major
27	Are there separate, dedicated and identified areas for storage of manufactured feeds containing RAM? # (Inspect to confirm) If “no”, what if any procedures are employed to ensure there is no post-production contamination?		CAR Major
28	Are separate trucks used to deliver bulk ruminant feeds? # If “no”, what if any procedures are in place to ensure that ruminant or non-RAM feeds are not contaminated with feeds containing RAM during the delivery process?		CAR Major
29	Are there separate and permanently dedicated production lines, including separate augers, mixers, pelleting machines and bagging equipment for the production of ruminant feeds and feeds containing RAM? #		# “Yes” to all these questions means the manufacturer can be considered to have separate production lines for future inspection purposes.
30	Does the manufacturer use manual sequencing to separate ruminant feeds and feeds containing RAM? *		
31	If “yes”, is there any evidence that these systems are not adequate? *		CAR Major
32	Does the manufacturer use “flushing” techniques to separate ruminant or non-RAM feeds and feeds containing RAM? *		CAR Major
33	If so, what type of material, and how much, is used between batches of feeds?		
34	Are adequate procedures in place to ensure that “flushings” are only used in the production of future monogastric (non-ruminant) feeds? *		CAR Major

No.	Question	Rating ¹⁷	Comments
			* "No" to the questions above means that the plant should be targeted for sampling of batches of ruminant feed prepared after a feed containing RAM.
35	Are any "wastes" or waste feed containing RAM generated? (Inspect to confirm)		
36	If waste feeds containing RAM are provided/made available for animal consumption, are they labelled appropriately in regard to their RAM content? <i>No such feeds should be moved off-site until appropriate labelling has been instituted.</i>		(Inspect to confirm) CAR Major
37	Are any bags that have ever held feeds containing RAM re-used for ruminant stockfeed? (Inspect to confirm)		 CAR Major
	FORMULATIONS		
38	Please show me all your formulations for feeds manufactured for ruminants.		Examine formulations for all ruminant feed lines to a maximum of 30. If any formulation reveals that RAM is included as an ingredient then no such feed is to be produced until corrective action has occurred to exclude RAM. <i>Existing supplies of such feed should be immediately recalled if legislatively possible.</i> CAR Major
	LABELLING – feeds with RAM		
39	Is stockfeed with RAM supplied in containers/bags?		
40	If yes, how many product lines are supplied?		
41	Is stockfeed with RAM supplied in bulk/1 tonne bags?		
42	If yes, how many product lines are supplied?		
43	Is any stockfeed with RAM supplied without the RAM statement on a label? <i>No such feeds should be moved off-site until appropriate labelling has been instituted.</i>		Examine labels for all lines to a maximum of 30.

No.	Question	Rating ¹⁷	Comments
			CAR Major
44	Is any stockfeed with RAM supplied with the RAM statement on a label but with minor non-compliances ²¹ ?		Examine labels for all lines to a maximum of 30. CAR Minor
LABELLING – feeds without RAM (As applicable.)			
45	Is stockfeed without RAM supplied in containers/bags?		
46	If yes, how many product lines are supplied?		
47	Is stockfeed without RAM supplied in bulk/1 tonne bags?		
48	If yes, how many product lines are supplied?		
49	Is any stockfeed without RAM supplied without the negative RAM statement on a label?		Examine labels for all lines to a maximum of 30. CAR Minor
50	Is any stockfeed without RAM supplied with a label with minor non-compliances in the negative RAM statement?		Examine labels for all lines to a maximum of 30. CAR Minor

²¹ Incorrect wording, print size, contrast, location, defaced (but still gives the meaning and is legible).

No.	Question	Rating ¹⁷	Comments
CORRECTIVE ACTION REQUESTS			
51	Has a corrective action request been issued for any non-compliance?		
52	Has there been any non-compliance with a previously served corrective action request?		Date and details of previous CAR (if applicable)
OTHER LEGISLATIVE REQUIREMENTS Not mandatory to check under these guidelines. Included to cover instances where an inspector happens to detect non-compliance in other areas in the course of inspecting for RAM controls).			
53	Is there any stockfeed not compliant with State/Territory legislation other than RAM controls?		<i>Provide details</i>

Form 2 Part C - Model Ruminant Feed Ban Corrective Action Request

Original – File with Audit Report
Duplicate – Business

Business Owner

Business Address

Audit Date

Non-conformance Details

Audit Document Reference (Mfr / Rend / etc.)

Section/s Involved (Question Number/s)

Description of Non-conformity/ies (Include Question(s)/number(s)) and corrective action required

Preventive action required

Classification Critical Major Minor
(Tick applicable box/es)

Proposed Follow-up Date

Acknowledgement of Nonconformity

Name (PLEASE PRINT)

Title / Position

Signature

Date

Auditor's Name (PLEASE PRINT)

Signature

Date

Follow-up and Close-out Details

Follow-up Audit Date

Details

Corrective Action Request Closed Yes No If no, raise new CAR etc.

Auditor's Name (PLEASE PRINT)

Signature

Date

The issuing of, and any compliance with, this CAR do not mean that further regulatory action in relation to the identified offence may not be taken by the Department.

5.6 Compliance Inspection of Retailers – by States and Territories

Retailers are those businesses/individuals that sell and re-bag stockfeed not manufactured by them to others.

It must be noted that those retailers that purchase stockfeed and blend stockfeed for sale meet the definition of a stockfeed manufacturer for the purposes of the ruminant feed ban and section 5.5 applies.

Inspection visits to stockfeed retailers are important in the context of ensuring the effectiveness of the ruminant feed ban. It is recognised, however, that such visits can only have limited application when inspecting for compliance, since retailers have little if any control over how stockfeeds are manufactured, packaged or labelled. Removal of non-compliant product from retail sale should be implemented when possible as a means of communicating to retailers the importance of the controls.

Programmed compliance inspection of all known retailers is to be carried out by inspectors approved by each state and territory. Retailer compliance inspections will be conducted taking into account any problems detected at previous inspections. A selection of retailers will be included in the compliance inspection program with a total of ~150 outlets²² to be inspected on a national basis every year²³ (See Table 4).

Table 4:

Number of inspections per year								
NSW	VIC	QLD	SA	WA	TAS	NT	ACT	Total
51	38	35	11	14	5	1	1	156

Retailers should be approached by the inspector to establish their knowledge of the ruminant feed ban and whether they advise end-users that RAM must not be fed to ruminant animals. Visits to retailers also help identify new manufacturers and those retailers who may be repacking or mixing their own rations/feeds

There are some retailers who prepare their own rations/feeds by:

- (i) adding additional ingredients to already prepared manufactured products,
- (ii) re-bagging other manufactured products into smaller lots, or
- (iii) selling product from opened bags or in open bins

²² Selected to give a 95% probability of detecting a non-compliance rate of 1% of among stockfeed retailers.

²³ Based on estimated quantities of bagged stockfeed produced in each jurisdiction as provided by the SFMCA in August 2004.

In the first case the retailer assumes the role of a manufacturer and as such must be made aware of, and required to comply with, the labelling and contamination requirements for manufacturers. They must also be subject to regular compliance inspection as a stockfeed manufacturer and should be separately identified in the state or territory database. Section 5.5 of these guidelines applies when addressing compliance inspection in this instance.

In the second case these retailers should be dealt with as per the standards set out in this section.

In the third case the retailer should be identified within the database of the relevant jurisdiction as a retailer who is selling opened product. Selling from opened bags or unlabelled bins should be discouraged or prohibited depending on the jurisdictions' legislation. This practice has implications regarding the labelling of the product and should be dealt with as per the standards set out in this section.

The carrying out of the core inspection activities listed in this section will be in the form of questions and other appropriate means, including visual inspection, to determine the level or extent of compliance.

If questions asked require YES/NO answers supplementary questioning seeking reasons or further details for either YES or NO answers may be desirable.

The questions listed are additional to any introductory matters that need to be carried out such as obtaining the particulars of the person or company being interviewed during the inspection, e.g. name and address, contact details, property details etc., or approval for entry. These shall be recorded as required by each state or territory using *Form Three* as a model. Entries on that form marked * are compulsory for record keeping in all jurisdictions.

In addition to carrying out interviews with the retailer the inspector should carry out any inspections of the premises they consider necessary to validate to their satisfaction all answers provided to their questions.

Retailer compliance inspections are to be based on a series of core inspection activities using the Retailer Compliance Inspection Form (see *Form Three*) to ensure compliance with the legislation.

The inspection forms incorporate the following minimum information:

- the core activity to be inspected; and
- compliance or the degree of non-compliance.

5.6.1 Compliance inspection of retailers

The following core activities seek to establish whether:

- Stockfeeds are being sold/repacked on site
- stockfeeds are appropriately labelled,
- non-RAM feeds are being contaminated by RAM
- stockfeeds are appropriately labelled when sold.

- 1) Determine whether the retailer is aware of the meaning of the term RAM and the ruminant feed ban and its implications.

If they are not aware, an explanation by the inspector will be necessary before proceeding to further questioning. Relevant publications should be provided.

- 2) Establish whether RAM or stockfeed containing RAM is sold on the premises.

This check will need to be rephrased to cover the situation where a retailer is modifying a manufactured product with additional ingredients – effectively manufacturing it – or re-bagging manufactured product into smaller bags. Item (3) in either of these instances may not apply.

- 3) If stockfeed containing RAM is sold, present or used on the premises, determining whether stockfeeds that do not contain RAM are also sold on site, for which species and whether the feeds may become contaminated
- 4) Checking how the products are to be supplied. Are stockfeeds sold on the premises contained in packages or intended to be supplied in loose bulk or both?
- 5) Checking that all stockfeeds are labelled. Are all stockfeeds sold on, or supplied from, the premises either labelled with a label on or attached to the bag (for packaged product) or a label incorporated in or attached to a delivery docket (or invoice if it is delivered at the same time as the stockfeed) for product supplied in loose bulk?
- 6) Checking the mandatory label information. Are the products labelled appropriately either on a label or on the delivery docket (or invoice)?

The inspector when checking the labels needs to be satisfied that:

- *if the product contains RAM, the following required ruminant feed warning statement is included;*

**“This product contains restricted animal material –
DO NOT FEED TO CATTLE, SHEEP, GOATS, DEER OR OTHER RUMINANTS”**

- *if the required ruminant feed warning statement is included on the label or delivery docket (invoice), the statement:*
 - *has the correct wording;*
 - *is the correct print size (≥ 3mm on a label or 10mm on a woven bag);*
 - *is sufficiently contrasted e.g. dark print on light background (or vice-versa);*
 - *is in a prominent position on the face (front) of the label; and*
 - *is not marked or defaced in such a way that the statement is obscured.*
- *if the product does not contain RAM, the statement below is included (with the same requirements as above):*

“This product does not contain restricted animal material”

Note some manufacturers may use a laminated Gravure printed bag. These should be considered as a labelled item, not a printed woven bag.

These activities are included as core activities that state and territories should carry out in the course of their inspections. They are not exhaustive – if other potential risks are identified state and territories should take appropriate action.

Products containing RAM, and found to be on sale for non-ruminants without the RAM warning statement, should be prevented from being sold and either returned to the supplier or held until correct labels are affixed to the containers.

5.6.2 Compliance with State/Territory's other stockfeed legislation

Each jurisdiction may incorporate additional questions and reporting mechanisms to deal with other issues covered by their own legislation such as statements of contents, statements of purpose or particular standards which are applied to stockfeeds other than RAM controls.

5.6.3 Corrective Actions

The detection of non-compliances which may justify action under legislation should be investigated in accordance with established jurisdictional policy and using appropriate legal cautions.

The most likely non-compliances are identified on the inspection forms as either CAR Critical, CAR Ma (Major) or CAR Mi (Minor), though this interpretation may be varied by the inspector involved.

Examples of the types of non-compliance at the retail level are likely to include but need not be limited to:

Critical:

- Stockfeed containing RAM is knowingly being supplied to a purchaser who has indicated he or she intends feeding it to ruminants

Major:

- Stockfeed containing RAM has been supplied by a manufacturer or sold by the retailer without a RAM ruminant feed warning statement.
- RAM bags have been re-used for non-RAM feeds.
- There has been non-compliance with directed corrective action.

Minor:

- Stockfeed containing RAM has a RAM ruminant feed warning statement that sets out the message intended but the statement is incorrectly worded, not in a prominent position, incorrectly sized, defaced or of poor contrast making it difficult to read.

- Stockfeed not containing RAM has no “non-RAM” statement or the statement sets out the message intended but is incorrect, not in a prominent position, incorrectly sized, defaced or of poor contrast making it difficult to read.

When a retailer has been determined to also be a manufacturer the non-compliances listed above for manufacturers should also be assessed.

The form of corrective or follow-up action will be in accord with the established enforcement policy and procedures in each jurisdiction. CARs are completed on-site by the inspector and left with the person in charge. Ruminant stockfeeds which include, or are found or suspected to be contaminated with, RAM will be dealt with in accordance with state and territory legislation to ensure that they are not used for feeding to ruminants. A model CAR report is included at *Form Three-Part B*.

The following information should be noted:

- Where any deficiency is found when checking the numbered points in *Form Three Retailer Compliance Inspection Form (Part B)* then question 13 of *Form Three –Part A* should be answered “Yes” and a CAR (*Form Three-Part C*) completed.
- All details on this form are to be completed, paying particular attention to the *Audit Document Ref* and the *Section/s Involved (Question Number/s)* relevant to the breach detected.
- The appropriate *ENTERPRISE TYPE* is to be circled on *Form Three – Part A (Retailer Compliance Inspection Form)* based on the answers at questions 6 and 7 of *Form Three-Part B*. A “no” to both indicates they are simply a retailer.
- The breach is to be classified according to the categories given in *Form Three-Part C*.
- A date for the CAR to be closed out is to be proposed based on the type of non-compliance. The following close-out periods should be used:
 - Critical non-conformity – immediate action
 - Major non-conformity – to be completed within 21 days
 - Minor non-conformity – to be completed within no more than 90 days.
- The inspector is to ensure the manager/company representative signs the CAR. The inspector is to make a copy and leave one with the manager/person in charge.
- When returning to the premises for the follow-up visit the inspector is to take with him or her (a copy of) the original completed CAR.
- At the inspection, the inspector is to complete another copy of *Form Three-Part A (the Coversheet)* and finalise the CAR *follow-up and close-out Details* on the original CAR (*Form Three-Part C*).
- If the non-conformity is not dealt with and cannot be closed-out by the inspector, and depending on the nature of the breach the inspector is to:

- Either issue another CAR, with a time frame of only half that allowed above, and/or
 - Collect information for possible issue of a penalty notice or prosecution in line with the policy of the State or Territory.
- Other state/territory breaches should be clearly identified in any CAR under the *Section/s Involved (Question Number/s)* i.e. 20, and followed up in line with the relevant jurisdiction's policy.

Form Three – Part A

Australian Ruminant Feed Ban –Retailer Compliance Inspection Form

1. Department site Code / Number	2. Registration / Property ID Number
3. Company name	
4. Company address (postal)	Company address (street)
Town:	State: Postcode
Telephone 1:	Telephone 2:
Facsimile:	Email:
5. Company approval to enter premises granted: yes no (circle one)	
6. Retailer type: Retailer / Retail re bagger / Retail - open bags (circle)	
7. Date of inspection:*	Date of previous inspection (if known):
Inspector:	Inspector location:
8. Reason for inspection: Programmed / Compliance / Follow up (circle one)	
9. Time of arrival: Time of departure: Elapsed time:	
10. CAR issued:* yes no (circle one) (To be entered after inspection) (If yes, forward with this sheet)	Type of non-compliance: critical major minor (circle one or more)
(If CAR issued, return all inspection Appendix sheets as well as this cover sheet)	
11. Feed samples collected:* yes no (circle one) Number of samples: (To be entered after inspection) Reason:	
Inspector signature: (To be entered after inspection)	Company representative: Name: Position: I acknowledge that the information provided during and/or arising from this inspection may be made available to any person or organisation involved in administering the Australian Ruminant Feed Ban (including industry and QA / Food Safety Programs) and authorise its release for that purpose Representative signature: (To be entered after inspection) (If representing a company, include the company name and ABN)
Signing within the above is confirmation that the inspector was accompanied by a company representative during the inspection.	
Comments:	
*Information to be collected and reported nationally. Results of sample testing are also to be reported.	

Form Three – Part B Retailer:

Date:

No.	Question	Rating	Comments
1	Do you understand the definition of “restricted animal material”?		If the retailer does not understand this term, an explanation by the inspector will be required.
2	Are you aware that there is legislation in place which bans the feeding of “restricted animal material” to ruminants and requires specific labelling for all manufactured stockfeeds (whether or not they contain RAM)?		Make reference to State or Territory legislation and handout material here.
3	Are all personnel employed at these premises aware of these provisions?		
4	Does the retailer handle bulk stock foods containing RAM, including bulk animal meals?		If yes, a manufacturer inspection form should also be completed.
5	Does this premises ever produce stock feeds, including mixing of purchased feeds into a new feed?		If the retailer uses any ingredients or feeds in a compounding process then a manufacturer form should also be completed.
6	Does this premise ever supply re-bagged feeds or feeds from (bulk) bins? If “yes” are they correctly labelled and are there controls or work instructions in place to ensure that “RAM” or products containing “RAM” do not contaminate other products during re-bagging?		
LABELLING – feeds with RAM (pig, poultry, other)			
7	Is stockfeed with RAM supplied in containers/bags? (Repacked bags must be fully labelled)		
8	If yes, how many product lines are supplied?		
9	Is any stockfeed with RAM supplied without the RAM statement on a label ²⁴ ? <i>Examine labels for all lines to a maximum of 30. No such feeds should be moved off-site until appropriate labelling has been instituted.</i>		CAR Major
10	Is any stockfeed with RAM supplied with minor non-compliances ²⁵ in the RAM statement on the label? <i>Examine labels for all lines to a maximum of 30.</i>		

²⁴ “Label” means a label attached to, or printing directly onto, a container, or for bulk feed a delivery docket or invoice (if the invoice is delivered with the bulk feed).

²⁵ Incorrect wording, print size, contrast, location, defaced (but still gives the meaning and is legible).

No.	Question	Rating	Comments
			CAR Minor
LABELLING – feeds without RAM (ruminants, other)			
11	Is stockfeed without RAM supplied in containers/bags? (Repacked bags must be fully labelled)		
12	If yes, how many product lines are supplied?		
13	Is any stockfeed without RAM supplied without the negative RAM statement on a label? <i>Examine labels for all lines to a maximum of 30.</i>		Questions 13 and 14 are only applicable in jurisdictions that have effected this as a legislative requirement CAR Minor
14	Is any stockfeed without RAM supplied with minor non-compliances ⁶ in the negative RAM statement on the label? <i>Examine labels for all lines to a maximum of 30.</i>		CAR Minor
MEAT MEAL SALES AND RECORDS			
15	Is there any RAM (MBM, fishmeal) on site (specify)?		

No.	Question	Rating	Comments
16	Is the retailer recording the details of cash sale purchasers of MBM and providing advisory material to them? <i>(This is not a legislated question.)</i>		If not, encourage retailers to provide copies of advisory material and record sales for tracing purposes.
17	Are any bags that have ever held feeds containing RAM re-used for ruminant feed?		CAR Major
CORRECTIVE ACTION REQUESTS			
18	Has a corrective action request been issued for any non-compliance?		
19	Has there been any non-compliance with a previously served corrective action request?		Date and details of previous CAR (if applicable)
OTHER LEGISLATIVE REQUIREMENTS Not mandatory to check under these guidelines. Included to cover instances where an inspector happens to detect non-compliance in other areas in the course of inspecting for RAM controls).			
20	Is there any stockfeed not compliant with State/Territory legislation other than RAM controls?		<i>Provide details</i>

Form 3 Part C - Model Ruminant Feed Ban Corrective Action Request

Business Owner

Business Address

Audit Date

Non-conformance Details

Audit Document Reference (Mfr / Rend / etc.)

Section/s Involved (Question Number/s)

Description of Non-conformity/ies (Include Question(s)/number(s) and corrective action required

.....
.....
.....
.....
.....

Preventive action required

.....
.....

Classification Critical Major Minor
(Tick applicable box/es)

Proposed Follow-up Date

Acknowledgement of Nonconformity

Name (PLEASE PRINT)

Title / Position

Signature

Date

Auditor's Name (PLEASE PRINT)

Signature

Date

Follow-up and Close-out Details

Follow-up Audit Date

Details

.....
.....
.....

Corrective Action Request Closed Yes No If no, raise new CAR etc.

Auditor's Name (PLEASE PRINT)

Signature

Date

The issuing of, and any compliance with, this CAR do not mean that further regulatory action in relation to

5.7 Compliance Inspection of End-users – by States and Territories

End-users are those operators that feed stockfeed to livestock - e.g. extensive sheep and cattle producers, lot feeders, dairy farmers, mixed ruminant/non-ruminant producers.

If an end-user mixes feed for use on their own property then they are inspected as an end-user.

If an end-user mixes feed and sells it to a third party (off-site), they are to also be inspected as a manufacturer.

N.B: lot feeders, dairy farmers and non-ruminant farmers who custom feed stock owned by other persons but who do not sell feed off site are inspected as an end-user and not a manufacturer.

Programmed compliance inspection of producers of ruminant animals, with particular emphasis on beef feedlots, dairy cattle and producers rearing both non-ruminant (pigs, poultry) and ruminant animals, is to be carried out by inspectors approved by each state and territory.

End-user compliance inspections are to be based on a series of core inspection activities using the **End-user Compliance Inspection** form (see *Form Four*).

The inspections are to be based on a series of core questions checking for compliance with the legislation as it applies to:

- (a) ensuring that RAM or stockfeeds containing RAM are not being fed to ruminant animals on the property;
- (b) ensuring ruminant stockfeeds prepared on-farm are free of RAM; and
- (c) ensuring that ruminants are not allowed to have access to RAM, stockfeeds containing RAM, or to waste materials such as poultry litter, poultry manure or mushroom compost or other food wastes containing RAM, which are stored or used on-farm.

Sufficient end-user inspections are to be carried out nationally to achieve a 95% confidence of detecting a 1% level of non-compliance. The ability to detect 1% non-compliance with 95% confidence is to be achieved by inspecting ~150 producers annually, nationally stratified on the basis of Australia-wide livestock enterprise populations. All state and territories will carry out a share of the ~ 150 inspections proportionately based on relevant herd/flock numbers.

Inspections shall include a proportion of beef farms, feedlots, dairies and mixed enterprises running both ruminant and non-ruminant (pigs and poultry) animals.

Based on Australian Bureau of Statistics (ABS) figures for agricultural businesses (sheep and cattle), 2015/16, the following breakdown of inspections for each state and territory has been determined (see Table 5) with NT also receiving one inspection.

<i>Table 5:</i> Number of end-user inspections per jurisdiction per year								
NSW	VIC	QLD	SA	WA	TAS	NT	ACT	Total
52	37	25	15	14	5	1	0	149

Each jurisdiction needs to undertake a risk assessment to identify what type of properties should be inspected and then to randomly select the farms for inspection based on their own lists of properties.

The inspection forms incorporate the following:

- the core activity to be inspected; and
- compliance or the degree of non-compliance.

The carrying out of the core inspection activities listed in this section will be in the form of questions and other appropriate means, including visual inspection, to determine the level or extent of compliance.

If questions asked require YES/NO answers supplementary questioning seeking reasons or further details for either YES or NO answers may be desirable.

The questions listed are additional to any introductory matters that need to be carried out such as obtaining the particulars of the person or company being interviewed during the inspection, e.g. name and address, contact details, property details etc., or approval for entry. These shall be recorded as required by each state or territory using Form Four as a model. Entries on that form marked * are compulsory for record keeping in all jurisdictions.

In addition to carrying out interviews with the end user, the inspector should carry out any inspections of the premises they consider necessary to validate to their satisfaction all answers provided to their questions.

5.7.1 Compliance inspection of end-users e.g. producers ‘on-farm’

The following core activities aim to establish whether a producer:

- has any RAM on site;
 - feeds RAM to ruminants, and
 - takes adequate precautions to prevent ruminants having access to any RAM.
- (1) Determining the stock held on the property: What type of stock and numbers are located on the property. [Such as but not limited to beef cattle, dairy cattle, sheep, goats, horses, pigs, poultry].
 - (2) Establishing whether RAM is present on the property: Whether there is any RAM, or stockfeed containing RAM (either proprietary feeds or home mixes, including feeds for pigs and poultry), or stored fertilisers containing RAM (such as poultry litter, blood and bone or mushroom compost) on the property. Whether the producer actually knows what is in the products they obtain.
 - (3) Establishing whether ruminant animals on the property are being fed or allowed access to RAM or stockfeeds or stored fertilisers containing RAM.
 - (4) Determining the types of animals being fed and/or allowed access to RAM, stockfeeds or stored fertilisers containing RAM.

- (5) If ruminants have been fed or allowed access to RAM or stockfeed containing RAM establishing whether there was a warning anywhere on the product label (for proprietary packaged feeds) or the delivery docket or invoice (for a loose bulk feed) that the product must not be fed to ruminants.
- (6) If ruminants are on the property and RAM/stockfeed containing RAM is available as feed for non-ruminant animals (e.g. pigs or poultry) determining whether there are adequate steps taken to prevent access to such feeds by all ruminants.

These activities are included as core activities that state and territories should carry out in the course of their inspections. They are not exhaustive – if other potential risks are identified state and territories should take appropriate action.

5.7.2 Guidelines for determining class of end-user for annual report

The list of classes of end-users is provided in Form Seven (page 87) and in Appendix 1 of the Ruminant Feed Ban Compliance Scheme Management Plan (Table two).

Report only one outcome per property.

Report 'Mixed' for any combination of commercial and/or incidental (1) ruminant/s and (2) pig/s and/or poultry.

If not 'mixed', report according to the predominant/most numerous animal type.

Ignore incidental monogastric such as dogs, cats and horses

Examples:

- Extensive property with cattle, dogs and horses = cattle - grass fed.
- Property with feedlot and chickens = Mixed (ruminants with pigs and/or poultry)
- Property with 800 cattle, 20 sheep and 2 goats = Cattle (grass fed or feedlot as applies)
- Property with big piggery and small poultry shed = Pig

5.7.3 Compliance with State/Territory's other Stockfeed Legislation

Each jurisdiction may incorporate additional questions and reporting mechanisms to deal with other issues covered by their own legislation such as statements of contents, statements of purpose or particular standards which are applied to stockfeeds and/or fertilisers.

5.7.4 Corrective Actions

The detection of non-compliances which may justify action under legislation should be investigated in accordance with established jurisdictional policy and using appropriate legal cautions.

The most likely non-compliances are identified on the inspection forms as either CAR Critical, CAR Ma (Major) or CAR Mi (Minor), though this interpretation may be varied by the inspector involved.

Examples of the types of non-compliance at the 'on-farm' end-user level will include but need not be limited to:

Critical:

- Evidence exists that RAM has been, or is being, fed to ruminants.

Major:

- Ruminants have access to RAM (including stored feed, spilled feed, stockpiled fertilisers or waste containing RAM) and there is evidence to show or suggest it has been consumed by ruminants.
- There is inadequate separation in on-farm manufacturing or storage processes resulting in potentially contaminated feed for ruminants.
- There is inadequate labelling of on-farm storages resulting in potentially contaminated feed for ruminants.
- RAM bags re-used for non-RAM feeds resulting in potentially contaminated feed for ruminants.
- There has been non-compliance with requested corrective action.

Minor:

- The feed products are treated to remove possible RAM contamination, if known, either before purchase or on-farm.

The form of corrective or follow-up action will be in accord with the established enforcement policy and procedures in each jurisdiction. The use of CARs, completed on-site by the inspector and left with the person in charge, is strongly encouraged. Ruminant stockfeeds which include, or are found or suspected to be contaminated with, RAM should be appropriately dealt with so that there is no further opportunity for feeding these to ruminants. A model CAR is included at *Form Four-Part B*.

The following information should be noted:

- Where any deficiency is found when checking the numbered points in *Form Four* then question 21 of *Form Four-Part B* should be answered “Yes” and a CAR (*Form Four-Part B*) completed.
- All details on *Form Four* are to be completed, paying particular attention to the *Audit Document Ref* (which is simply an end user?) and the *Section/s Involved (Question Number/s)* relevant to the breach detected.
- The breach is to be classified according to the categories given in *Form Four*.
- A date for the CAR to be closed out is to be proposed based on the type of non-compliance. The following close-out periods should be used:
 - Critical non-conformity – immediate action
 - Major non-conformity – to be completed within 21 days
 - Minor non-conformity – to be completed within no more than 90 days.
- The inspector is to ensure the manager/farm representative signs the CAR. The inspector is to make a copy and leave one with the manager/person in charge.
- Provided the Coversheet of *Form Four –Part B End-User Compliance Inspection Form* has been signed in relation to making information available then the inspector is to advise the relevant staff of the non-conformity/ies so they can pass on information to the relevant QA program.
- Head Office staff in the jurisdiction will notify the QA program administrator within 14 days of receiving advice of the breach.

- When returning to the premises for the follow-up visit the inspector is to take with him or her (a copy of) the original completed CAR.
- At the inspection, the inspector is to complete another copy of the *Form Four – Part A* (Coversheet) and finalise the CAR *follow-up and close-out Details* on the original CAR (*Form Four-Part C*).
- If the non-conformity is not dealt with and cannot be closed-out by the inspector, and depending on the nature of the breach, the inspector is to:
 - Either issue another CAR, with a time frame of only half that allowed above, and/or
 - Collect information for possible issue of a penalty notice or prosecution in line with the policy of the relevant state or territory.

Form Four – Part A

Australian Ruminant Feed Ban – End User Compliance Inspection Form

1. Department site Code / Number	2. Registration / Property ID Number
3. Company name	
4. Company address (postal)	Company address (street)
Town:	State: Postcode
Telephone 1:	Telephone 2:
Facsimile:	Email:
5. Approval to enter property granted: yes no (circle one)	
6. Does the property participate in the LPA or NFAS (Feedlots) QA programs: yes no (circle one)	
7. QA audited by:	
8. Approval provided to contact QA program for results of their audit: : yes no (circle one)	
9. Approval provided to divulge name and contact details: yes no (circle one)	
10. Date of inspection:*	Date of previous inspection (if known):
Inspector:	Inspector location:
11. Reason for inspection: Programmed / Compliance / Follow up (circle one)	
12: Time of arrival: Time of departure: Elapsed time:	
13. CAR issued:* yes no (circle one) (To be entered after inspection) (If yes, forward with this sheet)	Type of non-compliance: critical major minor (circle one or more)
(If CAR issued, return all inspection Appendix sheets as well as this cover sheet)	
14. Feed samples collected:* yes no (circle one) Number of samples: Reason:	
Inspector signature: (To be entered after inspection)	Property representative Name: Position: I acknowledge that the information provided during and/or arising from this inspection may be made available to any person or organisation involved in administering the Australian Ruminant Feed Ban (including industry and QA / Food Safety Programs) and authorise its release for that purpose Representative signature: (To be entered after inspection) (If representing a company, include the company name and ABN)
Signing within the above is confirmation that the inspector was accompanied by a property representative during the inspection.	
Comments: *Information to be collected and reported nationally. Results of sample testing are also to be reported.	

Form Four – Part B - Producer:

Date:

No.	Question	Rating	Comments
1	What type and numbers of stock are located on the property? <i>If no ruminants, end inspection (unless pigs are present and a separate inspection is to be done for swill feeding.)</i>		
2	Do you understand the definition of “restricted animal material”?		If the person does not understand this term, an explanation by the inspector will be required.
3	Are you aware that there is legislation in place which bans the feeding of “restricted animal material” to ruminants and requires specific labelling for all manufactured stockfeeds (whether or not they contain RAM)?		Make reference to State or Territory legislation and AHA handout material here.
4	Are all personnel employed on the property aware of these provisions?		
5	Does the producer ever have any RAM or stockfeeds containing RAM on site (e.g. meat meal, fishmeal, most poultry or pig feeds)?		Specify
6	What animals are fed these products?		If fed to ruminants, collect feed samples, preferably from feed (troughs) in use by ruminants, for further investigation. CAR Critical
7	Is the RAM warning present on all relevant feeds (on label or tag for bagged feeds, or		(Inspect to confirm) If not, obtain details on the type of feed, manufacturer, retailer and date of purchase for further investigation.

No.	Question	Rating	Comments
	the delivery docket or invoice for bulk feeds)?		
8	Does the producer use recycled fats or oils in his ruminant rations?		(Inspect to confirm)
9	If “yes”, are these products treated to remove possible RAM contamination, if known, (either before purchase or on-farm)?		(Inspect to confirm) If not, distribute appropriate extension material. CAR Minor
ON-FARM STOCKFEED MIXING			
10	Are any stockfeeds mixed on the property?		(Inspect to confirm)
11	Are separate storage/mixers/feed bins/augers used for ruminant stockfeeds and stockfeeds containing RAM when both are mixed or used on the property?		(Inspect to confirm)
12	If “no” (producer uses the same mixing/handling/storage equipment) are there adequate procedures to prevent cross-contamination?		(Inspect to confirm) If not, collect feed samples for further investigation. <i>Provide Appendix 2 for advice.</i> CAR Major

No.	Question	Rating	Comments
13	Are stockfeeds containing RAM stored and used in a manner that prevents access by ruminants (e.g. are ruminants excluded from areas where feeds containing RAM are stored, mixed or used, such as poultry feeding areas, pig or poultry feed silos and other areas where feed may be spilled)?		(Inspect to confirm) If not, collect feed samples for further investigation. CAR Critical
14	Are any bags that have ever held feeds containing RAM re-used to store ruminant feed?		CAR Major
15	Is any stockfeed (mixed on this property) supplied to other producers?		(Inspect to confirm) If yes, a manufacturer inspection report should also be completed.
PROPERTY MANAGEMENT			
16	Has meat, blood or bone meal, poultry litter or manure, compost or food waste containing RAM, ever been used as fertiliser/pasture topdressing/soil injection, or is it produced on the property? (<i>See Appendix 5</i>) If “no”, end inspection		(Inspect to confirm) Specify type of material produced/used and supplier details.
17	If “yes”, to either question, are these materials stored on the property before being spread or removed?		
18	If these materials are stored on the property, are adequate procedures in place to prevent ruminant access to such stored fertilisers/products?		(Inspect to confirm) If not, collect feed samples for further investigation. CAR Major

No.	Question	Rating	Comments
19	Are ruminants excluded from top-dressed paddocks for a minimum of 3 weeks?		If not, provide advisory material.
CORRECTIVE ACTION REQUESTS			
20	Has a corrective action request been issued for any non-compliance?		
21	Has there been any non-compliance with a previously served corrective action request?		Date and details of previous CAR (if applicable)

Form Four Part C - Model Ruminant Feed Ban Corrective Action Request

Business Owner

Business Address

Audit Date

Non-conformance Details

Audit Document Reference (Mfr / Rend / etc.)

Section/s Involved (Question Number/s)

Description of Non-conformity/ies (Include Question(s)/number(s)) and corrective action required

Preventive action required

Classification Critical Major Minor
(Tick applicable box/es)

Proposed Follow-up Date

Acknowledgement of Nonconformity

Name (PLEASE PRINT)

Title / Position

Signature

Date

Auditor's Name (PLEASE PRINT)

Signature

Date

Follow-up and Close-out Details

Follow-up Audit Date

Details

Corrective Action Request Closed Yes No If no, raise new CAR etc.

Auditor's Name (PLEASE PRINT)

Signature

Date

The issuing of, and any compliance with, this CAR do not mean that further regulatory action in relation to the identified offence may not be taken by the Department.

5.8 Compliance Inspection of Imported Stockfeed and Stockfeed Ingredients – by the Australian Government via Department of Agriculture, Water and the Environment

Biosecurity measures for the importation of stockfeeds into Australia are outlined in the policy: [Importation of Stockfeed and Stockfeed Ingredients - Finalised Risk Management Measures for Transmissible Spongiform Encephalopathies \(September 2015\)](#) published by the Australian Government Department of Agriculture, Water and the Environment.

6.0 SAMPLING AND TESTING OF DOMESTICALLY PRODUCED RUMINANT STOCKFEEDS

This section deals with how the States and Territories shall take samples for testing of domestic feed products, which can include imported stock foods released for sale in Australia.

6.1 Sampling Program for Stockfeeds

6.1.1 Routine Sampling and Testing of Domestic Feed Products

Routine sampling of domestic ruminant feeds for monitoring purposes will be carried out in each jurisdiction to validate the results of compliance inspections and of company/QA testing in accordance with FeedSafe. In general, monitoring sampling will be targeted at high risk activities and is expected that the majority of samples will be collected from stockfeed plants producing both RAM and non-RAM (ruminant) stockfeeds.

The States and Territories are to collect a minimum of 65 samples annually divided between the states and territories based on the amount of feed manufactured off-farm and the amount of meat and bone meal produced in each state/territory (2011 figures, see Table 8).

<i>Table 8:</i> Number of Feed Samples to be collected by each Jurisdiction								
NSW	VIC	QLD	SA	WA	TAS	NT	ACT	Total
17	18	16	6	6	1	1	0	65

The method of sampling shall be according to the protocol described in Section 6.3. A sample laboratory submission form for Biosecurity Queensland's Biosecurity Services Laboratory is included as *Form Six* for use as required.

Include a statement on the laboratory submission form to the effect that "This is routine testing of domestic feed for the Ruminant feed ban. **Animal Health Australia is to be invoiced for the cost of the testing**".

6.1.2 Non-routine Testing of Domestic Feed Products

If, at any time, an officer suspects on reasonable grounds that there may be RAM contamination of ruminant stockfeeds, or RAM material stored where ruminants have access to it, or a stockfeed being supplied for feeding to, or fed to, ruminants contains RAM as one of its ingredients, the stockfeed must be dealt with in accordance with state and territory legislation to ensure that it is not fed to ruminants or that ruminants are prevented from gaining access to it. Ruminants that are likely to have been fed high risk feeds will need to be dealt with in accordance the "*National Guidelines for Ruminants That Have Been Fed RAM*".²⁶

²⁶ Version 10, 2005

A sample of the stockfeed should be taken in accordance with the procedures set out in this section and submitted for testing for the presence of RAM. Appropriate corrective action is to be instituted for contaminated feeds.

If contaminated ruminant feed is detected following testing of feed samples then the manufacturer/farmer is to be issued with a Corrective Action Request (CAR) and given a maximum time frame to correct their procedures in accordance with previous sections.

The CAR should indicate that feed still present in the manufacturing plant when detected is to be reworked to produce non-ruminant feed.

The process to be used for dealing with contaminated feed detected, such as feed on farms or feed in trade will be based on a risk assessment by the relevant jurisdiction taking into consideration factors such as source of the RAM and contamination levels in the feed.

In all instances a sample of the stockfeed should be taken in accordance with the procedures set out in this section and submitted for testing for the presence of RAM in accordance with the nationally approved laboratory tests. Appropriate corrective action is to be instituted.

A positive or inconclusive test result does not necessarily equate to a breach of the ban. It provides the basis for follow-up visits and further detailed investigation to identify other possible risk areas and grounds for any further compliance activity including directed corrective action.

If contaminated ruminant feed is detected by testing of feed samples then the manufacturer/farmer is to be issued with a Corrective Action Request (CAR) and given a maximum time frame to correct their procedures:

Any positive test result shall be regarded as a critical non-conformity. Action should be completed within 7 days if possible. Structural defects, such as poor equipment, may require more time to correct but in the meantime additional flushing/sequencing should be used, or the equipment used only for either ruminant or non-ruminant feeds for future manufacturing batches, until it can be fixed. This should be indicated in the CAR. Where there are no structural defects detected or the previous inspection indicated that the sequencing/flushing procedures were sound and conforming to the SFMCA's guidelines, then the CAR should direct the manufacturer/farm to investigate possible reasons why the positive detection occurred and to advise the inspector the outcome of their investigation within a time period specified in the CAR. A further CAR may need to be issued depending on the manufacturer/farm's investigation findings. The feed producer should be advised to obtain and use lateral flow test devices²⁹ for on-site feed testing to confirm the effectiveness of any action taken.

Repeat sampling (by the jurisdiction) at the end of the period indicated in the CAR should be undertaken to confirm the adequacy of any changes. Use of lateral flow devices on-site by inspectors may be indicated in such situations.

The CAR should indicate that feed still present in a manufacturing plant when detected is to be reworked to produce non-ruminant feed.

6.2 Approved Testing Regimen

6.2.1 Routine Testing of Domestic Feed Products

Testing of feed products for RAM should be undertaken using a two-step approach utilising a screening test to be followed by a confirmatory test for all positives detected by the screening test.

The screening test to be used is the *FeedChek*[™] lateral flow device²⁷, whilst the confirmatory test to be used is microscopy undertaken by Biosecurity Queensland's Biosecurity Services Laboratory.

6.2.2 Non-routine Testing of Domestic Feed Products

Microscopy only should be used for testing these samples through Biosecurity Queensland's Biosecurity Services Laboratory.

6.3 Sampling Protocol for Domestic Stock Foods

The following procedures for collecting stockfeed samples for subsequent testing are based upon ISO 6497:2002. For a complete reference to sampling procedures, this ISO document should be consulted.

Representative sampling is required to obtain a pooled sample which represents the mean value of the feed being sampled. A minimum number of primary samples shall be taken from a lot (Tables 9 and 10). Primary samples are combined and mixed to form the pooled sample. Where the pooled sample is larger than that required for laboratory testing and where duplicate samples are required, it shall be divided to provide a representative sample.

Sampling equipment should be a bag trier for packaged stock feed and a bulk trier or spear for bulk stock feed. For sampling stock feed whilst in motion, a scoop, shovel or similar sampling container should be used.

Contamination of samples must be prevented at all stages of sampling. The sampling equipment shall be clean, dry and free from residual feed. Sampling spears based upon twin spiral cylinders should not be used due to residual feed particle contamination. Sampling equipment should be washed with water and detergent between different samples.

Use clean disposable gloves for each pooled stockfeed sample being tested. Unused plastic bags should be used for sample collection. Primary samples should not be collected and bulked together in containers which have had prior feed use.

The number of primary samples is determined by the size of the lot of stock feed being sampled. The pooled sample size is greater for larger lots of stock feed. Tables 9 and 10 define the number of primary samples and pooled sample size required for various lot sizes.

For bulk stock feed, samples should be obtained from either bulk silos or bulk delivery vehicles using a sampling spear. Sampling to be undertaken across the bulk feed delivery, choosing each sampling point so that all parts of the lot have an equal chance of selection.

Where bulk product is inaccessible for sampling, samples can be taken during either loading or unloading. Where sampling is undertaken with product in motion, take primary samples through the whole cross-section of the feed flow, either manually or mechanically, at time intervals depending upon the flow rate, as follows. Use the flow rate and lot size to determine the time for the lot to pass the sampling point. Divide this time by the number of primary samples to be taken, giving time bands. Take a primary sample randomly in each of these time bands.

²⁷ FeedChek[®] manufactured by Strategic Diagnostics Inc. and available from Foss Pacific (North Ryde, NSW).

<i>Table 9:</i> Packaged Stockfeed		
Number of bags	Number of primary samples	Min. mass of pooled sample - kg
1 to 5 bags	Each bag	1
6 to 30 bags	Every third bag but no fewer than 5 bags	2
31 to 100 bags	Every fifth bag but no fewer than 10 bags	4
101 bags and over	Every fifth bag but no fewer than 20 bags	8

<i>Table 10:</i> Bulk Stockfeed		
Mass of lot	Number of primary samples	Min. mass of pooled sample - kg
Up to 2.5 tonnes	7	2
2.5 to 5 tonnes	10	4
5 to 10 tonnes	14	8
Over 10 tonnes	18	8


Primary samples should be combined together, mixed and divided to provide a minimum 500g sample for laboratory testing. Sample dividing should be completed using a sampling device, by quartering, or other appropriate size reduction process. Remaining portions of the pooled sample should be retained for other verification tests and a portion left with the owner or operator of the premises from which the sample is obtained. It is desirable to use seals or bags that are tamper evident or as required for regulatory purposes in each jurisdiction.

All samples from imported stockfeeds are to be tested as soon as possible. The turn-around-time for the tests should be negotiated with the laboratory.

Individual test results will be supplied to the submitter listed on the laboratory submission form.

Form Six

Laboratory Submission Form

 <p>Queensland Government</p>	VETERINARY LABORATORY QUALITY MANAGEMENT SYSTEM		GEN-008	
	SPECIMEN ADVICE SHEET: FORM A			
<p>The Department of Agriculture, Fisheries and Forestry is collecting the information on this form to provide government with information to perform diagnostic testing for animal and plant disease management and control. This information will only be accessed by authorised employees within the department. Some information may be given to <u>external laboratories</u> (as listed in the link) for the purpose of further diagnostic testing if required while some information may be provided to other <u>state and federal animal and plant health authorities</u> (as listed in the link) for the purpose of animal and plant disease management, control and reporting. Your information will not be disclosed to any other parties unless authorised or required by law.</p>				
Submitter's name: Company Address Town Post code Fax no: Phone no: Email:		Submitter's reference:		Lab. use only <div style="border: 1px dashed black; padding: 5px; width: fit-content; margin: 0 auto;"> Affix LIMS job label here </div>
Animal details: Owner name Animal location: Property number (PIC) Property name Address Town Post code		Animal type Breed/species Sex <input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Desexed Age/age Group Status <input type="checkbox"/> Homebred <input type="checkbox"/> Introduced	Production type: <input type="checkbox"/> Meat <input type="checkbox"/> Dairy <input type="checkbox"/> Fibre <input type="checkbox"/> Layer <input type="checkbox"/> Breeding <input type="checkbox"/> Fingerling <input type="checkbox"/> Ornamental <input type="checkbox"/> Other	Husbandry type: <input type="checkbox"/> Pasture <input type="checkbox"/> Feedlot <input type="checkbox"/> Shed/ stable/ pen <input type="checkbox"/> Saleyard <input type="checkbox"/> Freshwater <input type="checkbox"/> Marine <input type="checkbox"/> Wild <input type="checkbox"/> Other
Current outbreak: Date of onset/...../..... No. on property No. in at-risk group No. sick No. deceased Treatments: Vaccinations:		Related previous job(s) #		
History and clinical signs: Form B (Necropsy) attached <input type="checkbox"/>				
Diseases suspected Tests requested				
Reason for test: <input type="checkbox"/> Disease investigation <input type="checkbox"/> Health test <input type="checkbox"/> Referral <input type="checkbox"/> Accreditation <input type="checkbox"/> Surveillance <input type="checkbox"/> Export to <input type="checkbox"/> Experimental project: <input type="checkbox"/> Regulatory <input type="checkbox"/> Other:	Specimens:	Date of collection/...../.....	Animal/sample ref.	Lab. use only
Customer signature:		Date:/...../.....		
<input type="checkbox"/> Satisfactory samples <input type="checkbox"/> Unsatisfactory		Receiving officer:	Time:	Job syndrome: Pathologist:
Authorisation: VLQMS committee				Issue: 3 Date: 21/09/12

This form can be downloaded from:

https://www.daf.qld.gov.au/data/assets/pdf_file/0006/65733/GEN008SpecimenAdviceSheet.pdf

7.0 SAMPLING PLAN FOR TESTING PRODUCT FOR THE PRESENCE OF RESTRICTED ANIMAL MATERIAL AND CORRECTIVE ACTION

The sampling and testing arrangements applicable to imported products prior to being released for sale in Australia, is a function of the Australian Government Department of Agriculture, Animal Division (Biosecurity).

7.1 Sampling of Imported Product

In the first instance, every shipment of the product will be subjected to testing for animal derived material. When a sufficient body of evidence shows consistent compliance, the rate of sampling will be reduced. This principle follows the "switching rules" incorporated into DoA's Imported Foods Inspection Program. The rate of sampling for ruminant material will be increased for product of unknown status and history. The criteria will follow the following guidelines:

1. Tightened level = 100 % of shipments sampled and tested

Under the tightened level, each consignment is tested. Five consecutive passes must be achieved at this level before inspection drops to the normal rate of inspection. This level will apply to consignments of each type of product imported. Where there are significant changes to management or production parameters at the point of production, the sampling rate will revert to this level.

2. Normal level = 25 % or 1 in 4 of shipments sampled and tested

Under the normal level of inspection, one in four shipments is tested on a statistically random basis where importations continue on a regular basis.

Twenty consecutive passes must be achieved at this level before inspection drops to the reduced level of testing.

3. Reduced level = 5 % or 1 in 20 shipments sampled and tested

7.2 Testing of Imported Product

Animal Health Committee has endorsed:

- The Agrigen Biotech PCR Assay (Ruminant Screen) as the test for detecting mammalian and avian animal material (bovine, ovine, porcine and avian) in imported fishmeal. Evaluations have demonstrated that this can reliably detect 0.05% bovine, ovine, avian, and porcine tissue with 100% sensitivity but cannot detect piscine material at that level.
- Microscopy as the test for detecting terrestrial vertebrate animal material, poultry material and fish material in imported plant-based stockfeed.

Note: Although the Agrigen Biotech PCR assay has been demonstrated a detection level of 0.05%, the company has advised the Department that the level of reporting used is 0.1%.

Detection of non-MBM RAM

Substitution with blood meal or feather meal could be a viable option especially for some high value, high protein plant based stockfeed.

In addition to striated and cardiac muscle, microscopy screening should also look for the presence of blood clumps, fibrin, leucocytes, keratin and other animal tissues or cellular structure.

Microscopy may be inadequate to detect RAM in highly processed, purified stockfeed additives and plant extracts. For these products if testing is to be undertaken, PCR Assay remains the preferred detection method.

8.0 GOVERNMENT INSPECTORS ACCOMPANYING INDUSTRY BASED QUALITY ASSURANCE AUDITORS ON AUDITS

The objective of this activity is to have a nationally consistent process in place for jurisdictional inspectors to follow when accompanying industry-based Quality Assurance (QA) auditors on their audits that include elements related to the Ruminant Feed Ban (RFB).

In October 2006 the Food & Veterinary Office (FVO) of the EC audited Australia and recommended that Australia consider strengthening the co-operation between the third party auditing bodies for industry operated QA programs and the jurisdictions involved in the RFB controls in order to enable the jurisdictions to take appropriate enforcement actions where non-compliances are detected (Recommendation 10). This recommendation was endorsed by Animal Health Committee and SAFEMEAT with TSEFAP being asked to implement such a system.

The industry QA programs involved in this are: Australian Renderers Code of Practice, FeedSafe, National Feedlot Accreditation Scheme (NFAS), Livestock Production Assurance (LPA) and Livestock Production Assurance Quality Assurance (LPAQA).

Some industry run QA programs already have government oversight. This is already in place for the Australian Rendering Association (ARA) where State Food Safety Authorities view audit paperwork and have contact with the QA auditors. The Dairy industry is similar where State Food Authorities or State Dairy Safety Authorities hold annual workshops with the various industry QA program auditors to ensure consistency of approach is achieved.

The system would entail each jurisdiction to accompany auditors undertaking audits against the four industry QA standards as set in Table 11.

The jurisdiction would rotate year by year, so that each jurisdiction would undertake this task once every seven years. The ACT is not involved.

The timing of this activity will depend on the arrangements each jurisdiction makes with the two organisations involved, the SFMCA (FeedSafe) and AUS-MEAT Ltd (NFAS, LPA and LPAQA).

Each jurisdiction will need to contact the SFMCA and AUS-MEAT to obtain the contact details of auditors operating in their jurisdiction.

The RFB communications protocol for the notification of Critical Action Requests (CARs) by the industry QA programs to the jurisdictions shall be followed according to the protocol described in Section 4 of these Guidelines.

The inspectors from the jurisdictions shall ensure the QA auditors are conducting their audits sufficiently to satisfy the ARFB National Uniform Guidelines 2019-20. The state coordinator will provide a report to the National Technical Committee at the end of the financial year.

Table 11:**Roster for when jurisdictions need to accompany industry QA auditors**

Year	State	Organisation to Contact	QA Program	Audits
2020-21	SA	Stock Feed Manufacturers Council of Australia	FeedSafe	1
		AUS-MEAT	NFAS	1
			LPA	1
			LPAQA	1
2021-22	NSW	Stock Feed Manufacturers Council of Australia	FeedSafe	1
		AUS-MEAT	NFAS	1
			LPA	1
			LPAQA	1
2022-23	NT	Stock Feed Manufacturers Council of Australia	FeedSafe	0
		AUS-MEAT	NFAS	1
			LPA	1
			LPAQA	1
2023-24	TAS	Stock Feed Manufacturers Council of Australia	FeedSafe	1
		AUS-MEAT	NFAS	1
			LPA	1
			LPAQA	1
2024-25	WA	Stock Feed Manufacturers Council of Australia	FeedSafe	1
		AUS-MEAT	NFAS	1
			LPA	1
			LPAQA	1
2025-26	QLD	Stock Feed Manufacturers Council of Australia	FeedSafe	1
		AUS-MEAT	NFAS	1
			LPA	1
			LPAQA	1
2026-27	VIC	Stock Feed Manufacturers Council of Australia	FeedSafe	1
		AUS-MEAT	NFAS	1
			LPA	1
			LPAQA	1

9.0 REPORTING

9.1 Domestic

Each jurisdiction will carry out the necessary inspections and testing, in accordance with its internal schedules, to meet the targeted numbers for each category of premises.

Reports will be made to AHA, by the end of August each year, for the inspections carried out in the previous 12 months (July to June). Jurisdictions are to complete *Form Seven* for this purpose.

The reports will include the information required using the format as set out in Form Seven.

Retailers who repack stockfeeds should be reported nationally as retailers, but retailers that mix or formulate their own feeds, e.g. by adding additional ingredients to already manufactured products should be reported as manufacturers.

An independent report will be supplied by the jurisdiction that has accompanied the industry QA auditors on an audit. This report will include details of the audits (date, location, time period, etc.) and any relevant observations that need highlighting (e.g. differences between approaches, training requirements, etc.).

9.2 Imports

The Department of Agriculture, Animal Division (Biosecurity) undertakes inspections and testing of imported stockfeeds.

Reports will be made to AHA by the end of August each year on the administration of RAM controls imposed on imported stockfeeds carried out in the previous 12 months (July to June).

9.3 Education and Awareness Programs

All state and territories should maintain a register of educational and awareness material which they produce such as media releases, advertising or advisory material posted on web sites, etc.

National Reporting of Ruminant Feed Ban Compliance Activities

Jurisdiction: **Date of this report:**

For the period: 1 July 20 to 30 June 20

Table One:

Jurisdictional Inspections								
	Renderers	RAM only (monogastric) feed manufacturers	Only no RAM feed manufacturers	Mixed feed manufacturers Single lines	Mixed feed manufacturers Separate lines	Retailers	End-users / Farmers	TOTAL
Number of businesses/ properties								
Number requiring inspection / 12 months								
Number inspected								
Number CARs issued in current FY –Critical nonconformities (A)								
Number CARs issued in current FY –Major nonconformities (B)								
Number CARs finalised of those issued in current FY (C)								
Number of CARs carried forward from last report (D)								
Number of CARs carried forward from last report and finalised since last report (E)								
Number of CARs to be carried forward to next FY (F)								
Number of feed samples tested								
Number of feed samples negative for RAM @ 30/06/21								
Number of prosecutions								

NB: Number carried forward from this financial year plus number carried forward from last financial year should equal the total number to be carried forward to next financial year i.e. (A+B-C) +(D-E) = F

Table Two:

End-users Inspected

	NSW	NT	QLD	SA	TAS	VIC	WA	ACT	TOTAL
Cattle- Feedlot									
Cattle – Grass fed									
Sheep or goats									
Mixed (ruminants with pigs and/or poultry)									
Other ruminants (e.g. deer, buffalo, camels)									
Pig									
Poultry									
Total									
Number of inspections required to meet Uniform Guidelines									

Table Three:

Number of Feed Samples Collected and Tested for RAM During 2021-22 (July to June)

	Number of Samples Required	Number of Samples Tested	Number of Positive Results for Ruminant Feed.	Comments
Queensland				
New South Wales				
Australian Capital Territory				
Victoria				
Tasmania				
South Australia				
Western Australia				
Northern Territory				
TOTAL				

Table Four.						
Industry Food Safety & Quality Assurance Third Party Audits						
		Number of program participants	Number inspected during 2021-22	Number of CARs issued – Critical nonconformities	Number of CARs referred to Jurisdictions	Number CARs finalised 30 June 2022
LPA Food Safety Program						
LPA Quality Assurance Program						
National Feedlot Accreditation Scheme						
Dairy Quality Assurance	QLD					
	NSW					
	VIC					
	TAS					
	SA					
	WA					
	TOTAL					
Feed Safe						
Australian Rendering Standard						
TOTAL						

Comments (relating to Tables 1, 2 & 3):

Project Management (AHA)

NSW

ACT

Victoria

Tasmania

South Australia

Western Australia

Northern Territory

Queensland

Department of Agriculture, Water & the Environment

APPENDIX 1 – SUMMARY OF AUSTRALIAN STATE AND TERRITORY LEGISLATION REGULATING THE RUMINANT FEED BAN

Jurisdiction	Name of legislation
New South Wales	<i>Biosecurity Act 2015</i> <i>Biosecurity Regulation 2017</i>
Victoria	<i>Livestock Disease Control Act 1994</i> (Order under section 29) <i>Agricultural and Veterinary Chemicals (Control of Use) Act 1992</i> (Order under section 25A) <i>Agricultural and Veterinary Chemicals (Control of Use)(Ruminant Feed) Regulations 2015</i>
Queensland	<i>Biosecurity Act 2014</i> <i>Biosecurity Regulation 2016</i>
South Australia	<i>Livestock Act 1997</i> <i>Livestock Regulations 2013</i> (Part 9)
Tasmania	<i>Animal Health Act 1995</i> <i>Animal Health Regulations 2016</i> (Part 5)
Western Australia	<i>Biosecurity and Agriculture Management Act 2007</i> <i>Biosecurity and Agriculture Management (Agriculture Standards) Regulations 2013</i>
Australian Capital Territory	<i>Animal Disease Act 2005</i>
Northern Territory	Livestock Act 2008, Livestock Regulations 2015 (Part 4, Division 3, Item 74 - 80)

APPENDIX 2 – GUIDELINES FOR PREVENTING CONTAMINATION WITH RESTRICTED FEED INGREDIENTS²⁸

The following document contains guidelines for preventing the contamination of feed with restricted feed ingredients. The format uses the same nomenclature as the Code of Good Manufacturing Practice for the Feed Milling Industry developed by the Stock Feed Manufacturers' Council of Australia and approved by the Animal Health Committee. The Code contains statements relating to the care and attention needed to prevent contamination of feed with "*Restricted Feed Ingredients*". These statements are *italicised* for convenience and **additional comments are highlighted in bold**.

Users of this document need to be aware that the numbering system in use follows that from the Code of Good Manufacturing Practice. Relevant sections of the Code are referred to and this results in gaps in numbering of these guidelines.

CODE OF GMP INTRODUCTION

This Code of Good Manufacturing Practice (GMP) is a guideline for the manufacture of stock feed that is true to label and suitable for its intended purpose. By following this Code of GMP potential sources of error or contamination in the manufacture of the product can be minimised. Contamination, as used in this document, refers to the presence in a stock feed product of any foreign material or ingredient, whether by accident or error, that would compromise the health or performance of the livestock for which the feed is intended, the health of human consumers of food products derived from such livestock, or the trade in animal products and animal feed. *This includes the contamination or unintended mixing of one finished stockfeed product with another.*

The Code does not deal with common or statute law requirements such as those relating to stock feed standards and labelling provisions, veterinary preparations, occupational health and safety, dangerous goods, poisons, weights and measures, waste disposal and pollution, and environmental protection. These must be met by the stock feed compounder. However some apparent duplication of legislative requirements may occur in the Code where it is felt that a point needs to be emphasised or explained more clearly. *One such example is in relation to the ruminant feed ban under which the feeding of restricted animal material (RAM) is prohibited.*

RAM is defined as tissue, blood or feathers derived from the carcass of an animal, including any substance produced from or containing any such tissue blood or feathers (but not including tallow, gelatine, milk or milk products). By definition RAM includes any rendered animal meal including but not limited to meat and bone meal, fish meal or poultry offal meal.

It is intended that the Code be used as a benchmark against which existing production facilities and practices may be judged. Those clauses in the Code which are considered essential are indicated by the use of the word "must". In other clauses, where the word "should" is used, implementation need not be immediate but should be aimed for and preferably be a part of the company plan. Thus, the Code indicates, by the use of "must", the points which are to be attended to first in a progressive upgrading program.

²⁸ Guidelines produced by the Stock Feed Manufacturers' Council Of Australia

1.0 HAZARD RISK ASSESSMENT

- 1.1 A site hazard risk assessment plan for food safety must be undertaken and regularly reviewed. The plan must take account of risks to human and animal health and trade in livestock products and stock feed.
- 1.2 The hazard risk assessment plan must utilise HACCP principles, these being:
- list all potential hazards associated with each step, conduct a hazard analysis and consider measures to control hazards;
 - determine critical control points (CCP);
 - establish critical limits for each CCP;
 - establish a monitoring system for each CCP;
 - establish corrective action plans for deviations that may occur at CCPs;
 - establish verification procedures;
 - establish record keeping and documentation.

Storage or use of RAM on sites which also manufacture ruminant feeds is a risk which must be included with the site's hazard risk assessment. HACCP principles must be used, looking at critical control points in minimising the risk of cross transference of RAM into ruminant feeds. The risk assessment must include all critical control points from raw material receipt (including inwards transport vehicles) through to delivery onto farm.

2.0 PREMISES AND MILL BUILDINGS

- 2.5 *Adequate facilities must be provided to hold raw materials in a manner which prevents mixing or cross-contamination except as required by product formulations. Where mills manufacture ruminant feeds and use RAM, separate receiving hoppers should be used for products containing RAM. Procedures adopted to address this RAM risk must be documented and verified through inspection, sampling and testing.*

Where separate intake receipt systems are not available, then detailed review of procedures including sequencing of raw material delivery, cleaning and flushing after delivery of RAM is needed.

Procedures should include a mandatory inspection of the pit, surrounds and the conveyors to ensure they are cleaned of all material before the next non-restricted feed raw material is received.

Some milling equipment such as drag conveyors are designed to be self-cleaning, whilst other equipment such as screw conveyors are not self-cleaning. Where intake and conveyors do not always self-clean, these areas should be re-engineered and repaired at the earliest opportunity.

For mills where there are not separate receipt systems, the following is recommended for raw material intake flushing following the receipt of RAM:

- For self-cleaning systems, a minimum 500kg of non-restricted materials.
- For non-self-cleaning systems, a minimum 5 minutes of running with non-restricted materials or the time it takes for the flushing material to reach the furthest possible destination point.

It is recommended that the process to flush the intake system, and the volume of material used, has been verified to confirm that no residual RAM is carried into the following feed. Verification of the flushing system is based upon physical inspection, sampling and testing and should be completed at least every 6 months.

The flushing material used must be segregated following flushing and only used in feeds containing RAM according to the rework conditions listed below (see 9.6).

There should be a documented raw material intake procedure and records of material intake handling should be maintained.

Batching bins should be checked to confirm they discharge as designed and they should not leak. Raw material bins used for RAMs when emptied should be inspected and cleaned prior to filling with other raw materials.

Discharge from dust collectors needs to be disposed of in a manner to ensure any RAM collected within the dust does not re-enter the feed line contaminating ruminant feeds.

3.0 PERSONNEL

3.4 Training must be appropriate for the complexity of the manufacturing process and the tasks assigned. Personnel must be trained to understand the importance of the processes for which they are responsible in terms of their impact on all aspects of product safety, quality and environment.

Training should ensure an understanding of any significant legislative requirements relative to the staff member's assigned tasks (e.g. the ruminant feed ban for the prevention of BSE).

A good idea is to formally review this Guidelines document with appropriate staff, especially including procedures developed to meet current regulations. Remember to keep a copy of your training record for audit purposes and to ensure this on-going training is included in your program for new employees and where existing staff responsibilities change.

5.0 RAW MATERIALS - SOURCING/PURCHASING

5.4 A manufacturer who purchases supplies of packaged RAM that are not labelled with the ruminant feed warning statement must either include the correct labelling statement on the packages prior to storing at the storage facilities or reject the product and return it to the supplier.

It is illegal to sell RAM which is not appropriately labelled. This should be a condition of your purchase and goods not correctly labelled should generally be rejected and returned to your supplier. Any RAM products received which are missing RAM labels cannot enter storage unless they are relabelled.

6.0 RAW MATERIALS – RECEIVALS

6.3.2 Appropriate tests should be applied to all raw materials on receipt to detect any obvious biological, chemical or physical contamination risks and any other product quality risks.

Non RAM raw materials need to be assessed to confirm they have not been contaminated with RAM. Additionally there is a risk that bulk trucks used to transport bulk raw materials may contain carry-over materials.

A good idea is to have your suppliers conduct truck inspections before loading and refuse to load vehicles which are not clean. This is especially the case where vehicles are used both for the transport of RAMs, other meals and/or grains. You might consider formally adding such a requirement to your purchase and cartage contracts.

When RAMs are received add a requirement to ensure that the vehicle is completely empty before completing the receipt procedure.

6.3.4 All packaged raw materials, premixes and medications must be clearly labelled by the supplier with product name, weight, date of manufacture and/or expiry date, batch number *and, when applicable, the mandatory ruminant feed warning statement required under the ruminant feed ban.* These should be received in sound condition (e.g. no broken bags or leaking containers).

Your receipt procedures should include checking that the appropriate warning is in place on all packages and provision made to record that such an inspection occurred.

7.0 RAW MATERIALS – STORAGE

7.1 All storage areas should be designed and maintained to prevent damage to, contamination, *un-intended mixing*, or spoilage of ingredients and packaging materials.

7.6 *Where mills manufacture ruminant feeds and have raw materials containing RAM on site, these raw materials must be stored in designated bins or areas to ensure cross contamination of ruminant feeds with RAM does not occur.*

When reviewing this aspect a careful check should be conducted and a record of the review maintained in your quality records for audit if/when required.

Where improvements to material separation are recorded as being required these should be scheduled without undue delay.

9.0 FORMULATION AND MANUFACTURING INSTRUCTIONS

9.2 For each formula the following information must be included:

- the name and unique identity code of the product;
- an indication as to the animal type for which the product is intended to be fed;
- the precise quantity of each raw material and, where appropriate, the location of the bin or bags of that raw material;
- *if the formula contains RAM, and the mill also manufactures ruminant feeds, a statement must be included to the effect that the product contains RAM and must not be used for ruminant feeding.*

Wording such as “Contains RAM and must not be used for ruminant feeding” is recommended. The critical aspect is in ensuring production staff recognise feeds which do and do not contain RAM and production scheduling responds accordingly.

9.4 Good manufacturing practice must recognise and address the *potential for contamination of feeds with incompatible feed* ingredients or medications resulting from the order in which feeds are manufactured. This must be done with an

adequate understanding of the operational limits of the mill's equipment and the particular quality and safety risks that apply to a particular ingredient/medication in a particular feed. *Strategies adopted to address this may include flushing, sequencing and cleaning. The procedures adopted to address these risks must be documented and verified through inspection, sampling and testing*

9.5 *Precautions must be taken to ensure carry-over from previous mixing of feeds does not contaminate subsequent feed mixes.*

Scheduling and manufacturing procedures should include the following:

- **Plan your production so that all feeds containing RAM are manufactured together.**
- **Follow manufacture of feeds containing RAM with non-ruminant feeds.**
- **Implement an appropriate inspection after manufacture of feeds containing RAM to ensure that all feed is cleaned from mixers, surge bins, coolers and conveyors before commencing the next batch.**

Alternatively flushing with a non RAM raw material can also be used but requires this material to be separated and then only re-used in non ruminant feeds (refer to 9.6 below). Production of a non ruminant feed which does not contain any RAM can be used as a means of flushing the production system.

When using batch sequencing and flushing, define the quantity of flush required to clear residual feed from the production line. This will vary from mill to mill due to differences in mixer size and number of elevators and conveyors. Some batching and mixing equipment such as mixers with “bombay doors” are self emptying/cleaning whilst other equipment such as vertical mixers are not self cleaning. The amount of material required to flush the manufacturing line will vary dependent upon the equipment in use. The following is provided as a minimum standard guide for feed manufacturers:

It is recommended that the minimum flushing volume should be:

- **5% of the mixer volume in a fully self-cleaning systems;**
- **25% of the mixer volume in a non-self cleaning system.**

The scheduling, flushing and manufacturing procedures used to prevent cross transference must have been verified through physical inspection, sampling and testing. RAM testing needs to be completed using rapid assay analysis test kits, with sampling of finished product at the point of out-loading to verify the adequacy of the flushing procedures. Testing for medication cross transference should be completed using either micro-tracers or medication assays.

Verification testing should be completed at least every 6 months to re-confirm the suitability of flushing procedures. Completion of verification work must be documented and retained.

Where positive RAM test results are found following flushing, corrective actions must be taken to ensure negative results are obtained. Corrective actions may include, but are not limited to, modification to sequencing and flushing procedures, equipment changes and use of RAM ingredients.

Sequencing, flushing and manufacturing procedures must include transfer of feed through production lines to finished product bulk bins and bagged feeds.

- 9.6 Care must be taken to avoid the generation of reworks. *Reworks consist of product that has been previously erroneously formulated or mixed.* However, where reworks and returns are generated they must be carefully handled and documented. *Returns are formulated feeds that have been produced, left the control of the feed mill, and returned to the feed mill.* Key practices to be followed are set out below.
- 9.6.1 Products that cannot be identified must not be used in further manufacture of stockfeed and must be disposed of as waste. Raw materials or finished product that has been downgraded to waste and is awaiting disposal must be clearly identified and segregated from good stock to prevent its accidental use.
- 9.6.2 Reworks and returns must be labelled appropriately and should be segregated from raw materials and finished products.
- 9.6.3 *Reworks and returns must be identified as containing or not containing RAM. If uncertainty exists regarding RAM status, the feed must be assumed to contain RAM. Reworks or returned feed either containing RAM or assumed to contain RAM must only be reprocessed into non ruminant feeds.*
- 9.6.4 Such reworks and returns must only be approved for release and reformulation by an authorised person. Reformulation must be strictly in accordance with written instructions.
- 9.6.5 Full details of returns and of the reformulation of reworks and returns must be documented.

Finished product carry-over from finished product conveyors or out loading bins should be treated in the same way, but remember to adhere to the rules above and maintain an appropriate record.

Documentation of reworks and returns must identify whether the feed contains RAM and if so, procedures adopted to ensure it is only remixed into non ruminant feeds.

10.0 PRODUCTION

- 10.7 Out loading and packaging systems, including all fixed or mobile silos, bins and tanks, must be *designed and operated to prevent contamination, un-intended mixing or misidentification of finished product.* Key elements of this system are that:
- the bins (silos, tanks etc) must be identified by an appropriate labelling or numbering system;
 - product stored within a given bin (silo, tank etc) must be identified via documentation and records;
 - bins (silos, tanks etc) must be designed to be free-flowing, readily inspected and cleaned, and should be able to be sealed and secured;

An essential procedure is to verify that out loading bins are always emptied completely and inspected accordingly, especially for feeds containing RAM. Any feed remaining and unable to be loaded, should be removed, labelled and then bagged with appropriate labelling or disposed of as waste or rework as above. Remember to keep records.

11.0 LABELLING OF BAGGED PRODUCT

- 11.1 In the case of bagged product, correct packaging and labels must be applied at the time of bagging.
- 11.2 Labels must meet regulatory requirements.

With respect to the ruminant feed ban for the prevention of BSE, labels on bags of stockfeed containing RAM must include the prescribed warning statement and lettering must be of the prescribed size, in accordance with state legislation.

Similar legislation is in force within each state and territory the principle labelling conditions for feeds containing RAM are:

The label must contain the following statement:

**“This product contains restricted animal material —
DO NOT FEED TO CATTLE, SHEEP, GOATS, DEER OR OTHER RUMINANTS”**

The statement must be in —

- (a) a position where it can be clearly seen on the face of the label;
- (b) if the label is —
 - (i) written or stamped on the outside of a stock feeds container - letters a minimum 10 mm in height; or
 - (ii) fixed to the outside of a stock feeds container - letters minimum 3 mm in height; and
- (c) dark print on a light background.

Labelling conditions for feeds that do not contain RAM are:

The label must contain the statement

‘This product does not contain restricted animal material.’

12. LABELLING OF PRODUCT SOLD IN BULK

- 12.1 Bulk product must be labelled to meet all regulatory requirements. *With respect to the ruminant feed ban for prevention of BSE, the product supplied in bulk must be accompanied by documentation with the necessary statement concerning RAM, as prescribed by state legislation, either attached to or incorporated in the invoice or delivery docket, and to be supplied to the buyer before or on delivery.*

If your invoice follows the delivery, then you must include the appropriate warnings on your delivery docket and ensure this is delivered when the feed is unloaded. Information to be supplied for bulk deliveries is the same as that shown above for bagged feeds. The 3mm size of print is required.

13. LOADING, TRANSPORT AND DELIVERY

- 13.1 *Loading, transport and delivery of bulk and packaged feed products must maintain the identity and integrity of each feed product post production, thereby minimising any post-production unintended mixing or contamination risks.*

Delivering bulk feeds containing RAMs on the same load as ruminant feeds should be avoided. Where this is unavoidable you must ensure that there is no possibility of leakage between truck compartments or from discharge valves when unloading. Where bagged feed is delivered, adequate barriers (packaging or pallet wrap) should be a standard practice between feeds containing RAM and ruminant feeds.

13.2 Loading

A formal system must be in place to ensure loading of all vehicles used for transport of bulk and packaged feed products with the correct product, without risk of damage, unintended mixing or contamination. Key elements of this system are that:

- out loading storage bins, transport vehicles/trailers, and vehicle/trailer compartments used in loading and transporting a given order of feed to a customer must be clearly identified and documented;
- vehicles/trailers must be kept in clean, well maintained and roadworthy condition, and designed such that feeds can be kept dry and protected from contamination during transport and delivery;
- *All equipment and vehicles that have been used in the loading or transportation of RAM must be effectively cleaned before loading of feeds not containing RAM. Any feed deemed to be containing RAM cleaned from equipment or vehicles must be disposed of or used only for non-ruminant feeds;*
- all equipment and vehicles that have been used in the loading and transport of medicated feeds must be inspected and cleaned where necessary before loading non-medicated feeds.
- *vehicles/trailers must be inspected prior to loading;*
- details of contents of prior loads should be provided prior to loading and appropriate action taken e.g. further cleaning;
- pallets used for the loading of packaged feed products must be kept in good condition so as not to damage product;
- damaged or leaking bags and other packaging should not be loaded for delivery.

Cleaning and inspection requirements should be included in your transport contracts and you should ensure training on these requirements is provided to employees and/or transport contractors and their employees.

13.4 Delivery

13.4.2 When delivering bulk feed products to a farm, it is essential that *feed products are unloaded into the correct farm storage facilities for feeding to those animals intended, without risk of contamination*. If, due to unacceptable facilities or inadequate instructions, this cannot be assured, the driver must not unload before seeking advice from the appropriate person at the mill.

13.4.3 Feed must not be unloaded into a farm storage facility (e.g. silo, bin) other than as instructed, unless with the permission of the farm owner/manager. Each such instance must be documented. Similarly, *any feed returned to the mill for whatever reason must be documented*.

- 13.4.4 If any significant spillage occurs during unloading, this must be reported to the appropriate person at the mill and to a representative of the customer, and the *spilt feed disposed of responsibly*.

Delivery drivers must be trained in duties to ensure the correct feed is delivered to the right animals without risk of RAM contamination of ruminant feeds.

14. INSPECTION, SAMPLING AND TESTING

- 14.1 *Samples may be required by state authorities as part of the audit process for the BSE ruminant feed ban. Access must be provided at suitable points in the manufacturing process for the purpose of taking samples.*

Feed mills are required to work with State inspectors in the conduct of ruminant feed ban audits. This includes access to the manufacturing site to allow collection of feed samples.

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APPENDIX 3 - ACRONYMS AND ABBREVIATIONS

ABS	Australian Bureau of Statistics
AGMIN	Agriculture Ministers Forum
AGSOC	Agriculture Senior Officials Committee
AHC	Animal Health Committee
AOCS	American Oil Chemists Society
ARA	Australian Renderers' Association
ARMCANZ	Agricultural and Resource Management Council of Australia and New Zealand
BSE	bovine spongiform encephalopathy
CAR	Corrective Action Request
CJD	Creutzfeldt–Jakob disease
CWD	chronic wasting disease
DoA	Department of Agriculture
DNA	deoxyribonucleic acid
EC	European Commission
FeedSafe®	HACCP-based Quality Assurance program for the stockfeed industry developed by SFMCA
FMD	Foot and Mouth Disease
HACCP	hazard analysis critical control point
LPA	Livestock Production Assurance – grazing industries QA program developed by MLA
MBM	meat and bone meal
MLA	Meat and Livestock Australia
NVD	national vendor declaration
NFAS	National Feedlot Accreditation Scheme – feedlot QA program developed by Australian Lot Feeders' Association
OIE	World Organisation for Animal Health
PIMC	Primary Industries Ministerial Council (now Agriculture Ministers Forum)
PISC	Primary Industries Standing Committee (now Agriculture Senior Officials Committee)
QA	quality assurance
RAM	restricted animal material
SFMCA	Stock Feed Manufacturers' Council of Australia
TSE	transmissible spongiform encephalopathy
TSEFAP	TSE Freedom Assurance Project
UK	United Kingdom

vCJD	variant Creutzfeldt–Jakob disease
VetCom	Veterinary Committee (now Animal Health Committee)
WHO	World Health Organization
WTO	World Trade Organisation

APPENDIX 4 – RAM LABELLING REQUIREMENTS

An inspector when checking stockfeed labels needs to be satisfied that:

- if the product contains RAM, the following required ruminant feed warning statement is included:

**“This product contains restricted animal material –
DO NOT FEED TO CATTLE, SHEEP, GOATS, DEER OR OTHER RUMINANTS”**

- if the required ruminant feed warning statement is included on the label or delivery docket (invoice), the statement:
 - has the correct wording
 - is the correct print size (≥ 3 mm on a label or 10mm on a woven bag)
 - is sufficiently contrasted e.g. dark print on light background (or vice-versa)
 - is in a prominent position on the face (front) of the label
 - is not marked or defaced in such a way that the statement is obscured
- for manufactured stockfeeds that do not contain RAM, the statement below is included (with the same requirements as above):

“This product does not contain restricted animal material”

Note: some manufacturers may use a laminated gravure printed bag. These should be considered as a labelled item, not a printed woven bag.

APPENDIX 5 – MANAGING RISK OF RAM INGESTION (ORGANIC FERTILISERS, COMPOSTS AND FOOD WASTE)

Managing the risk of unintentional ingestion by ruminants of restricted animal material (RAM) arising from use of products or waste on pastures grazed by ruminants

Includes

- guidelines for use of organic fertilisers /composts/soil amendments on ruminant pastures.
- information about recycling of food waste²⁹ that contains RAM on agricultural land.

Policy

Ruminants must not be fed restricted animal material (RAM).

The risk of unintentional ingestion by ruminants of products containing RAM must be mitigated.

A product should be considered to contain RAM if it contains or may contain any of the following:

- **Animal protein – including whole or partial carcasses, feathers, or sloughing**
e.g. all poultry litter/manure and feeds or fertilisers containing poultry litter/manure are considered to contain RAM.
- **Spilt stock feed containing RAM**
e.g. all manures and effluent arising from animals (usually poultry, pigs and farmed fish) that are fed stock food containing RAM are considered to contain RAM due to possible spillage.
- **Manure/faeces containing RAM that has passed undigested through the gut**
e.g. all manure or effluent from animals that are fed RAM are considered to contain RAM.
- **Blood and bone fertiliser, or other products including blood, meat, animal waste or bone.**
- **Mushroom compost or any other compost containing products containing RAM** (e.g. containing poultry manure and/or mortalities, blood and bone, abattoir waste, or food waste that contains animal material including but not limited to grease trap waste, food organic, green organic (FOGO) kerbside bin waste, and pet food
- **Food waste that contains RAM**
- **Any other product that might reasonably contain a RAM ingredient.**

²⁹ Food waste is waste that includes material that had been produced, sold or supplied for human or pet consumption

Background

Prions are extremely stable pathogens that cause transmissible spongiform encephalopathies (TSEs), including bovine spongiform encephalopathy (BSE) and (classical) scrapie. Prions may be transmitted via ingestion of RAM.

Australia's ruminant feed ban (ARFB) is part of a comprehensive national TSE Freedom Assurance Project (TSEFAP) that supports trade through the demonstration of Australia's ongoing freedom from BSE and (classical) scrapie, and protects the health of Australia's people and livestock.

The ARFB bans the feeding to all ruminants of materials derived from all vertebrates, including fish and birds, with the internationally recognised exceptions of tallow, gelatine and milk/milk products. This ban was established by statutory laws in each of Australia's jurisdictions and is enforced by government inspections. The requirements of the ban have also been incorporated into quality assurance schemes that operate within Australia's ruminant livestock industries.

An effective ARFB is critical to maintaining Australia's favourable OIE BSE risk-rating of 'negligible'. International market access for Australian animals and animal products is dependent on our ability to demonstrate that no RAM is fed to ruminants.

The acceptable level of RAM to be fed to ruminants is nil.

Organic fertilisers containing RAM derived from Australian animals

Some organic fertilisers (e.g. poultry manure, blood and bone) and some effluent (e.g. piggery run off), and potentially other products, contain RAM. While Australia remains free of BSE, the likelihood that RAM derived from Australian animals contains transmissible prions is negligible.

Use of products that contain RAM derived from Australian animals (e.g. pig or poultry manure or blood and bone derived from Australian animals) in areas accessed by ruminants (e.g. applications of some fertilisers or effluent to paddocks) poses a low but not nil risk of TSE transmission that must be mitigated. In addition, there is a possibility of illegally imported meat being placed in food organic, green organic (FOGO) kerbside bins, which may be used as a feedstock for organic compost.

Guidelines for use of organic fertilisers

Acceptable options for mitigating the biosecurity risks associated with use of products containing RAM derived from Australian animals include:

- Ensure ruminants do not have access to heaped piles of products containing RAM (e.g. exclude ruminants from organic fertilisers piled for storage or composting or piles of poultry litter).
- Incorporate (turn) organic fertilisers containing RAM into the soil **OR** spread the product (e.g. organic fertilisers containing RAM) evenly **AND** prevent ruminants from having access to treated areas until a combination of rain or irrigation and pasture growth has minimised the risk of RAM ingestion when grazed by ruminants.

As a guide – excluding ruminants from treated pasture for 3 weeks *may* allow for sufficient pasture growth to adequately minimise the risk of RAM ingestion; however **longer periods of ruminant exclusion are required when pasture growth or rainfall are low.**

Examples of unacceptable use of organic fertilisers

Application of organic fertilisers to pastures poses an unacceptable risk of RAM being ingested by grazing ruminants if:

- the product is stored or composted in a location that is accessible by ruminants
- the product is spread on pasture unevenly or in any other way such that ruminants may ingest it when given access
- treated paddocks are grazed before a combination of incorporation, rain or irrigation and pasture growth has been sufficient to minimise ingestion when grazed by ruminants.

Food waste that contains RAM

Waste that includes domestic or imported food intended for human or pet consumption may contain RAM. Application of food waste to agricultural land poses a low but not nil risk of transmission of TSEs that must be mitigated.

Australia only permits importation of specific milk or meat products from certain countries for human or pet animal consumption after rigorous import risk assessment (IRA). IRA's take account of current scientific information, international standards (OIE), as well as policies adopted by other countries to ensure the risk of TSE in imported products is adequately minimised.

However, despite Australia's tight border controls at air- and sea-ports, RAM may be brought into Australia illegally and subsequently be included in food waste.

Consequently food waste containing RAM poses a higher TSE risk to grazing animals than RAM derived from domestic animals.

Acceptable risk mitigation for use of food waste on agricultural land

Guidelines for mitigating the biosecurity risks associated with applying food waste to agricultural land have not been established. Until they are, applying food waste containing RAM to agricultural land that may later be grazed by ruminants is not acceptable.

Pending establishment of biosecurity policy and guidelines specific to the application of food waste on agricultural land, it is recommended that the use of food waste on agricultural land be consistent with the NSW Environmental Protection Authority's [Environment guidelines: Use and disposal of biosolids products](#).

Additional biosecurity considerations

In addition to the TSE risks associated with ingestion of RAM – there are additional biosecurity risks associated with ruminants having access to organic material including:

- Emergency animal diseases that are exotic to Australia, in particular foot and mouth disease (FMD)
- Botulism
- Salmonellosis
- Mastitis

FMD can remain infective in the environment for several weeks, and possibly longer in the presence of organic matter (such as soil, manure and dried animal secretions). Pigs have a higher relative susceptibility to infection through ingestion of contaminated feed including meat scraps and bones, or untreated raw milk and milk products from infected animals.

In the United Kingdom, botulism outbreaks in cattle have led to the recommendation by the Food Standards Agency not to spread poultry litter on pasture. If it must be spread, animals should not be allowed onto that pasture until at least the following grazing season, because fragments of carcasses may persist on pasture for a considerable time. If poultry litter must be spread, it should be deep ploughed into arable ground. It should not be spread on a windy day in order to prevent contamination of adjacent fields. Any animal or bird carcasses, or portions of carcasses, visible on pasture or in cattle houses, should be promptly removed. Even small fragments of carcasses may be dangerous to cattle and should be disposed of.

Permits to import products into Australia are specific for the intended purpose. The requirements for importing milk and milk products intended for consumption by stock are higher than those for importing milk products for human or pet consumption due to the higher risk of FMD transmission, when consumed by livestock. Consequently, waste that includes products legally imported for human or pet consumption poses a low but not nil FMD risk, if the imported product or its waste is used in a way that leads to ingestion by grazing animals.

In addition, food waste (including compost that contains food organic, green organic (FOGO) kerbside bin content) may include illegally imported products that pose a risk of FMD transmission.

Consequently **application of food waste to agricultural land should adequately mitigate the risk of FMD transmission to ruminants and pigs.**

Composting to the Australian Standard AS4454 of organic materials (e.g. poultry litter) to kill pathogens other than prions (bacteria, viruses, etc.) prior to use as fertiliser or compost will mitigate the risk from most other pathogens. However, composting does not reduce the potential risk from infective prions.