

ANIMAL RAISING CLAIMS

Title: RAISED WITHOUT THE USE OF ANTIBIOTICS

Date: 27/10/17

1. Purpose

An Animal Raising Claim is a claim made in the Trade Description or export documentation about the animal or supply chain specifically relating to Animal Husbandry conditions, feeding, handling, drug treatments and/or geographical references. An approved program within the QMS must be developed to provide integrity to the Trade Description where Animal Raising Claims are used and must be clearly defined and legally based.

The three core components of the Animal Raising Claim:

Program Approval: Approval by AUS-MEAT Limited for the Livestock Sourcing through to the application of final Trade Description, incorporated within the AUS-MEAT approved Quality Management System (QMS) (all markets).

Approved Arrangement: Approval by the Department of Agriculture (the Department) based on Program Approval by AUS-MEAT under the MOU between the Parties (export purposes).

Market Access: Pre-conditions for specific market access or operational requirements to meet importing country requirements including label approval (where applicable).

2. Scope

This guideline document covers a claim of Raised without the use of Antibiotics (*No antibiotics administered / No antibiotics added*) in the Trade Description applied to meat or meat products, ensuring that no antibiotics were used during the animal's life.

3. Definitions

Raised without the use of antibiotics (*No antibiotics administered*) in the description of Australian Meat or Meat Products means:

Livestock (cattle) have never been treated with antibiotics including; low-level (sub-therapeutic) or therapeutic level doses; sulphonamides, ionophores or coccidiostats. However

- i) The use of anthelmintics for the treatment of parasites are allowable, and
- ii) Ionophores used as coccidiostats for parasite control may be used under stated conditions.

Other allowable statements include: *No antibiotics administered, No antibiotics added, Raised without antibiotics added.*

NOTE: The use of Ionophores as coccidiostats would be subject to compliance with importing country requirements and a parasite treatment and control plan must be documented within the On Farm Management System.

4. Background

An Animal Raising Claim is a claim made in the Trade Description or export documentation about the animal or supply chain specifically relating to animal husbandry conditions – in this case Raised without the use of antibiotics.

An Approved Program within the Enterprise's QMS must be developed to provide integrity to the Trade Description where a (*No antibiotics administered*) claim is used. In Export Registered Establishments this program must be included within the Approved Arrangement and receive approval from the Department which may be based on AUS-MEAT Program Approval.

5. References

- Meat Notice MN 2016/02 – AUS-MEAT Responsibilities
- DAWR: [Approved Arrangement](#) Guidelines, Meat
- Pasturefed Cattle Assurance System (PCAS) standard
- National Feedlot Accreditation Scheme

6. Methodology

The minimum requirement for the inclusion of a (*No antibiotics administered*) claim in a Trade Description is that all products labelled with this marketing claim must incorporate information explicitly stating that animals have been raised in a manner that meets the following conditions:

- 1) Cattle have never been treated with antibiotics, whether through feed or water, or by injection, from birth to slaughter.
- 2) If an animal is in need of medical attention, proper treatment should be administered as required. In the case where antibiotics or the stated prohibited substances are required to be administered, the treated animal must be identified as ineligible.

Whole of Life (Never Ever) claims must be supported by lifetime traceability to support the claim including use of the NLIS Database, as applicable.

Animals to be processed into product with a raising claim of (*No antibiotics administered*) must be presented with a vendor declaration (Livestock Sourcing requirement). Treatment claims must be clearly described on relevant Point of Slaughter documentation which may take the form of the livestock description box on the National Vendor Declaration (NVD) or any other suitable form such as a Livestock purchase contract or the like provided sufficient information is available.

The raising claim may be verified by an independent third party process through a routinely verified on farm QA system which addresses the claims made (Approved Supplier Evaluation).

First Party Declaration (Self Attestation)

Livestock Sourcing Program

- Vendor Declaration of the animal husbandry conditions
- Defined husbandry conditions incorporating relevant details of acquisition, use and disposal of animal treatments and life time traceability.
- May include Livestock Contract documentation with defined husbandry treatment criteria relevant to the raising claim.

Second Party Verification - Establishment (on plant) Systems

Point of Slaughter Certification

- Verification using prescribed standards or Industry codes of practice as applicable for the animal husbandry declarations that are relevant
- Point of Slaughter Certification may require counter signing by the Department
- Separation program (identification and traceability)
- Trade Description is accurate and complete
- Compliance with importing country requirements (Label approval etc.)

Third Party Certification

Accredited Certification Bodies

- On farm verification program (3rd party verification) e.g PCAS, GAP, LPA QA.

Approved Supplier Evaluation

Where required by Importing Country Requirements (e.g. Canada) each component along the supply chain must be subject to supplier selection, evaluation, approval and re-evaluation which shall comprise independent 3rd party audits. Development and maintenance of approved supplier lists and producer registration programs would assist the supply chain verification process. PCAS and GAP represent third party certified programs.

Livestock Producers

- Vendor declarations (livestock buying contracts, declarations including NVD's)
- Treatment practices and records
- Production and turnoff records
- Introduced livestock purchases (outside stock)
- Lifetime traceability

Feedlot

- Induction records including Vendor declarations
- Treatment practices and records
- Identification and lifetime traceability through to processing (Abattoir)

Saleyard Procurement

- Traceable sales documentation supported by completed Vendor declarations including required husbandry conditions information.

Approved Arrangement

An Approved Program with specific coverage:

- Livestock Sourcing program including Vendor declaration of specific husbandry conditions
- Defined husbandry conditions (treatment practices)
- Point of Slaughter certification may require counter signing by the Department
- Separation program (identification and traceability)
- Trade Description compliance (accurate and complete)
- Compliance with importing country requirements (Label approval etc.)

7. Monitoring

The Approved Program must include monitoring, corrective action and record keeping procedures to maintain the integrity of the program.

The monitoring method(s), monitoring frequency and how the monitoring is recorded need to be described with any measurements or observations to assess whether the program is operating within defined limits (how is it done, when is it done, how often is it done). This must be specific and state the pass/fail criteria. The frequency of monitoring must be defined.

8. Market Access

[US Label Approval](#) – All raising claim labels and labels including a language other than English on the label or on the carton or packaging must be approved by the Food Safety and Inspection Service (FSIS) prior to use. A copy of the relevant section of the Approved Arrangement (AA) endorsed by the Department may be provided to FSIS with the draft label approval submission to demonstrate justification for label claim

[EC Regulation No. 1760/2000](#) – establishing a system for the identification and registration of bovine animals

and regarding the labelling of beef and beef products.

Canada: CFIA [Food Labelling for Industry](#)

Note: Refer MICOR for any other importing country requirements and further information.

9. Records

The Approved Program (part of the Approved Arrangement) will identify any records that need to be maintained for verification purposes.

10. Industry Standards / Recognised Programs

11. **LPA-QA:** On-Farm Quality Assurance (QA) program, incorporating the CATTLE CARE and Flockcare programs represents the second tier (Level 2) of the LPA framework.

PCAS: is an assurance program that enables the industry to prove claims relating to pasturefed or grassfed production methods. The PCAS Standards also include two optional modules to support claims relating to the freedom from antibiotics and hormone growth promotants (HGPs).

Global Animal Partnership: GAP– 5 step Animal Welfare Certification program, including an Animal Health (medication use) – Section 3.

NFAS: is owned by the Australian Lot Feeding Industry through AUS-MEAT Limited. AUS-MEAT administers the scheme through the Feedlot Industry Accreditation Committee (FLIAC).

12. Responsibility and Verification

The Department ensures the legislative requirements for trade description are met by the verification of the trade description system and relevant functions.

AUS-MEAT Limited performs verification processes whereby AUS-MEAT takes day to day operational responsibility, including that for corrective action, for all trade description other than those basic descriptions that importing country authorities may require the Department, as the government regulating authority, to oversight.