

## ANIMAL RAISING CLAIMS

Title: **RAISED WITHOUT HORMONAL GROWTH PROMOTANTS (HGP)** Date: **16/03/18**

### 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 (export purposes):

**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 market access or specific operational requirements to meet importing country requirements including label approval (where applicable).

### 2. Scope

This guideline document covers a claim of *HGP Free* (No hormonal growth promotants) applied to meat or meat products.

### 3. Definitions

*HGP (hormonal growth promotant) means a veterinary chemical product that:*

- a) *contains a substance that is, or a mixture of substances that are, responsible for oestrogenic, androgenic, gestagenic or thyrostatic activity to enhance growth or production in cattle; and*
- b) *is registered for use for this purpose in Australia. Eligible Descriptions: No Added Hormones, No Hormones Administered, No Growth Promotants Administered.*

Source: *Export Control (Meat and Meat Products) Orders 2005*

### 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 *HGP Free* claims.

An Approved Program within the Enterprise's QMS must be developed to provide integrity to the Trade Description where an *HGP Free* Claim is used. In Export Registered Establishments this program must be included within the Approved Arrangement and receive approval the Department approval which may be based on AUS-MEAT Program Approval.

### 5. References

- Meat Notice MN 2016/02 – AUS-MEAT Responsibilities
- Meat Notice 2017-05 – Establishment sourcing of livestock to comply with importing country Hormonal Growth Promotant Free requirements (HGP Free)
- DAWR: [Approved Arrangement](#) Guidelines, Meat
- Pasturefed Cattle Assurance Systems Standard (PCAS)
- EUCAS Accreditation

### 6. Methodology

The minimum requirement for the inclusion of a *HGP Free* claim in a Trade Description is that all products labelled with a this marketing claim must incorporate information explicitly stating that animals have been raised in a manner that meets the following conditions:

- 1) No hormonal growth promotants (HGP) were ever administered to the animals; and
- 2) livestock must be sourced from LPA Accredited producers.

Animals to be processed into product with a raising claim of “HGP Free” must be presented with a vendor declaration (Livestock Sourcing requirement).

Point of Slaughter documentation must include a correctly completed LPA National Vendor Declaration (NVD).

The raising claim of *HGP Free* must be verified through routine Point of Slaughter verification which addresses the claims made. All cattle in the consignment must be examined as detailed in Meat Notice 2015/06

#### 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 Verification*

- Verification: Physical Inspection - must be palpated for the presence of palpable markers and examined for other indications of use (i.e. triangular ear-punch, cuts suggesting implants may have been removed)
- 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 (3<sup>rd</sup> 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 3<sup>rd</sup> 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
- Identification and verification
- Traceability through to processing (Abattoir)

### *Saleyard Procurement*

- Traceable sales documentation supported by completed Vendor declarations including required husbandry condition 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 Department of Agriculture
- 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 of Agriculture 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**

**EUCAS:** European Union Cattle Accreditation Scheme is a national animal production scheme that guarantees full traceability of all animals through the National Livestock Identification System (NLIS), linking individual animal identification to a central database. EUCAS allows Australia to meet the European Union (EU) market requirements for beef by segregating cattle that have never been treated with hormonal growth promotants

(HGPs) at any time.

**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).

## 11. 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.