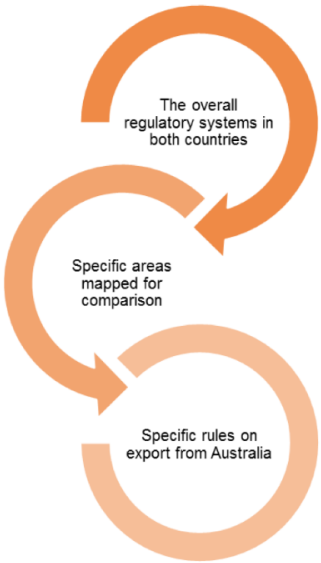
Food Safety Systems: Australia & China

Introduction

This presentation is designed to provide a system level overview of the Australian and Chinese food safety systems, and aims to compare the many similarities and differences.



Australia's federal system of government

Three levels of government:

- Commonwealth – regulates imports and exports; develops national food standards
- State and Territory – regulates food businesses, administers primary industry and food legislation
- Local government – enforces compliance with the legislation

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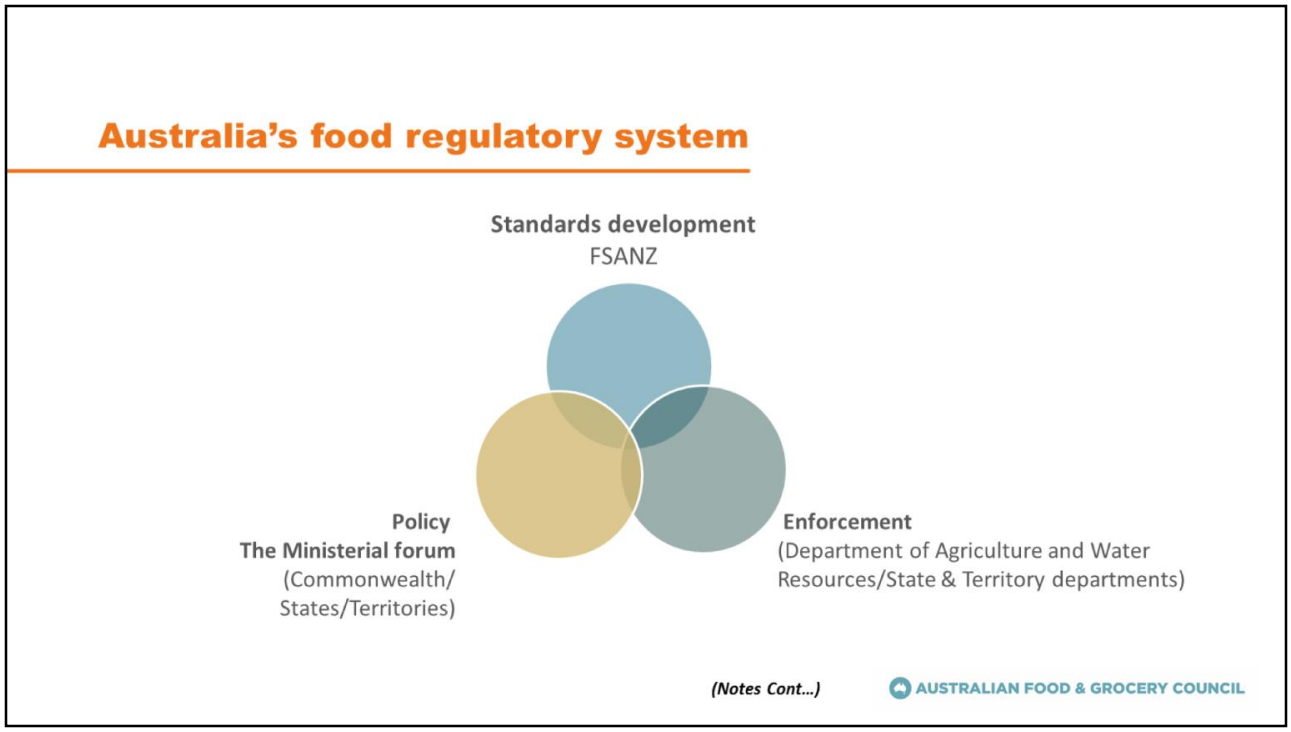
In 1901, Australia formed a federation of 8 states and territories. Our constitution recognises the importance of the states and territories by distributing power between the national government (or Commonwealth) and each of the states and territories. The states and territories have primary responsibility for food safety.

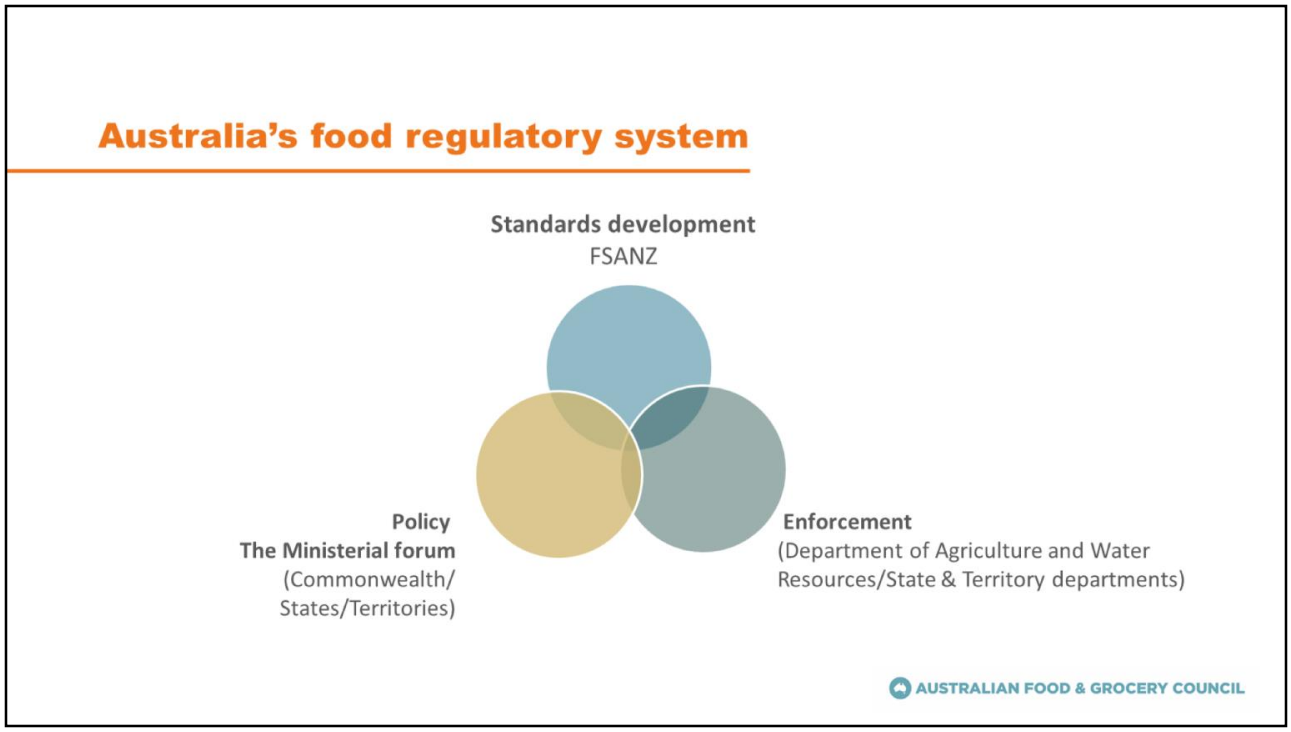


Food Regulatory System

Australia's current system has three distinct components: policy setting, standard development and enforcement. This single yet collaborative system enables whole of government consideration of the entire food supply chain from farm to retail sale.

Gold sphere:

The first component of Australia's food regulatory system is **policy setting**. Food regulation policy is set by the Council of Australian Governments Legislative and Governance Forum on Food Regulation (the forum). The forum develops food regulation policy, guidelines for setting domestic food standards, and is responsible for promoting a consistent approach to compliance with food standards. The forum is made up of health and agriculture ministers from the Commonwealth and the States and Territories, and New Zealand and is supported by a standing committee of senior officials who provide policy advice. In setting policy, Australian governments have agreed to apply principles of good regulatory process to the development of all regulations. This is to ensure the regulatory burden on industry is kept to the minimum necessary. For food regulations, there needs to be a clear public health case for the development of a food standard. The case must show that a regulatory option will provide the greatest net benefit to the community.



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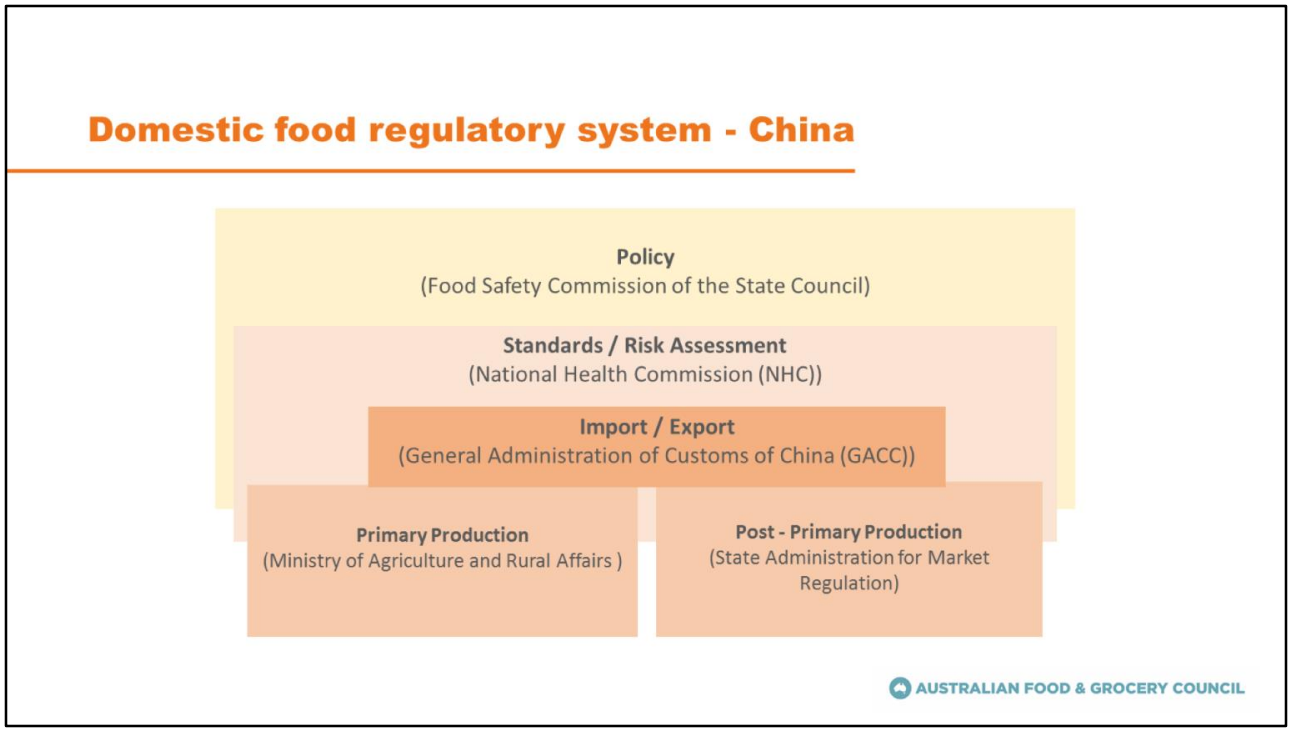
Blue Sphere:

The second component of the regulatory system is the **standards development** process. Food Standards Australia New Zealand, or FSANZ, is the authority responsible for developing and reviewing food standards for Australia and New Zealand, based on scientific and technical criteria. It develops the Australia New Zealand Food Standards Code which regulates the use of ingredients, food additives, vitamins and minerals. The goal is to ensure that Australia and New Zealand has a safe food supply and consumers can make informed choices about the food they eat. When developing or amending a food standard, FSANZ undertakes a scientific risk analysis.

Our approach is consistent with Codex Alimentarius Commission (Codex) approaches to managing food safety risks. Codex is the international food standards setting body established by the United Nation's Food and Agriculture Organization and World Health Organization. Codex develops international food standards, guidelines and codes of practice for an international food code that contributes to the safety, quality and fairness of food trade. Codex standards are recognised by the World Trade Organization (WTO). They are not imposed on member countries. As part of its standard setting work, FSANZ is required to undertake a regulation impact assessment and a benefit/cost analysis for consideration by all stakeholders. It also undertakes public consultation, WTO SPS notifications and considers economic and social analyses. The final decision on food standards is made by the Ministerial Forum on Food Regulation. Ministers can accept, amend or reject a standard or can ask FSANZ to review a draft standard.

Green Sphere:

The third component of Australia's Food Regulatory System is **enforcement**. Australian states and territories enforce regulation domestically, in conjunction with local government authorities and state and territory food regulation enforcement agencies are responsible for enforcement of the food standards domestically. The Department of Agriculture and Water Resources is responsible for enforcement at the border for imported and exported food. The New Zealand Ministry for Primary Industries has enforcement responsibility in New Zealand.



This diagram sets out the functions and the relationships between the national level bodies that exercise the functions of the food regulatory system.

Policy for the whole food safety system rests with the Food Safety Commission which is a committee of the State Council, the highest government entity. The FSC coordinates the various Ministries involved, as well as shaping policy.

The scientific input to the system comes from the Health Ministry, the National Health Commission. It oversees risk assessment and standardization, plus monitoring and surveillance.

The State Administration for Market Regulation provides the Secretariat to the Food Safety Commission and has some responsibilities in policy planning and formulation and coordination. It also has responsibility for handling major incidents and public communications. Its responsibilities, however, are for the food chain after the stage of primary production, i.e. after slaughter and cutting or after harvest. Responsibility for food safety prior to that still rests with the Ministry of Agriculture and Rural Affairs.

Import/Exports functions are the responsibility of the General Administration of Customs and is part of the product quality regime, rather than food supply or food safety. It has responsibility for the safety of food products as tradeable products in international trade. As such, it cuts across the primary production / post-primary production divide but is still subject to standards and to policy.

This is the structure at national level. It is broadly replicated at lower levels but with some key differences. The enforcement agencies at these lower levels report to the local government and not to the Ministry.

Laws, Regulations and Standards - Australia

In Australia, the food safety regulatory system is underpinned by laws, policies, standards and codes including:

- Food Standards Australia New Zealand Act 1991,
- The Australia New Zealand Food Standards Code,
- State/Territory Food Acts and regulations,
- The Export Control Act 1982,
- The Imported Food Control Act 1992, and
- Competition and Consumer Act 2010.

Australia New Zealand Food Standards Code

The Australia New Zealand Food Standards Code requires the food sold in Australia to be compliant with four broad areas: composition; labelling; food safety programs based on preventive approaches the Hazard Analysis Critical Control Point system (HACCP); and production/processing.

Food Composition

- Substances permitted to be added to food,
- Limits for contaminants, residues and microorganisms,
- Permission of foods that require pre-market clearance such as irradiated foods, and
- Compositional requirements for certain food categories.

Food Production and Processing

- Primary Production and Processing standards strengthen food safety and traceability throughout the food supply chain from paddock to plate.
- Currently standards for seafood; poultry meat; meat and meat products; dairy products; eggs and egg products; and seed sprouts.

Food Safety Programs

- Businesses must implement a food safety program based upon preventive approaches such as HACCP.
- The food safety program is subject to periodic audit by a suitably qualified food safety auditor.

Food Labelling

- General labelling and information requirements for all foods e.g. allergens,
- Specific labelling and information requirements that apply to certain food products, and
- All representations about food are subject to fair trading and food laws in Australia and New Zealand which prohibit false, misleading or deceptive representations.

The Australia New Zealand Food Standards Code

Chapter 1	Chapter 2	Chapter 3	Chapter 4	Schedules
General food standards: • Definitions • Labelling requirements • Use of substances added to food • Use of new foods • MRLs (Aus) • Food processing requirements (Aus) • Microbiological limits	**Food product standards:** • Cereals • Fruits and Vegetables • Dairy products • Meat ,eggs and fish • Edible oils • Beverages • Sugar and honey • Special purpose foods	**Food safety standards** Australia only • Food safety practices general requirements • Food premises and equipment	**Primary production standards** Australia only • Seafood • Poultry meat • Meat • Dairy products • Eggs • Seed sprouts	**Permissions for use of:** • Substances added to food • Use of new foods • Permitted MRLs • Microbiological limits

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Laws, Regulations and Standards - China

The China food regulatory framework is made up of the laws, regulations and standards that apply domestically and for all imported foods. These include:

- Food Safety Law 2015
- Regulations on the Implementation of the Food Safety Law (Revised Draft) 2017
- Agricultural Product Quality Safety Law 2006 (for primary production)
- Product Quality Law 1993 (Amended 2000) (for product quality of any processed products)

The Chinese food safety regulatory framework covers three areas of regulation – (a) food safety, (b) primary production; and (c) generic product safety. It follows that there are also three sets of standards to match these three areas. They now fall into three categories, similar to Codex:

- general (horizontal) standards,
- commodity/product (vertical) standards, and
- hygiene practices and laboratory testing methods.

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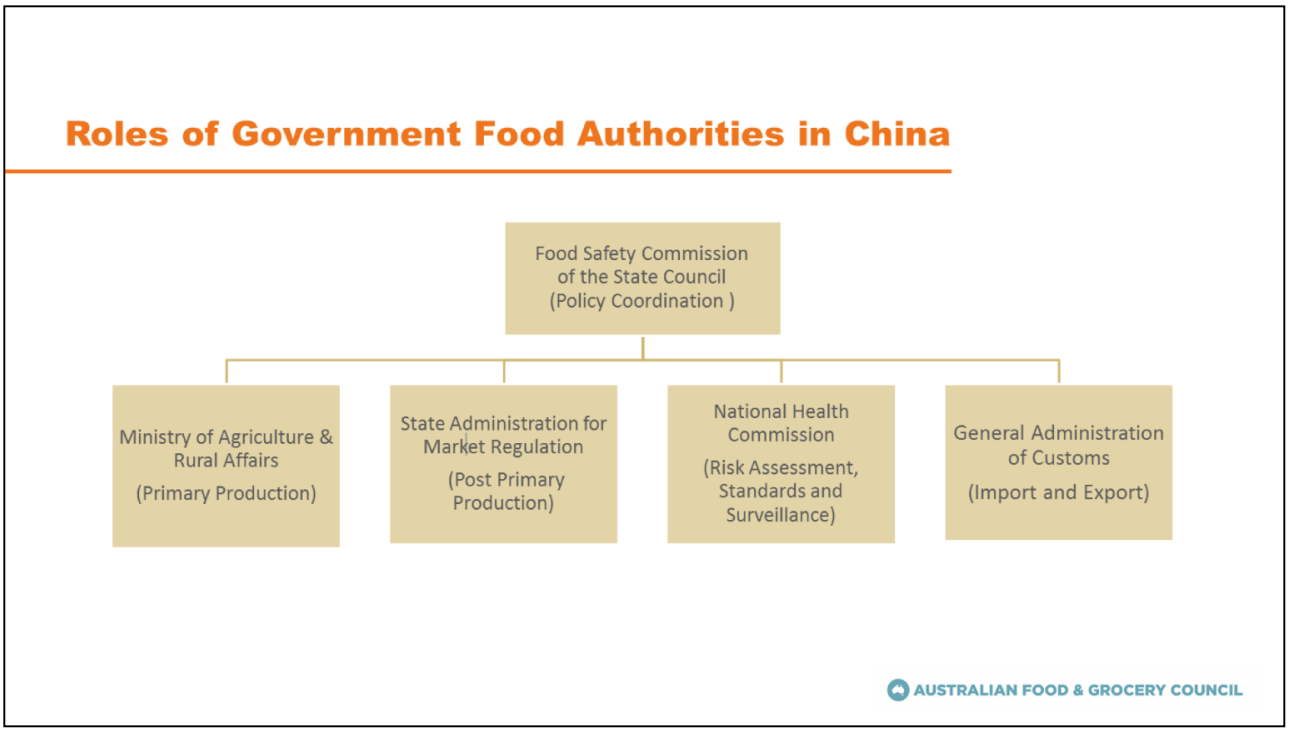
Australian food imports to China have risen from less than AU $1 billion in 2005 to AU $5.5 billion in 2015.

Article 26 of the Product Quality Law prescribes conditions for any product manufactured or processed for sale (which includes processed food):

- "Being free from unreasonable dangers to the personal or property safety, and conforming to the national or sector standards for safeguarding the health and personal or property safety if such standards are available;
- Possessing the properties and functions for use that they ought to possess, except for those with directions stating the defects in the functions of the product; and
- Conforming to the product standards marked on the product or on the package thereof, and to the quality conditions indicated by way of product directions and physical sample."

Food safety legislation has been streamlined and modernised in the last five years, along with institutional structures, but responsibility is still split across primary production (Ministry of Agriculture and Rural Affairs and the Agricultural Product Quality Safety Law), the rest of the supply chain (China National Drug Administration and the Food Safety Law) and Exports (General Administration of Customs and the Product Quality Law, plus the Food Safety Law).



Below national level, Chinese government has a vertical hierarchy which, below that of Province, is broadly split across urban and rural areas.

After Province comes Area City / Municipality, then City / County, then Township / District, then Street / Village.

There are four Big Cities – Shanghai, Beijing, Guangzhou, Shenzhen. At each level, the split across primary production / post-production and import / export is maintained in the various enforcement agencies.

There is also a version of the Food Safety Committee as a coordinating body across these agencies, at local government level. These agencies report to the local government, not to the national level Ministries.

There is an Agriculture Committee, Livestock Committee and Aquaculture Committee for primary production, a Provincial and Municipal level FDA but then, at County level, it is a Market Supervision Bureau. MARA has a network of quality control centres, CIQs, with 35 across the 31 Provinces.

Risk-Based Approach - Australia

- The Australian Food Safety system is based on the 1997 FAO / WHO principles for food control systems.
- It follows the risk-based approach that applies Risk Assessment, Risk Management and Risk Communication.
- Enforcement is also risk-based. More frequent inspection is targeted at the businesses and food products that present higher levels of food safety risk.
- In addition to enforcement by the regulatory authorities, Australian businesses use third-parties for audit and certification of their operation to provide additional assurance of the effectiveness of their systems.

Source: The Codex risk analysis framework

Risk-Based Approach - China

The Food Safety Law, Article 3, establishes both prevention and risk as key principles.

Risk is applied through NHC in its work on risk assessment and standards. Much of this is the responsibility of the China National Centre for Food Safety Risk Assessment (often called CFSA, to mirror EFSA in the EU).

The traditional approach to food safety has been through testing the food products, although a more comprehensive approach to a risk-based system is now being encouraged.

Source: The Codex risk analysis framework

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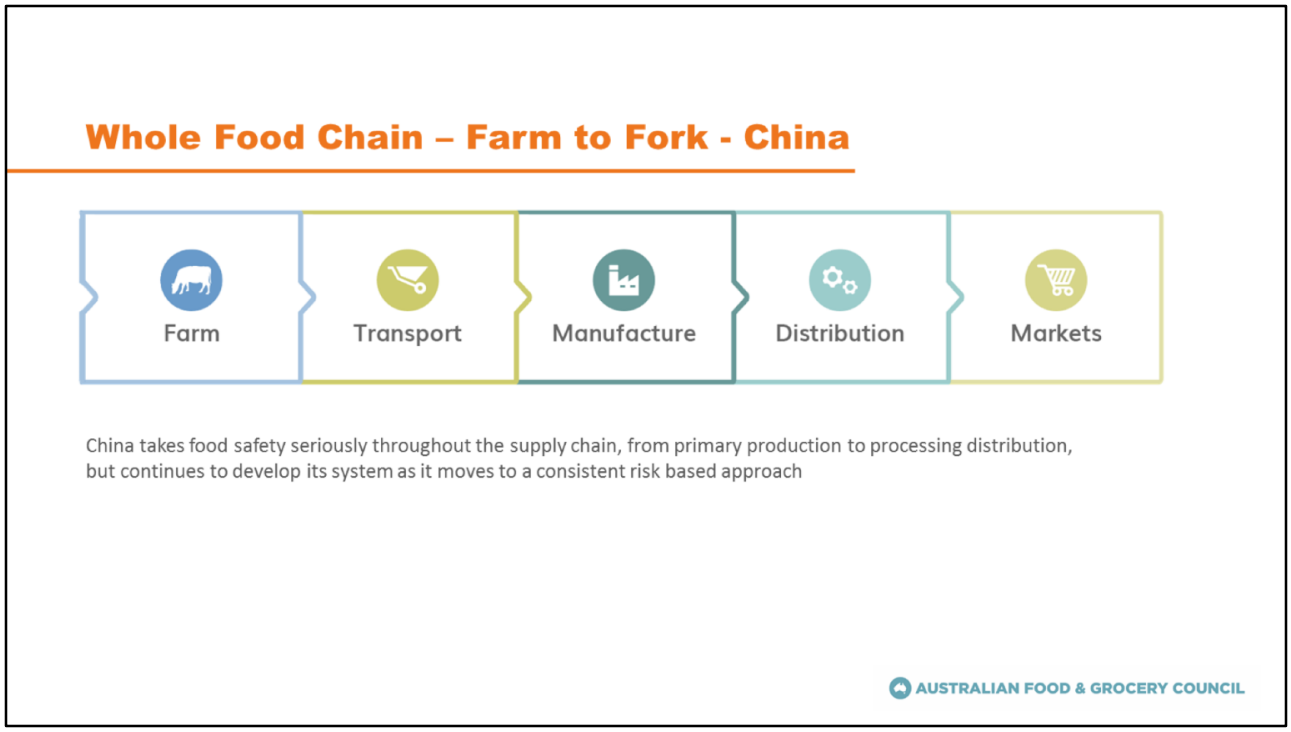
Recent developments in delivering food safety have focused on applying the latest technology and data analytics in order to get closer to certainty.

The human resources available make some approaches to managing food safety more possible in China than elsewhere. Certainly all large businesses can be inspected at least once a year, and usually more often, and most medium sized businesses can also be inspected each year. Therefore risk-based inspection is less of a priority than in other countries, in terms of optimizing human resources. The "Internet of Things" is also being applied to gathering more data relevant to food safety hazards, such as growing conditions or monitoring transport practices. This is leading to identification and prevention of hazards and therefore is in itself a form of risk management. Traceability is being monitored by a data centre, rather than just being a 1:1 transaction between supplier and customer, allowing the possibility of tracking the progress along the chain of individual products. Test results can also be added to that information. The amount of data capable of being generated is enormous but Big Data analytics may be able to both monitor and predict with more accuracy than risk-based forecasting. Alternatively, that data can also be used with conventional risk-based forecasting.

Whole Food Chain – Farm to Fork – Australia

- In applying the risk-based approach, the Australian food safety system takes a holistic approach to the entire value chain, "from farm to fork".
- It recognizes risks of new hazards along the supply chain and opportunities to incorporate good hygiene practices and ensure the continued safety of the product.
- Responsibility for ensuring food safety rests with the food business in control of the food at that point in the supply chain. This may be farming, transport, processing, retail or any other operation.
- Each food business has a legal obligation to appoint a Food Safety Supervisor to supervise the operation, following a risk management plan tailored to that operation.



The bias towards getting the primary production stage right is very strong. It does not mean that other risks at other stages in the supply chain are ignored. For catering, there has been a rating system for restaurants for many years, either using A,B and C or "Smiley Faces". Street traders are extremely numerous due to the urban demographic drift, where people in cities have a lack of facilities for cooking and have to rely on street food. Rapid urbanization also puts pressure on storage and transport. FDA enforcement is divided into processing, distribution (including retail) and catering but there is still a feeling that the key issue is making the food safe at the start. In fact, cooking counteracts many hazards that may have faced the food, from growth onwards.

Traceability - The overall system: Australia

- Traceability is a key component of the Australia food regulatory system – required for both domestic and exported foods. Standard 3.2.2 of the Food Standards Code covers the "one step back and one step forward" elements of traceability.

- For food processing businesses, traceability extends to being able to identify the source of all food inputs such as:
  - raw materials
  - additives
  - other ingredients, and
  - packaging.

- The information required to be recorded is:
  - name and address (and other contact details) of suppliers and a description of products or inputs supplied
  - name and addresses (and other contact details) of customers and a description of the product supplied to them
  - date of transaction or delivery
  - batch or lot identification (or other markings)
  - volume or quantity of product supplied or received, and
  - any other relevant production records.

- Specific commodities can have additional traceability requirements

- Traceability is also important to facilitate the recall of food that has been found to be hazardous in some way. Recalls are therefore tests of the effectiveness of the traceability system.

Traceability using meat as an example pre-slaughter

The Australian Traceability system for meat covers three programmes.

1. The National Livestock Information System (NLIS), which consists of:
   - a permanent animal identifier (a visual or electronic ear tag),
   - location identifiers along the value chain, and
   - a web-accessible database which stores and correlates livestock movement data and associated details.

2. The Livestock Production Assurance programme (LPA) is an independently audited, on-farm assurance program covering food safety, animal welfare and biosecurity. It provides evidence of livestock history and on-farm practices when transferring livestock through the value chain.

3. The National Vendor Declaration (NVD) is the statement made by the owner when the animal is moved that attests the LPA data on the animal.

Traceability – post slaughter

- Australia uses the GS1 standard for barcodes and for RFID tags.
- Each carcass has a ticket with a barcode. There is a specific GS1 barcode which should be used on carcass tickets called the GS1-128. This barcode allows the necessary industry specific information to be included on the barcode. The GS1-128 code is also applied to any carton label containing the carcasses.
- New traceability system technologies are developing to allow more accurate and faster recording and processing of data. There is a developing market for systems that allow consumers to use smartphones to access traceability data on supermarket products.

Traceability - China

- Article 42 of the Food Safety law 2015 requires food producers and traders to develop traceability systems and encourages them to use information technology in doing so.
- It also provides that the State Administration for Market Regulation will work with the Ministry of Agriculture and Rural Affairs and other relevant departments to establish a coordinated traceability system for food safety across the supply chain.
- There is no Implementing Regulation adopted yet for the Law and no requirements have come for standardisation of traceability systems.
- The consequence is that some enterprises have developed very sophisticated IT systems with QR codes that can provide the consumer with the full history of the product. But these systems are proprietary to each enterprise and dependent on their supply chain data.

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China has some very sophisticated traceability systems in practice but they tend to be proprietary and not readily interchangeable. There is a role for government in encouraging standardisation, across value chains and across administrative boundaries. Some Municipalities are making progress in this by requiring traceability transactions to be copied to a data centre so the progress of that product can be tracked. This could be a major development in traceability and open the possibility of real-time tracking of individual lots across the whole supply chain.

Tracking back in the event of a food borne disease outbreak could be almost instantaneous and a better picture of an emerging problem could be obtained from aggregation of even weak signals.

Enforcement - Australia

- Enforcement of food safety is the responsibility of the State and Territory regulators in Australia, but consistency in approach is assisted by the standards set by FSANZ.
- Central to it is that primary responsibility for food safety rests with the food business. A business has to develop a risk management plan for its operations and appoint a Food Safety Supervisor from its staff to oversee the application of that plan.
- Risk management plans are based on HACCP but the level of sophistication will depend on the complexity and risk of the operation. Small, low- risk businesses only need to follow HACCP principles.
- Enforcement applies to those businesses that do not comply with the requirements for the safe production and sale of food.

Enforcement - China

- Implementation of the Food Safety Law is the responsibility of the County, Municipal and Provincial agencies and government. For import / export, China Customs is responsible for regulation implementation. At national level, SAMR will produce implementing regulations (already drafted but not brought in to force).
- Enforcement is the responsibility of Provincial governments, however they tend to supervise the agencies below rather than carry out direct enforcement itself.
- Enforcement is split between primary production and post-primary production. The Agriculture Committee, Livestock Bureau and Aquaculture Bureau are responsible for enforcement at primary production stage, up to and including slaughter, with the Provincial and Municipal CNDA responsible beyond that.
- For Exports and Imports, however, GACC retains control of enforcement.

Labelling – Range of Information required in Australia

- name of the food
- lot identification
- name and address of the supplier
- advisory statements, warning statements and declarations
- a statement of ingredients
- date marking information
- country of origin
- storage conditions and directions for use
- information relating to nutrition, health and related claims
- nutrition information
- information about characterising ingredients
- weights and measures information

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Information regarding the **ingredients** used in the production process must be mentioned on labels in the form of a list, beginning with the ingredient which has the largest proportion. This does not apply to vitamins, minerals, and other nutritional supplements.

Information on the **nutritional content of food** shall be provided on the food label. Where applicable, this is to be accompanied by a declaration of any vitamins, minerals and/or other kinds of nutritional supplement present in the food. Nutritional content information shall be contained in the following order:

- total volume of energy, with specifications based on amounts of energy derived from fat, protein and carbohydrates.

- total volume of fat, saturated fat, cholesterol, carbohydrates, fibre, sugar, protein, vitamins and minerals.

Labelling – Range of Information required in China

- name of the food
- lot identification
- name and address of the manufacturer discretionary
- a statement of ingredients
- date marking information
- country of origin (only for imports)
- storage conditions and directions for use
- nutrition information
- code of Product Standard
- generic name of food additives used
- production license number (not mandatory on label, CNCA registration number can be placed on the packing carton)

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The basic labelling requirements are similar to both systems.

Labelling – Date Marking

- Australia uses the "Best Before" and the "Use By" system of date marking
- The format for dates is Day – Month – Year in most cases
- There is no obligation to have a date of production, although it is allowed
- Food must not be sold after "Use By" date

Chinese Requirements

- China does not use the "Best Before" and the "Use By" system of date marking
- The format for dates is Year – Month – Day
- The only mandatory date is date of production, with instructions on how to calculate the expiry date. In the photograph, that meat was produced on the 5th of July, 2017
- Product must have either distributor or importer address and phone

Labelling – Front of Pack

- **Australia** uses the 'Health Star Rating' system for front of pack labelling on a voluntary basis to assist consumers with healthier diets.
- The figures are the amount per 100g or per pack and are not percentages of the recommended daily intake.

Chinese Requirements

- **China** has back of pack labelling for nutritional information but it is set out as a table of nutrients, with amounts of nutrients and the equivalent percentages of daily intake (Nutrient Reference Values).
- It does not normally use eye-catching symbols although they can be permitted as marketing, rather than as a regulatory requirement.

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Content and health claims

Based on Government Regulation No. 69/1999 on Food Labels and Advertisement ("GR 69") all food that contains vitamins, minerals and/or other kinds of nutritional supplements must state the presence of such products on the label of the food.

Furthermore, under Ministry of Health Regulation No. 30/2013 on the Inclusion of Information regarding Sugar, Salt and Fat Contents and Healthy Claims for Processed Foods and Fast Foods ("MOH Regulation No. 30"), anyone who produces processed food for trade must provide the sugar, salt and/or fat and other health information on the food label and in related advertisements and promotional materials.

Nutrition content and health claims are regulated under: Food & Drugs Supervisory Agency ("BPOM") Regulation No. HK.03.1.23.11.11.09909 on the Supervisory of Claim in Processed Food Label and Advertisement ("Nutrition Content and Health Claims Regulation"). Under the Nutrition Content and Health Claims Regulation, every nutrition and health claim on food must be in accordance with the criteria set under the Nutrition Content and Health Claims Regulation.

Nutrition content claims that are allowed are claims regarding energy, protein, carbohydrates, fat, vitamins, and minerals, and their derivatives as set in the Nutrition Label Reference. Health claims that are allowed include nutrition function claims, other function claims, and claims as to the decline of risk of disease.

If a manufacturer or the distributor wishes to make nutrition content and/or health claims that differ to those permitted under the Nutrition Content and Health Claims Regulation, the manufacturer or the distributor must submit them to BPOM for review.

Advertising

The Law No. 8 of 1999 on Consumer Protection provides a general requirement for advertising to be truthful and not misleading. The same is required in relation to advertising for food products pursuant to the Law No. 18/2012 on Food.

Based on Government Regulation No. 69/1999 on Food Labels and Advertisement ("GR 69"), all advertisements for traded food shall contain true statements, and shall represent all mandatory information on the food label. The regulation also stipulates that every advertisement of food shall not contravene norms of decency and public order.

Labelling - Country of Origin: Australia

- It is mandatory to state the country of origin of the food on the label
- If foods are combinations from different countries the label has to state whether the majority or minority of the food is from Australia
- The label can distinguish where the food was grown from where the food was packed
- With processed food, the country of origin is the country where the processing was such that it changed the nature of the food product.

Labelling - Country of Origin: China

- The imported good must have the information required for domestic food, written in the Chinese language and characters.
- A sticker can be used to provide the information.
- Unlike Australia, China does not require labels to identify products which combine ingredients from different countries, or products grown in one country but packaged in another.

Exporting Australian Goods

Around two thirds of Australia's agricultural goods are exported. Efficient regulation of exports is the cornerstone of Australia's reputation as an excellent source of reliable and safe agricultural goods.

Many goods are "prescribed" (i.e. regulated) under the Export Control Act 1982 and their export requires compliance with the following:

- require export registration;
- must meet Australian standards plus any additional importing country requirements;
- require inspections and certification to meet food safety and import requirements;
- require traceability systems;
- be fit for human consumption, and
- be accurately described and labelled.

The commodity orders, under the Export Control Act 1982, provide requirements for production, processing and product standards. These orders reflect international standards and guidance, including Codex Alimentarius. Establishments that produce a prescribed good must comply with the requirements of the relevant commodity order. Any establishment that intends to produce or store a type of prescribed good for export must be registered.

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Overarching legislative instrument: *Export Control Act 1982*
Australia's export inspection and certification of certain agricultural, food and fisheries products operate within the statutory powers of this act .

Subordinate legislative instruments

- *Export Control (Orders) Regulations 1982*
- *Export Control (Prescribed Goods – General) Order 2005*
- Commodity specific orders (meat, fish, dairy, eggs, plant products)
- *Export Control (Fees) Orders 2001 + Export Inspection (Establishment Registration Charges) Regulations 1985*

The Australian Government has powers under the Export Control Act 1982 :

- prohibit the export of goods unless prescribed conditions are met,
- discretionary certification to meet specific importing country requirements,
- Inspection of registered export premises to determine compliance with export requirements,
- sample and assess export consignments with the authority to reject and, if necessary, seize and detain product that does not comply with regulations, and charge for services.

Australian Government may apply penalties if:

- export takes place in breach of prescribed conditions,
- official mark provisions are contravened and false trade descriptions and false declarations are made

Products prepared for export as food:

- need to be fit for human consumption,
- include a complete and accurate trade description,
- meet the requirements of the Australia New Zealand Food Standards Code for production processing and storage and, where different, importing country requirements, and
- be accurately identified and traceable if recall is required.

Prescribed Goods – Export Process

- To be allowed to export prescribed goods, the exporter has to register with the department. To do so, the exporter has to have an Approved Arrangement (excluding plant and plant products) available for assessment by the department.
- All export registered establishments, including vessels, involved in the preparation, handling and storage of dairy, egg, fish and meat products destined for human consumption must have an approved arrangement.
- It describes in detail how the establishment ensures compliance with legislative and importing country requirements and is approved by the department following desk and site audits, confirming the system as described is implemented.
- It will include the establishment's Hazard Analysis Critical Control Point (HACCP) programme and related operating procedures and practices and is completed by a Declaration of Compliance.

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A) Documented Food Safety Management Systems

- Establishments must develop and follow a documented food safety program, referred to as an **Approved Arrangement**
- based on Codex General Principles of Food Hygiene, HACCP principles
- includes management commitment, internal review, training requirements
- describes in detail how the establishment ensures compliance with legislative and importing country requirements
- program is approved by Department of Agriculture and Water Resources, following desk and site audits, confirming the system as described is implemented

Approved Arrangements

- A fully documented program that includes an establishment's Hazard Analysis Critical Control Point (HACCP) program and related operating procedures and practices
- The purpose is to clearly describe those processes and practices which, when correctly applied, will underpin the certification of exports

Key elements of an approved arrangement. Each establishment's approved arrangement must cover:

- Management practices
- Internal audit, corrective action, verification
- Commitment to comply with and implement export legislation and importing country requirements
- Plans and specifications
- Water supply and potability
- Process control (mandatory HACCP)
- Training
- Identification, traceability
- Product sampling, product standards and testing requirements
- Maintenance of equipment and buildings
- Pasteurisation/heat treatment
- Sourcing provisions
- Transport

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An Approved Arrangement should include the following elements:

- a 'Declaration of Compliance' with legislative and importing country requirements for all products to be exported
- a system of management review and internal audit
- training and competency
- systems of inspection, inspection frequency, documentation requirements, sampling and analysis

An example focused on milk: Requirements apply to processor: the processor must demonstrate :

- milk is not sourced from areas of concern (ie that could result in contamination)
- farms must have disease management controls
- processor must have controls to ensure milk fitness for human consumption not adversely affected

The processor's Approved Arrangement must have procedures managing and evidence to support:

- Animals not treated/fed with substances
- collection/storing/chilling does not occur in a manner that can affect fitness
- milk is chilled as soon as practicable

Mandatory state licensing conditions are recognised as the means for meeting these requirements

b) Assessment, approval and registration of establishments

- establishments must be assessed, approved & registered to export
- once registered, establishment information is maintained in an electronic database - the Establishment Register (ER)
- database is used to confirm eligibility to export particular products produced by particular establishments

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- To be allowed to export prescribed goods, the exporter has to register with the department. To do so, the exporter has to have an Approved Arrangement (excluding plant and plant products) available for assessment by the department.
- All export registered establishments, including vessels, involved in the preparation, handling and storage of dairy, egg, fish and meat products destined for human consumption must have an approved arrangement.
- It describes in detail how the establishment ensures compliance with legislative and importing country requirements and is approved by the department following desk and site audits, confirming the system as described is implemented.
- It will include the establishment's Hazard Analysis Critical Control Point (HACCP) programme and related operating procedures and practices and is completed by a Declaration of Compliance.

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(Cont…)

Assessing an AA

- examination of written and other records
- examination of results of verification systems operated by establishment
- operational standards, GMP, GHP - documented and in place
  - good manufacturing practices (e.g. temp controls, personnel & operational hygiene)
  - sanitary operating procedures to ensure environment and operating conditions appropriate for production of safe, wholesome food
  - good hygienic practices to ensure that food is safe and wholesome
  - checks on hygiene, including personal cleanliness and clothing
- application of HACCP for food safety, including verification and validation
- structural requirements, standards of construction for the factory walls, floors, equipment etc
- product standards – microbiological, physical and chemical
- trade descriptions, weight declarations, labelling requirements
- product integrity through product identification, segregation, and traceability practices

C) Audit

Audit frequency based on risk:

- 6 months: processing establishments are medium to high risk
- All dairy processors
- Annually: stores

Further audits required if non-compliance found or as a result of additional verification activities

D) Export Certification

The electronic documentation system (EXDOC) automatically checks:

- export permit has been issued prior to export of milk and milk products
- products are automatically blocked from export if:

  - on the *prohibited goods list* (ie a list for excluding specific products, exporters or establishments from export)
  - establishments are not registered to produce the particular product
- declaration of compliance is held by exporter
- compliance with importing country requirements

Exporting Non-Prescribed Goods

- Highly processed products, like wine, can usually be exported without government oversite. In certain circumstances and markets the goods may require certification.
- Non-prescribed goods are all those goods where specific export requirements are not prescribed in Australian export legislation, and include processed foods.
- Export requirements are trading partner driven and the *Export Control Act 1982* is the legislative basis for issuance of export certification and enforcing any additional importing country requirements.

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If the processed food contains any prescribed good, it is still a prescribed good – e.g. meat pie, salmon dip, mixed dinners with fish

If not, it is called a non-prescribed good (NPG) and there are a range of provisions that the department may take, such additional verification checks, to ensure import conditions have been met prior to an export certificate being issued for an NPG.

For many NPG, the department will issue an NPG certificate that is a 'certificate as to condition'. These goods have no oversight of manufacturer from the department, but are still subject to state and territory food safety laws. This certificate attests that the goods are legally available for sale in Australia on the basis of state governments/food regulatory agencies oversight.

For some markets, and particular types of non-prescribed goods, routine audits of the manufacturer may need to be conducted. These audits can be conducted by an approved third party auditor or can be undertaken by a departmental auditor.

China Imported Food Requirements

中华人民共和国海关总署
GENERAL ADMINISTRATION OF CUSTOMS, P. R. CHINA

Chapter 6 of the Food Safety Law regulates Imports and Exports.

The General Administration of Customs controls both exports and imports of food (section 91).

GACC has set up 35 Entry-Exit Inspection and Quarantine Bureaus (CIQs) in China's 31 provinces, nearly 300 branches and more than 200 local offices across the country, with over 30,000 employees in distribution centers at sea ports, land ports and airports.

Imported food has to comply with China's national food safety standards.

If there is no national food safety standard for an imported food, the overseas exporter / producer, or its importers, should submit a relevant national standard or international standard of the exporting country to the National Health Commission. NHC may permit the importation if it is considered compliant with food safety requirements, and will then develop a national food safety standard accordingly. Where the imported food contains new raw materials or new additives, it is preferable to work with NHC to develop a new standard before trying to import.

Summary

The Chinese and Australian food safety systems have different histories but are becoming more closely aligned.

There are robust controls imposed by each country on the export of Australian food to China, to ensure that the food is high quality and safe.

This presentation has compared the overall approaches of the two systems and focused on some specific areas to demonstrate how well the Australian system is managed.

Australian food has a strong reputation internationally for safety and quality, earned as a result of stringent regulatory frameworks as outlined in this presentation.