

BIOSECURITY PLAN IMPLEMENTATION GUIDANCE FOR PROCESSORS AND KNACKERIES

Introduction

The Biosecurity Plan implementation compliance program has been developed to assist industry to implement measures to reduce the Biosecurity risks involved with their operations. Correct implementation of biosecurity measures outlined in a plan provides individuals and business' with stronger protections from people who enter a property.

The adoption of a plan also provides harsh penalties for individuals who subject a property to uncontrolled biosecurity risks.

The inspection and compliance program assure the industry that a robust system is in place to maintain biosecurity within the industry, which is consistently applied, and is risk based.

The aim of this document is to provide both licensees and authorised officers with consistent information and understanding of the inspection process. This guidance document can also be used by licensees to understand why defects are identified during inspections, and the severity of potential defects.

Biosecurity Plans

All Abattoir and Knackery license holders are inspected for compliance against relevant sections or clauses of the;

- *Biosecurity Act 2015*
- *Biosecurity Regulation 2017*
- *Food Act 2003,*
- *Food Regulation 2015*
- AS4841:2006 Hygienic Production of Pet Meat: PISC Technical Report 88- Knackereries
- AS 4696:2007 Hygienic production and transportation of meat and meat products for human consumption – Abattoirs

The Biosecurity Plan

A biosecurity management plan is a practical way of demonstrating how you are preventing the introduction of pests, disease, weeds and contaminants to your property, spreading around your property, or spreading from your property.

Why have a Biosecurity Management Plan?

Your biosecurity management plan:

- Defines your responsibilities
- Outlines your emergency disease protocols
- Supports governments during an emergency animal disease response by ensuring all property biosecurity information is accessible
- Act as a communications opportunity between livestock owners, essential service providers and others that are legally allowed to access the property to ensure biosecurity procedures are being met.

What is in the inspection?

An inspection is a process where a authorised officer visits a facility to assess compliance with legislation, standards and orders. The inspection process includes an assessment of premises, documentation and associated records.

During this compliance inspection, the authorised officer will check that the licensee:

- Is complying with the requirements of the relevant Australian Standard
- Is implementing the control measures and maintaining written records identified in the Biosecurity Plan
- Has a documented a Biosecurity Plan, which covers all Biosecurity risks regarding operations, and includes an Emergency Animal Disease (EAD).

If the authorised officer determines that a licensee is not complying with the requirements, they will record an unacceptable inspection outcome and implement appropriate compliance or enforcement action.

Corrective Action Requests

The compliance officer has a list of areas that must be checked. If an area is not compliant, the officer will raise a Corrective Action Request (CAR). A CAR identifies the non-compliance, and generally allows the licensee a period of time to take action and address the issue. The CARs identified during inspections are rated as Minor, Major or Critical, depending on the risk. The number and rating of CARs issued determines the inspection outcome.

Minor CAR

A minor CAR is a non-compliance resulting from a failure to comply with the standards which may result in a biosecurity risk.

A minor CAR is issued where there administrative or technical breakdowns in the system.

Major CAR

A major CAR is a non-compliance resulting from a failure to comply with the standards which is likely to result in a biosecurity risk.

A major CAR is issued where there is a significant breakdown in the implementation or documentation of controls, which threatens the effective control of the risk.

Critical CAR

A critical CAR is a non-compliance which, in the opinion of the compliance officer a biosecurity risk has occurred or an imminent risk present.

A critical CAR is issued where there is a serious threat to biosecurity or food safety.

Table 1: Non-conformance categorisation guidelines

Table 1 below is a guideline for the rating of non-conformances, based on existing knowledge and data, and are typically the main areas of risk. It should be noted however that these are guidelines only as each individual circumstance can vary, which can impact on the risk, and the subsequent rating.

Category	Minor	Major	Critical
Biosecurity Plan			
Has the facility implemented a Biosecurity Plan?	<p>The facility has not filled in all the details on page 1.</p> <p>The Biosecurity Plan statement has not been completed by management.</p> <p>Biosecurity Plan team has not been completed.</p>	Biosecurity Plan not available at time of inspection	The facility has not implemented a Biosecurity Plan.
Has the facility maintained the Biosecurity Plan up to date?	The Biosecurity Plan is not maintained.	The Biosecurity Plan is not accurate or up to date	
Has the facility completed an accurate site map?		<p>The Biosecurity Plan site map is not accurate or up to date.</p> <p>The Biosecurity Plan site map does not include important information such as entry or exit points.</p>	The Biosecurity Plan does not have a site map.
People, vehicles and equipment			
Has the facility implemented the visitor controls outlined in their Biosecurity Plan?		<p>Visitor directions (signage) not available/unclear</p> <p>The facility has not implemented or complied with visitor controls as outlined in the plan</p>	<p>Visitor log not available</p> <p>Visitor log not maintained or filled in</p>

Has the facility informed visitors and staff of the contents of the Biosecurity Plan?		The facility has not informed visitors and staff of the contents of the plan. Induction forms have not been completed.	
Does signage comply with requirements?		Biosecurity signage does not comply with requirements.	Biosecurity signage is not available at entry points
Has the facility implemented the staff controls outlined in their Biosecurity Plan?	Sufficient PPE is not available	Staff controls have not been implemented or complied with.	Personal cleaning, disinfectant or hand washing not available
Does the business ensure that staff have sufficient skills and knowledge of the biosecurity plan?		Staff observed not complying with biosecurity plan. Training has not been effective in ensuring staff comply with the biosecurity plan	
Has the facility implemented the vehicle and equipment controls outlined in their Biosecurity Plan?	Vehicle cleaning records have not been completed.	Vehicle and equipment controls have not been implemented or complied with	

Livestock, water and feed

Has the facility implemented the livestock controls outlined in their Biosecurity Plan?			Incoming livestock are not uploaded to the NLIS database. Incoming livestock not appropriately identified or traceable. The facility has not implemented or complied with livestock controls. Incoming livestock are not accompanied by an eNVD or traceability document.
Has the facility implemented the exotic and notifiable disease action plan as outlined in their Biosecurity Plan?	EAD plans are not updated every 12 months or as the risk profile changes.	An EAD plan is not available. Facility EAD plan has not been implemented. EAD plan does not sufficiently outline the control of Emergency animal diseases.	

Has the facility implemented the feed and water controls outlined in their Biosecurity Plan?	Commodity Vendor Declarations not available for feed.	Feed or water not suitable for animals. Feed or water not appropriately stored. The facility has not implemented or complied with feed and water controls.	The facility has allowed ruminants access to RAM. The facility has allowed pigs access to swill.
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Effluent and waste Management

Has business adhered to withholding period 14 days for grazing on effluent treated pastures?		Business has not complied with the withholding period.	
Has the business disposed of property waste in a way to Minimise or eliminate the biosecurity risk?		Business has not disposed of waste in manner to minimise or eliminate biosecurity risk.	

Fences

Are property fences installed, maintained and inspected?	Fences are not regularly inspected.	Fences are not maintained.	Fences are not effectively installed.
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Personnel Records

Are all vulnerable personnel working on the site vaccinated for identified risk diseases such as Q Fever and tetanus?		The facility has not kept vaccination records for staff.	
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Documentation

Are all records outlined in the Biosecurity Plan completed?		The facility has not implemented or completed records in biosecurity plan.	
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Corrective Action

Has appropriate corrective action been taken for defects identified at previous inspection?	Appropriate corrective action has not been taken for defects identified at previous inspection. Use Escalation policy - see below.	Minor Corrective Action Requests (CARs) from the previous inspection not adequately addressed	Major Corrective Action Requests (CARs) from the previous inspection not adequately addressed
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Animal Welfare

Did the inspection observe animals free from any animal welfare issues?			Animal welfare issues identified during the inspection
Are all animals observed free from signs of injury or disease?		Animals observed with signs of injury Animals observed with signs of disease	Ante mortem inspection not conducted

CAR Escalation Policy

A failure of a licensed business to rectify any CAR or defect identified during an inspection by the required timeframe will result in the escalation of the original CAR. In addition, a further CAR or defect is to be considered as the business has failed to implement effective corrective actions to rectify the original issue.

How is the inspection outcome determined?

At the conclusion of the inspection, the result of the inspection will either be ACCEPTABLE or UNACCEPTABLE. If a critical corrective action request (CAR) is issued the result of the inspection will immediately be UNACCEPTABLE.

Unacceptable inspection result

In the event an inspection results in an unacceptable outcome one or more enforcement actions may occur:

- An Individual Biosecurity Direction (IBD) will be issued
- Corrective action will be required within specified timeframes on the IBD
- Immediate corrective action may be required
- Conditions may be imposed that restrict or prohibit certain activities by the licensee or permit holder
- Individuals or companies may receive penalty notices or be prosecuted

Table 2. Unacceptable rating inspection frequency

Rating	Unacceptable Inspection	Acceptable follow up inspection
UNACCEPTABLE	Enforcement action taken with a follow up inspection carried out	Return to original inspection schedule

Sanctions

Sanctions are issued in cases where a biosecurity risk is present, and the issue needs to be addressed to mitigate that risk. A sanction is a way to formally document the issue and the timeframe in which action must be taken to address the issue. This sanction will still allow time for you to take action to address the items that it contains but will incur harsher penalties or sanctions if not complied with in the specified timeframe. If you are issued a sanction and cannot complete the required action in the timeframe identified, you must contact the issuing officer before the expiry of the due date.

If a defect is related to a requirement of the *Biosecurity Act 2015* an Individual Biosecurity Direction (IBD) is to be issued.

Unannounced Inspections

Routine inspections will generally be carried out on an announced basis, however unannounced or unscheduled inspections may be carried out. These unannounced or unscheduled inspections can be in response to complaints, sampling or other matters requiring investigation or to monitor compliance.

Communication

The compliance officer will document the inspection, all findings and CARs raised in an inspection report. This report will generally be completed while the officer is on site. They will discuss the findings, any non-conformances identified, and expected timeframes to correct the non-conformances. The inspection report will be sent to you, either as hard copy or digitally. If you have any questions regarding the findings contained in the inspection report, it is recommended you contact the authorised officer to discuss prior to the next inspection.

About the NSW Food Authority: The NSW Food Authority is the government organisation that helps ensure NSW food is safe and correctly labelled. It works with consumers, industry and other government organisations to minimise food poisoning by providing information about and regulating the safe production, storage, transport, promotion and preparation of food.

Note: This information is a general summary and cannot cover all situations. Food businesses are required to comply with all of the provisions of the Food Standards Code and the *Food Act 2003* (NSW).