

FeedSafe® Certification Rules

QA Programme for the Australian Feed Manufacturing Industry

FeedSafe has been developed by the Stock Feed Manufacturers' Council of Australia for use in strengthening the industry's position in supplying high quality stock feed to Australia's livestock producers. FeedSafe provides a set of minimum standards that all feed manufacturers who belong to the SFMCA adhere.

1. Objectives of FeedSafe

- To protect the health of the human consumer of food products derived from livestock fed prepared stockfeeds.
- To protect the health of livestock and to enable livestock producers to achieve expected levels of performance by delivering stock feed of consistent quality to animals.
- To contribute to the delivery of livestock products of consistent and appropriate quality to the end consumer.

2. SFMA Membership

FeedSafe Certification

The central aspect of FeedSafe is the compliance of feed mills to a Code of Good Manufacturing Practice (GMP) for the Feed Milling Industry. **Members of the SFMCA are required to undergo third party audit to verify that their manufacturing sites comply with the Code of GMP. This requirement is a minimum standard for feed manufacturers to gain FeedSafe certification** and to retain SFMA Full Membership.

Should Full Members at their annual audit fail to achieve the FeedSafe audit standard, and their FeedSafe certification has expired by 3 months, their membership classification will change to "Provisional Member" for a maximum 12 month period. Should members not complete FeedSafe audit standards within this subsequent 12 month period their membership will cease.

Feed manufacturers wishing to join the Association will be admitted as Provisional Members for a maximum 12 month period until they are required to have completed a FeedSafe audit and met the Code of GMP minimum standard.

Once Provisional Members successfully complete FeedSafe audits they will be moved to Full Member status.

Provision of SFMCA FeedSafe Certificates

The SFMCA maintains a register of member manufacturing sites, issuing certificates bearing the FeedSafe logo based upon annual provision of third party audit compliance statements.

Manufacturing sites achieving FeedSafe certification are given the right to use the organisations FeedSafe logo and the statement “*FeedSafe Accredited - a HACCP based QA accreditation program*” on stationery, product packaging and marketing materials.

FeedSafe accredited manufacturing sites are listed on the SFMCA website.

3. Code of GMP

The SFMCA in the 1990’s developed a **Code of GMP for the Feed Milling Industry, this Code has been reviewed in 2002 in conjunction with the Chief Veterinary Officers within each State and the final document has gained Primary Industries Ministerial Council endorsement.**

The Code covers all feed quality elements of stock feed manufacture. Feed manufacturers should compare the Code of GMP with their own management practices and production procedures and, if necessary, adapt and improve them in order to meet the requirements of the Code. Manufacturers are required to produce their own milling procedures and instructions, these being written to account for each sites specific characteristics of the production plant in operation and the products being manufactured. The Code of GMP sets minimum standards; feed manufacturers can implement higher standards at their own discretion.

Together with the Code of GMP, there is an Audit Checklist, comprising questions for use by feed manufacturers and auditors in assessing level of compliance. These questions match with the Code of GMP standard.

4. FeedSafe Audit Process

The following is required for manufacturing sites to obtain FeedSafe accreditation.

1. Complete Site Audit – each manufacturing site is required to be audited. The SFMCA does not complete Code of GMP audits. Feed manufacturers are required to gain the services of third party auditors.
2. Complete Audit Checklist – confirmation that the site complies with listed items cross referenced to the Code of GMP. The third party auditor may utilise the SFMCA Audit Checklist to establish compliance. The Code of GMP is not superceded by the Audit Checklist.
3. Completed and signed FeedSafe Audit Statement are to be sent to the SFMCA.
4. Annual audit – third party audits are required to be completed annually and audit statements are required to be submitted to the SFMCA annually.
5. Accepted Auditors – the auditor engaged by individual feed companies is required to be RABQSA (Quality Society of Australia) accredited in Food Safety, preference should be given to auditors with feed industry experience. Restrictions apply to avoid

conflicts of interest, the auditor cannot also act as consultant to the feed manufacturer nor can they be an employee (directly or indirectly) of the feed manufacturer. The auditor cannot have worked in a consulting capacity to assist the company in the implementation of their QA programme.

5. FeedSafe Responsibilities

Auditor's Responsibility

The following directions are provided for use by auditors in completing FeedSafe audits.

1. The auditor will audit stock feed manufacturing facilities as instructed by individual feed manufacturing companies and audits will include the following:
 - a. Be completed on site.
 - b. Must involve both viewing documented systems as well as inspecting manufacturing systems to validate procedures are being followed.
 - c. Focus on greater feed safety risk areas of medication use, RAM procedures, mill hygiene and cleaning, raw material receipt and testing, finished product quality and customer service.
 - d. View previous audit results to ensure continuous improvement is being achieved.
 - e. Confirm that the site maintains Code of GMP compliance through-out the year and is not just satisfying an annual auditor visit. This especially relates to issues of mill hygiene and cleaning.
2. Audits are to be conducted observing the RABQSA Auditor Code of Conduct, refer Appendix 2.
3. The audit will compare the establishment's performance against the requirements of the Code of GMP. The SFMCA FeedSafe Audit Checklist is provided for use in completing site audits.
4. The mill being audited for FeedSafe is required to declare to the auditor whether State Department audits have been completed since the last FeedSafe audit and the results of this audit provided to the auditor. If the State Department found any area of non compliance, including positive RAM test results for ruminant feeds, the FeedSafe auditor needs to place additional attention to these areas of non conformance. The auditor must confirm with the site whether State Department audits have been completed since the last FeedSafe audit.
5. The audit will identify points of non-compliance against the Code of GMP. The points of non-compliance will be rated as major, moderate or minor according to the auditor's assessment of how the non-conformance affects product quality and safety relating to the food chain.

Major non-compliance – the auditor believes that the point of non-compliance results in a high risk that finished products present a hazard to animal health and human food products.

Moderate non-compliance - the auditor believes that the point of non-compliance results in a low risk that finished products present a hazard to animal health and human food products.

Minor non-compliance - the auditor believes that the point of non-compliance will not result in any risk that finished products present a hazard to animal health and human food products.

Non-Compliance Results

The SFMCA FeedSafe minimum requirements are that each manufacturing site must meet the following standard:

- No major non-compliance
- No more than 5 moderate non-compliances
- No more than 10 minor non-compliances

6. The Auditor will supply to the individual feed manufacturing company an audit report. The report will identify all points of non-compliance with appropriate explanation. When sites meet the required standard, the Auditor will provide to the individual feed manufacturing company a completed FeedSafe Audit Statement (refer Appendix 1) confirming that the company's site has been audited, this Statement providing details of non-compliances against the Code of GMP.

7. FeedSafe auditors are to look for continuous improvement based upon prior year audit results. Code of GMP items identified as minor or moderate need to be moved to moderate and major in the following year when no improvement is identified.

8. Auditors are required to notify SFMCA should the company fail to meet the FeedSafe audit standard in terms of having more than the allowed number of non-compliances.

9. FeedSafe audits are to be completed with consistency between site audits. No allowance is to be made for differing size of operation or staff employed on site. SFMCA is seeking consistency in applying the Code of GMP across all stock feed manufacturers.

Feed Manufacturer Responsibility

1. Each feed manufacturing company is required to annually complete independent site audits.
2. Companies are to submit copies of the FeedSafe Audit Statement confirming that their manufacturing sites meet the SFMCA FeedSafe minimum requirements.
3. Subsequent annual audits are required to be completed within 3 months of the defined certification date.
4. Should the company fail a FeedSafe audit they are required to complete corrective action and undertake a follow-up audit.
5. The mill being audited for FeedSafe is required to declare to the auditor whether State Department audits have been completed since the last FeedSafe audit and the results of this audit provided to the auditor.
6. FeedSafe accredited feed manufacturers entering into third party contract supply arrangements are to only source feeds from FeedSafe accredited feed manufacturers.
7. Where feed is supplied to a non-accredited mills, the supplying mill is to ensure that the FeedSafe name and logo is not misused by the non-accredited mill.
8. Accredited mills are required to comply with the FeedSafe logo use guidelines, refer Appendix 4.

SFMCA Responsibility

1. SFMCA through its Federal Council reviews and endorses FeedSafe certification based upon the receipt of FeedSafe Audit Statements.
2. Accreditation certificates are provided to each manufacturing site, these providing a certification number and time period for which certification is effective.
3. SFMCA is required to retain a listing of all stock feed manufacturing members and a copy of their FeedSafe Audit Statements of compliance.
4. FeedSafe is co-ordinated to ensure all feed manufacturers are notified of their requirement to submit annual audit statements by a defined date.
5. SFMCA retains the right to not accept FeedSafe Audit Statements should there be any concern over the diligence of the audit process. As SFMCA is reliant upon the veracity of audits completed, should an auditor be suspected of not adequately completing FeedSafe audits, the SFMCA retains the right to direct feed manufacturers not to use such auditors.
6. Confidentiality relating to audit conduct and outcomes is retained within the SFMCA national office. The SFMCA Federal Council and State SFMA are only advised when sites have not successfully completed a FeedSafe audit within 3 months of their FeedSafe certification expiry date.
7. The SFMCA provides a FeedSafe complaint resolution process, refer to FeedSafe Complaint Procedure documentation in Appendix 3.
8. The SFMCA will protect the value and trade mark of FeedSafe, with actions taken when misuse of the trade mark is identified.

**Appendix 1
FeedSafe Audit Statement**

Once the audit has been completed, the auditor is required to complete the following FeedSafe Audit Statement. Audit Statements are to be sent to: SFMCA Executive Officer, PO Box 383, Beaconsfield, Vic 3807 or fax 03 9769 7174 or email contact@sfmca.com.au.

Note this statement must be completed and signed by the auditor, either using this format copy or in a letter format as long as the same statements are provided. SFMCA does not accept alternate statements from auditors. A separate Audit Statement is required for each manufacturing site.

I _____ as an accredited RABQSA Food Safety auditor have completed an audit on the stockfeed manufacturing site listed below against the Code of Good Manufacturing Practice for the Feed Milling Industry and confirm that these sites meet the SFMCA FeedSafe minimum requirement of:

- No major non-compliance
- No more than 5 moderate non-compliances
- No more than 10 minor non-compliances

as defined by the FeedSafe Objectives and Outcomes.
Version Date of the Code of GMP used to complete audit _____
Non-compliance items for the site are identified below:

Non-compliance	Code of GMP Item – Identify each section number
Major	
Moderate	
Minor	

Company Name: _____ (Company being audited, ensure this is accurate as this will appear on FeedSafe certificates)

Company Postal Address: _____

Site Physical Address _____

Audit Date _____

I declare that I am a third party auditor, not being an employee of the company or having worked in a consulting capacity to assist the company in implementing their QA programme.

Signed: _____ **Date:** _____

RABQSA Auditor Number: _____

Auditor’s Name: _____

Address: _____

Phone No. _____ **Email Address:** _____

Appendix 2. RABQSA Auditor Code of Conduct

1. I will act professionally, accurately and in an unbiased manner.
2. I will strive to increase the competence and prestige of my profession.
3. I will assist those in my employ or under my supervision in developing their professional competencies.
4. I will not undertake any assignments that I am not competent to perform.
5. I will not represent conflicting or competing interests and will disclose to any client or employer any relationships that may influence my judgment.
6. I will not discuss or disclose any information relating to any assignment unless required by law or authorized in writing by the client and/or my employing organization.
7. I will not accept any inducement, commission, gift or any other benefit from client organizations, their employees or any interested party or knowingly allow colleagues to do so.
8. I will not intentionally communicate false or misleading information that may compromise the integrity of any assignment or the personnel certification process.
9. I will not act in any way that would prejudice the reputation of RABQSA or the personnel certification process and will cooperate fully with an enquiry in the event of any alleged breach of this code.

Appendix 3

FeedSafe® Complaint Procedure

This set of procedures defines the method that the SFMCA uses to address stock feed manufacturer complaints relating to the FeedSafe program. The procedure has been established to address complaints raised by individuals or companies that have purchased feed from a FeedSafe accredited manufacturer or one feed manufacturer against another manufacturer. This includes issues of FeedSafe status, adequacy of audit conduct and use of the FeedSafe logo and promotional activity relating to FeedSafe status.

1. Complaints are to be documented in writing, these ideally being addressed through State secretaries to the SFMCA Executive Officer. Complaints are to provide the contact details of the person making the complaint. Anonymous complaints will not be addressed by the SFMCA. It is recognised that raising complaints through State SFMA member meetings may not be an appropriate forum and members are encouraged to speak or write directly to State Secretaries or the Executive Officer.
2. The Executive Officer will investigate all complaints of a serious nature. The Executive Officer will define whether complaints are frivolous in nature. This investigation may include reference to relevant companies and FeedSafe auditors involved. The Executive Officer has the capacity to co-opt other individuals to take part in complaint investigation.
3. The Executive Officer shall advise companies if a complaint has been made against them and where appropriate seek their co-operation in addressing the issues raised.
4. Confidentiality of the person making the complaint is held by the SFMCA Executive Officer.
5. The results of complaint investigation will be documented, this including actions taken to resolve.
6. Both the entities making the complaint and the subject of the complaint will be provided with confirmation of actions resulting from the complaint investigation.
7. Complaint investigation reporting will be by the Executive Officer to SFMCA Federal Council.

Appendix 4

FeedSafe® Logo and Statement Use Guidelines

These guidelines are provided to stock feed manufacturer's that have completed FeedSafe accreditation and seek to use the FeedSafe logo.

Companies are given the opportunity to use the FeedSafe logo and the following preferred statement on products, promotional materials, signage and advertising. The FeedSafe logo, including an eps file format for sign writing, can be downloaded from the SFMCA website www.sfmca.com.au.



"FeedSafe Accredited - a HACCP based QA accreditation program"

The following guidelines relate to the use of the FeedSafe logo and statement as shown above.

1. Restricted use to companies that are State SFMA Full Members and have completed FeedSafe accreditation for sites operating within that state. Manufacturers using the logo who cease to be members of their state SFMA or fail to achieve FeedSafe accreditation to the satisfaction of the SFMCA must remove all reference to FeedSafe within 3 months of the lapse of their membership and are not to use the FeedSafe logo under any circumstances.
2. The FeedSafe logo can be used in isolation or where accompanied by text the preferred wording is "*FeedSafe Accredited - a HACCP based QA accreditation program*".
3. This statement can be used to make reference to the products supplied, being manufactured in a company operated manufacturing site that has completed FeedSafe accreditation. The site can also be promoted as having achieved FeedSafe accreditation.
4. Completion of FeedSafe relates to specific site manufacturing operations and their compliance with the Code of GMP for the Feed Milling Industry. FeedSafe accreditation does not warrant nor imply that the feeds manufactured are in their own right accredited or endorsed by the SFMCA.
5. The FeedSafe logo can be printed in either dark blue (PMS287) or black, no other colours are to be used. Users of the logo should make reference to the FeedSafe Style Guide.

FEEDSAFE CERTIFICATION RULES

6. All enquiries relating to the logo and statement use should be directed to the SFMCA Executive Officer at the contact details below.