



final report

Project code: P.PIP.0523

Prepared by: Food and Veterinary Services Pty Ltd

Date published: 29 October 2018

PUBLISHED BY
Meat and Livestock Australia Limited
Locked Bag 1961
NORTH SYDNEY NSW 2059

Using GS1 barcoding to resolve missing port marks in the USA – Stage 2

This is an MLA Donor Company funded project.

Meat & Livestock Australia acknowledges the matching funds provided by the Australian Government and contributions from the Australian Meat Processor Corporation to support the research and development detailed in this publication.

This publication is published by Meat & Livestock Australia Limited ABN 39 081 678 364 (MLA). Care is taken to ensure the accuracy of the information contained in this publication. However MLA cannot accept responsibility for the accuracy or completeness of the information or opinions contained in the publication. You should make your own enquiries before making decisions concerning your interests. Reproduction in whole or in part of this publication is prohibited without prior written consent of MLA.

Executive summary

Both the Australian Department of Agriculture and Water Resources (DAWR) and the United States Department of Agriculture Food Safety Inspection Service (FSIS) have agreed that the GS1 bar-code can be used as a backup in the event that the current manually applied shipping mark is missing or illegible.

The purpose of this project was to demonstrate the robustness, reliability and timeliness of both electronic messaging and Meat Messaging portal to FSIS in support of a proposal that the GS1 bar code can replace the shipping mark. This was to be done through a trial using a nominated supply chain with scan all cartons at load-in and reconcile each carton against the cartons uploaded into the Meat Messaging portal. The report from this trial would then be made available to DAWR immediately upon completion and would be used to support a case to have the GS1 barcode replace manually applied shipping marks.

Currently all US loads from all Teys Australia sites are being uploaded into the test portal. The integrity of the message, the Teys Australia Load-out processes and transfer of the message have been verified as effective. As Teys Australia are still in test mode there has been no opportunity to use the Meat Message to verify the remarking of any carton with missing or illegible shipping marks. Teys Australia will be moved into production mode as soon as approval from FSIS is received.

Despite operating in the test environment, it has been possible to track over that same period what Teys Australia would have saved in remarking costs and in lost product where the numbers of cartons requiring remarking didn't warrant the cost of the remarking. The Teys Australia costs of remarking and condemnations of the smaller lots that don't warrant the costs of the current remarking process are around AUD\$65,000 for the 2017 calendar year.

The Meat Messaging portal has been shown to be a reliable means of re-identifying cartons with missing or illegible shipping marks. The Teys Australia IT system can now automatically extract and upload the necessary product/shipping data as part of its normal paperless load-out system. The load-out process including the carton and pallet scans, data uploads have been independently verified as being effective. Teys Australia will avail themselves of the remarking opportunities when the message uploads are moved into the production mode upon approval by FSIS.

The Meat Messaging portal has been shown to facilitate the use of a pallet label that has the shipping mark printed on it. This allows reconciliation of individual cartons on a pallet with the pallet label. A trial has been proposed to FSIS through DAWR. The Supply Chain sub-committee of the Australian Meat Industry Language and Standards Committee should continue to pursue this opportunity with DAWR.

The uptake by industry of the Meat Messaging portal has also been slow. It is recommended that consideration be given to improving awareness and knowledge of the Meat Messaging system in both Australia and the US. The understanding of Meat Messaging within the US Meat Import Industry is very low.

Milestone 7 of the project is to run a series of information sessions for the wider industry. Improving awareness and knowledge of the Meat Messaging system in both Australia and the US will be a component of these sessions.

Table of contents

1	Background	4
2	Project objectives	5
3	Methodology	5
3.1	Project plan.....	5
3.1.1	Meat Importers Council of America (MICA) Conference	6
3.1.2	Visit to Mullica Hill (iHouse number 669)	6
3.1.3	Meeting with FSIS	6
3.2	Development of rejected product report	7
3.2.1	Rejected product report.....	7
3.2.2	Pallet lots, shipping marks and FSIS official import inspection marks	7
3.3	Solution Prototype	8
3.4	Test automated integration	9
3.4.1	Pallet labels – replacement for the manually applied shipping mark	9
3.5	Solution Pilot.....	9
4	Results	10
5	Discussion	10
5.1	Industry progress.....	10
5.2	Revised DAWR Meat Notice	10
5.3	Revised FSIS Notice	11
5.4	Pallet labels – replacement for the manually applied shipping mark	11
6	Conclusions/recommendations	11
7	Key messages	12
8	Bibliography	12
9	Appendix.....	13
9.1	Appendix 1: Meat Importers Council of America Conference Presentation.....	13
9.2	Appendix 2: Meat Messaging Receiving Email File	16
9.3	Appendix 3: DAWR proposal to use pallet labels	18
9.4	Appendix 4: MICA proposal to FSIS on the use of pallet labels	21
9.5	Appendix 5: Bar Code Test Presentation	25
9.6	Appendix 6: Agenda paper for the AMILSC Committee.....	31
9.7	Appendix 7: Department of Agriculture and Water Resources Meat Notice	34
9.8	Appendix 8: FSIS Notice – Using barcodes to verify eligibility of imported products.	
	42	

1 Background

Both the Australian Department of Agriculture and Water Resources (DAWR) and the United States Department of Agriculture Food Safety Inspection Service (FSIS) have agreed that the GS1 bar-code can be used as a backup in the event that the current manually applied shipping mark is missing or illegible.

In a previous project (P.PIP.0439) a web portal was used to upload the load-out scan file generated at the time of loading and requesting the Export Permit and Health Certificate, to make it available to the import warehouse in the US, DAWR and to FSIS. The scan files in this earlier trial were uploaded manually. The upload from the Port of Entry could be the entire load or just the cartons with the missing or illegible shipping mark but was only required if there were problems with the shipping mark.

Now that the trial has been accepted by the regulators, the next aim is for the GS1 bar-code to completely replace the current manually applied shipping mark. This will require a complete load scan at the port of entry for a period to give FSIS and DAWR confidence that the system is robust and reliable. FSIS have indicated that if we could show that the GS1 bar code/e-Messaging system were reliable then FSIS will look seriously at recognizing the GS1 barcode as the shipping mark.

The purpose of this project is for a nominated supply chain to scan all cartons at load-in and reconcile each carton against the cartons uploaded into the Meat Messaging portal. The report from this trial would be made available to DAWR immediately upon completion and would be used to support a case to have the GS1 barcode replace manually applied shipping marks.

This project also opens up other possibilities for the industry:

- The same upload facility could also be used to access the electronic Meat Transfer Certificate and may in future be used to assist in the underpinning of the integrity of the supply chain and product claims.
- The availability of all load-out/export information in the portal may be of use to other markets which either require shipping marks (e.g. Canada, Japan) or those that may require advanced notice of incoming loads of meat and meat products to improve the integrity of the supply chain (e.g. meat and meat by-products to China, Taiwan). It may also be useful to improve the integrity of meat processing co-products such as skin and hides, foetal blood and other technical products which are not currently prescribed under regulation. The use of the portal information in other markets and for co-products would be an inexpensive additional benefit.
- The use of the portal could also allow information about unsatisfactory loads to be returned to the exporter including the provision of photographs of product and packaging defects and possibly the production of summary information for the DAWR to use when managing non-compliance.
- There may also be the possibility for FSIS to use the information in the portal to verify that product that has been accepted for import at the port of entry has in fact passed import inspection in case the “USDA” inspection stamp is missing which is also manually applied by on site labour with the same failings as the manual application of the shipping mark. The alternate possibility may be that the pallet label (containing the Sequential Serial Container Code) is stamped to indicate that the whole pallet has passed USDA import inspection and the portal could be used to verify that the individual cartons belong to the pallet.

2 Project objectives

The project objectives were to:

- Develop an unacceptable transfer report content and format that can be sent back to exporters via the portal to cover problems identified at the Port of Entry.
 - Investigate a proposed portal functionality of producing summary reports to the DAWR of unacceptable loads at Port of Entry.
 - Develop a proposal to be put to the FSIS covering the application of FSIS inspection stamps to imported product.
- Automate the uploading of the scan file of every export load at every Teys Australia plant and contracted cold store into the web portal, and
- By demonstrating the robustness, reliability and timeliness of both the electronic messaging and Meat Messaging portal to FSIS propose that the GS1 bar code can be the shipping mark.

3 Methodology

3.1 Project plan

A trial proposal aimed at demonstrating an alternative method of meeting the FSIS requirements for a shipping mark was developed. It would apply initially to manufacturing packs for the first couple of months and then if successful to all US bound packs from 1 or more plants. The proposed process was as follows:

1. Load assembly, container loading, and portal upload
 - a. Cartons to be loaded will be palletised
 - b. Cartons on pallet will be scanned and shipping marked
 - c. Pallet will have two pallet labels printed containing pallet number (SSCC) and port mark and product description
 - d. One label will be attached to the side of the pallet (insurance)
 - e. The pallet will be shrink wrapped
 - f. The second identical label will be applied to the outside of the shrink wrap
 - g. Container will be loaded by fork lift (slip sheeted)
 - h. Container/lot label will be applied to the back of the lot containing Container number and shipping mark
 - i. Load-out data including pallet numbers uploaded to the portal
2. Draft proposal discussed with the DAWR, the Meat Importers Council of America (MICA) and Australian Industry
3. Draft proposal put to Supply Chain Sub-committee
4. Proposal sent formally to DAWR for submission to FSIS
5. Trial commences

During the trial individual cartons would still be shipping marked for a period of time. The trial would be an overlay of the current compliant system. FSIS approval would be required if individual carton marking ceases.

To facilitate the trial, a number of visits and presentations were also conducted.

3.1.1 Meat Importers Council of America (MICA) Conference

A presentation was delivered by Dr John Langbridge (Tefs Australia) and Des Bowler (Management for Technology) to the MICA conference describing the system (Appendix 1). A live demonstration of how to establish the integrity of cartons (with missing or illegible shipping marks) were identified at load-in, was also provided.

3.1.2 Visit to Mullica Hill (iHouse number 669)

Mullica Hill group (the company that runs the iHouse) were involved in the original trial in 2002 and again in the revised trial in 2014 (P.PIP.0439). Tefs Australia and Management for Technology met with representatives from Mullica Hill Group and MICA.

Prior to the visit, information on a number of loads that were due to arrive in the US were uploaded to the portal. The iHouse had already successfully scanned them and uploaded the file to the portal. The files were a match.

The iHouse needed a unique identifier (not repeated) to be able to search for the correct load details, and they needed someone to send it to them. It was determined that the container number along with the shipping mark would be enough detail to use in a search of the portal. To facilitate that a “placard” printed with the container number and shipping mark could be applied to the back row of the container. This information could then be used to identify the exact load. Once identified the information could also be provided to the FSIS inspector stationed at the iHouse.

We then went on to look at carton by carton scanning at de-containerisation. Currently during this process if the load is a manufacturing type (sold on Chemical Lean) then around 5% of cartons are randomly selected and held to one side. This is to provide a sample for chemical lean testing by an independent laboratory in the event of a claim against the exporter for the product containing too much fat. The cost of each carton scan for this process is USD 0.27 each. That cost was developed around the new fat claims guidelines which have been in place for just under two years. For a whole container scan the cost is likely to be reduced to about half which is USD \$0.13 per carton or around USD \$91.00 per container.

We discussed an alternate system. In commerce the pallet lots tend to move intact and that is how most are sold. In the US at the unloading of the container the cartons are restacked on pallet in product groups and sometimes in packing date groups. If these cartons could be loaded as pallet groups in this way the pallet group itself could be labelled with an SSCC code representing the cartons on that pallet and the shipping mark. The portal may be able to be programmed to record the pallet number against the carton numbers.

Some other commodities entering the US get handled as pallet lots. For example, manufacturing meat from Canada, eggs, pails of egg whites.

3.1.3 Meeting with FSIS

Tefs Australia met with representatives from FSIS, MICA and an AGRO group consultant.

The group were provided an update of the state of implementation of the Meat Messaging portal and the reasons that the implementation has been slow which included companies needing to automate the system and integrate it with their existing inventory systems and eCert (EXDOC) uploads.

Teys Australia provided an overview of the proposed trial. Trial of these pallet labels would be undertaken whilst maintaining the carton by carton shipping mark. FSIS expressed an interest in pallet labelling as an interim measure and would be willing to consider a formal trial.

The FSIS group indicated there is an existing acceptance that if the pallet lot moves to the end user in the US intact then the pallet may be able to carry the shipping mark.

3.2 Development of rejected product report

3.2.1 Rejected product report

The possibility of capturing data for rejections was discussed with both MICA and the iHouse used in the shipping mark trials. All thought it was a good idea to do so. However, the data captured needed to be, what was immediately available at container unloading. Given this, it was also thought that identifying the cartons that had been selected for further inspection by FSIS may also be useful.

A new data field was programmed for the return message covering the possibilities for rejection and sampling at de-containerisation (Appendix 2). This additional field allows the consolidation, analysis and reporting of rejection data for those plants using the portal.

3.2.2 Pallet lots, shipping marks and FSIS official import inspection marks

It was ascertained that there was a significant cost to scan carton by carton bar codes at \$0.13 USD per carton or \$91.00 USD per container. It was also noted that the iHouse applied pallet labels and then controlled the logistics on a pallet by pallet basis to the end user. It was also noted that the end user in the US did not allow wooden pallets onto their processing plants, so the pallets were slip sheeted onto and off US domestic transport vehicles.

FSIS has accepted the use of a web portal as a backup to be used when there are missing or illegible shipping marks on individual cartons (FSIS Notice 81-16). For each load of meat exported to the US from approved FSIS listed establishments the load details including the unique carton numbers, trade description, packing dates, as well as container number, seal number, health certificate number can be uploaded to a web portal (Meatmessaging.com).

More recently FSIS have been looking into the identification of pallet lots of meat for export from the US utilizing a single placard and export stamp. FSIS uses the same process for tray packed product as per FSIS Directive 9000.1 -

C. Palletized, consumer packaged (including food service—hotel, restaurant or institution (HRI)), fully marked and labeled products may be presented with the shipping mark and shipping container label applied to the outside of the pallet rather than to individual tray packs or cartons.

Teys Australia is looking at testing the loading of containers by slip sheets using a US transport industry compliant pallet stacking configuration so that a containers product can be unloaded by slip sheet directly and then be forwarded to the end user intact. This type of container and truck loading and unloading allows for pallet labels.

Palletised, packaged and labelled products are presented with the shipping mark and shipping container label applied to the outside of the pallet rather than to individual cartons. The US Official

Inspection Legend can be applied to the same pallet label to show that the cartons on the pallet have passed import inspection when that happens. The web portal shows the link between cartons, pallets, container lots and the health certificate.

As the intention is for the pallet lots to move intact to the end user it could also be argued that the USDA Official Mark of Inspection could also be applied to the pallet label. If there were concerns further down the supply chain as to which cartons were grouped together in a pallet then the portal could be used to verify that linkage.

Essentially, the pallet becomes the outer carton. The only difference would be that the safe handling instructions would remain printed on the individual cartons rather than the pallet. However, if required this could be accommodated.

For import inspection sampling FSIS could either revert back to the currently used cartons sampling plan or move to its combo sampling plan. Either way the sample size taken stayed the same. This is how FSIS handle import inspection during the one-ton frozen block trial (MLA project A.TEC.0067 – 2009).

3.3 Solution Prototype

Both the DAWR and FSIS have agreed the GS1 bar-code can be used as a backup in the event that the current manually applied shipping mark is missing or illegible. During a successful pilot period, a web portal was used to upload the load-out scan file to make it available to the import warehouse in the US, DAWR and to FSIS. The scan file is generated at the time of loading and requesting the Export Permit and Health Certificate. Now that the trial has been accepted, a more long term solution is required with the aim of having the GS1 bar-code completely replace the current manually applied shipping mark, or use a Serial Shipping Container Code that is applied to the pallet.

This project aimed to automate the uploading of the normal load out scan file to the web portal at the same time that the health certificate is finalised through the EXDOC interface. The portal will allow information about unsatisfactory loads to be returned to the exporter including the provision of photographs of product and packaging defects and even the production of summary information for DAWR to use when managing non-compliance.

There will also be the ability for FSIS to use the information in the portal to verify that product that has been accepted for import at the port of entry and has in fact passed import inspection in case the “USDA” inspection stamp is missing.

The Meat Messaging portal has been developed to accept a formatted message containing information about the contents of a load. This project is to demonstrate the commercial application of exporting the required information in a timely manner from a company inventory system to a specified location that an interface can act on.

EMark will be the middleware provider that will take the data as supplied by the company inventory system and submit the final data to the Meat Messaging portal. Likewise, any responses from Meat Messaging will be passed through the EMark system and submit the data for the company inventory system to process.

The work done resulted in the identification of the necessary business requirements and the development of the functional specifications for the data extraction and upload from the Tey Australia inventory database.

EMark has developed a secure SOAP (Simple Object Access Protocol) web-service for the purpose of receiving synchronous “original”, “update” and “cancelled” messages from the company inventory system. The EMark system will also provide a response to messages supplied by the company inventory system. It will then pass the data onto the Meat Messaging portal. Likewise, any responses from the Meat Messaging portal will be passed through the eMark system back to the company inventory system to process.

Specifications for these two systems (defining the two-way communications between the company inventory system and the proposed Emark messaging portal and the two-way communications between the proposed Emark messaging portal and the MLA Meat Messaging portal) were developed

3.4 Test automated integration

Currently all US loads from all Teys Australia sites are being uploaded into the test portal. It is anticipated that Teys Australia will be going live into production mode soon. The intention is to upload all export loads to all markets.

3.4.1 Pallet labels – replacement for the manually applied shipping mark

The overall aim of this project is to remove the need to apply a shipping mark manually to each carton exported to the US.

During this project a proposal was presented to the DAWR about using a pallet label to carry the shipping mark and be used to relate the cartons on a pallet to the Health Certificate. This proposal was generated after observing the various practices at load-outs in Australia and Load-ins in the US. This proposal has been subject to some amendments after discussion with the DAWR. The latest version is attached (Appendix 3).

In the interim the Meat Importers Council of America has presented a complimentary proposal to FSIS as they believe that the process outlined will work with all countries exporting meat to the US (Appendix 4). With the assistance of Teys Australia the proposal was demonstrated to FSIS at Mullica Hill on the 9th of January 2017. A presentation on the demonstration is at Appendix 5.

3.5 Solution Pilot

The project was to include a Go-Live and Pilot of the integration between the company inventory system and Meat Messaging portal to demonstrate the robustness of the system to the US FSIS Department, supporting the case to replace the current manually applied shipping mark with the GS1 barcode. This was to be a 12-month trial.

However due to circumstances beyond the control of the project, it has not yet moved from the test environment to production.

Uploads to the Meat Messaging test portal have been occurring now for 6 months. Teys Australia also have amended their approved arrangements at each site to include the use of the Meat Messaging portal. The DAWR has reviewed those amendments and approved the 6 Teys Australia sites. DAWR have also recommended the 6 plants to FSIS for approval within their system. The FSIS have not yet processed the applications from the DAWR to list the 6 Teys Australia sites on the FSIS’ Sharepoint website. This has kept the 6 Teys Australia facilities effectively in test mode.

4 Results

Currently all US loads from all Teys Australia sites are being uploaded into the test portal. The integrity of the message, the Teys Australia Load-out processes and transfer of the message have been verified as effective. As Teys Australia are still in test mode there has been no opportunity to use the Meat Message Portal to verify the remarking of any carton with missing or illegible shipping marks.

Teys Australia will be moved into production mode as soon as approval from FSIS is received.

Despite operating in the test environment, it has been possible to track over that same period what Teys Australia would have saved in remarking costs and in lost product where the numbers of cartons requiring remarking did not warrant the cost of the remarking. The Teys Australia costs of remarking and condemnations are around AUD\$65,000 for the 2017 calendar year.

A separate report on the results of the trial was also to be produced for use by DAWR. This has not been completed due to not yet moving from the test environment to production.

5 Discussion

5.1 Industry progress

Around 25% of the export registered US listed plants are in either test or production mode of Meat Messaging Portal. However, the volume of product produced by those plants for the US represents around 70% of the export meat volume to the US.

Cost to industry for the application of, and “missing or incorrect” port marks to the US is estimated at \$14.5 million per year as reported in June 2013 by D.N Harris & Associates on the technical barriers to trade for Australian red meat prepared for MLA and AMIC.

A short presentation was made to the Australian Meat Industry Language and Standards Committee (AMILSC) on the 17th May to inform them of the progress across industry and the future plans for the Meat Messaging Portal (pallet labels and eMTC). The agenda paper is attached at Appendix 6.

The uptake by industry of the Meat Messaging portal has also been slow and the understanding of Meat Messaging within the US meat Import Industry is very low. There are a number of extension exercises planned to improve the awareness of the solution and uptake of the solution within Australia. Milestone 7 of the project is to run a series of information sessions for the wider industry during the latter half of 2018. Improving awareness and knowledge of the Meat Messaging system in both Australia and the US will be a component of these sessions.

5.2 Revised DAWR Meat Notice

On the advice of the AMILSC Meat Messaging Steering Sub-Committee DAWR have reissued the relevant Meat Notice (Appendix 7). The main change has been the introduction of an internal audit function which allows the exporter to test the integrity of the load-out and upload system by submitting a second scan to the portal to verify the commercial message.

This was included as some of the plants currently operating in production mode were experiencing discrepancies between the message uploaded to the portal and the scan of the cartons that arrived in the US. FSIS were questioning how this could have occurred.

In short, the 700 cartons that the exporter thought they sent were different to the 700 cartons that arrived to some extent. This indicates that there were changes to the load between the time that the cartons were marshalled and scanned and when those cartons were loaded. Reasons include replacing damaged cartons and not changing the load inventory to reflect that or loading the wrong cartons by mistake. This could have broader ramifications to issues like the STEC lotting equivalence decision made with FSIS.

5.3 Revised FSIS Notice

FSIS review their administrative notices annually. The reissued notice (Appendix 8) is substantially the same as the previous version.

5.4 Pallet labels – replacement for the manually applied shipping mark

The overall aim of this project was to remove the need to apply a shipping mark manually to each carton exported to the US. This aim was worked on throughout the project successfully however to some extent has been surpassed by the option to use pallet labels.

A proposal was presented to the DAWR about using a pallet label to carry the shipping mark and to relate the cartons on a pallet to the Health Certificate. This proposal was generated after observing the various practices at load-outs in Australia and load-ins in the US. This proposal has been subject to some amendments after discussion with DAWR.

The Meat Messaging portal contains the detailed carton serial numbers that are covered by each pallet label. The portal also has the capability of producing a supplementary pallet label when a carton has to be removed for reasons such as damage, selected for testing or selected for inspection. In the interim the Meat Importers Council of America has presented a complimentary proposal to FSIS as they believe that the process outlined will work for all countries exporting meat to the US. With the assistance of Teys Australia the proposal was demonstrated to FSIS at Mullica Hill on the 9th of January 2017.

DAWR have now formally approached FSIS to trial the use of a pallet label displaying the shipping mark. FSIS have yet to respond.

6 Conclusions/recommendations

The Meat Messaging portal has been shown to be a reliable means of re-identifying cartons with missing or illegible shipping marks. The Teys Australia has demonstrated that commercial IT systems can automatically extract and upload the necessary product/shipping data as part of their normal paperless load-out system. The load-out process including the carton and pallet scans and data uploads have been independently verified as being effective. Teys Australia will avail themselves of the remarking opportunities when the message uploads are moved into the production mode upon approval by FSIS.

The Meat Messaging portal has been shown to facilitate the use of a pallet label that the shipping mark printed on it. This allows reconciliation of individual cartons on a pallet with the pallet label. A

trial has been proposed to FSIS through DAWR. The Supply Chain sub-committee of the AMILSC should continue to pursue this opportunity with DAWR.

The uptake by industry of the Meat Messaging portal has also been slow. The understanding of Meat Messaging within the US Meat Import Industry is very low. It is recommended that consideration be given to improving awareness and knowledge of the Meat Messaging system in both Australian exporters and the US importers.

Milestone 7 of the project is to run a series of information sessions for the wider industry during the latter half of 2018 which should improve awareness and knowledge of the Meat Messaging system in both Australia and the US.

7 Key messages

- The Meat Messaging portal has been shown to be a reliable means of re-identifying cartons with missing or illegible shipping marks.
- Despite operating in the test environment, it has been possible to track over that Tleys Australia would have saved around AUD\$65,000 for the 2017 calendar year in remarking costs and in lost product where the numbers of cartons requiring remarking did not warrant the cost of the remarking. Based on the cost benefits demonstrated from the test environment there are benefits to industry.
- The uptake by industry of the Meat Messaging portal has been slow.
- The Meat Messaging portal has been shown to facilitate the use of a pallet label that has the shipping mark printed on it. This allows reconciliation of individual cartons on a pallet with the pallet label. A trial has been proposed to FSIS through DAWR. The Supply Chain sub-committee of the AMILSC should continue to pursue this opportunity with DAWR.

8 Bibliography

Anon. 2018. FSIS Directive 9000.1 Rev.2. United States Department of Agriculture, Food Safety and Inspection Service.

Eustace, I. 2009. Frozen beef preliminary consignment. Meat and Livestock Australia Final Report. Project Code A.TEC.0067

Harris D. N. and Associates. 2013. Comparative evaluation of technical barriers to trade for Australian red meat, Report prepared for Meat & Livestock Australia Ltd (MLA) and the Australian Meat Industry Council (AMIC), Melbourne, June 2013.

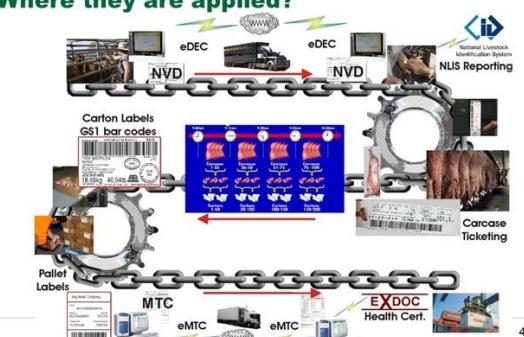
Wilcock, E. 2015. Using GS1 Barcoding to resolve illegible and missing shipping marks in loads of meat in the US. Meat and Livestock Australia Final Report. Project Code P.PIP.0439.

9 Appendix

9.1 Appendix 1: Meat Importers Council of America Conference Presentation

 Australian Meat Processors Corporation  Meat Industry Information Standards Product Identification – Traceability Shipping Marks John Langbridge Des Bowler	Presentation Objectives <ol style="list-style-type: none"> 1. History of standard development 2. Back-up shipping mark 3. Demonstration 4. Opportunities
---	---

2

Background <ul style="list-style-type: none"> • Late 1990s - Retail industry pushing back up the supply chain to adopt standards. • Regulators start demanding traceability and identification systems. <ul style="list-style-type: none"> – Australia developed EXDOC (predecessor of eCert) – National Livestock Identification System • Emergence of Global Standards (GS1 System) for codification or wholesale and retail items, EDI, etc. <ul style="list-style-type: none"> – 95% of world electronic commerce is Unedifact/GS1 compliant • Demonstration projects conjunction with Australian Government, Industry, R&D organisations, & GS1. • Allows the development of tools (software) <ul style="list-style-type: none"> – Regulatory and commercial – e.g. shipping mark portal 	Where they are applied? 
--	--

4

Meat Industry Information Standards <ul style="list-style-type: none"> • Coding information – standard numbering on carcass, carton & pallet labels • Representing information - bar codes, RFIDs, pallet labels, carton labels and carcass tickets • Sending information – eMessaging transmitting data between trading parties (eMTC and eDec) 	eMessaging <ul style="list-style-type: none"> • Electronic data exchange (EDI) <ul style="list-style-type: none"> – syntax-based standards used to transact documents electronically – UNEDIFACT compliant – eCert is UNEDIFACT compliant – Direct or through a portal <ul style="list-style-type: none"> • Direct requires dedicated software or • Portal does the work
--	--

5

6

Cartons Bar Code (Data Carriers)

- Representation of numbering that enables automatic capture of data
- GS1-EAN128 is commonly used in Australian meat industry and through-out the world

Application Identifier (01) means GS1-14
Country Code
GS1 company prefix
Check digit
Weight of 27.56 kgs
Date of 19th May 2002
up 12 digit unique Carton Number (01)9933701110483(3102)001470(13)150310(21)001405

Carton Label

BONELESS BEEF ORGANIC PRODUCT OF AUSTRALIA *YP - TRI/TB* TOP SIRLOIN 100% GRASS FED IW/VAC NASAA 4139P NASAA Certified Organic 4139P NOP KEEP REFRIGERATED

ANY MEAT WORKS Co LONG FLAT ROAD ANYTOWN NSW 3 PC

(01)9933701110483(3102)001470(13)150310(21)001405

USDA ORGANIC

NASA CERTIFIED ORGANIC

HALAL AUSTRALIA

PKD ON 10-MAR-2015 07:24 SLAUGHTERED ON 7-MAR-2015 14.7kg 32.4lb NET WEIGHT Step 4: Pasture Centered www.globalanimalpartnership.org EST. NO.9999

Shipping Mark

- Opportunity to revisit project
 - Sorbello Family and Len Lang
- Proposal developed with Australian Government and US/Aus Industry
- Trial August 2014 with 2 loads
- FSIS notice: 41-15
- Australian Meat Notice: 2015-1

Differences to original trial

- 2002 trial required sender and receiver had software that could create the message
 - Sender receiver, regulator all required complex software upgrades
- 2014 trial used a web portal to receive the scanned file, apply the analysis and provide reports
 - Software upgrade to sender is simple
 - Receivers can rely on the portal
 - Portal can generate the request to remark
 - Building a link on HC to portal message (SSCC)

State of Play

- Implementation
 - Automating Process, &
 - Integrating with existing eCert upload system
- Number of processors using Test database
 - ~80% on line by the end of the year
- Should be transitioning to main data base after approval

DEMONSTRATION

Sender uploads message
Scan-file plus transfer information
Can send email with link

Receiver
Downloads message or
Scan and upload to portal
for report
Can request remarking

Regulator
Receives advice of upload
Can access all transfers and
generate reports (automatic)

Example Label

BONELESS BEEF PRODUCT OF AUSTRALIA *YG* KNUCKLE
PACKED BY: REALLY GOOD MEATS PTY LTD 1 SLAUGHTER ROAD SLAUGHTERVILLE 9999
32207001
IWVAC 5PCS
KEEP FROZEN

(01)9933017085086(3101)000246(13)160916(21)102936
SLAUGHTERED ON: 11-Sep-2016
PACKED ON: 16-Sep-2016 08:44
24.6kg 54.2lb
NET WEIGHT CARTON ID: 102936
EST. NO. AAAA

Receiving a consignment

- The establishment that receives a consignment can scan the consignment barcodes to match to the message.

The screenshot shows the 'MEAT INDUSTRY GSL EANCOM DESPATCH ADVICE (EMTC AND EXPORT) - TEST SITE' interface. The top navigation bar includes links for Home, Help, About, Logoff, and Other functions. The main header displays the site name and a support email address: info@meatindustrygsl.com.au +61 7 3673 9024.

Receive product and send back receipt message

Consignment details

- Origin consignment no.: 00000000000000000000000000000000
- Origin state (provinces): Queensland
- Number of items (groups): 1
- Buyer consignee no.: 00000000000000000000000000000000
- Buyer state (provinces): Queensland
- Number of samples: 0

Receiving and receipt details

- Carried received (marked): 00000000000000000000000000000000
- Carried consignment no.: 00000000000000000000000000000000
- Carried state (provinces): Queensland
- Carried address: 123 Main Street, Brisbane, QLD 4000, Australia
- Carried telephone number: +61 7 3673 9024
- Carried fax number: +61 7 3673 9024
- Carried email address: info@meatindustrygsl.com.au
- Carried delivery note: This delivery note is included in the message

Reports

Barcodes

Number of Cartons from Bar Code scan: 000

The right side of the interface shows a list of scanned carton barcodes, each associated with a unique identifier and a small preview image. Buttons for 'Add Received Carton Barcode' and 'Delete All Carton Barcodes' are visible at the top of this section.

Other opportunities

- Be the shipping mark (imports and exports)
 - Improve traceability though the entire supply chain – farm gate to plate - providence
 - Cover internal transfers of meat
 - Control of tested lots
 - Use portal to report problems provide reports
 - Can attach photos, micro results, etc.
 - Trace-back and forward quickly
 - Use to back-up import inspection

References

- <http://www.agriculture.gov.au/export/food/meat/eImer-3/notices/2015/mn15-04>
 - <http://www.fsis.usda.gov/wps/wcm/connect/2cd330cb-0152-4830-af90-17cf4a0eeb74/41-15.pdf?MOD=AJPERES>
 - www.gs1.org
 - <http://www.meatmessaging.com/docs.asp>

9.2 Appendix 2: Meat Messaging Receiving Email File

Meat Messaging Receiving Email File

Production: <http://www.meatmessaging.com/>

Test: <http://www.meatmessaging.info/>

Documentation: <http://www.meatmessaging.com/docs.asp>

Overview:

Establishments that receive shipment using the Meat Messaging portal have the option of sending a simple CSV file to a set email address with a set subject line to fulfil the process of receiving a consignment. This option is most useful for establishments that have limited information about the consignment or limited information systems or software that prohibits communicating directly with the Meat Messaging portal.

Once the Meat Messaging portal receives the email the data is processed and the establishment is sent an email with the summary of the consignment. The summary has the consignment verification details and any actions required.

If the data file has an incorrectly format subject line or the CSV is incorrectly formatted the email sender is sent an error email with a summary of the error.

Sending the CSV file

The CSV file would be emailed by the establishment to the email address:
receiving@meatmessaging.com

The subject line would be: ***Consignment received by user: 80000045***

Where 80000045 is the user's meat messaging ID number.

CSV file structure

The CSV file has 4 columns:

1. Barcode This is the GS1 barcode for the carton label
2. Portmark If applicable, this the port mark shown on the carton for the corresponding bar code.
3. MessageID If know, this is the 18-digit message ID for the consignment.
4. Status This is the status of the carton where:
 1. 0 = Good
 2. 1 = Missing Port Mark, if applicable
 3. 2 = Illegible Port Mark, if applicable
 4. 3 = Incorrect Port Mark, if applicable

5. 4 = Labelling problem
6. 5 = Off Condition
7. 6 = Hold pending lab results (official test)
8. 7 = Voluntary hold
9. 8 = (reserved)
10. 9 = Damaged carton

Column headers are optional.

The Port Mark is only included where it is applicable for the consignment. This would be export shipments to those countries that require port marks.

The Message ID is only included where the message ID is known at the time of scanning of the consignment.

At least a port mark or Message ID is required in the file for each bar code, except where one or more port marks are missing for a set of carton with port marks.

9.3 Appendix 3: DAWR proposal to use pallet labels

Shipping mark proposal for pallet lots

21 December 2016

Purpose

To propose a trial of the application of shipping marks by a pallet label (placard applied to two sides of the pallet) to palletized lots of meat intended for further processing (grinding) within the US, and to further propose the application of the USDA Official Inspection Legend to the same pallet label (placard) when the product is accepted for entry into the US.

For the trial, lots will have individual cartons fully labeled and marked with a shipping mark as well as the pallet label (placard). After data is captured and analyzed regarding the shipments it would be proposed continue to apply the shipping mark to the pallet label and cease labelling individual cartons with a shipping mark.

Background

FSIS has accepted the use of a web portal as a backup to be used when there are missing or illegible shipping marks on individual cartons (FSIS Notice 81-16). For each load of meat exported to the US from approved FSIS-listed establishments, the load details including the unique carton numbers, trade description, packing dates, as well as container number, seal number, health certificate number can be uploaded to a web portal (Meatmessaging.com).

More recently FSIS have been looking into the identification of pallet lots of meat for export to the US utilizing a single placard and export stamp. FSIS uses the same process for tray packed product as per FSIS Directive 9900.1 -

Chapter IV, 1 (C). Palletized, consumer packaged (including food service—hotel, restaurant or institution (HRI)), fully marked and labeled products may be presented with the shipping mark and shipping container label applied to the outside of the pallet rather than to individual tray packs or cartons.

In addition, Australia is looking at testing the loading of containers by slip sheets so that a container's product can be unloaded by slip sheet directly on a pallet as a whole unit. This type of container loading allows for pallet labels.

Proposal

Palletised, packaged and labelled products are presented with the shipping mark and shipping container label applied to the outside of the pallet rather than to individual

cartons. The US Official Inspection Legend can be applied to the same pallet label to show that the cartons on the pallet have passed import inspection when that happens. The web portal shows the link between cartons, pallets, container lots and health certificate. The web portal can also show any change to the pallet lots (e.g. removal of damaged cartons or cartons that have been selected for testing).

Pre-inspection

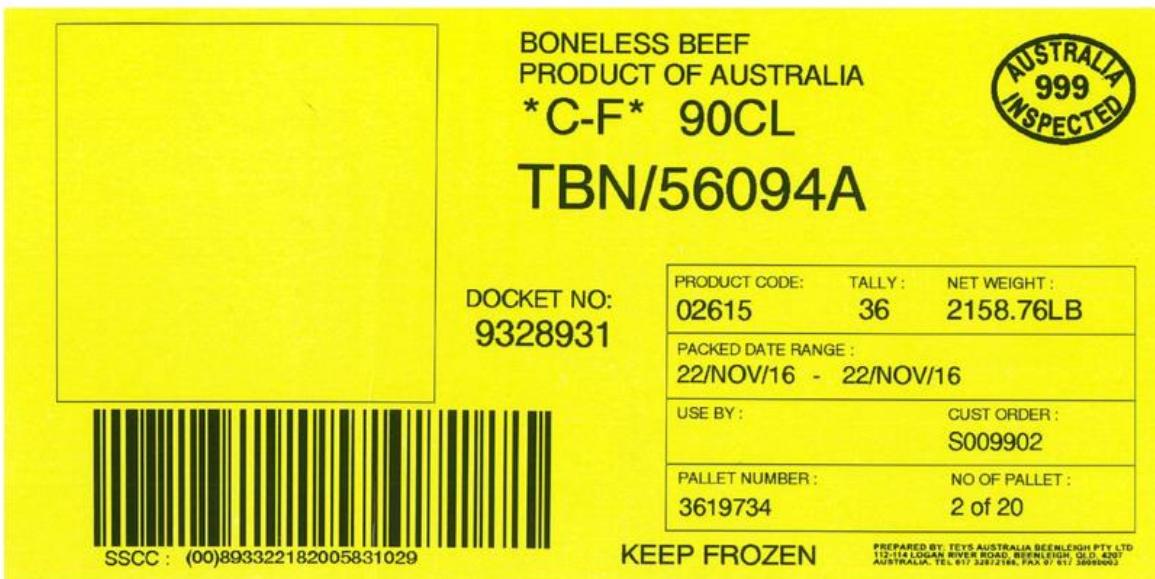
Process detail – Normal load

1. When products are exported in this manner:
 - a. Only one product type for further processing (grinding) is presented on a pallet; for example, boneless beef – *C-F*.
2. Fully labelled packaged products are placed on pallets and secured (e.g. shrink wrapped).
3. A pallet label (see attachment) can be considered the immediate container label and will be applied to the pallet shrink wrap containing:
 - a. The name of the country of origin, preceded by "Product of;"
 - b. the establishment number assigned by the foreign inspection system;
 - c. the name of the product - Generic description (boneless beef) and cypher, or in clear description e.g. C-FH or Beef - Fore Meat;
 - d. a shipping mark - used to link the product to the health certificate;
 - e. sufficient space on the pallet label for the USDA mark of import inspection;
 - f. handling statement (keep frozen);
 - g. address of producing establishment;
 - h. Australian Legend (mark of inspection);
 - i. production dates present on the pallet;
 - j. *serial Shipping Container Code (SSCC)* number (GS1); and
 - k. the pallet label will be applied to at least two sides of the pallet in case one becomes damaged.
 - l. Note – The safe handling Instructions are printed on each individual carton on each pallet.
4. The Meat Messaging web portal is used for each lot of meat:
 - a. Contains the individual carton identification barcodes correlated with the pallet numbers, and all are referenced to load identifiers such as Health Certificate Number, Container numbers, Container seal numbers.

USDA FSIS Inspection

1. If there are missing or illegible marks or labels identified by USDA FSIS (i.e. caused by damage, missing pallet label) the portal is still used to establish the status of the cartons within a load.
 - a. Can print a supplementary pallet label or apply shipping mark to individual cartons after DAWR/FSIS approval through Meat Messaging system.

Attachment



9.4 Appendix 4: MICA proposal to FSIS on the use of pallet labels

PROPOSAL: ALTERNATIVE METHODS OF STAGING AND CERTIFYING PRODUCTS FOR USDA FSIS IMPORT INSPECTION

Issue: Should FSIS allow imported products to be identified to Import Establishments using alternative methods of labeling and shipping marks? Can these alternatives be utilized to identify individual cases with a shipment that has been Inspected and Passed or in the case of a failure, recall, or traceback?

Background: The United States Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS) is the public health regulatory agency responsible for ensuring that imported meat, poultry, and processed egg products are safe, wholesome, and correctly labeled and packaged, based on the statutory authority of the Federal Meat Inspection Act (FMIA); the Poultry Products Inspection Act (PPIA); and the Egg Products Inspection Act (EPIA).

In FSIS Notice 81-16 Foreign establishments may apply barcodes in addition to a shipping mark to shipping units of products that are offered for import into the United States. The individual barcode on each shipping unit contains a unique identifier that can be used to link the shipping unit to the foreign inspection certificate issued by the central competent authority (CCA) of the foreign government. Under 9 CFR 327.4 (e)(7), 381.197 (e)(7), and 590.915 (e)(7), published September 19, 2014, a shipping or identification mark can be used. Thus, if the shipping mark is missing or completely illegible, and the barcode correctly links the shipping unit to the foreign inspection certificate.

In addition, in FSIS Notice 03 – 17 APPLYING THE USDA EXPORT STAMP TO PALLET OR CONVEYANCE FSIS provides instructions to inspection program personnel (IPP) on new alternatives available to establishments for marking consignments with the U.S. Department of Agriculture (USDA) export stamp.

All shipments of meat, poultry, and egg products that are offered for import into the United States must be presented for reinspection at a FSIS official import inspection establishment or at an alternative inspection location authorized by FSIS at the time of importation.

As per FSIS Directive 9900.1 IMPORTED PRODUCT SHIPMENT PRESENTATION Import inspection personnel are to verify that each lot of meat, poultry, or egg products that is offered for import into the U.S. is accompanied by the proper certification. Part of this certification includes a shipping or identification mark that links the foreign inspection certificate to the units that are staged. Product is staged in lots and identified as ready for reinspection so that import inspection personnel may perform the Certification and Labeling Type of Inspection (TOI).

PROPOSAL/DISCUSSION: As per FSIS Notice 03-17 FSIS is permitting the application of the USDA export stamp to be applied utilizing more options to mark meat, poultry, or egg products with the USDA export stamp (9 CFR 322.1, 9 CFR 381.105, 9 CFR 590.407). These

options include applying the stamp to each outside container, a securely enclosed pallet or pallets within the consignment, or the closed means of conveyance transporting the consignment.

The Code of Federal Regulations does not require a specific requirement for shipping marks or the presentation of the staged lot. As per the regulation;

327.4 Foreign inspection certificate requirements - (7) The number of units (pieces or containers) and the shipping or identification mark on the units;

§327.6 Products for importation; program inspection, time and place; application for approval of facilities as official import inspection establishment; refusal or withdrawal of approval; official numbers.

(a)(1) Except as provided in §§327.16 and 327.17, all products offered for entry from any foreign country shall be reinspected by a Program inspector before they shall be allowed entry into the United States.

(2) Every lot of product shall routinely be given visual inspection by a Program import inspector for appearance and condition, and checked for certification and label compliance.

Based on the regulations and directives there is no restriction to a pallet label or the method used to identify a shipping mark to a foreign inspection certificate – staged lot.

The Meat Importers Council of America (MICA) would like to propose alternative methods of presenting product to USDA FSIS when staging the product. These alternatives also include proposals to the traceback of imported product. The alternatives are equivalent to current proposals FSIS has put forward for exports, traceback (FSIS Directive 10010.3), and Palletized, consumer packaged (including food service—hotel, restaurant or institution (HRI)), fully marked and labeled products may be presented with the shipping mark and shipping container label applied to the outside of the pallet rather than to individual tray packs or cartons (FSIS Directive 9900.1).

The proposals are as follows;

- a) **Single Placard Label No Slip Sheet** – Allow product to be staged using a single pallet label affixed to one side of the pallet a pallet barcode as shipping mark relating to all boxes.

Product can be shipped and presented on slip sheets/pallets containing a single pallet label. The pallet label contains all the FSIS labeling requirements as well as a shipping mark barcode. In the test conducted the shipping mark was a barcode that when read identified all barcodes on the boxes of the pallet.

Proposal – Allow slip sheeted or palletized shipments to be staged with 1 label as a unit. The one label contains all the required information and is used as the Certification/LVP verification point (not the individual boxes). Where barcodes are

used as shipping marks the pallet barcode can be used to identify all the boxes on that pallet. For presented lots barcodes used on the shipment can be identified as per the Canadian system, through the Public Health Information System (PHIS) eventually.

- b) **Traceback-** As per FSIS Directive 10010.3 -

<https://www.fsis.usda.gov/wps/wcm/connect/ae5e81d0-c636-4de1-93f3-7a30d142ae69/10010.3.pdf?MOD=AJPERES> TRACEBACK METHODOLOGY FOR ESCHERICHIA COLI (E. COLI) O157:H7 IN RAW GROUND BEEF PRODUCTS AND BENCH TRIM - Production date or any other information, such as barcodes or production codes that identifies the product's date of production may be used for traceback of a lab failure..

Identified box/unit barcodes read during the FSIS sampling and test show production dates and segments. This information could be associated with a lab failure, used to traceback and refuse individual cases with the same production date versus entire shipments. Barcodes of sampled cases could be read and those cases within a lot identified preventing recalls of entire lots.

Tray Pack Equivalent – Allow the barcode to be used as a method of traceback for individual units, identifying them as inspected and passed. As per 9900.1 Palletized, consumer packaged (including food service—hotel, restaurant or institution (HRI)), fully marked and labeled products may be presented with the shipping mark and shipping container label applied to the outside of the pallet rather than to individual tray packs or cartons

Boxes or units removed from the pallet can be tied into the master pallet through barcodes and documentation. A stamped USDA Application can be sent with boxes or units that are removed and shipped individually identified through barcodes maintained by an Importer of Record as Inspected and Passed product thus giving FSIS a paperwork trail of the product.

Proposal- On the FSIS sampling for lab TOI's allow the barcodes of the sampled cases to be read and documented. That documentation serves as traceback in case of a failure, identifying a segment of production. Those barcodes can be verified through government to government communication. The result could identify not a failure of 600 cases as an example but possibly 10 cases after the government gives successful proof of the foreign establishments system.

Allow individual cases to be identified as per a paper copy of the stamped application or barcode as the identifier that a shipment has passed USDA Import Inspection. The Importer of Record would be the source of barcode information. Barcodes could be used to identify an individual box or unit as US Inspected and Passed while the mark on non-barcode shipments would be traced back to the PHIS.

CONCLUSION: The week of January 9th, 2017 tests were conducted on the alternatives at Mullica Hill C.S., Pedricktown, NJ. The results of those tests are attached to this proposal.

The tests further show that these proposed alternatives work and can be used as part of the FSIS Food Safety Program.

The planned proposals follow USDA FSIS Regulations and Directives as well as show cost savings for both the agency and IOR. The proposals promote FSIS initiatives with FSIS Notice 03-17 and future program changes.

Items around each proposal would need to be fully explained and discussed prior to moving forward. MICA looks forward to being a part of that discussion.

We look forward to discussing this proposal further. If you have any questions, please feel free to contact us.

9.5 Appendix 5: Bar Code Test Presentation

BAR CODE TEST

MULlica HILL AGRO, PETERICKTOWN, NJ

January 9, 2017

OBJECTIVE

TO TEST ALTERNATIVE USES OF BARCODES
AND PRESENTATION. INCLUDES;

1. BARCODE AS SHIPPING MARK SINGLE
PALLET LABEL
2. TRACEBACK THROUGH BARCODE
3. MISSING MARKS

SHIPMENT WAS TRANSPORTED AND PACKED BY SLIP SHEET VERSUS FLOOR LOADING



SLIP SHEETS IDENTIFIED PALLET EQUIVALENT WITH ONE PLACARD LABEL PER PALLET



PLACARD LABEL NEEDS ALL REQUIRED USDA INFORMATION – ONE PLACARD PER PALLET



BARCODES ARE EAD AT PALLET LEVEL

PALLETS CAN BE FURTHER BROKEN DOWN TO CARTONS WITH INFORMATION ASSOCIATED WITH SEGMENT OF PRODUCTION

PALLET BARCODES GIVEN TO SYSTEM ADMINISTRATOR - CARTONS BELOW IDENTIFIED ACCURATELY AS ON PALLET WITH THE PROPER MARK

Shipping_Mar	Product_Article	Net_Weight_Baugruppe	Carton_ID_Locator	Pack_Date	On	Item_No	Line_Dir	CL	Carton_ID	SSCC
TRN/344095	1C-P-KAC1-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020704	0
TRN/344095	1C-P-KAC2-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020300	0
TRN/344095	1C-P-KAC3-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020400	0
TRN/344095	1C-P-KAC4-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020500	0
TRN/344095	1C-P-KAC5-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020600	0
TRN/344095	1C-P-KAC6-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020704	0
TRN/344095	1C-P-KAC7-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020804	0
TRN/344095	1C-P-KAC8-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020904	0
TRN/344095	1C-P-KAC9-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020A04	0
TRN/344095	1C-P-KAC10-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020B04	0
TRN/344095	1C-P-KAC11-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020C04	0
TRN/344095	1C-P-KAC12-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020D04	0
TRN/344095	1C-P-KAC13-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020E04	0
TRN/344095	1C-P-KAC14-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020F04	0
TRN/344095	1C-P-KAC15-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020G04	0
TRN/344095	1C-P-KAC16-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020H04	0
TRN/344095	1C-P-KAC17-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020I04	0
TRN/344095	1C-P-KAC18-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020J04	0
TRN/344095	1C-P-KAC19-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020K04	0
TRN/344095	1C-P-KAC20-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020L04	0
TRN/344095	1C-P-KAC21-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020M04	0
TRN/344095	1C-P-KAC22-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020N04	0
TRN/344095	1C-P-KAC23-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020O04	0
TRN/344095	1C-P-KAC24-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020P04	0
TRN/344095	1C-P-KAC25-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020Q04	0
TRN/344095	1C-P-KAC26-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020R04	0
TRN/344095	1C-P-KAC27-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020S04	0
TRN/344095	1C-P-KAC28-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020T04	0
TRN/344095	1C-P-KAC29-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020U04	0
TRN/344095	1C-P-KAC30-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020V04	0
TRN/344095	1C-P-KAC31-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020W04	0
TRN/344095	1C-P-KAC32-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020X04	0
TRN/344095	1C-P-KAC33-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020Y04	0
TRN/344095	1C-P-KAC34-BP (WAC)	27.2	10/04/2014	BBHCHI	10/05/2014	BBH881	402F	11/05/2014	BBH332218001111000072013141000210100020Z04	0

BARCODE ON PLACARD LABEL RELATES TO BARCODE ON EACH BOX



BOXES WITHOUT A STENCILED MARK CAN BE ASSOCIATED WITH A CERTIFICATE'S PORT MARK

BOX WITHOUT SHIPPING MARK - RAN IN SYSTEM - ASSOCIATED WITH CERTIFICATE MISSING SHIPPING MARK TEST		
BARCODE	Mark	Pallet SSCC
019933221802613331020027201314102521010065780400	port mark - TBU2544098	#89332218000119128

USE OF BARCODE WOULD EVENTUALLY REPLACE SHIPPING MARK



USDA VERIFICATION

- USDA CAN STILL VERIFY AS PER 9900.5 DIRECTIVE 1 OUT OF 10 PALLETS
- NOT EVERY BARCODE NEEDS READ BUT THE LVP PALLET BARCODE WOULD NEED TO BE RELATED TO THE CERTIFICATE.
- SAFE HANDLING WOULD STILL BE ON EVERY CARTON
- As PER 10010.3 DIRECTIVE TRACEBACK METHODOLOGY FOR ESCHERICHIA COLI (E. COLI) O157:H7 IN RAW GROUND BEEF PRODUCTS AND BENCH TRIM
Production date or any other information, such as barcodes or production codes that identifies the product's date of production may be used for traceback of a lab failure.
- FSIS Notice 81-16 Foreign establishments may apply barcodes in addition to a shipping mark to shipping units of products that are offered for import into the United States.

9.6 Appendix 6: Agenda paper for the AMILSC Committee

ITEM FOR INFORMATION
TOPIC: Meat Messaging Implementation/Participation Update
RECOMMENDATION:

It is recommended that the Committee note the Status of the Meat Messaging Implementation/Participation Update.

DISCUSSION:

This brief information paper is to update the Committee on the uptake of Meat Messaging since it went live in 2017 (John Langbridge as a member of the Steering Committee will also provide a verbal comment on his experience and on progress to date).

The Meat Messaging portal is a program reporting to the Australian Meat Industry Language and Standards Committee and is administered by AUS-MEAT Limited. Over 50 establishments have signed up to use the Meat Messaging portal including the three largest processing companies in Australia. Collectively this represents over 70% of the Australian export volume and to date 3.4 million cartons have been processed. There are a number of Establishments that are still going through the process of developing integrated systems to automate Meat Messaging.

Establishments wanting to use the Meat Messaging portal need to work through with the System Vendors to implement integration with their existing on plant systems. QA also need to ensure the Establishment's approved arrangements are updated to reflect using the Meat Messaging portal.

The cost to industry for “missing or incorrect” port marks to the US is estimated at \$14.5 million per year as reported in June 2013 by D.N Harris & Associates on the technical barriers to trade for Australian red meat prepared for MLA and AMIC. The costs to industry for manual preparation of Meat Transfer Certificates is estimated at a cost of \$25 for the labor component per MTC with approximately 175,000 paper MTCs per year. This equates to a cost of \$4.375 million per year. The use of the Meat Messaging portal based on the underlying GS1 barcoding and electronic messaging technologies and supply chain standards can readily reduce these two costs (total of \$18.875 million) to virtually \$0.

The industry web portal (meatmessaging.com) facilitates the collection, processing and reporting of carton GS1 barcode and related data to achieve the requirements of the issued DA Meat Notice “Alternate protocol for managing illegible or missing shipping marks for the USA” and the FSIS Notice 41-15 “Shipping marks-Barcodes.PDF”. The Meat Messaging portal includes a QA monitoring process that provides a level of reporting on the measured accuracy of the program participants. This process of QA monitoring is utilised as a

validation tool for the endorsement of the updated approved arrangements for the establishments and reporting to government.

In rolling out Meat Messaging a number of suggested modifications have been added to the system;

A summary of the points are:

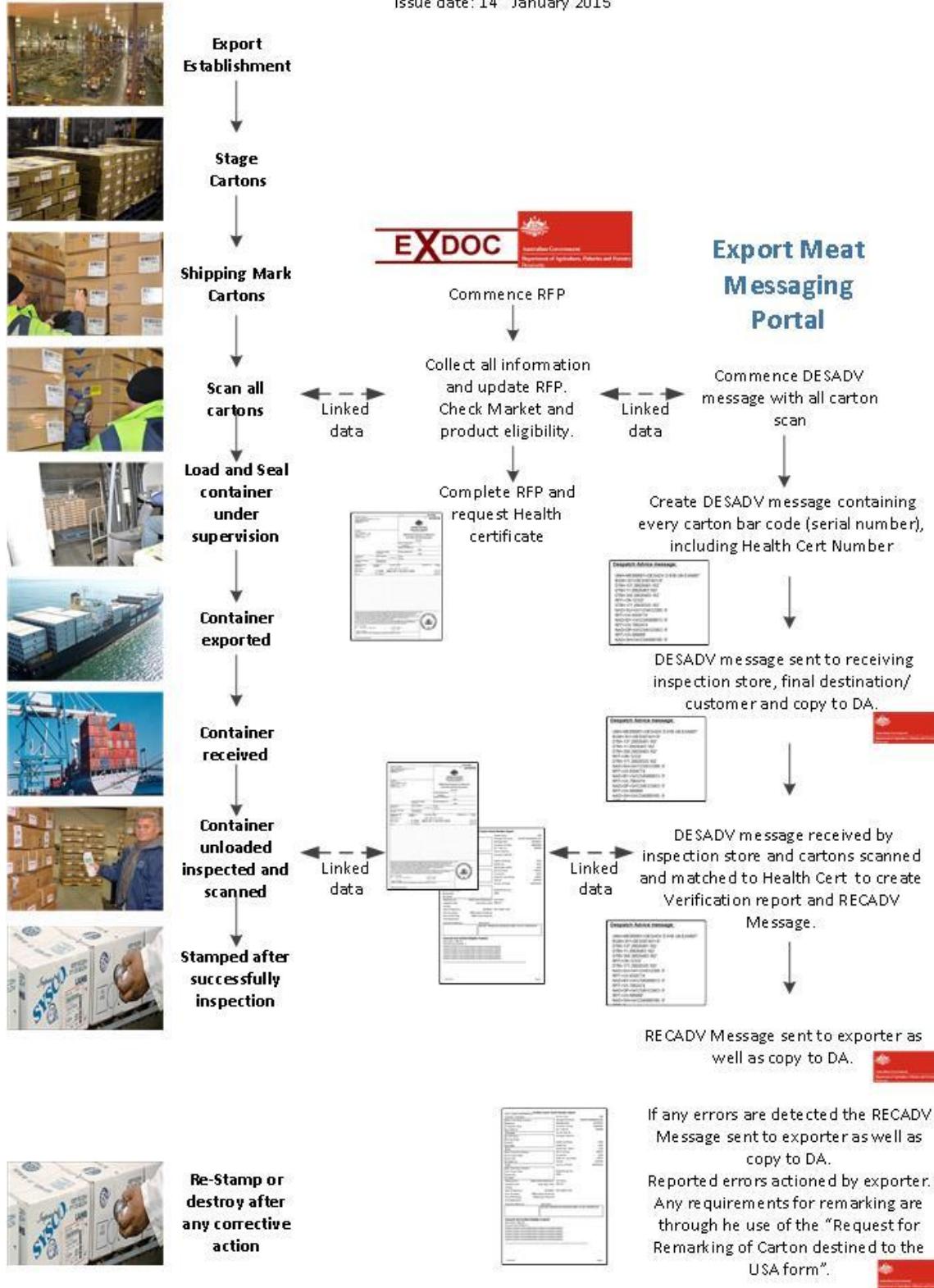
1. Additional search functions suitable for cold stores and importing I-stores. These search functions provide a simple means to find a consignment by scanning any carton as well as submitting a request for remarking.
2. eMTC functionality and paper eMTC creation for any eMTC consignment. This is driven by a Company for using eMTC between their establishments.
3. Country and market eligibility on a line by line basis for eMTCs.
4. Inclusion of CL value for each carton in a consignment. This means that US grinders can check the recorded CL for each carton using Meat Messaging.
5. Generation of SSCC pallet labels to match those used by i-Stores in the US on a group by group basis for a consignment using meat messaging.

Prepared By: Ian King AUS-MEAT Limited

Date: 8 May 2018

Shipping Mark verification Model

using Meat Messaging

Issue date: 14th January 2015

9.7 Appendix 7: Department of Agriculture and Water Resources Meat Notice



Australian Government
**Department of Agriculture
and Water Resources**

Meat notice

Meat notice number:			
Meat notice title:	Alternate protocol for managing illegible or missing shipping marks for the packed products (meat) exported to USA		

NSFS reference	Issue date	Date of effect	Review date
TBA	TBA	Immediate	December 2019

Contact officers	Distribution categories
Christina McPhie Operational Integrity, Export Meat Program 02 6272 3059 christina.mcphie@agriculture.gov.au	<input type="checkbox"/> Central and regional office <input type="checkbox"/> Departmental on-plant officer(s) <input type="checkbox"/> Managers, export meat establishments
Documentation, Registration & Licensing, Exports Division foodexportdocumentation@agriculture.gov.au	

1. Purpose

To inform export registered establishments eligible to produce meat and meat products for the United States of America (USA) of the agreed process available to manage shipping mark discrepancies identified at the point of entry.

This meat notice replaces meat notice 2015/04.

2. Scope

This notice applies to export registered meat and meat product establishments listed for export to the USA and seeking to utilise the alternate protocol for the remarking of cartons where shipping marks are missing or illegible.

3. Definitions

The following table defines terms used in this notice.

Term	Definition
Barcode	Unique numbering system to identify individual cartons of meat and meat products
GS1	International organisation that develops and maintains standards for supply and demand chains across multiple sectors
Inspection Warehouse	A receiving warehouse in the USA approved by the US FSIS, which is able to access the meat messaging web portal, can view the despatch advice message (DESADV) and scan the cartons in the load on arrival in the US to verify and identify a missing or illegible shipping mark.
Meat Messaging	An electronic message in a prescribed format
Meat Messaging Web Portal	The system developed for the purpose of reconciling unique cartons within a load of product exported from Australia for import into the United States of America
Shipping mark	Unique number used to identify lots within a container that relates those lots to the health certificate(s)
SSCC	Serial Shipping Container Code

Background

The USA require that a unique shipping mark is applied to all shipments of edible meat and meat products for import to the USA. Shipping mark details are included on the health certificate and are used to support the identification and traceability of the meat and meat products.

One of the more common reasons for the rejection of edible meat and meat products in the USA is for missing or illegible shipping marks. In these instances, FSIS allows the competent authority of the exporting country or their agent to remark the cartons at the exporters' expense.

In 2015, FSIS released FSIS Notice 41-15, which approved the use of barcodes as a means to verify whether containers of imported product with missing or completely illegible shipping marks are part of a lot certified on the accompanying foreign inspection certificate. This notice has been replaced by FSIS Notice 81-16.

Responsibilities

5.1 Establishment Management must:

- a) Register with the Meat Messaging web portal (<http://www.meatmessaging.com>).
- b) Demonstrate competence in using the Meat Messaging web portal in the test environment in accordance with Attachment 1.

- c) Update their Approved Arrangement to include the use Meat Messaging web portal and relevant controls.
- d) Notify the department as soon as they become aware of any issues affecting the integrity of the alternate protocol.
- e) Ensure that the inspection warehouse has the technology and capability to scan GS1 barcodes and access the reports from the portal.
- f) Ensure the establishment has GS1 barcoding, Meat Messaging system and a barcode scanner.

5.2. Departmental on-plant officers will:

- a) Provide establishment management with a copy of this Meat Notice (MN).
- b) Verify the establishment responsibilities and actions of this MN (as relevant) have been included in the occupier's Approved Arrangement.
- c) Verify the establishment complies with the requirements of this MN.

5.3 Departmental Auditors (Food Safety Auditors or Area Technical Managers) will:

- a) Review the occupier's Approved Arrangement.
- b) Approve or not approve the arrangement as per their findings.
- c) Verify through audit at least once per year that the occupier is complying with this MN; (for example, this may be done during an EMSAP or monthly audit)
- d) Notify by email to exportestablishmentregistration@agriculture.gov.au, that the establishment has met the requirements of this MN and request that the appropriate overseas operation be added to the establishment registration.

5.4 Export Documentation and Registration will:

- a) Update the establishment registration to include US Bar Coding (USBC).
- b) Notify the US of the establishment's approval and request that the share-point website be updated.
- c) Request US to advise when the share point website has been updated with the approved establishment details.
- d) Issue an updated Certificate of Registration to the establishment showing USBC under Overseas Operations.

Angela Davies

Director
Export Meat Program

Attachment 1

Meat Messaging Protocol for Missing/Illegible Shipping Marks

General description

Export registered meat and meat product establishments /Export processors that are in compliance with the GS1 standard for barcodes will be serially numbering each carton that they produce through the application of that barcode. This allows the individual cartons in every load to be uniquely identified.

As a routine the exporter will scan cartons/carcases at the point of despatch, using that information to generate the Request for Permit and Health Certificate and also send the separate commercial electronic despatch advice message containing the carton serial numbers to the industry supported Meat Messaging web portal. The International Warehouse (receiver) in the US, which is able to access the web portal, can view despatch advice message (DESADV) and scan the cartons/carcases in that load on arrival in the US to verify whether or not those cartons/carcases are meant to be in the load and identify a missing or illegible shipping mark.

If the cartons/carcases are verified as being part of the certified load, and all correct against the electronic despatch advice message, then a Receipt message is generated and sent electronically via the meat messaging portal. Additionally an email would be provided to the on-site FSIS inspector who will check with the FSIS share-point web site to ensure that the exporting plant is approved to be in this process. When satisfied the FSIS inspector approves the cartons to be remarked if required under the FSIS inspectors general supervision.

Carton labelling requirements

GS1 compliant barcode is required to be used on the carton/carton labels to be able to access the Meat Messaging System.

Uploading the load out scan file

The export processor must be able to up-load the load-out files to the web portal in the required format.

Approved Arrangement preparation and amendment

- To demonstrate compliance with the Meat Messaging system, the export processor must send 10 test messages to the Meat Messaging web portal test database at <http://www.meatmessaging.com>.
- conduct a review of those messages to ensure that they can access and use the Meat Messaging portal correctly.
- print off the 10 review reports and submit with the amendments to the AA as proof that they are compliant.

The Approved Arrangement for the export processor /establishment must state that they:

- are compliant with GS1 standards around the use of barcoding.

- have a system in place to upload to web portal the load out scan files for all loads to the US in the required format.

The amendment must be approved by the department prior to the export processor being allowed access to the production (live) part of the Meat Messaging web portal.

Registration amendment

The export processor/establishment will need to present statement of compliance for the Meat Messaging system to the Export Documentation and Registration section through an email at exportestablishmentregistration@agriculture.gov.au for Establishment Register (ER) to be updated with US Bar Coding (USBC) to Overseas Operations for the export processor/establishment.

The ER administrator will issue an updated Certificate of Registration to the export processor/establishment showing USBC code under Overseas Operations.

Procedure for each shipment

At Export End

- Apply a GS1 barcode on labelling to identify each individual carton
- Apply the shipping mark to each carton as per USA requirements to identify a lot/s within the container.
 - Each carton is scanned to a file identifying the particular shipping mark of the grouping/s of cartons in preparation for loading into the container
- Create a data file using GS1 barcode and Meat Messaging as a record of all the cartons identified to a particular shipping mark that is loaded into the container
 - Note: the same data file/s is commonly used to input the loads summary data into the RFP
- Ensure that the data file/s detailing the load and each unique carton within the shipping mark grouping/s assigned to the load is uploaded to the Meat Messaging web portal and is available to the import warehouse in the USA
 - Note: the upload to the Meat Messaging web portal must occur prior to the departure of the goods as declared on the health certificate
- Enter the Serial Shipping Container Code (SSCC) into the exporter comments of the RFP when applying for an export permit/certificate.

At Import End

- Inspection warehouse receives the container and scans the individual cartons with the missing or illegible shipping marks at unloading of the container.

Remarketing Process

Where cartons are identified with illegible or missing shipping marks the:

1) Inspection warehouse

- uploads the data into the meat messaging web portal which generates a verification report that verifies the cartons within the load (Attachment 2).

- notifies the exporter of the goods and provides relevant shipping details to accurately identify the load (e.g. health certificate number or SSCC number etc) and confirmation that a carton verification report was generated.
- 2) Exporter or Inspection Warehouse submits a ‘Request for Remarketing of Cartons destined to USA form’ through the Meat Messaging portal as per instructions on the form (Attachment 3) and attaches the verification report
 - 3) The department assess the application and provide decision on the ‘Request for Remarketing of Cartons destined to the USA form’ to enable the remarketing of the cartons under US FSIS supervision.
 - 4) Exporter or International Warehouse notifies the import warehouse and provides relevant information to US FSIS to initiate remarking
 - 5) Inspection Warehouse organises remarking of cartons as per FSIS instruction.

Verified cartons may then be remarked by the import warehouse under US FSIS supervision.

A summary of the overall process from assembling the load through to submitting the application for remarking is shown in Attachment 4.

For more information on the Meat Messaging Web Portal please visit
<http://www.meatmessaging.com/docs.asp>

Attachment 2

SSCC 993487310090000125 Verified Carton Serial Number Report		
Exporter / Consignor	Carton Count	280
Really Good Meat Company Building 6 1 Slaughter Road QLD 4999 AU	Message File Name	993487310090000125A
	Message Date	20140623
	Container Number	99889988
	Gov. Seal No.	999999
	Carrier Seal No.	
Consignee	Consignor Seal No.	
My Cold Store 65 Long Street Coldville QLD 4000	Health Certificate	4536
	EXDOC No.	4235
	Goods Decl. (ECN)	1234
	Bill of Landing	789678
	Invoice No.	6578
	Order No. (purchase)	65875
	Species	BOVINE
	Country of Origin	AUSTRALIA
Buyer		
Meat Importing Company 1111 Import Road Importville NJ 06584 US	Establishment No.	
	9999	
Notify		
Meat Importing Company 1111 Import Road Importville NJ 06584		
Shipping Line	Really Good Shipping Co	Port Marks
Vessel/Aircraft	Good Ship/ V443	ABC123
Voyage		
Date of Departure	20140623	Net Weight Total
Port of Loading	9999 loadout Street AU	
Port of Discharge	8888 Import Road US	
Final Destination		
Shipment Reference	Description	
	BOVINE TENDERLOIN BONELESS BEEF IW/VAC TENDERLOIN	

Scanned and Verified (Eligible Product)

Description: ABC123
 Scanned and Verified: 5
 019931234501123431020014601314062121053036260020
 019931234501123431020015001314062121053041140020
 019931234501123431020015301314062121053042290020
 019931234501123431020016801314062121053062350020
 019931234501123431020016901314062121053063440020

Attachment 3

Request for Remarking of Cartons destined to USA form

USA CARTON DISCREPANCIES

REQUEST TO REMARK

ALL FIELDS MUST BE COMPLETED

Establishment Number where goods were loaded for export <small>Establishment must have a certified program for US Remarking</small>	[This is the establishment where the goods were loaded for export that has a certified program to demonstrate compliance to MN XX/2017]
RFP and/or health certificate number SSCC Number	RFP: _____ HC Nbr: _____ [as per the SSCC number declared in the RFP in exporter comments]
Exporter name	[name of exporter on the RFP]
Contact phone number	
Import Warehouse Name and location	[name of warehouse in the USA where goods will be inspected/remarked]
Meat Messaging carton verification report	[provide link to report or attach]
<p>I confirm that this request is on the basis of compliance to the MN XX/2017</p> <p>Name: [must be a person in management & Control of the establishment authorized to validate RFP] Date: _____</p>	

ONCE COMPLETED PLEASE SEND TO MidOps.Coord@agriculture.gov.au

Department of Agriculture Export Meat Program

- Certified Program (ER) RFP SSCC Number Carton Verification Report
 Approved for Remarking Not Approved (please provide reasons in space provided)

9.8 Appendix 8: FSIS Notice – Using barcodes to verify eligibility of imported products.

**UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC**

FSIS NOTICE

81-16	10/24/16
-------	----------

USING BARCODES TO VERIFY ELIGIBILITY OF IMPORTED PRODUCTS WITH MISSING OR COMPLETELY ILLEGIBLE SHIPPING MARKS

I. PURPOSE

- A. This notice reissues FSIS Notice 41-15 in its entirety. This notice provides instructions to inspection program personnel (IPP) for actions to take when they use barcodes as a means to verify whether containers of imported product with missing or completely illegible shipping marks are part of a lot certified on the accompanying foreign inspection certificate.
- B. The instructions in this notice apply only to shipping units and certifications from countries that have provided a written procedure and a list of foreign establishments eligible to participate in this procedure to FSIS. When IPP are able to determine that a country and a foreign establishment are eligible to participate in this process, IPP are to follow this notice instead of Part VI, Section C. 2, of [FSIS Directive 9900.5, Label Verification of Imported Meat, Poultry and Egg Products](#).

II. BACKGROUND

- A. Foreign establishments may apply barcodes in addition to a shipping mark to shipping units of products that are offered for import into the United States. The individual barcode on each shipping unit contains a unique identifier that can be used to link the shipping unit to the foreign inspection certificate issued by the central competent authority (CCA) of the foreign government. Under [9 CFR 327.4 \(e\)\(7\), 381.197 \(e\)\(7\)](#), and [590.915 \(e\)\(7\)](#), published September 19, 2014, a shipping or identification mark can be used. Thus, if the shipping mark is missing or completely illegible, and the barcode correctly links the shipping unit to the foreign inspection certificate, the shipping unit is eligible to have the shipping mark applied or reapplied to comply with FSIS regulatory requirements.
- B. FSIS permits the application of a shipping mark to shipping units when a shipping mark is missing or completely illegible when the shipping unit is presented for reinspection at the official import inspection establishment. This activity is currently performed only under the supervision of a representative of the CCA. FSIS is now allowing authorized import establishment personnel to apply the shipping mark to these shipping units in lieu of a CCA representative having to be on-site, provided that FSIS IPP can verify the unique identifier within the barcode on the shipping unit using the supporting documentation from the foreign country.

III. IPP RESPONSIBILITIES

- A. When either import establishment management or IPP identify shipping units within a lot of imported product with missing or completely illegible shipping marks, IPP are to verify that import establishment personnel segregate and control the product within the official establishment.

DISTRIBUTION: Electronic	NOTICE EXPIRES: 11/1/17	OPI: OPPD
--------------------------	-------------------------	-----------

B. When import establishment management indicates they will utilize the barcode on the shipping unit to verify and apply the shipping mark, IPP are to:

1. Access the Import Inspection Operations (IIO) SharePoint site. If IPP do not have access to this site, they are to send an e-mail to importinspection@fsis.usda.gov to request access. They are to include "IIO SharePoint Access" in the subject line;
2. Refer to the "Country Eligibility for Use of Barcodes" document on the [IIO SharePoint](#) site to determine whether the country is eligible to utilize barcodes to verify missing or completely illegible shipping marks;
3. If the country is:
 - a. Not listed as eligible for this process, notify import establishment management that the shipment is not eligible, and refuse entry of the applicable shipping units; or
 - b. Eligible for this process, verify that the producing establishment has been approved by the CCA by verifying that the establishment number is on the country list. If the producing establishment number is:
 - i. On the list, review the examples of acceptable documentation on the IIO SharePoint site to become familiar with the process; or
 - ii. Not on the list, notify import establishment management that the shipment is not eligible, and refuse entry of the applicable shipping units;
4. When the foreign country and establishment are eligible for this process, review documentation provided by the import establishment management to verify that the shipping units are part of the lot identified on the foreign inspection certificate. The documentation is to be comparable to the examples on the IIO SharePoint site and may consist of:
 - a. A letter from the CCA attesting to the identification of the shipment; or
 - b. A report provided by the exporter that links the barcodes to the lot identified on the foreign inspection certificate;
5. Verify that the barcode for each shipping unit matches the documentation provided. The numbers after the (21) identify the unique shipping unit number;

6. Permit import establishment personnel to apply the shipping mark to the shipping units if the documentation links the barcode to the foreign inspection certificate; and
7. Verify whether the shipping units have:
 - a. Been identified with the correct shipping mark and release the product; or
 - b. Not been identified with the correct shipping mark, fail the Label Verification type of inspection (TOI) for the affected lots, and refuse entry on the shipping units in PHIS.

NOTE: The importer of record may still request to have a representative of the CCA certify and re-mark the product as per [FSIS Directive 9900.5](#) in the event the documentation does not link the barcodes to the foreign inspection certificate.

IV. QUESTIONS

Refer questions regarding this notice to the Import/Export Policy Development Staff (IEPDS) through [askFSIS](#). When submitting a question, use the Submit a Question tab and enter the following information in the fields provided:

Subject Field: Enter Notice 81-16
Question Field: Enter question with as much detail as possible.
Product Field: Select Import from the drop-down menu.
Category Field: Select Labeling Compliance for Imported Products from the drop-down menu.
Policy Arena: Select International (Import/Export) from the drop-down menu.

When all fields are complete, press Continue and at the next screen press Finish Submitting Question.

NOTE: Refer to [FSIS Directive 5620.1](#), *Using askFSIS*, for additional information on submitting questions.



Daniel J. Sogolow
Assistant Administrator
Office of Policy and Program Development