



Australian Government

Australian Quarantine and Inspection Service

Product Standards

Verification Testing for the Sourcing & Handling of Eggs and Egg Products

A Guideline to compliance with the

Export Control (Eggs and Egg Products) Orders 2005

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Background

The *Export Control (Eggs & Egg Products) Orders 2005* (the Orders) together with the *Export Control (Prescribed Goods General) Orders 2005* (the PGGOs), provide conditions and restrictions on the export of eggs and egg products.

Prior to 1 October 2005, eggs and egg products for export were regulated under the *Export Control (Dairy, Eggs & Fish) Orders 2005* – these Orders have now been separated into the *Export Control (Fish and Fish Products) Orders 2005*, the *Export Control (Eggs & Egg Products) Orders 2005* and the *Export Control (Milk & Milk Products) Orders 2005*.

Objectives

The objectives of the Orders are to facilitate trade based on effective food safety and suitability procedures and accurate descriptions of product. Audit provisions are required to substantiate the adequacy of these procedures. On this basis, certification is provided as required by importing countries, thereby facilitating trade.

This document specifically addresses the requirements of registered establishments to meet objective 3.1 (a) and (c) of the objectives of the Orders.

3. Objectives of these Orders

- 3.1 The objectives of these Orders are to facilitate trade by ensuring the following:
 - (a) that eggs and egg products for export as food are fit for human consumption or are manufacturing grade eggs and egg products and are identified as manufacturing grade for export for further processing; and
- 3.2 (c) that eggs and egg products for export as food meets importing country requirements.

Product Standards

1.0 Introduction

This guideline outlines minimum testing requirements for products to verify compliance with food safety requirements under the *Export Control (Eggs and Egg Products) Orders 2005*, which came into force on 1 October 2005, specifically:

- Aspects of Schedule 6 Product Standards; and
- Verification of the HACCP plan which forms part of the minimum requirements of an Approved Arrangement detailed in Schedule 2.

Schedule 6 Product Standards states:

Contaminants, natural toxicants, residues and food additives

1.1 Eggs and egg products for export as food and ingredients of egg products for export as food must not contain any of the following;

- (a) a metal or non metal contaminant or a natural toxicant in excess of the maximum level specified for the contaminant or toxicant in the Food Standards Code;
- (b) an agricultural or veterinary chemical in an amount that contravenes the requirements of the Food Standards Code;
- (c) a food additive, processing aid, vitamin, mineral, added nutrient, other matter or substance in contravention of the applicable requirements of the Food Standards Code.

Note 1 For the meaning of **ingredient** see order 7. See further the meaning of **unsafe** in order 9 and the meaning of **unsuitable** in order 10.

Note 2 For contaminants and natural toxicants see Standard 1.4.1 and Standard 1.4.4 of the Food Standards Code. For histamines see Standard 2.2.3 of the Food Standards Code.

Note 3 For residues see Standard 1.4.2 of the Food Standards Code.

Note 4 For food additives see Standards 1.3.1 to 1.3.4 of the Food Standards Code.

2.1 Eggs and egg products for export as food and ingredients of egg products for export as food must meet the microbiological limits specified for eggs, egg products or ingredients of that kind in the Food Standards Code.

Note See Standard 1.6.1 of the Food Standards Code.

1.1 Importing country authority requirements

The only time that compliance with the Food Standards Code is not required is if different standards are specified by an importing country. In such cases, the Approved Arrangement must document the specified maximum limit approved by the importing country authority and what controls will be put into place to ensure compliance. (*For the meaning of **importing country authority** see order 7.*)

1.2 Contamination

Contaminants, natural toxicants, residues, food additives and microbiological contamination occur as a result of:

- (a) Where the product is sourced; and
- (b) How the product is handled;

and as such, to verify that food is safe and suitable requires that testing addresses these two scenarios and acknowledges either compliance with:

- The importing country authority's requirement; or
- The Food Standards Code if the importing country requirements are not known.

This guideline provides the minimum testing to be carried out by all registered establishments which process eggs and egg products for export.

It is possible that establishments already test product for a range of residues, heavy metals, pesticides or against other microbiological standards at a higher frequency than indicated here in the minimum testing regime to meet customer specification.

If so, the minimum testing regime can be integrated into other testing you carry out. Testing to meet importing country requirements must be documented in your Approved Arrangement. If you are unsure of what you need to do, please contact AQIS.

2.0 Principles of the testing regime

Pasteurised egg products are to be tested for compliance with standard 1.6.1 of the Food Standards Code.

The following principles have been adopted in developing the testing regime:

1. Unless specified by an importing country or there is a requirement for specific declarations referencing test results on certification, testing can be conducted in-house or at non NATA laboratories. Verification testing requested by AQIS Authorised Officers is to be carried out at a NATA or independent lab.

If declarations relating to test results are required on certification then all testing must be carried out in a NATA laboratory.

2. Microbiological testing frequency is performance based - being linked to the Establishment rating (i.e. company compliance with documented controls).
3. Testing can be minimised for certain environmental or sourcing hazards if industry can provide technical data which support the likelihood that eggs taken from particular areas will contain acceptable levels of environmental contaminants.

For example data may be available from the National Residue Survey data, which is collected as part of the egg and poultry monitoring project.

Or

If your supplier is on a NSW/Vic *Salmonella* Monitoring and Accreditation Scheme, the testing regime for *Salmonella* would preclude the need for further *Salmonella* testing on arrival at your establishment. This testing regime is suitable for verifying the source of eggs in NSW and Victoria

only, if the eggs are sourced in other states, the eggs require testing to verify the source. If eggs are to be further processed after being received by an establishment, which introduces new hazards, then additional testing will be required

4. If declarations are required on certification, test results will need to be available prior to requesting certification - that is, a test and hold arrangement. Where no such declarations are required, product will be released for export before the test results are known.

A regular program of product testing provides a level of assurance to the Australian government to be able to issue government-to-government certification.

3.0 Who will be required to test product?

All registered egg establishments must verify by testing or some other means that eggs meet the requirements of Schedule 6, sub order 1.1 & 2.1 of the *Export Control (Eggs & Egg Products) Orders 2005*.

The only exception is if product is processed in one Registered Establishment, transferred to a second Registered Establishment and is in its final form for export. In this case the first establishment should test the product.

Preparation is defined in the *Export Control Act 1982* as:

Preparation, in relation to prescribed goods, includes the following:

- (a) the slaughter or killing of animals and the dressing of carcasses from which prescribed goods are obtained;*
- (b) the processing, packing or storage of prescribed goods;*
- (c) the treatment of prescribed goods;*
- (d) the handling or loading of prescribed goods.*

Prescribed goods in relation to the *Export Control (Eggs and Egg Products) Orders 2005* means eggs and egg products, where:

Egg means an egg from an avian species, and
Egg product means a product containing egg.

3.1 When should testing occur?

Wherever a food safety hazard is introduced in the through chain then testing should be carried out at the frequency indicated in Table 1.

Example:

If receiving whole eggs for grading and packing, tests for *Salmonella* can either be conducted by the supplier and supporting documentation supplied or conducted on receipt at your premises, as the eggs are unchanged and the tests verify the source of the eggs.

If pasteurising and chilling egg pulp, then samples of the product should be tested to verify your HACCP plan is effective.

If chilled product is transferred to a Registered Establishment and subsequently frozen, then the frozen product should be sampled and tested before export.

4.0 Frequency of testing to verify safe processing and handling of product.

Table 1. Minimum frequency of testing of prepared product to verify HACCP, sourcing and standard 1.6.1 of the FSC.

Product risk category*	Establishment rating		
	A	B	C
Low	1 sample every 6 months	1 every 4 months	1 every 3 months
Medium	1 sample every 4 months	1 every 3 months	1 every 2 months
High	1 sample every 3 months	1 every 2 months	1 every 1 month

*See table 2 below

Additional notes / conditions:

1. A major non-compliance occurs when:
sampling has not been done as per the frequency.

A critical non-compliance occurs when:

results of pathogens exceed relevant standards - this demonstrates the controls in place to manage food safety hazards have been ineffective.

2. An establishment rated D cannot export product unless each batch is sampled and deemed to meet the applicable product standards. An establishment rated E is prohibited from exporting eggs and egg products unless certain conditions, which ensure the ability of the establishment to produce safe food, are met. Please contact the [AQIS Fish Exports Program](#) for details, who are in a position to answer questions about answering questions about exporting eggs and egg products.

Table 2. Product risk categories

In the case of microbiological risk, a product is defined by the processing it is subjected to.

*Note: The below risk categories applies to the listed egg products, assuming that the production and handling of the eggs and egg products does not compromise the integrity of the product.

Low risk	Medium risk	High risk
<ul style="list-style-type: none"> • Whole egg in shell. 	<ul style="list-style-type: none"> • Egg and egg products intended to be cooked or further processed prior to consumption. • Frozen, pasteurised egg products. • Frozen, un-pasteurised egg products. 	<ul style="list-style-type: none"> • Ready to eat eggs and egg products. • Pasteurised egg products. • Cooked egg products. • Liquid eggs products. • Vacuum or modified atmosphere packaged eggs and egg products.

5.0 What testing needs to be carried out?

Sourcing – Establishments that pack and export whole eggs and pasteurised egg products to Singapore must ensure that the farm has a *Salmonella enteritidis* (SE) monitoring and accreditation program in place. The program is approved and monitored by the relevant State Government Authority. The farm must also be approved by the Agri-Food & Veterinary Authority of Singapore (AVA)

Packing & processing establishments must demonstrate that the eggs & egg products for export as food is from a safe source and not contain any contaminants, natural toxicants, residues and food additives which exceeds or contravenes the FSC. (Part 1. 0 of this guideline lists the relevant standards of the FSC) . The methods used to verify the source and to demonstrate that the egg & egg products comply with Schedule 6, Part 1, sub-order 1. 1 & 1. 2 of the *Export Control (Egg & Egg Products) Orders 2005* must be documented in the establishment's Approved Arrangement.

Testing in accordance with Table 3 must be carried out to verify that the products specified in the table are from a safe source, demonstrates & verifies compliance with the HACCP plan and meets Standard 1.6.1 of the Food Standards Code for Pasteurised egg products.

Compliance with the minimum testing regime will be determined at audit.

The testing regime that follows gives details of the tests to be carried out, the sample size to be taken, action levels and additional regulatory notes and comments.

If action levels are exceeded you will need to institute some corrective action as the test results are telling you that there is a problem with where you source your eggs or the way in which the eggs are being processed and handled.

6.0 Frequency of Testing to verify source

Frequency of testing needs to be sufficient to demonstrate that environmental hazards are being adequately assessed.

The frequency of testing required to verify the source of the product is indicated in Table 3. – ‘Testing Regime to verify the source of eggs, compliance with HACCP and that the egg products meet regulatory requirements’.

Testing in accordance with Table 3 must be carried out to verify that the products specified in the table are from a safe source or meet the requirements of the FSANZ standard 1.6.1.

7.0 Procedure for when Action Levels in Table 3 are exceeded

Where Action Levels outlined in Table 3 are exceeded, corrective action to address relevant deficiencies should be undertaken immediately.

- Trace back to identify any affected product in the through chain or in storage and to verify cause of problem;
- Affected product should be segregated and appropriately labelled;
- Review HACCP or source of product and institute appropriate controls to correct the problem; and
- Discuss all of the test results with AQIS to determine the status of the affected product and whether it can be exported and the effectiveness of the corrective actions.

8.0 Testing Regime to verify the source of eggs, compliance with HACCP and that the egg products meet regulatory requirements

Table 3. Minimum Testing Regime for Eggs.

Category	Testing Required	Sampling Size & Frequency	Action Levels	Regulatory Notes	Additional Comments
Pasteurised egg products.	<i>Salmonella</i> / 25 g	As per minimum frequency specified in table 1.	No sub-sample to be greater than 0 org / 25grms.	FSANZ standard 1.6.1	Testing done to demonstrate and verify compliance with HACCP. Testing done to meet regulatory requirements.

Consult laboratories regarding reporting of compliance against the action levels.

A lot is a quantity of eggs or egg products of the same type processed or packed under essentially the same conditions during a particular time interval generally not exceeding 24 hours, and usually from a particular processing or packing line or other identifiable processing or packing unit.

9.0 Maximum permissible limits for agricultural and veterinary chemical residues in eggs and egg products

Schedule 1 in Standard 1.4.2 of the Food Standards Code lists the maximum permissible limits for agricultural and veterinary chemical residues present in food. [Schedule 1 in Standard 1.4.2](#) of the Food Standards Code lists all of the agricultural and veterinary chemical limits in particular foods.

If a maximum residue limit for an agricultural or veterinary chemical in a food is not listed in Schedule 1, there must be no detectable residues of that agricultural or veterinary chemical in that food. Also, if an agricultural or veterinary chemical is not listed in Schedule 1, there must be no detectable residue of that chemical and no detectable residue of any metabolites of that chemical in food (whether or not that the particular food is listed in Schedules 1, 2 or 4).

The Food Standards Code can be found at Food Standards Australia New Zealand
<http://www.foodstandards.gov.au>

Abbreviations

AQIS = Australian Quarantine and Inspection Service.

FSC = Food Standards Code.

FSANZ = Food Standards Australia New Zealand.

g = gram; mg = milligram.

Further information

Bad Bug Book, Foodborne Pathogenic Micro-organisms and Natural Toxins Handbook US FDA

<http://vm.cfsan.fda.gov/~mow/intro.html>

Codex Alimentarius FAO/WHO Food Standards http://www.codexalimentarius.net/web/index_en.jsp

Food Standards Code, Food Standards Australia New Zealand, Commonwealth of Australia, 2005

<http://www.foodstandards.gov.au/foodstandardscode/>

HACCP Implementation Manual, Food Safety Enhancement Program, Agriculture and Agri-Food Canada

<http://foodnet.fic.ca/safety/haccp.html>

Introduction to Foodborne Pathogenic Micro-organisms and Natural Toxins.

<http://www.cfsan.fda.gov/~mow/intro.html>

USDA/FDA Foodborne Illness Education Information Centre, Unites States Department of Agriculture Food Safety and Inspection Service and the Food and Drug Administration Center for Food Safety and Applied Nutrition.

<http://www.nal.usda.gov/fnic/foodborne/foodborn.htm>

Also contact: Dr Fay Stenhouse, Technical Standards Branch AQIS; for information on 02 6272 5965 or email fay.stenhouse@aqis.gov.au

Legislative Information

- EC legislation can be accessed on the EUR-lex website - <http://europa.eu.int/eur-lex/en/index.html>
- US legislation can be found on the US Food and Drug Administration website – <http://www.fda.gov>
- Canadian regulations can be found at - <http://inspection.gc.ca/english/anima/eggoeu/eggoeue.shtml>
- Japanese regulations can be found on - <http://www.maff.go.jp/eindex.htm>