

Segregation procedure in Italian bovine meat processing plant authorized to export to Japan

The scope of this document is to describe a procedure that has to be implemented in each stage of the bovine meat product processing in order to prevent any direct or indirect contact of the Italian bovine meat product eligible for the export to Japan with any meat and meat products that do not meet Japanese requirements.

TRACEABILITY SYSTEM

According to the EU / National legislation, the bovine meat introduced into a processing plant has to be identified.

In the case of export to Japan, the eligible bovine meat comes only from authorized slaughterhouses and the introduction to the authorized processing establishments must be done registering the following information from the relative accompanying pre-export health declaration:

- country of origin;
- slaughterhouse and cutting plant (among those recognised by the Japanese MAFF);
- slaughtering date;
- delivery date of bovine meat to the processing plant;
- number of pre-export health declaration accompanying the bovine meat from the country of origin (a copy will be attached to the health veterinary certificate that will subsequently accompany the processed meat product to Japan);
- quantity of bovine meat introduced.

The local Italian Veterinary Service (Local Health Unit - ASL) supervises all registration activities (keeping registers, how to make registrations, deadlines for registrations) to check the compliance with the requirements specified above.

Each individual consignment¹ of eligible bovine meat introduced into the authorized processing plant is identified in one or more production batches². The production batch labels assigned are maintained throughout all processing stages according to the conditions specified by individual production establishments under the supervision of ASL veterinarians who must check the appropriateness of the solutions applied by the establishments for the correct consignments identification.

In addition to the information kept and recorded for the traceability of the bovine raw material the following data have to be kept and recorded:

- processing start date of bovine meat eligible for export to Japan;
- production batches labels;
- obtained quantity of bovine meat product eligible for export to Japan;
- destination of the bovine meat product to be exported to Japan;
- date of shipment of the bovine meat product to be exported to Japan.
- document in which the establishment must guarantee the compliance with traceability requirements for production batches destined to Japan (so-called pre-shipment review).

The above mentioned informations are verified by the official veterinarian before the issuing of the health certificate that will accompany the product that will be shipped.

¹ **Consignment** shall mean the quantity of goods accompanied by a health certificate.

² **Production batch** shall mean a set of products, transformed, processed, sliced and packed in practically identical circumstances.

DESCRIPTION OF THE STAGES AND CONDITIONS OF ISOLATION OF THE PROCESSING LINE / SEGREGATION OF PRODUCTS

Every precaution must be taken to prevent any direct or indirect contact during all stages of the bovine meat product processing, handling, packaging with any non-eligible meat or meat products that do not meet Japanese requirements.

The list of goods for which Italy expressed interest and that can be considered eligible for the export to Japan according to the agreed protocol and certificate on bovine meat product includes product as: Cured Bovine Meat Product (Bresaola); Cooked Bovine meat product shelf stable (canned/steril); Preparation of bovine meat product as meat-based sauce or similar shelf stable (canned/steril).

Taking into account the length of the processing of the products, the cured Bovine meat product, Bresaola in particular, can be considered as the more risky product in terms of traceability requirement and possible non-compliance with the segregation condition.

For that reason, in this procedure there is the description of each phase of the Bresaola processing in the framework of the compliance with the segregation requirement. However, the same approach should be considered as equivalent for any other bovine meat product eligible for the export to Japan according to the agreed protocol and certificate.

The management measures to ensure the segregation of the processing of the product eligible for the export to Japan can be categorized as follows:

TRACEABILITY

Traceability measures (see above) are applied in order to ensure the identification of the product (including raw material) eligible for the export to Japan. Specific records are requested to guarantee the separation /segregation of product eligible from that not eligible for Japan in each phase of the processing.

DEDICATED AREA

Each processing steps must take place in a dedicated area. When the processing is a storing phase, the dedicated storage area must be delimited and identified with a sign bearing the inscription EJ (Eligible for Japan). When the processing is a working phase, the dedicated working area must be managed with no presence at the same time of meat with different status (not eligible for export to Japan).

POST SSOP start of the processing phase

The processing phase must take place only after SSOP (Sanitation Standard Operating Procedures) have been performed on the food contact surfaces in order to prevent any possible direct and indirect contact with meat or product with a different status (not eligible for export to Japan)

Air Cured Bovine Meat Product – Bresaola processing example.

In this paragraph is described each phase of the Bresaola processing.

In Annex 1 is reported the flow chart of the same process with the indication (coloured code) of the measures applied to ensure segregation.

- a) **Intake:** delivery of bovine raw material into the processing plant – traceability have to be ensured according to the measures foreseen by EU/National legislation and following the specifications foreseen in the Traceability paragraph).
- b) **Storage:** the bovine meat is stored maintaining its original packaging. It is adequately identified and kept in a dedicated area separated from meat with a different status (not eligible for export to Japan);

- c) **Cardboard removal:** takes place in a working area where no meat with different status (not eligible for export to Japan) is present at the same time. Start date of bresaola processing is the record kept for verification;
- d) **Defrosting** (if necessary): takes place in a working area where meats not eligible for export to Japan are not present at the same time. This phase must take place only after the SSOP (Sanitation Standard Operating Procedures) have been performed. Start of this processing phase is the record kept for verification. Moreover this phase must be carried out in uniform batches to ensure traceability. Batch number is the record kept for verification;
- e) **Selection / trimmings:** these operations must take place:
- in dedicated premises (processing only bovine meat eligible for export to Japan) **or**:
 - in a working area where meats not eligible for export to Japan are not present at the same time. In this case, this phase must take place only after the SSOP (Sanitation Standard Operating Procedures) have been performed. Start of this processing phase is the record kept for verification ;
- i) **Deep salting / tumbling:** the bovine meat is placed in containers, where ingredients (salt, spices, nitrate) are added, and stored in coolers for a period of about 15 days. The bovine meat may be tumbled to facilitate salt penetration. These operations must take place under conditions designed to avoid any direct or indirect contact with meats and products of different status (not eligible for export to Japan):
- The equipment is dedicated to production eligible for the export to Japan or
 - This phase must take place only after the SSOP (Sanitation Standard Operating Procedures) have been performed.
- Start of this processing phase is the record kept for verification.
- j) **Casing and binding:** the bovine meat is encased in a working area where meats not eligible for export to Japan are not present at the same time. In any case, this phase must take place only after the SSOP (Sanitation Standard Operating Procedures) have been performed. Start of this processing phase is the record kept for verification. Casing shall take place using artificial (cellulose) casing. The product is placed in the net casing and then hung on trolleys adequately identified and kept in a dedicated area separated from meat with a different status (not eligible for export to Japan).
- k) **Drying and seasoning:** these stages shall take place in:
- premises free from meat not eligible for export to Japan, or
 - in a dedicated area separated from meat with a different health-hygiene status (not eligible for export to Japan)
- This processing phase must be carried out in uniform batches to ensure traceability. Batch number is the record kept for verification;

Bresaola (whole piece / half pieces)

All of the subsequent processing stages shall take place in uniform batches to ensure traceability and in compliance with the principle of segregation. Every precaution must be taken to prevent any direct or indirect contact during all stages of handling, slicing and packaging of the eligible bresaola with any non-eligible meat or any meat or animal products that do not meet Japanese requirements:

- In a working area where meats not eligible for export to Japan are not present at the same time

- The equipment is dedicated to production eligible for the export to Japan or
- Take place only after the SSOP (Sanitation Standard Operating Procedures) have been performed.

Start of those processing phase is the record kept for verification

- **Cleaning:** at the end of seasoning, the surface of the product is cleaned under fresh drinking water (not recycled).
- **Drying:** after washing the product, destined for sale as a whole piece or in half pieces or several pieces, it is rapidly dried under hot air.
- **Cutting:** the product may be cut into two or more pieces.
- **Vacuum packing:** sealing the whole bresaola or pieces of the product in appropriate materials ensuring protection and waterproofing with respect to the external environment.

Bresaola (sliced product)

All of the subsequent processing stages shall take place in uniform batches to ensure traceability and in compliance with the principle of segregation. Every precaution must be taken to prevent any direct or indirect contact during all stages of handling, slicing and packaging of the eligible bresaola with any non-eligible meat or any meat or animal products that do not meet Japanese requirements:

- In a working area where meats not eligible for export to Japan are not present at the same time
- The equipment is dedicated to production eligible for the export to Japan or
- Take place only after the SSOP (Sanitation Standard Operating Procedures) have been performed.

Start of those processing phase is the record kept for verification

- **Cleaning:** at the end of seasoning, the surface of the product is cleaned under fresh drinking water (not recycled).
- **Casing removal :** removal of the artificial or collagen casing.
- **Vacuum packing:** sealing the bresaola in appropriate materials ensuring protection and waterproofing with respect to the external environment.
- **Slicing:** The Bresaola is sliced ensuring the isolation of the slicing line for bresaola eligible for export to Japan from that of non-eligible products and subsequent segregation of the relative production batches.
- **Protective atmosphere packaging:** sealing the sliced bresaola in appropriate materials ensuring protection and waterproofing with respect to the external environment. The bresaola destined for the Japanese market will be clearly labelled by marking the package with the packaging date.

If the bresaola to be exported to Japan is sliced in an establishment different from the establishment in which it was produced, the following **additional** procedures must be implemented to ensure the identification and segregation of the bresaola eligible for export to Japan from products with a different status (not eligible for export to Japan). In particular:

- a) Whenever the bresaola is transported from one official establishment to another, it must be accompanied by

- an official transfer health declaration of origin and processing issued in Italian and English by an official veterinarian responsible for the establishment where the bresaola was processed;
 - a copy of the health declaration accompanying the bovine meat from the country of origin to the bresaola production establishment.
- b) The bresaola shall be transported from the production establishment to the slicing / packaging plant in sealed containers, labelled with the identification mark of the establishment and the production batch.
- c) Registrations: the establishment slicing the bresaola to be exported to Japan shall keep a register recording the following information:
- production batch entering to the slicing area
 - date of entry;
 - official transfer declaration details;
 - slicing batch / batches number;
 - production date / dates;
 - quantity sliced;
 - number of packs.

The Italian Veterinary Service (ASL) shall supervise all registration activities (keeping registers, how to make registrations such as filling in new data, deadlines for registrations) to check on compliance with the requirements specified above.

The following stages shall apply to the product shipped to Japan irrespective of its presentation in a “whole piece”, in “pieces” or in “sliced products” when such operations are carried out in the establishment where the bresaola to be exported to Japan was produced or in another one

- **Temporary storage:** after packaging, the bresaola shall be stored in a cooler and kept separated from meat with a different status. Packaged bresaola must be labelled (immediate package label) to distinguish it from the bresaola not eligible for export to Japan. Labels of the immediate packaging shall bear the identification mark with the official number of the packaging establishment.
- **Packaging:** The packs of bresaola destined for export to Japan shall be placed in appropriate containers. Labels on the shipping cartons shall bear the identification mark with the official number of the packaging establishment. Awaiting shipment, the bresaola eligible for export to Japan must be placed in a dedicated area to maintain segregation from products not eligible for export to Japan.
- **Shipment and delivery:** the cartons will then be placed in pallets with identification of the country of destination (Japan). Before the shipment the establishment must check that all requirements identified as necessary for export to Japan have been satisfied, filling in a specific form (pre-shipment review).

CONCLUSION

The above mentioned described segregation procedure will become part of the official controls applied by the Italian competent Authority to verify the Italian establishments authorized for the export of bovine meat products to Japan and complying with the requirements foreseen in the protocol and certificate agreed. In particular this procedure ensure segregation between products destined to the export to Japan with those that are produced for other destinations and do not necessarily comply with all the requirements foreseen for the export to Japan.