

Biosecurity - Chemical trace back investigation

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Management of the biosecurity risk

Chemical contamination of animal food commodities is potentially harmful to the health of humans and animals and is a threat to Australia's continued market access for animal products.

This procedure provides operational guidance required to achieve the outcomes of the NSW Department of Primary Industries (DPI), an office within the NSW Department of Planning, Industry and Environment (DPIE), policy on chemically affected food producing animals, animal food commodities and stock food. It specifies the response required by NSW DPI and Local Land Services (LLS) when the National Residue Survey (NRS) notifies the State Residue Coordinator (SRC) concerning detection of a chemical in an animal food commodity exceeding the maximum residue limit (MRL), maximum level (ML), environmental residue limit (ERL) or residue action level (RAL). This includes the following NRS programs:

- Random monitoring program
- Targeted Antibacterial Residue Testing program (TART)
- National Antibacterial Residue Minimisation program (NARM)
- Sheep Targeted Antibacterial Residue Testing program (START)
- Pig Targeted Antibacterial Residue Testing program (PTART)
- Hormonal Growth Promotant (HGP) audit program.

Available from: <http://www.agriculture.gov.au/ag-farm-food/food/nrs/animal-residue-monitoring>

Scope

The *Biosecurity Act 2015* (the Act) promotes biosecurity as a shared responsibility between government, industry and communities. This procedure is a State Priority for NSW and should be read in conjunction with the [Chemically affected food-producing animals, animal food commodities and stock food policy](#). This procedure applies to NSW DPI and LLS in their role as authorised officers under the Act.

There is a separate procedure regarding [lead affected food producing animals](#) that details how to investigate/manage suspect/confirmed lead affected food producing animals.

The [Australian milk residue analysis survey](#) provides a national monitoring program for potential agricultural and veterinary chemical residues, and environmental contaminants in Australian bovine milk. The survey is national, coordinated by Dairy Food Safety Victoria (DFSV) on behalf of other state regulatory authorities and the Australian Government Department of Agriculture. The program is supported and funded by Dairy Australia on behalf of the Australian dairy industry.

Biosecurity legislation summary

Under the Act, chemical contamination of food producing animals and animal commodities may result in a biosecurity event (section 39 (1)) with the animals and their products becoming chemically affected which has a biosecurity impact (section 13 (2) of the Act).

Mandatory measures for chemicals in food producing animals and animal products are detailed in Division 10 of the Biosecurity Regulation 2017. These measures detail the obligation for laboratory reporting of test results for chemical residues in animal food commodities and the obligation of vendors of a food producing animal to notify a purchaser if the animal is or suspected to be chemically affected. There is also a mandatory measure in the Biosecurity Regulation 2017 regarding substances in stock food. The Biosecurity (National Livestock Identification System) Regulation 2017 details information requirements in stock transactions (clause 32), including delivery information and the obligation of vendors to declare whether an animal has or has not ever been treated with a HGP and the requirement to deliver a unique serial number of any permit or National Livestock Identification System (NLIS) movement document created.

All stakeholders in the value chain of food producing animals have a general biosecurity duty under the Act to take reasonably practical steps to prevent, eliminate or minimise the risk that animal food commodities are chemically contaminated.

The collection, use and disclosure of information in accordance with this procedure, including any internal or external discussion or distribution of information, must be in compliance with the *Privacy and Personal Information Protection Act 1998* or be exempted by the operation of section 387 of the Act.

Section 387 (2) of the Act provides authority for the disclosure of information about a person, without the consent of the person: to a public sector agency or to any other person, but only if the disclosure is reasonably necessary for the purpose of exercising a biosecurity risk function.

Work health and safety

The *Work Health and Safety Act 2011* places an obligation on the agency (NSW DPI and LLS) as a person conducting a business or undertaking and workers to provide a safe and healthy workplace. Safe Work Method Statements that support activities included in this procedure must be used in identifying, assessing and controlling risks.

NSW DPI and LLS will work together to create a safe and supportive work environment when undertaking any activities for this procedure.

The [Work Health and Safety Act \(2011\)](#) and the NSW Government Department of Planning, Industry and Environment Work health and safety policies (see Section 8) apply to all people using this procedure.

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Chemical trace back investigation procedure

1. Roles and responsibilities

1.1 NSW Department of Primary Industries

- will appoint a State Residue Coordinator (SRC) to oversee management of suspect or confirmed chemically affected food producing animals in NSW.
- will ensure that authorised officers are available for investigation of suspect or confirmed chemically affected animals.
- invoice the Commonwealth for any trace back investigations performed by LLS on request from the Commonwealth National Residue Survey (NRS). Invoices should refer to the NRS sample number(s) and have the investigation report attached.

1.2 Local Land Services

- will ensure that government field veterinarians are available for investigation of suspect or confirmed chemically affected food producing animals.
- invoice NSW DPI for any chemical trace back investigations performed on request from the Commonwealth NRS. Invoices must refer to the NRS sample number(s) and have the investigation report attached. Send invoices to the SRC at residues.animal@dpi.nsw.gov.au.

2. Investigation by LLS of chemical detections that exceed a MRL/ERL/ML/RAL

- The NRS notifies the State Residue Coordinator (SRC) of any chemical detection at levels greater than the MRL/ERL/ML/RAL requesting a trace back investigation. The NRS sends the laboratory report, National Vendor Declaration (NVD) and any other relevant documents to the SRC.
- The SRC identifies the location of the incident, the relevant LLS region and confirms that the property identification code (PIC) is valid.
- The SRC requests authorisation from NRS to conduct the appropriate tier of investigation.
- SRC sends email notification of the detection and all relevant documents to the appropriate LLS veterinarian with a copy to the LLS Team Leader and Manager Biosecurity and Emergency Services (MBES) requesting a trace back investigation be undertaken and reported within four weeks. The SRC will suggest the appropriate tier level of investigation required by the LLS with the corresponding fee schedule (Appendix One). Please note that tiers 3 and 4 involve contacting the veterinarian who services the property as part of the investigation if relevant.
- The LLS veterinarian investigates and reports to SRC using the 'NRS Investigation Summary form' (available at the Chemical Residues landing page on the intranet, see Section 8) which outlines the results of the investigation and includes recommendation/s on the next course of action.
- The LLS veterinarian must advise the SRC if they are unable to complete the investigation within four weeks.
- The LLS veterinarian uploads details of the trace back investigation into Livestock Health Management System (LHMS) (Appendix Two and LHMS Field Guide, see Section 8). the SRC reviews the investigation, in consultation with the LLS veterinarian, and countersigns the NRS Investigation Summary form, and recommends one of the following:
 - no further action is required
 - a warning letter be issued by the LLS veterinarian
 - an Individual Biosecurity Direction (IBD) be issued by the LLS veterinarian
 - a Biosecurity and Food Safety compliance unit authorised officer visits the property to conduct a Record of Interview. Note a DPI authorised officer may be accompanied by the LLS veterinarian)

- The Biosecurity and Food Safety compliance unit authorised officer, in consultation with their manager will decide whether an infringement notice or prosecution is warranted, or if no further action should be taken in line with the compliance enforcement policy
- The Biosecurity and Food Safety compliance unit authorised officer will make a written recommendation re regulatory action to their manager and cc the recommendation to the SRC.
- If regulatory action is decided, the Biosecurity and Food Safety compliance unit authorised officer will proceed accordingly.
- All evidence collected by the investigating officer is uploaded to LHMS by the investigating Biosecurity and Food Safety compliance unit authorised officer (Appendix One and LHMS field guide).
- The SRC will advise the NRS if any investigation is delayed.
- The SRC submits the completed NRS Investigation Summary form and any other supporting documentation to the NRS within four weeks of notification from the NRS. The trace back report will normally contain the following:
 - NRS Investigation summary form completed
 - supplementary information that may further clarify the information contained in the NRS Investigation Summary report
 - details of any regulatory/enforcement action taken or proposed.

3. Investigation of residue detections reported as ‘for information’

- The SRC may receive notification of a chemical detection that has been reported from the NRS as “For information”. The SRC may decide to forward detection reports to the appropriate LLS veterinarian depending on the amount of residue detected, the chemical detected and statements on the NVD.
- Any trace back investigation undertaken is at the discretion of the SRC, as per the Australian Government Head Agreement for National Residue Survey Activities. (INT19/51178). The procedure for investigation is as for Section 2 above.
- There is no financial assistance from the NRS for “For information” trace back investigations.
- All “For information” reports forwarded to LLS must be recorded by the LLS in LHMS (Appendix Two and LHMS field guide).

4. Non EU Hormonal Growth Promotant trace back investigations

- The NRS notifies the State Residue Coordinator (SRC) of any Hormonal Growth Promotant (HGP) incidents and requests a trace back investigation. The NRS sends the laboratory report, National Vendor Declaration (NVD) and any other relevant documents to the SRC.
- The SRC requests authorisation from NRS to conduct the appropriate tier of investigation.
- The SRC sends the notification to the NSW DPI regulatory compliance manager, who forwards the notification to the appropriate senior NSW DPI Biosecurity and Food Safety compliance authorised officer who will delegate.
- The investigation should be completed within four weeks where possible, the investigating officer must advise the SRC if they are unable to complete the investigation within four weeks.
- The NSW DPI Biosecurity and Food Safety compliance authorised officer investigates and records findings on the HGP investigation summary form.
- Suspected incidents will be investigated by a NSW DPI Biosecurity and Food Safety compliance unit authorised officer and enforcement action will be determined in line with NSW DPI compliance and enforcement policies.
- The SRC will be advised of the outcome of the completed investigation.
- The SRC forwards all relevant documents (including warning letters and/or infringement notices) relating to the investigation to the NRS.

- The investigating officer will update the SRC on the progress of investigation at least every two weeks until the investigation is completed.
- The NSW DPI Biosecurity and Food Safety compliance unit authorised officer must record the investigation results, including any relevant documentation in LHMS as per Appendix Two and the LHMS field guide (in addition to any compliance database).
- BFS compliance will request the SRC invoices NRS on their behalf and will provide the MyHQ Project Code for the funds to be allocated to. Invoices must refer to the NRS sample number(s) and have the investigation report attached

5. National Antibacterial Residue Minimisation (NARM) program

- When bobby calves consigned to an abattoir from a PIC return a positive urine microbial inhibition testing (MIT) test result, the NRS notifies the SRC who applies a KV status to the source PIC on the NLIS database. The SRC advises the PIC owner in writing using the KV status notification letter template available at the Chemical Residues landing page on the intranet, see Section 8). The NRS tests the kidney of the MIT positive calf. The KV status lapses after 28 days unless the SRC removes the status sooner.
- When kidney test results are available, the NRS notifies the SRC who:
 - removes the KV status if the detection is below the MRL and notifies the PIC owner in writing using the KV status removed notification letter template
 - removes the KV status and assigns a KV2 status if residue is detected at or above the MRL and notifies the PIC owners in writing using the KV2 status notification letter template
- KV2 status remains on the PIC for 90 days (from slaughter date). KV2 status alerts the abattoir to test the urine of all bobby calves from this PIC for the remainder of the 90 days. The calves are detained until results of tests are known. The database automatically removes the KV2 status after 90 days if no further positive calves from this PIC are detected.
- Where the residue is detected at or above the MRL the NRS sends the SRC the NVD, the life history of the animal and the laboratory reports, requesting a trace back investigation on the source PIC.
- The SRC requests authorisation from NRS to conduct the appropriate tier of investigation.
- The SRC forwards these documents to the appropriate LLS veterinarian, copied to the LLS Team Leader and MBES requesting a trace back investigation be completed as per Section 2.
- The investigating LLS veterinarian/NSW DPI authorised officer is responsible for uploading all information on each NARM case to LHMS (Appendix Two and LHMS field guide).

6. Trace backs of topical veterinary chemicals that require dilution

- Trace backs involving topical veterinary chemicals that require dilution on-farm are completed as per section 2 except that if regulatory action is recommended the NSW Environment Protection Authority (EPA) is the lead agency for any action
- The SRC emails the appropriate documentation to Manager Chemicals Regulation Unit, EPA for their attention and suggested action.

7. Definitions and acronyms

DPI	NSW Department of Primary Industries
EPA	Environment Protection Authority
ERL	Environmental Residue Limit- the maximum permitted limit of a pesticide residue, arising from environmental sources other than the use of a pesticide directly or indirectly, in or on a food, agricultural commodity or animal feed.
HGP	Hormonal Growth Promotant
LLS	Local Land Services
MBES	Manager Biosecurity and Emergency Services
ML	Maximum level- as defined in Policy

MRL maximum residue limit- as defined in Policy
NARM National antibacterial residue minimisation
NRS National Residue Survey- part of Department of Agriculture and Water Resources
NVD National Vendor Declaration
PIC Property Identification Code
SRC State Residue Coordinator
RAL Residue Action Level- the concentration of a residue of an agricultural or veterinary chemical or contaminant in food, agricultural commodity or animal feed, above which detection will trigger a request for a trace back by the State

8. Documentation

Policy - [Chemically affected food producing animals, animal food commodities and stock food](#)
Policy - Biosecurity collection, use and disclosure of information
Policy - Records Management (IND-I-177)
Policy - Information Security (IND-I-197)
Policy - Classified Information (IND-I-196)
Policy - Government Information (Public Access) (IND-I-178)
Procedure - Biosecurity collection, use and disclosure of information
Procedure - [Lead affected food producing animals](#)
Intranet Chemical Residues landing page: <https://intranet.industry.nsw.gov.au/know-the-department/our-structure/primary-industries/dpi-biosecurity-food-safety/biosecurity-act-forms/biosecurity-forms/animal-biosecurity/chemical-residues>
National antibacterial residue minimisation program – available from the SRC
[National residue survey](#)
National Residue Survey Activities Head Agreement- Commonwealth of Australia and State of NSW – available from the SRC or at INT19/51178.
LHMS field guide available on the Biosecurity Information System intranet landing page <https://intranet.industry.nsw.gov.au/online-systems/biosecurity-toolset/bis>
Arsenic and DDT residues at cattle dip yards ([Primefact 1371](#))
Buying stock feeds - minimising chemical residue risks ([Primefact 315](#))
Drought increases residue risks ([Primefact 312](#))
DAWR - Residue and residue testing
DAWR - Animal product residue monitoring
Intranet Work Health and Safety Policies, strategy and handbooks landing page <https://intranet.industry.nsw.gov.au/employment/work-health-and-safety/whs-resources/whs-resources/policies>
Intranet Biosecurity procedures landing page <https://intranet.industry.nsw.gov.au/support-and-services/science-and-research/dpi-procedures/biosecurity-procedures>
Intranet Chemical Residues landing page:

9. Records

The documents below are available on the NSW Department of Industry intranet Chemical Residues landing page <https://intranet.industry.nsw.gov.au/know-the-department/our-structure/primary-industries/dpi-biosecurity-food-safety/biosecurity-act-forms/biosecurity-forms/animal-biosecurity/chemical-residues>

National Residue Survey investigation summary form
HGP investigation summary form
Undertaking for chemical affected food producing animals
Biosecurity direction for chemical affected food producing animals
Warning letter for chemically affected food producing animals
Record of interview of chemically affected food producing animals
Letter templates for KV and KV2 notifications

10. Revision History

Version	Date issued	Notes	By
1	01/07/2017	Substantially revised procedure in response to the <i>Biosecurity Act 2015</i>	Animal Biosecurity and Welfare
2	20/08/2019	Revised hyperlinks, minor amendments section 2 – invoicing and section 5 – KV status application and related appendices	Animal Biosecurity

11. Contact

Biosecurity NSW – General Enquires
1800 808 095
animal.biosecurity@dpi.nsw.gov.au

Appendix One – Schedule of fees from National Residue Survey

(taken from: Head agreement, National residue survey activities – Commonwealth of Australia and The State of New South Wales, April 2019)

Table 1. Consolidated fee structure for Activities delivered by the State

Tier	Activity	Description of activity	Example activity [^]	Key performance indicators	Time	Payment (GST inclusive) Fully itemised invoice
One	Sample collection	Collection of honey or other specified samples	Honey sample collection.*	Samples collected & dispatched. NRS IMS entries completed.		Up to \$55 per sample (sample purchase not covered)
Two	Desktop enquiry	Phone/email enquiries	Minor traceback follow-up (e.g. bobby calf). NORM risk assessment.	Risk assessment completed & copy provided to NRS. Producer contacted & the NRS advised.	2.5 hours	\$275
Three	Minor field investigation	Field visit and investigation report preparation	Minor traceback investigation. Minor NORM audit.** Property visit for a bobby calf violative residue investigation.	Audit report provided. Producer & vet contacted or visited. Investigation report provided to the NRS.	4 hours	\$440
Four	Major field investigation	Field visit and investigation report preparation	Major traceback investigation. Major NORM audit.**	Audit report provided. Producer visited & vet contacted. Investigation report provided to the NRS.	7.5 hours	\$825
Five	Extended field investigation	Multiple field visits, collection of investigation samples and investigation report preparation	Extended traceback investigation. NORM field investigation.**	Producer visited on one or more occasions. Investigation samples taken. Full investigation report prepared and provided to the NRS.	5 days @7.5 hours	\$4,125
SAFEMEAT#	SAFEMEAT incident response initiated	Any tier 2–5 activities	Minor, major or extended traceback investigation.	Traceback investigations completed within timeframes agreed by the SAFEMEAT Emergency Response Committee and the State to manage the incident.	As required	\$110 / hr

[^] Refer to program specific guidelines (e.g. NORM/ NARM/TART Principles and Guidelines) for other detailed Activities.

* NORM program soil and fat samples should be taken as part of a higher tier Activity; therefore the sample would not be reimbursed separately.

** If NORM testing is required from a F status property the Commonwealth may cover analysis costs in some circumstances with prior written approval.

Financial assistance for Activities under the SAFEMEAT tier is only available if the industry(ies) concerned have approved NRS reserve funds be used for this purpose. The Commonwealth will advise the State when the SAFEMEAT tier applies on a case-by-case basis.

Appendix Two – Livestock Health Management System entry

- Initial investigation: Create an event and select “compliance” event and in “program” select ‘residue & food safety’ and if first visit also select surveillance. Attach all relevant documents to this page.
- Attach all forms sent from SRC and those created during the audit/ visit.
- If samples (animal, soil or feed) are collected, create a “Diagnostic” event and in the General Details tab for “Presenting Complaint” select survey (audit, monitoring); “Differential Diagnosis” select residue – X” and Program” select Residue and food safety. Complete the remainder of the tabs as per the LHMS field guide.