

USDA Beef Export Verification (BEV) Program Questions and Answers

Revised August 15, 2003

1. **Is the BEV Program a regulation?**

No. The BEV Program is a voluntary program. However, certain countries require participation in the BEV Program in order for beef and beef products to be exported to these countries.

2. **Who does the BEV Program apply to?**

The Program applies to suppliers (slaughterers, fabricators, processors, and exporters) of beef, beef products, and processed beef products who intend to export to countries that require participation in the BEV Program

3. **Where can I get the BEV Program Procedure?**

Visit the ARC Branch website at <http://www.ams.usda.gov/lsg/arc/audit.htm>.

4. **How do I apply for service?**

Suppliers must request initial assessment of eligibility by submitting the following to the ARC Branch Washington, DC office:

- A completed and signed LS Form 313, Application for Service. If you have Meat Grading and Certification Branch services or ARC Branch services, it is not necessary to complete the LS 313.
- A cover letter requesting service
- Program documentation

5. **Where do I get the LS Form 313 and information about this program?**

Visit the ARC Branch website at <http://www.ams.usda.gov/lsg/arc/audit.htm>. While you may email or fax this form, you must also submit the original by mail.

6. **How do I submit my application?**

You may submit your application by email, fax, or mail to the contact person.

7. **Who should I contact regarding the BEV Program?**

Samantha J. Simon
Stop 0294, Room 2627-S
1400 Independence Avenue, SW
Washington, DC 20250
Phone: (202) 720-9759
Fax: (202) 690-3428
Email: samantha.simon@usda.gov

8. **What if I must make changes to my BEV Program?**

All changes must be submitted to Samantha Simon. Significant changes must be submitted and approved prior to implementation.

9. **What must the program documentation contain?**

Documentation must address all requirements and supplier responsibilities.

- The names and positions of persons with managerial responsibilities for operation of the BEV Program;
- Written procedures that describe the company's procedures for ensuring products are received, processed, and identified conform to the BEV Program requirements;
- Written procedures that address the company's procedures for training and monitoring customer perception
- A written segregation plan that describes the identification, segregation, traceability, handling, and labeling of product;
- Completed examples of all forms, tags, labels, etc. used to track or demonstrate Program conformance; and
- An issue date or other method for identifying the most current version of all program documentation.

10. **What are acceptable forms of documentation?**

- Written procedures
- Flow Charts
- Tables
- Pictures
- Drawings

11. **Are there procedures, forms, and records that my facility has already that would meet the program documentation requirements?**

Yes, most likely there are procedures, forms, and records that your facility already has that could be incorporated into your program documentation. Only include those that are applicable to the scope. Otherwise, it will take longer for the audit. Existing procedures may include:

- Plant HACCP Plans
- Standard Operating Procedures
- Plant Production Procedures
- Plant Receiving Procedures
- Product Specifications, Logs, Yields
- Control Procedures
- Employee Training Documents
- Quality Control Procedures and Records
- Finished Product Paperwork

12. **What are the requirements for the BEV Program?**

All beef and beef products must be from cattle slaughtered in the U.S.

All beef and beef products in the BEV Program must be traceable to cattle slaughtered in the U.S. and must be from an Eligible Supplier listed on the Official Listing.

13. **Who may produce product for the BEV Program?**

Only eligible suppliers who are listed on the Official Listing may supply product under the BEV Program.

14. **What is conforming product?**

Any beef or beef products that meet, and can be verified as meeting, the requirements of the BEV Program.

15. **What is non-conforming product?**

Any beef or beef products that do not meet, or can not be verified as meeting, the requirements of the BEV Program.

16. **Why does Section 5.3 state “Only beef and beef products that meet the requirements of the BEV Program may be identified and labeled as such.”?**

A facility may decide that not all products that meet the requirements will be destined for export. Such products may not be identified.

17. **What must be identified?**

Either conforming product destined for use in the BEV Program or non-conforming product or both must be identified.

- If only non-conforming product is identified in the facility, then by default, all other product is conforming. In such instance, the facility does not have to identify conforming product as long as it is traceable back to cattle slaughtered in the U.S.
- If only conforming product is identified in the facility, then by default, all other product is non-conforming. In such instances, the facility does not have to identify non-conforming product as long as it can be traced throughout the system. (i.e. Where did the non-conforming product go? When was it fabricated, processed, and boxed?)

18. **My facility does not receive product from other establishments. Consequently, the entire product from my facility is conforming product. What am I required to do?**

You must submit the proper program documentation and address all requirements and supplier responsibilities. You should state that your facility does not receive product from other establishments. You must ensure traceability of the product. The proper documentation of finished product must be provided.

19. **What if my facility receives product from other establishments?**

Product received from other establishments and destined for use in the BEV Program must be (1) from an eligible supplier listed on the Official Listing **and** (2) identified as meeting the BEV Program requirements. Product that does not meet both of these requirements is considered non-conforming product.

20. **Must I declare products that I receive from other establishments, even if they will not be included in the BEV Program?**

Yes. **ALL** beef and beef products that are received from other establishments must be identified in your program documentation. A receiving procedure and a segregation plan must be included to ensure that products are handled according to the BEV Program requirements.

21. **How does my facility prove traceability of product?**

Does your facility have a product recall program? If so, the program and related records would help to verify that product originated from cattle slaughtered in the U.S. It would also help to verify that non-conforming product was diverted from the BEV Program.

22. How must finished products be identified?

Documentation for finished products must identify each lot of conforming product by including the lot number, production date, production code, number of boxes, manufacturer, and the statement “Product Meets BEV Program Requirements”.

23. Must finished products be labeled?

No, a company may decide to label finished products to also show conformance.

24. What are finished products?

Finished products are the end product produced by a facility. They may be either raw materials that will be further processed at another establishment or they may be end items.

25. What must cold storage facilities do?

Suppliers should train their cold storage facilities about the BEV Program requirements, specifically the proper documentation for finished product and the necessity to maintain the identification on the finished product. Product that can not be verified as meeting the BEV Program requirements are not eligible for the Program.

26. What information is needed to complete the FSIS Export Certificate?

The supplier must be listed on the Official Listing **and** the product must have the proper documentation. If product can not be verified as being the product identified in the documentation, then it is not eligible for the Program.

27. Who will complete the FSIS Export Certificate?

FSIS will complete the certificate at the time of export.

28. What about beef and beef products produced after the border closed and prior to September 1?

Product must be traceable to cattle slaughtered in the U.S. Verifiable evidence must be submitted to approve these products.

29. My facility received beef and beef products from other establishments during this time. Is it eligible for the BEV Program?

Product must be traceable to cattle slaughtered in the U.S.

- If the other establishments only slaughtered cattle and did not receive product from other establishments, then a letter stating this fact along with the slaughter and production dates, is sufficient.
- If the other establishments received product, then a letter stating conformance is not sufficient. Verifiable evidence must be submitted to approve these products.

30. What is the cost for the BEV Program?

This Program is user-fee funded. Participants will be charged \$64.00 per hour for the document review, travel time, on-site audit, and report preparation. Participants will also be charged for travel costs and per diem costs. NOTE: The ARC Branch will make every effort to keep costs to a minimum.

31. How many times will my facility be audited each year?

Facilities will be audited 3 times per year. For this year, participants will receive the initial on-site assessment and 1 surveillance audit before January 1, 2004.

32. Who will be conducting the audits?

The USDA, Agricultural Marketing Service, Livestock and Seed Program, Audit, Review, and Compliance (ARC) Branch will be conducting the audits.

33. Must I train all of my employees?

No, only the employees that have areas of responsibility with in the BEV Program must be trained. This would include employees who receive product from other establishments; handle non-conforming product; prepare documentation for finished products; and supervisors who have responsibilities.

34. How must I handle customer feedback?

Many facilities currently have a customer complaint-resolution program. This program should be broadened to include the BEV Program. The procedures for how customer feedback is received, reviewed, and resolved should be outlined.

35. How long must I retain my records?

Records should be retained long enough for an auditor to verify conformance. We recommend at least 1 year from the date of production.

36. How is the BEV Program different from the ARC 1010 Supplier Eligibility Program for Purchase Programs?

- ARC 1010 requires that an eligible supplier meet the domestic origin and slaughter requirements. Domestic origin is defined as product that is not derived from imported meat or animals imported for direct slaughter.
- The BEV Program requires that an eligible supplier supply beef and beef products that are derived from cattle slaughtered in the U.S. At this time, only beef and beef products will be allowed by permit from Canada. If the border reopens to live animal imports, Japan may request that we address that imported cattle. In addition, ARC 1030 requires the designation of managerial responsibilities, training, and monitoring customer perception: sections 5.5.1, 6.7, and 6.8, respectively.