



USDA Beef Export Verification (BEV) Program Appendix A, Processed Beef Products

1 Purpose

The purpose of this document is to set forth the policies, procedures, and requirements of the USDA Beef Export Verification (BEV) Program and for the independent process verification of participants in the BEV Program as it pertains to processed beef products.

Processed beef products are ready-to-eat beef products that contain at least 2% cooked meat and have been subjected to heat or drying and do not contain products of edible rendering. Under the BEV Program Appendix A, processed beef products meet the following requirements: contain no beef or beef products from a country named in 9 CFR, section 94.18 (a)(1); and contain no beef or beef products produced from livestock imported from a country named in 9 CFR, section 94.18 (a)(1).

2 Scope

This Procedure applies to processors of processed beef products that label and sell products as meeting the requirements of the BEV Program Appendix A. The USDA Agricultural Marketing Service (AMS) will conduct independent process verification audits of processor's program documentation and procedures with regard to the BEV Program Appendix A requirements.

3 Reference Documents

- 3.1 *Chapter 9 CFR, section 94.18 Restrictions on Importation of Meat and Edible Products from Ruminants Due To Bovine Spongiform Encephalopathy (9 CFR, section 94.18).*
- 3.2 *ARC Instruction 1000 Quality Systems Verification Program General Policies and Procedures.*

4 Definitions

- 4.1 Conforming Products: Processed beef products that meet, and can be verified as meeting, the requirements of the BEV Program Appendix A. Such products may be identified and labeled as meeting the requirements of the BEV Program Appendix A.
- 4.2 Eligible Processor: Any processing facility that manufactures processed beef products meeting all requirements of the BEV Program Appendix A. A processor is deemed eligible upon implementation of a program that addresses the requirements of the BEV Program Appendix A and upon successful completion of an audit.
- 4.3 Non-conforming Products: Processed beef products that do not meet, or can not be verified as meeting, the requirements of the BEV Program Appendix A. Such products must be excluded from products labeled as meeting the requirements of the BEV Program Appendix A.
- 4.4 Program Documentation: Documents and records prepared and maintained by the eligible processor that describe and record the company's procedures for ensuring finished products conform to the BEV Program Appendix A requirements. This documentation may be in the form of a well-defined quality manual or an accumulation of controlled program documents and records that meets all BEV Program Appendix A requirements.

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- 4.5 Segregation Plan: Documents prepared and maintained by an eligible processor that describe the facility's procedures for (1) ensuring that processed beef products destined for use in the BEV Program Appendix A meet the following requirements: contain no beef or beef products from a country named in 9 CFR, section 94.18 (a)(1); and contain no beef or beef products produced from livestock imported from a country named in 9 CFR, section 94.18 (a)(1); (2) ensuring that processed beef products produced under the BEV Program Appendix A are appropriately identified and labeled; (3) describing how conforming products will be identified and handled; and (4) describing how non-conforming products will be identified and handled.
- 4.6 Surveillance Audit: A review of an eligible processor's facilities, procedures, and records (1) to determine conformance with the approved segregation plan and this Procedure, and (2) to verify the eligible processor's ability to meet all of the requirements of the BEV Program Appendix A. These audits will be conducted by the USDA, AMS, Livestock and Seed Program, Audit, Review, and Compliance (ARC) Branch.

5 Program Requirements

- 5.1 All processed beef products identified as meeting the requirements of the BEV Program Appendix A meet the following requirements: contain no beef or beef products from a country named in 9 CFR, section 94.18 (a)(1); and contain no beef or beef products produced from livestock imported from a country named in 9 CFR, section 94.18 (a)(1).
- 5.2 Only eligible processors may produce processed beef products for the BEV Program Appendix A. Eligible processors must be listed on the *Official Listing of Eligible Processors for the Beef Export Verification (BEV) Program Appendix A*.
- 5.3 Only processed beef products that meet the requirements of the BEV Program Appendix A may be identified and labeled as such. Documentation for finished products must identify each lot of conforming products by including the lot number, production date, production code, number of boxes, manufacturer, and the statement "Products Meet BEV Program Appendix A Requirements".
- 5.4 Only processed beef products produced by eligible processors and identified as meeting the requirements of the BEV Program Appendix A may have the FSIS Export certificate amended to read, "These processed ready-to-eat beef products contain at least 2% cooked meat and have been subjected to heat or drying and do not contain products of edible rendering. The shipment contains no beef or beef products from a country named in 9 CFR, section 94.18 (a)(1); and contains no beef or beef products produced from livestock imported from a country named in 9 CFR, section 94.18 (a)(1).
- 5.5 Program documentation must contain, at a minimum:
- 5.5.1 The names and positions of persons with managerial responsibilities for operation of the BEV Program Appendix A;
 - 5.5.2 Written procedures that describe the company's procedures for ensuring products received, processed, and identified conform to the BEV Program Appendix A requirements;
 - 5.5.3 A written segregation plan that describes the identification, segregation, and labeling of product;
 - 5.5.4 Completed examples of all forms, tags, labels, etc. used to track or demonstrate Program conformance; and
 - 5.5.5 An issue date or other method for identifying the most current version of all program documentation.



5.6 Conformance with the BEV Program Appendix A requirements will be determined through fee-for-service, process verified, surveillance audits conducted by the ARC Branch using this Procedure and *ARC Instruction 1000 Quality Systems Verification Program General Policies and Procedures*.

6 Processor Responsibilities

- 6.1 Request initial assessment of eligibility by submitting the following to the ARC Branch Washington, D.C., office.
 - 6.1.1 A completed and signed *LS Form 313, Application for Service*;
 - 6.1.2 A cover letter requesting a BEV Program Appendix A audit; and
 - 6.1.3 Program documentation used to ensure conformance to the BEV Program Appendix A requirements and this Procedure, including a copy of the written segregation plan.
- 6.2 Ensure that processed beef products destined for use in the BEV Program Appendix A conform to the requirements of the Program.
- 6.3 Properly identify all conforming and non-conforming products to ensure traceability.
- 6.4 Maintain traceability of conforming and non-conforming products to determine conformance to the BEV Program Appendix A requirements.
- 6.5 Maintain segregation of conforming and non-conforming product.
- 6.6 Provide and maintain documentation for finished products that identifies each lot of conforming products by including the lot number, production date, production code, number of boxes, manufacturer, and the statement "Products Meet BEV Program Appendix A Requirements".
- 6.7 Ensure that all persons with responsibilities for Program activities have been properly trained and have a complete understanding of all Program requirements relevant to their area of responsibility.
- 6.8 Monitor information relating to customer perception as to whether the processor has met BEV Program Appendix A requirements.
- 6.9 Address all non-conformances within the timeframe outlined in the audit report.
- 6.10 Comply with all provisions of this Procedure, and applicable Rules and Regulations.
- 6.11 Maintain complete records demonstrating conformance with the BEV Program Appendix A.
- 6.12 Provide any and all documents and records (written or electronic) necessary to verify conformance.
- 6.13 Provide access to all areas of an establishment or facility that is requesting an eligibility status.



- 6.14 Immediately notify the ARC Branch Washington, D.C., of any changes in the approved program documentation used to verify conformance of processed beef products destined for use in the BEV Program Appendix A.
- 6.15 Notify the ARC Branch Washington, D.C., to cancel service prior to the next surveillance audit when service is no longer desired.

7 ARC Branch Responsibilities

- 7.1 Review submitted *LS Form 313, Application for Service*, program documentation and segregation plans.
- 7.2 Assign a qualified USDA ARC Branch auditor to perform an initial audit as soon as possible upon determining that the *LS Form 313 Application for Service* is complete and that the submitted program documentation and segregation plan meet the requirements of the BEV Program Appendix A.
- 7.3 Conduct audits according to this Procedure and *ARC Instruction 1000 Quality Systems Verification Program General Policies and Procedures*.
- 7.4 Prepare a detailed report of the audit observations, findings, and a recommendation.
- 7.5 Forward the audit report and the final decision to the processors.
- 7.6 Ensure surveillance audits are performed as required by this Procedure.
- 7.7 Maintain and publish the *Official Listing of Eligible Processors for the Beef Export Verification (BEV) Program Appendix A*.

8 Surveillance Audits

- 8.1 *ARC Instruction 1000 Quality Systems Verification Program General Policies and Procedures* and the requirements outlined in this Procedure will be used to assess processors.
- 8.2 All eligible processors will be audited at least three (3) times per year. However, more frequent audits may be conducted if either numerous continuous improvement points or a hold point are identified during the audit.
- 8.3 All eligible processors are subject to unannounced audits by the ARC Branch.

9 Approval Procedures

- 9.1 *ARC Instruction 1000 Quality Systems Verification Program General Policies and Procedures* and the requirements outlined in this Procedure will be used to approve or deny processors.
- 9.2 Approval. A processor who has been found to conform to this Procedure and the approved program documentation and segregation plan will be considered eligible. Once eligible, the ARC Branch will post the processor's information on the *Official Listing of Eligible Processors for the Beef Export Verification (BEV) Program Appendix A*.



- 9.3 Denied Approval. The ARC Branch may deny eligibility for any of the following reasons:
- 9.3.1 Failure to adequately address any requirements.
 - 9.3.2 Failure to demonstrate capability to meet any requirement.
 - 9.3.3 Finding of a hold point to stated procedures.
 - 9.3.4 Denying access to an eligible processor's facilities, documentation, or records within the scope of the requested audit.
 - 9.3.5 Presenting false or misleading information to USDA personnel.
- 9.4 Suspending Approval. The ARC Branch may suspend eligibility and remove an eligible processors from the Official Listing for any of the following reasons:
- 9.4.1 Failure to follow requirements set forth in this Procedure, the approved program documentation, or written segregation plan.
 - 9.4.2 Implementing significant changes to approved program documentation, or written segregation plan or without prior written notification to the ARC Branch.
 - 9.4.3 Deliberate misrepresentation of the eligibility of processed products.
 - 9.4.4 Presenting false or misleading information to USDA personnel.
 - 9.4.5 Confirmed finding of non-conforming products that were utilized in the BEV Program Appendix A. Upon confirming the violation, the ARC Branch will suspend the processor's eligibility pending a complete investigation, in cooperation with appropriate regulatory agencies.
 - 9.4.6 Denying access to an eligible processor's facilities, documents, or records within the scope of the requested audit.
 - 9.4.7 Failure to respond to non-conformances in the timeframe provided.
 - 9.4.8 Failure to pay ARC Branch fees.
- The ARC Branch will notify the processor in writing of the suspension and the details on actions required to regain eligibility status.
- 9.5 Cancellation. Eligible processors may cancel service at any time by notifying the ARC Branch in writing. Eligible processors who cancel service will be removed from the *Official Listing of Eligible Processors for the Beef Export Verification (BEV) Program Appendix A*. Processors who cancel service must reapply and be reassessed through an audit before they will be returned to the Official Listing.

10 ARC Branch Contact Information

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