

Australian Hide Skin and Leather Exporters Association Inc.

# AUSTRALIAN CODE OF PRACTICE FOR PROCESSING OF HIDES AND SKINS FOR EXPORT.

Edition 3 Version 1.5 January 2024

## Introduction

The 2024, Australian Code of Practice for Processing of Hides and Skins for Export (the Code) is published by the Australian Hide Skin and Leather Exporters Association Inc. (AHSLEA).

Adoption of the Code by individual Establishments is voluntary and demonstrates a commitment to continuous improvement in the Australian hides and skins processing industry.

The Code provides an industry benchmark for the processing of hides and skins for export, including the requirement to have a Quality Assurance Program to demonstrate control of operations to meet best practice industry standards and export requirements, as applicable.

The Code has been adopted by AHSLEA following development through an AHSLEA subcommittee representing a cross section of members from the association, in consultation with the Department of Agriculture and Water Resources.

The Code is subject to an ongoing review process which is evidence of the industry's continual improvement process.

Under a Letter of Exchange with the Commonwealth Department of Agriculture and Water Resources, this Code is the foundation on which audit and verification activities for export are based.

Audits against this Code are available under licence for both members and non-members of AHSLEA.

AHSLEA has also established a voluntary Accreditation Program for members to enable them to demonstrate conformance with this Code.

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## 1. Scope and Application

The scope of the Code applies to the construction, equipment and operation of enrolled Australian hides and skins processing establishments. The Code is intended to provide a set of standards which, when applied, will provide best practice processing and manage the integrity of hides and skins for export.

The Code has the following components:

- Standards of construction, equipment and methods of operations.
- A Quality Assurance Program which includes:
  - A monitoring program designed to verify that the integrity of finished product is under control and is fit for intended purpose.
  - Compliance with applicable legislative requirements.
- A staff training program.

AHSLEA provides accreditation to Establishments. The compliance criteria required for accreditation are defined in the AHSLEA Accreditation Program Rules for Hides and Skins Processing Establishments. An Approved Auditor appointed by AHSLEA undertakes verification audits at Establishments.

## 2. Objectives of the Code

The objectives of the Code are to:

- 2.1 Prescribe standards and give guidance to hide and skin processing establishment management on suitable production outcomes and quality assurance for hides and skins.
- 2.2 Provide for the consistent and adequate application of processing treatments for hides and skins.
- 2.3 Use Quality Assurance techniques to monitor and control operations to achieve required outcomes.
- 2.4 Control the risk of recontamination of the processed hides and skins.
- 2.5 Implement a monitoring program to verify that the integrity of finished product is under control and is fit for intended purpose.
- 2.6 Operate the processing establishment with regard to applicable national and regional legislation, and in accordance with the establishment's operating permits.
- 2.7 Provide a basis for independent auditing against an industry benchmark and, where applicable, Importing Country Requirements.

## 3 Definitions

In this Code, when commencing with a capital letter:

**Accreditation** means Accreditation of a Hides and Skins Processing Establishment by AHSLEA.

**AHSLEA** means the Australian Hide Skin and Leather Exporters Association Inc. ABN 39 174 408 287.

**AHSLEA Accreditation Program** means a voluntary program established and operated by AHSLEA to verify conformance with the Industry Code of Practice or Importing Country Requirements, as applicable.

AHSLEA Accreditation Program Rules for Hides and Skins Processing Establishments means the rules which form part of the AHSLEA Accreditation Program and published by AHSLEA at <u>www.ahslea.com.au</u>, as amended from time to time.

**Approved Auditor** means a third party independent person approved by AHSLEA, in accordance with criteria detailed under the AHSLEA Accreditation Program Rules, to conduct Audits to verify conformance with the Industry Code of Practice or Importing Country Requirements, as applicable.

**Audit** means a systematic and functionally independent examination to determine whether activities and related results comply with planned objectives.

**Commonwealth** means the competent authority/ies of the Australian Government responsible for regulation of the export of hides and skins from Australia.

Establishment means a Hides and Skins Processing Establishment.

Hides and Skins Processing means, as a minimum, Raw Materials that are:

- trimmed to exclude internal organs, bone and hoof.
- processed or preserved sufficiently to ensure hygienic transportation to their intended destination.
- where required, treated with appropriate biocides to control any bacteria or insect infestation.

**Hides and Skins Processing Establishment** means a premises used for processing of hides and skins for export.

**Industry** means the Australian hides and skins processing industry represented by AHSLEA whose membership includes the major exporters of Australian cattle hides, calf skins, sheep and lamb skins, kangaroo skins and goat skins.

**Importing Country Requirements** means the standards imposed by an export market which are necessary in order for the product to be considered eligible for importation.

**Industry Code of Practice** means the 2016 Australian Code of Practice for Processing of Hides and Skins for Export (this Code) published by AHSLEA at <u>www.ahslea.com.au</u>, as amended from time to time.

**Non-conformance** means non-conformance with this Code or Importing Country Requirements, as applicable.

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**Quality Assurance** means all the planned and systematic actions to be implemented to provide confidence that a product is fit for purpose.

**Quality Assurance Program** means the documented quality assurance system prepared and adopted by an Establishment.

**Raw Material** means hides and skins derived from animals of Australian origin, or which have been raised in Australia for more than 3 months, and were treated solely within Australia.

Verification Audit means an Audit undertaken by an Approved Auditor.

## **4** Construction of Processing Premises

#### 4.1 Site and Services

#### **Outcome required**

Premises are provided with essential services for processing and handling of hides and skins.

- 4.1.1 Hides and skins processing establishments shall conform to relevant government and statutory authority requirements including planning, environmental protection, water supply, drainage, waste disposal, occupational health and safety, transport and any other applicable requirements.
- 4.1.2 Hides and skins processing establishments shall have:
  - Adequate supplies of hot and cold water.
  - A drainage system designed to prevent overflow outside the premises to the environment.

#### 4.2 Defined Areas

#### **Outcome required**

The facilities and operational procedures provide the ability to identify and segregate hides and skins that are ineligible for specific markets from eligible products.

4.2.1 Hides and skins ineligible for specific markets under this Code shall be stored separately as defined in the Establishment's Quality Assurance Program.

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# 5 Raw Material Collection and Reception

#### **Outcome required**

Raw material transport vehicles and other equipment is suitable for the purpose.

#### 5.1 Raw Material Vehicles

- 5.1.1 All raw materials should be transported and conveyed from the source to the processing site without undue delay.
- 5.1.2 All vehicles and other equipment, either moveable or fixed, used for transport of raw materials on public roads should be suitable for the purpose for which they are being used.
- 5.1.3 Vehicles and equipment used for collection and transport of raw material must be maintained in a clean state.
- 5.1.4 Records must be maintained identifying the source of all raw materials.

## 6 Operations

#### **Outcome required**

Treatments must be sufficient to ensure finished product is fit for purpose.

#### 6.1 Sourcing and Eligibility of Product

- 6.1.1 Only hides and skins derived from animals of Australian origin, or which have been raised in Australia for more than 3 months, and were treated solely within Australia can be exported.
- 6.1.2 All hides and skins shall be sourced from processing facilities that are licensed by relevant State, Territory or Federal Authorities.
- 6.1.3 Only hides and skins from animals that were not killed to eradicate any epizootic disease can be exported.
- 6.1.4 Only hides and skins which meet specific Importing Country Requirements can be exported to that country.

- 6.1.5 Where required for a specific market, product shall be checked for any applicable defects and affected product not able to be corrected shall be removed as ineligible.
- 6.1.6 Procedures must be in place to maintain identification and segregation of hides and skins that are eligible for specific markets from other ineligible product through all stages of processing while at the Establishment.

#### 6.2 Processing

- 6.2.1 Hides and skins shall be trimmed to exclude internal organs, bone and hoof.
- 6.2.2 Hides and skins shall be processed and/or preserved sufficiently to ensure hygienic transportation to their intended destination.
- 6.2.3 Processes utilised at the establishment for treatment of hides and skins must be defined and may include: drying; dry or wet salting; use of additives; or other preservation processes other than tanning. Where appropriate to the process: salt or additive concentration, moisture, time, temperature or other relevant parameters must be defined.
- 6.2.4 Appropriate methods shall be used to control any bacteria and insect infestation.

#### 6.3 Process Monitoring

- 6.3.1 Monitoring procedures must be established to verify that the minimum process criteria which contribute to the effectiveness of the treatment utilised are applied and the identification and segregation of products eligible or ineligible for specific markets.
- 6.3.2 Monitoring records which demonstrate that the hides and skins have been treated in accordance with the Establishment's Quality Assurance Program
- 6.3.3 Records of the results of monitoring activities shall be maintained to show that the minimum process values are applied.
- 6.3.4 Corrective and preventive action shall be implemented where process deviation is identified and the effectiveness of the action recorded.
- 6.3.5 Accurately calibrated temperature gauges/recorders should be used to monitor the processing conditions continuously. Records should be kept to show the date of calibration of temperature gauges/recorders.
- 6.3.6 All chemicals used in the processing of hides and skins or used for cleaning purposes shall be controlled and secured at all times.

#### 6.4 Storage

- 6.4.1 Hides and skins will be stored and protected from the elements, and must be monitored for insect infestation. If infestation is apparent appropriate action will be taken.
- 6.4.2 A documented pest control program including an appropriate use of pesticide must be used to prevent infestation of the processing and storage area by insects or other pests. The spraying regime must be recorded. Monitoring must include visual inspections during processing and storage.
- 6.4.3 After processing, hides and skins shall not come in contact with products of animal origin of a lower sanitary status and/or live animals presenting a risk of spreading transmissible disease.
- 6.4.4 Appropriate cleaning procedures must be documented and implemented for all parts of the premises.

#### 6.5 Container Loading

- 6.5.1 Every transport container must be inspected and be fit for purpose before it is loaded.
- 6.5.2 All hide pallets must be visually inspected prior to loading into containers to ensure there is no evidence of insect infestation or other gross non-conformances.
- 6.5.3 Where indicated by evidence of insects, all pallets must be re sprayed prior to loading into a container and the corrective action must be recorded.

#### 6.6 Container Sealing

- 6.6.1 Containers must be sealed and the seal number shall be recorded in a log book for a minimum of two (2) years or as specified by Importing Country Requirements.
- 6.6.2 Seals must be stored securely and be accounted for.
- 6.6.3 Records of seals in stock, used or damaged must be kept.
- 6.6.4 Seals shall be of a type that easily identifies if they have been tampered with.

# 7 Quality Assurance

## **Outcome required**

Implementation of a management system to control all aspects of production that affect the quality of finished products

#### 7.1 Quality Assurance Program

- 7.1.1 The Establishment must establish, maintain and comply with a Quality Assurance Program covering all activities conducted within the Establishment which relate to processing of hides and skins for export and conformance with the requirements of the Code including the establishment of standard operating procedures, and work instructions, and monitoring, verification, corrective and preventive action, and recording systems.
- 7.1.2 Establishment management must provide a commitment to implement and maintain its Quality Assurance Program to conform with this Code and to comply with specific Importing Country Requirements, as applicable.
- 7.1.3 The Quality Assurance Program shall include a detailed schedule of products and processing methods, and a description of process flow from sourcing to despatch including identification and segregation of products that are eligible or ineligible for specific markets.

#### 7.2 Document and Record Control

- 7.2.1 A detailed record identifying the source of all hides and skins received and their eligibility status shall be kept for a minimum of two (2) years. These records must be available for inspection and audit as required at any time.
- 7.2.2 Records for export hides and skins shipments shall be kept in accordance with Importing Country Requirements.
- 7.2.3 The Establishment must complete a "traceability exercise" at least annually and a record of the traceability exercise must be retained for audit purposes.

# 8 Staff and Training

#### Outcome required

All processing staff should understand the principles of processing and handling of hides and skins products

#### 8.1 Staff Training

- 8.1.1 An establishment shall employ in a supervisory role at least one member of staff who is experienced in the processing and handling of hides and skins. This staff member should have knowledge of the Importing Country Requirements of the markets to which the Establishment exports.
- 8.1.2 All production staff shall receive training on practices for processing and handling of hides and skins to a competent standard. Records shall be kept of employee training.
- 8.1.3 The Australian Code of Practice should be available to staff in the establishment.

## 9 Voluntary Accreditation Mechanism

#### 9.1 AHSLEA Accreditation Program

- 9.1.1 AHSLEA provides industry accreditation for hides and skins processing establishments. Accreditation is available to establishments that comply with the requirements of this Code.
- 9.1.2 AHSLEA also provides supplementary accreditation for selected export markets where compliance with relevant Importing Country Requirements can be demonstrated at Audit. The requirements for supplementary accreditation for selected markets are contained in the AHSLEA documented protocols for accrediting establishments for export of products.
- 9.1.3 Establishment that are Accredited by AHSLEA are subject to an annual Verification Audit by an Approved Auditor.
- 9.1.4 Accreditation status is conferred in accordance with the in the AHSLEA Accreditation Program Rules for Hides and Skins Processing Establishments published by AHSLEA at <u>www.ahslea.com.au</u>.