

final report

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PCAS Lifetime Pasturefed Project Pilot

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Executive Summary

The Cattle Council of Australia (CCA) developed the Pasturefed Cattle Assurance System (PCAS); an industry owned quality assurance program that provides assurances to customers regarding the production methods of cattle marketed under PCAS.

Underpinning the system is the PCAS Standard that governs the feed, traceability, eating quality and antibiotic and hormone growth promotant (HGP) treatment of cattle.

A pilot project of the system was undertaken in order to evaluate the Standard in the market prior to full implementation.

Feedback from the pilot was distilled and the outcomes were:

- Recommendations for changes to the original Standard.
- Recommendations for the audit process and administration
- Recommendations for the branding and strategy

In addition to this, the following items were developed which will assist with the implementation of the system:

- Producer Guide – to assist producers to understand the system and the requirements.
 - Example audit document – to provide an example of what a desktop or on-site audit may entail.
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1 Background

The Cattle Council of Australia (CCA) developed the Pasturefed Cattle Assurance System (PCAS); an industry owned quality assurance program that provides assurances to customers regarding the production methods of cattle marketed under PCAS.

Underpinning the system is the PCAS Lifetime Pasturefed Standard (Standard) that governs the feed, traceability, eating quality and antibiotic and hormone growth promotant (HGP) treatment of cattle.

The Standard has been developed and a small amount of in-field pilot testing has been performed. CCA, together with Meat & Livestock Australia (MLA), required a broader roll-out of the system through a pilot project in order to evaluate the Standard in the market prior to full implementation. This report relates to this broader pilot project.

1.1 Objectives

The objectives of the pilot project were to:

- Finalise the Standard
- Evaluate the Standard in the market place
- Assess the audit and administration requirements for the PCAS program
- Provide a branding strategy and communications outline

Schuster Consulting Group Pty Limited (SCG) and BCS Agribusiness (BCS) were responsible for managing the project.

2 Methodology

A pilot project was undertaken to evaluate PCAS and the Standard in the market place and provide recommendations for modifications to PCAS and the Standard.

Specific activities included:

- Formation and management of an evaluation/pilot group
- Development of a vendor declaration or similar
- Assessment of the Standard and Performance Checklists
- Assessment of PCAS at a processor-level
- Recommend modifications to the Standard
- Assessment of PCAS audit, administration and branding requirements

2.1 Formation and management of an evaluation group

2.1.1 Producer group

SCG recruited 12 producers who indicated they were willing to participate in a pilot of PCAS.

Recruitment of producers took significantly longer than originally expected due to apathy on the part of the producers. While they were broadly interested in the PCAS concept, this was not given a priority and, therefore, difficulty was experienced in securing their active participation in the pilot. All reasonable steps were taken to recruit producers to the pilot including:

- **Identification of interested producers**
 - An email was sent to a group of producers.
 - Three follow up emails to elicit response from first email
 - Two follow up phone calls to elicit response from first email
- **Correspondence with interested producers**
 - Initial email to interested producers explaining the process
 - Initial phone calls to interested producers explaining the process and gauging interest
- **Correspondence with confirmed pilot group**
 - Email to finalised pilot group with relevant pilot instructions and materials
 - Postage of pilot instructions and materials to pilot group
 - Follow up phone calls to pilot group to confirm receipt of materials and interest
 - Follow up phone calls and emails to pilot group to secure initial pilot assessment sheets

2.2 Development of a vendor declaration or similar

An initial PCAS vendor declaration was developed. Consideration was also given to incorporating a PCAS declaration in the MSA declaration via a check box to avoid the introduction of a new declaration.

Both of these options were considered by the pilot group. Outcomes are included in the recommendations.

2.3 Assessment of the Standard and Performance Checklists

2.3.1 Review of the Standard

The draft Standard was reviewed by SCG and BCS prior to being provided to the pilot group.

Initial recommendations for changes were made and those adopted are outlined in Appendix 1. This “final draft” of the Standard was provided to the pilot group.

2.3.2 Development of Producer Guide

To assist producers implement PCAS on-farm, SCG developed a draft Producer Guide. This Guide included:

- An introduction to PCAS
- Benefits of involvement
- System fundamentals
- The fit between PCAS, Livestock Production Assurance (LPA) and Meat Standards Australian (MSA)
- Steps to gaining accreditation (example)
- Definitions
- Zadocks Decimal Code for Growth Stages in Cereals
- How to meet the Standard
- Example recording templates and forms

Feedback on this Producer Guide was also gathered during the pilot and the finalised document is included in Appendix 2.

2.3.3 In-field assessment

The pilot group were provided with the following documents:

- **PCAS Pilot Program Outline (PDF)**
An overview of the pilot including what participants were required to do as well as information regarding documentation.
- **PCAS Producer Guide (PDF)**
The draft Guide that provides information on the system, as well as necessary advice, checklists and forms producers may need in order to implement PCAS on their property.

- **PCAS Lifetime Pasturefed Standard (PDF)**
The draft Standard.
- **PCAS Form Templates (Word)**
A series of blank templates to assist in demonstrating compliance.
- **PCAS Pilot Program Pre-assessment (Word)**
A pre-assessment survey. Each member of the pilot group were asked to complete and return this survey to SCG by 31 December 2011. The purpose of this assessment was to:
 - Provide background on their enterprise/s
 - Document their initial thoughts regarding the Standard and the compliance requirements prior to involvement in the pilot
 - Benchmark the group prior to involvement in the pilot for reference post-pilot

While the pre-pilot surveys were developed according to best practice and to minimise inconvenience to those being surveyed, very few surveys were returned on time, despite the continued efforts of SCG and BCS and one survey remains outstanding.

A post-assessment was initially also planned to allow for a direct comparison with the pre-assessment; however, this was abandoned due to the difficulties experienced with the return of pre-assessment surveys.

2.3.4 Final pilot group

Although 12 producers indicated their interest initially, after they received the Standard a number did not progress their involvement for various reasons:

- One felt that the Standard was not applicable to their business.
- One felt they were already "doing everything" and didn't need to record what they were doing as they should be taken at their word.
- One merged their involvement in with another family enterprise that was also involved.
- Three were unresponsive after receiving the pilot documentation and failed to respond to numerous contact attempts by SCG.

2.3.5 On-site assessments

Initial on-site assessments were scheduled for late February however due to the extensive flooding experienced in Queensland; this had to be delayed until the end of March.

BCS arranged four on-site assessments which occurred between 26 and 28 March 2012 with four producers in central Queensland and south west Queensland.

The purpose of the on-site assessments was to gather feedback from producers in relation to the:

- PCAS Lifetime Pasturefed Standard
- PCAS Producer Guide
- Audit process (using a "mock-audit" style)

Feedback from the on-site assessments was combined with the pre-assessment survey information as well as feedback from other stakeholders. This is included in Section 3: Recommendations.

2.4 Assessment of Standard at a processor-level

SCG sought to recruit a processor that would be interested in participating in the pilot. Based on recommendations from MLA, CCA, the pilot group and SCGs own resources, four companies were contacted to determine their interest.

SCG was unable to secure involvement in a pilot from any of the processors approached.

- One processing company, while not involved in a pilot, did provide useful feedback on the Standard. This has been incorporated into the recommendations.

2.5 Recommend modifications to the Standard

Based on the pilot group's feedback, the Standard was re-assessed and recommendations for modifications to the Standard are provided in Section 3: Recommendations. An updated Standard based on the majority of recommendations is included as Appendix 3 – any recommendations that require CCA determination have not been incorporated into this version.

2.6 Assessment of audit, administration and branding requirements

In consultation with stakeholders, SCG assessed the audit and administration requirements for PCAS. Initial recommendations in relation to this were provided to MLA and CCA in February 2012 in the discussion document *PCAS Administration Outline*. This included information relating to:

- Program structure
- Certification method
- Audit model
- Application process
- Management system
- Auditor requirements

- Database requirements
- Communication

Based on the on-farm assessments and feedback from MLA, this information has been updated and is included in Section 3: Recommendations.

An example audit document was developed and used as the basis of the on-site assessments. This has been refined based on feedback and is included in Appendix 4.

Although outside the scope, SCG also approached two auditing and certification bodies to gauge their interest in being involved in the program: SAI Global and NCS International. Initial discussions were positive and are further outlined in the recommendations.

2.6.1 PCAS branding and communications strategy

SCG documented initial considerations in relation to PCAS branding in the PCAS Brand Platform document. This included information relating to:

- Program hierarchy
- Brand promise
- Brand essence
- Brand attributes
- Brand name
- Brand value

SCG also received an enquiry from MLA's marketing department on extending the brand to a producer-to-consumer brand. This was motivated by feedback from "a major retailer". MLA's marketing department indicated:

- They wanted a logo developed based on consumer appeal.
- Qualitative and quantitative consumer research (focus groups) should be conducted to determine key messages, ie grass or pasturefed as well as review a number of final designs.
- The logo needs to communicate authority, be self-contained and able to stand alone and clearly communicate the core message on packaging down to a diameter of 12mm.
- The logo will need to be used internationally so a review of international grassfed logos should be conducted to make sure it is a unique design.

A consumer facing brand was outside the scope of this project, however the brand platform SCG developed did incorporate suggestions for a consumer-facing brand.

It was indicated by MLA that further consideration should be given to the program's branding focus before a final logo could be developed. Should CCA decide the program should be consumer-facing, then a consumer brand strategist should be employed to manage this process.

Section 3 provides recommendations for the program as an industry-facing brand.

3 Recommendations

The original Standard was called the Lifetime Pasturefed Standard; however this was causing confusion around the link to PCAS and the Standard. It is recommended that the Standard become the PCAS Standard.

Further recommendations are provided in the rest of this section and relate to:

- Recommendations for the Standard
- Recommendations for the audit process and administration
- Recommendations for the branding and strategy

3.1 Recommendations for the Standard

Element 1: Identification and lifetime traceability			
Performance Indicator/Checklist	Description	Discussion	Recommendation
Indicator: 5 Checklist: 10	<ul style="list-style-type: none"> All transactions and movements of eligible cattle off the PIC are accompanied by appropriate vendor declarations and movement documents, such as a Livestock Production Assurance National Vendor Declaration and Waybill, MSA Vendor Declaration, and that appropriate declarations relating to the PCAS Standard have been made where necessary. 	<ul style="list-style-type: none"> An initial PCAS-based vendor declaration was developed. Consideration was also given to including a checkbox on the MSA declaration as a way to avoid introducing further declarations. Feedback from a processor indicated they would expect a PCAS-specific declaration even if it was a simple statutory declaration. The pilot group supported this requirement. 	<ul style="list-style-type: none"> Reword: <i>All transactions and movements of eligible cattle off the property are accompanied by a PCAS Declaration as well as other appropriate declarations and movement documents, such as a LPA NVD/Waybill and MSA Vendor Declaration.</i> An example PCAS Declaration is included as Appendix 7.
Indicator: 7 Checklist: 14	<ul style="list-style-type: none"> With the exception of "non-PCAS breeding females" (definition provided), vendors are satisfied that introduced cattle meet the PCAS Standard eligibility requirements. 	<ul style="list-style-type: none"> It was initially considered that placing a restrictive requirement on introduced cattle may limit the number of producers that would qualify and the number of cattle processed through the system. The pilot group, however, recommended that a tighter performance indicator was required and that the same declaration that would be used when selling PCAS eligible cattle to processors should also be used when buying in stock. This requirement was supported by a processor. The group also indicated that an exception for breeding stock was not required as they could be eligible or ineligible. 	<ul style="list-style-type: none"> Reword: <i>Introduced cattle that are intended to be sold as PCAS eligible must be accompanied by a PCAS Declaration.</i>

Performance Indicator/Checklist	Description	Discussion	Recommendation
Indicator: 6	<ul style="list-style-type: none"> Eligible cattle are not transported in mixed mobs with ineligible cattle. 	<ul style="list-style-type: none"> The pilot group felt that there was some inconsistencies and duplication between Performance Indicator 6 and Performance Checklist items 11, 12 and 13. 	<ul style="list-style-type: none"> Change to: <i>For transportation, eligible and ineligible cattle must be positively and clearly identified and the method of identification recorded.</i>
Checklist: 11	<ul style="list-style-type: none"> Management systems must identify eligible cattle at load out and correlate against records of ineligible cattle. 		<ul style="list-style-type: none"> Change to: <i>A separate movement document and/or vendor declaration such as an LPA NVD/Waybill must be used for the despatch of eligible and ineligible cattle and the method of identification recorded on the movement document.</i>
Checklist: 12	<ul style="list-style-type: none"> A separate LPA NVD must be used for the despatch of eligible and ineligible cattle 		<ul style="list-style-type: none"> Change to: <i>Cattle numbers at load out must correlate against records of eligible and ineligible cattle.</i>
Checklist: 13	<ul style="list-style-type: none"> For transportation, eligible and ineligible cattle must be positively and clearly identified, separated and the method of identification recorded on the LPA NVD. 		<ul style="list-style-type: none"> Remove

Performance Indicator/Checklist	Description	Discussion	Recommendation
Element 2: No confinement for the purpose of intensive feeding for production			
Checklist: 2	<ul style="list-style-type: none"> Facilities and equipment are not used to confine cattle for intensive feeding for production. 	<ul style="list-style-type: none"> The pilot group felt this checklist item should be removed as it was not required to meet the intent of the Standard and that Performance Checklist 1 covers the issue of confinement adequately. 	<ul style="list-style-type: none"> Remove
Checklist: 5	<ul style="list-style-type: none"> Management records demonstrate periods of confinement for management activities. 	<ul style="list-style-type: none"> The pilot group felt this checklist item was unreasonable considering the Standard referred to management activities in Performance Checklist 4 as weighing, drafting, marking, weaning, treatment and preparation for transport. As it stands, producers would be required to record every movement through the yards or other equipment no matter how minor the reason was. While it could be argued that for activities such as weighing, marking, weaning, treatment and transport the producer would typically already be keeping records (based on LPA or other management requirements) it is understandable that producers may feel this is an onerous requirement. 	<ul style="list-style-type: none"> SCG recommends that management records only be required to be kept when feed is offered during confinement for management activities. Reword: <i>Where cattle are confined for management activities and feed is offered during this time, management records should demonstrate such periods of confinement and feed on offer.</i>

Performance Indicator/Checklist	Description	Discussion	Recommendation
Checklist: 6	<ul style="list-style-type: none"> Management systems are in place to record the type, use, production and/or introduction of stockfeed and supplements (including ingredients). 	<ul style="list-style-type: none"> The pilot group felt that Performance Checklist 7 was unnecessary as it was covered for the most part in Performance Checklist 6. 	<ul style="list-style-type: none"> Reword: <i>Management systems are in place to record the type, use, production and/or introduction of stockfeed and supplements (including ingredients) and are consistent with the absence of an intensive feeding program for production.</i>
Checklist: 7	<ul style="list-style-type: none"> Management records of the use, introduction and/or production of stockfeed are consistent with the absence of an intensive feeding program. 		<ul style="list-style-type: none"> Remove

Element 3: Pasturefed only			
Performance Indicator/Checklist	Description	Discussion	Recommendation
Indicator: 3	<ul style="list-style-type: none"> Cattle may be fed an Eligible Diet which must be derived solely from forage consisting of grass (annual and perennial), forbs (eg: legumes and brassica etc), browse, or cereal grain crops in the vegetative (pre-grain) state for the lifetime of the cattle. 	<ul style="list-style-type: none"> A number of members of the pilot group felt it was unreasonable to remove cattle from forage crops (that is crops grown specifically for the purposes of feeding livestock) at any stage. It was suggested that the original intent of the Standard was that producers would be able to grow crops specifically for grazing by cattle and these were an exception to the Standard and could therefore be grazed through the entire growth cycle. Further, it was felt that the Standard was originally intended to only apply to crops grown for cereal production. 	<ul style="list-style-type: none"> CCA to determine original intent of the Standard. If the current Standard reflects the original intent, then further clarification around crops grown as forage and those grown for harvest should be added to the Standard.
Checklist: 4	<ul style="list-style-type: none"> Where cattle are grazed on a grain or a cereal crop, photos have been taken when the cattle are moved off the crop that demonstrates the crop was still in a pre-grain state. 		
Checklist: 5	<ul style="list-style-type: none"> Records of cattle movements on and off grain or cereal crops are maintained (including movement date and duration). 		
Checklist: 3	<ul style="list-style-type: none"> Records of crops grown and/or supplements produced for stockfeed must be maintained including the quantity grown and disposal (date, quantity and destination). 	<ul style="list-style-type: none"> The pilot group felt that this checklist item was unnecessary. 	<ul style="list-style-type: none"> SCG recommends this remains in the Standard as evidence relating to the disposal of crops grown would be required by an auditor.
Checklist: 6	<ul style="list-style-type: none"> Records of cattle movements are maintained to demonstrate eligible cattle have been on a PCAS certified PIC(s) since birth (excluding time spent in saleyards and transport not exceeding 7 days). 	<ul style="list-style-type: none"> The pilot group felt this checklist item should be removed from Element 3 as it related to Element 1 	<ul style="list-style-type: none"> Performance Checklist 6 from Element 3 be moved to Element 1 to become Performance Checklist 15 and Element 1, Performance Checklist 14 becomes 15.

Element 4: Minimum eating quality standards			
Performance Indicator/Checklist	Description	Discussion	Recommendation
Indicator: 1	<ul style="list-style-type: none"> The PCAS certified PIC must be MSA accredited. 	<ul style="list-style-type: none"> A processor questioned the inclusion of MSA in the Standard, indicating that this was not relevant to export markets such as the US and would limit the pool of producers that could contribute cattle to the system. 	<ul style="list-style-type: none"> Consideration should be given to removing the MSA requirement within the PCAS Standard. <p>The rationale for this is that MSA is a stand-alone program and if the supply chain demands MSA accreditation for a product, then a system is already in place to enable this.</p>
Indicator: 2	<ul style="list-style-type: none"> All cattle consigned for slaughter as eligible under PCAS must be accompanied by an approved MSA Vendor Declaration. 	<ul style="list-style-type: none"> A processor indicated that it appeared to be a domestic-focused Standard. Feedback from "a large retailer" via MLA's marketing department also indicated that more flexibility was required to fit the domestic and international markets in relation to MSA and HGP. 	<p>In addition, this will broaden the number of producers that may be able to supply PCAS-eligible cattle which is important in establishing the program as a serious consideration for processors etc.</p>

Element 5: Lifetime Free from Antibiotics and Hormonal Growth Promotants			
Performance Indicator/Checklist	Description	Discussion	Recommendation
Indicator: 1	<ul style="list-style-type: none"> Cattle have never been treated with hormonal growth promotants (HGPs). 	<ul style="list-style-type: none"> Overall, the majority of the pilot group were already producing HGP-free cattle so felt this was a requirement that could easily be met. Feedback from a processor indicated that this requirement would, however, result in a limited supply of cattle as only a small number of producers could produce HGP-free cattle and not in any significant volume. Feedback from “a large retailer” suggested that, while the HGP requirement has appeal, more flexibility was required. They suggested that there could be a number of production methods that could be individually certified based on market requirements for example: <ul style="list-style-type: none"> <i>Grassfed</i> - meets elements 1, 2 and 3 of the PCAS Standard <i>HGP-free</i> - comprises items in element 5. 	<ul style="list-style-type: none"> SCG has reviewed the production systems outlined by “a large retailer” and suggests that there is merit in separating out components within the current PCAS Standard. If this approach was adopted, there would be a group of inter-related standards which could be combined For example: Grassfed, HGP-free.

Performance Indicator/Checklist	Description	Discussion	Recommendation
Indicator: 2	<ul style="list-style-type: none"> Cattle have never been treated with antibiotics, whether through feed or water, or by injection, from birth to slaughter. 	<ul style="list-style-type: none"> The antibiotic requirement was not considered to be difficult to satisfy by the pilot group as it was only occasionally that livestock were treated with antibiotics. Treated cattle would become "ineligible" under PCAS. The retailer indicated that the antibiotic claim would be difficult to achieve as producers in high rainfall zones use antibiotics (sparingly) to maintain animal health. Their suggestion was that this requirement focus on not allowing treated animals to enter the food supply chain within prescribed WHP. 	<ul style="list-style-type: none"> SCG considered the feedback regarding antibiotics and acknowledges that antibiotics are typically used sparingly. In addition, other programs are in place to ensure WHPs and ESIs are observed. It is therefore suggested that the anti-biotic-free requirement should remain in the Standard and that cattle treated with antibiotics should become ineligible under PCAS. Should HGP-free be made into a separate standard, then antibiotic-free should be moved to that standard also.

3.2 Recommendations for the audit process and administration

Outlined below are recommendations and considerations for the administration of the system including: Structure, audit methods, frequency and auditor requirements.

3.2.1 Program structure

- **Program Owner**

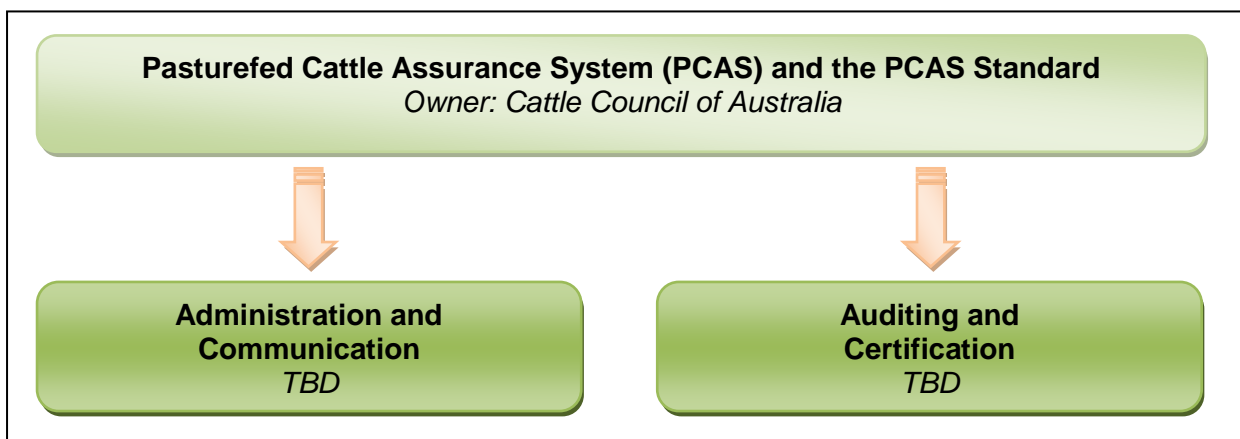
CCA is the "Program Owner" in that they own the name, brand, logo, Standards and database associated with PCAS. CCA are responsible for the maintenance of the Standards, the database and the contracts for administration, auditing and certification services, the management of copy right and trademark requirements for the name/brand and/or logo.

- **Administration and communication**

TBD provides administrative and communication support. In this role, TBD is responsible for the application process, the development of producer program information (such as the Producer Guide, example templates and forms etc), the development of information regarding the program for processors and consumers and the maintenance of the program database.

- **Auditing and certification**

Suitably qualified auditing and certification body/ies are appointed by CCA to provide auditing, certification and training services. They are responsible for maintaining information in the program database, undertaking audits and certifying properties.



3.2.2 PIC-based certification

PCAS certification will be PIC-based. The PIC-based system provides flexibility for a participant to certify individual PICs within their business. In instances where more than one property is under one PIC then further identifiers will be used including property name and rural property address.

3.2.3 Central and open audit model

It is recommended that the audit model for PCAS be a centrally managed system through an appropriate standards management and certification body or bodies (ie: a third party audit).

In this model the certification body would assign an auditor to a PIC. The assigned auditor may change over time.

Consideration should be given to opening PCAS to a number of certification bodies as this may increase competitiveness in terms of audit costs and service.

An audit model similar to CATTLECARE and FLOCKCARE, in which producers were able to have a choice of auditor is not recommended. While one advantage of this audit model is believed to be that market forces would keep prices competitive, the history of CATTLECARE and FLOCKCARE show that this advantage was not been realised and there are significantly more disadvantages with such a model:

- In cases where auditors have retired, participants have found that the market rate is significantly higher with the replacement auditor than what they have had with their previous “first choice” auditor.
- The model results in a lack of transparency of audit rates and some of the rates charged historically for audits have not been commercially sustainable.
- The model results in different auditors servicing different participants in the same region at the same time which does not provide for efficiencies in minimising travel related costs.
- There is a lack of auditor rotation with this model in. Producers appear to prefer to continue to utilise the auditor they know rather than to “shop around”.
- Potential for the quality of auditing to vary. Feedback has indicated that items one auditor would approve would be failed by another.

3.2.4 Criteria for a standards management and certification body

The standards management and certification body/ies who would undertake PCAS audits and certification must meet the following criteria:

- Independence;
- No conflict of interest; and
- Possess an appropriate level of competence and expertise

Consideration should be given to ensuring the certification body/ies are appropriately accredited themselves through the Joint Accreditation System – Australia and New Zealand (JAS-ANZ) and/or to an international standard (such as ISO) in Quality Management Systems or equivalent.

3.2.5 Application

Producers seeking to participate in PCAS would need to apply in writing. A separate application form would be required for each PIC.

A producer may register multiple PICs. Even though certification is applied to each PIC.

In instances where more than one property is under one PIC and only one property is to be PCAS certified then certification will be applied to a PIC combined with property name and rural property address.

3.2.6 Application fee

A fee would apply for each application and would be payable at time of initial application.

The application fee would be set to recover the cost of processing each application and the cost of a desktop audit (including any postage and handling costs associated with returning reviewed material to each applicant).

3.2.7 Evidential management system

Following acceptance of application, each applicant would need to develop an evidential management system for the PIC/property to which the application relates.

The management system may record information electronically or in hard copy.

A single management system could be utilised across more than one PIC however any variances in management practices between PICs have to be clearly defined.

The evidential management system would be approved through the desktop audit process and a PCAS status applied to the PIC.

3.2.8 PCAS status

Seven status' would apply to PCAS PICS:

1. Preliminary Certification
2. Approved - Certified
3. Approved Subject to Minor Amendment
4. Failed
5. Preliminary Certification Expired
6. Certification Expired
7. Revoked

3.2.9 Desktop audit

The evidential management system of the producers choosing would be submitted to the certification body/ies for a desktop audit. A desktop audit would need to be submitted for each PIC/application.

Applications may be made electronically (for example, but not limited to the submission of records in Excel, Word, PDF or scanned images) or in hard copy (for example, but not limited to the submission of records in manuals, journals or other printer material).

Following a desktop audit the PICs PCAS status would be identified as either:

- Preliminary Certification
- Approved Subject to Minor Amendment; or
- Failed

The cost of the desktop audit would be charged to the applicant as part of the initial application fee.

Hard copy information provided for a desktop audit would be returned to applicants via traceable processes (eg: AusAir Express or Registered Post).

The cost of postage and handling of hard copy materials would be covered by the application fee. Electronic material provided for a desktop audit would be deleted from the receivers computer and email program.

3.2.10 Preliminary certification

Once a PIC has successfully completed the desktop audit, then that PIC would have Preliminary Certification. This preliminary certification would then be verified by an on-site performance audit within the first 12 months following the initial desktop audit.

The preliminary certification would expire if an audit is not conducted within 12 months of the desktop audit; in which case the PIC PCAS status would change to:

- Preliminary Certification Expired

3.2.11 On-site audit

An on-site audit would be conducted within the first 12 months following the initial desktop audit and then at least once every three years.

A three year audit cycle is recommended to ensure producers do not have additional pressures put upon them if they are involved in other audited programs (for example EUCAS). However, consideration should be given to the impact a three-year audit cycle would have on the auditing body as they would require a certain volume of audits to make their involvement financial feasible.

The on-site audits would be announced, with the auditor advising the participant of the requirement for an on-site audit and then determining a mutually convenient time to conduct the audit. The outcomes of the on-site audits would be a status of either:

- Approved - Certified; or
- Failed

The certification would expire if an audit is not conducted within three years of the last audit; in which case the PIC PCAS status would change to:

- Certification Expired

3.2.12 Audit reports

A separate audit report would be generated by the auditor for each PIC audited for both desktop audits and on-site audits. The audit report would include:

- PIC
- Name of enterprise and owner/manager
- Property name
- Physical address of site where audit conducted (ie: rural property address)
- Date of audit
- Audit organisation name, Auditor name and signature
- Description of the elements covered by the audit, for example:
 - Identification and lifetime traceability
 - No confinement for the purpose of intensive feeding for production
 - Pasturefed only
 - Minimum eating quality standards
 - Lifetime free from antibiotics and Hormonal Growth Promotants
- Summary of outcomes of the audit including the status:
 - Approved - Certified;
 - Approved Subject to Minor Amendment; or
 - Failed

- Details of any identified non-compliances and corrective actions that should be taken.

The outcome of the audit and the certification status should be uploaded to the PCAS database (refer below).

Audits would be specific to each PIC. If the client used the same management system for multiple PICs, multiple audits would still need to be created (although they may effectively be a "cut and paste" of each other).

3.2.13 Auditors

The certification body/ies would provide the auditors and ensure the appropriate level of capability, capacity and training. Details of approved auditors would be available on a website. Consideration would need to be given to:

- **Auditor tools**
As a new program with new Standards, program specific auditor tools would be needed. This would include the development of audit checklists, auditor guidelines or standard operating procedures, signoff/approval processes for auditors, reporting requirements etc.
- **Training**
There would be a need for some minimal training on the PCAS Standards - consideration should be given to CCA conducting the initial training of the certification body/ies with the potential to demonstrate the system on-farm. It is suggested this be a train-the-trainer style.
- **Auditor qualifications**
It would be the responsibility of the certification body/ies to ensure auditors had the appropriate qualifications and capability to conduct PCAS audits as well as provide on-going training.

3.2.14 Audit costs

Costs regarding audits will need to be determined. Establishment of a fee structure is relatively complex given that the time on-site will vary between participants in relation to the management system in place and effectiveness of the management system, the number of certification bodies involved and their cost preference.

It is anticipated that the certification body/ies will propose a fee structure however consideration should be given to:

- **Hourly rate**
 - Hourly audit rate for time spent on-site.
 - Hourly audit rate the same regardless of the auditor.
 - Hourly audit rate varies depending on the auditor.

- **Fixed price**
 - Fixed audit price regardless of the auditor or time spent on-site.
 - Fixed audit price regardless of time spent on-site but variable between auditors.
- **Travel**
 - Travel expenses included in hourly audit rate or fixed audit price.
 - Travel expenses charged in addition to the hourly audit rate of fixed audit price.
 - Travel expenses charged based on either time, cents for kilometre or based on expenses incurred.
- **Negotiation and disclosure of costs**
 - Hourly audit rate and fixed audit prices may vary between certification bodies or be the same between them.
 - CCA may negotiate hourly audit rate, fixed audit prices and travel expenses with certification body/ies.
 - The costs may be disclosed to producers in a publically available schedule (for example downloadable from a website).

3.2.15 Issue of certificates

A Certificate will be issued for each PIC with a Preliminary Certification or Approved - Certified status. Each Certificate will be required to include the:

- Date of Certification
- Type of Certification (Preliminary or Approved)
- Issue Date
- Expiry Date (12 month for preliminary and three years for full certification)
- Signature of CCA Chairman and certification body/ies representative.

A new certificate will be issued at the completion of a successful on-site audit.

3.2.16 Centralised database

The program should be supported by a centralised, secure database to assist in management of the program. This database should be managed by CCA (the "Program Owner") with restricted access provided to the certification body or bodies and additional stakeholders.

The database should also be utilised as a communication tool for providing program updates to participants.

Following are examples of queries or information that could be maintained and examples of access levels (NB: privacy compliance would apply to these levels).

Query Type	Program Owner	Certification Body/ies	Processor	Producer	Public
Application/Certification Information					
Application status	✓	✓	✓	✓	
Certification status	✓	✓	✓	✓	
Audit Information					
Last audit	✓	✓	✓	✓	
PICs due for audits	✓	✓		✓	
Auditor assigned	✓	✓			
View audit outcomes	✓	✓		✓	
Admin Information					
Look-up details	✓	✓	✓	✓	
Report non-compliance	✓	✓	✓	✓	
Search for certified PIC	✓	✓	✓	✓	✓

3.2.17 Consideration of certification bodies

Consideration must be given to using the incumbent meat industry certification body compared with introducing "new" certification bodies.

- **Advantages**

- Perceived opportunity to link PCAS to LPA, MSA and other industry-based quality assurance programs. For example, links to LPA could mean that with the participants LPA User ID, PIC can be linked that may be part of a single management system.
- Familiarity with industry.
- Established network of auditors with access to regional/rural areas.
- Additional costs to establish the program are likely to be the same as establishing with "new" certification bodies.

- **Disadvantages**

- Most likely they are at maximum capacity in terms of audits, auditors etc.

- Additional costs to establish the program are likely to be the same as establishing with "new" certification bodies.
- Inconsistency in audit quality and no structure or program for auditor training (findings from LPA QA Strategic Review).
- Established network of auditors with access to regional/rural areas (potential for auditors to audit "their way" as opposed to the "PCAS required way").

3.2.18 Certification bodies

Should CCA consider introducing multiple certification bodies then two organisations have indicated interest and a willingness to be involved non-exclusively.

Further discussions would need to be undertaken to determine: the number of producers likely to be involved (ie: how many audits), the fee structure and areas of responsibility etc.

3.2.19 Communication administration

All participants in the program should be made aware that their involvement signifies acceptance that the Program Owner is able to communicate to them on issues related to the program (for example: Program updates, newsletters etc). It also means that companies or individuals involved in the program (for example the assigned auditor) may communicate with them (for example sending reminders and program related material).

The database should collect mail and email addresses and systems should be put in place to maintain the accuracy of this information. These details would then be used to communicate information relevant to the program.

Individual certification body/ies may also consider developing their own communications plans particularly in regards to reminding Preliminary Certified PICs about their 12 month deadline etc.

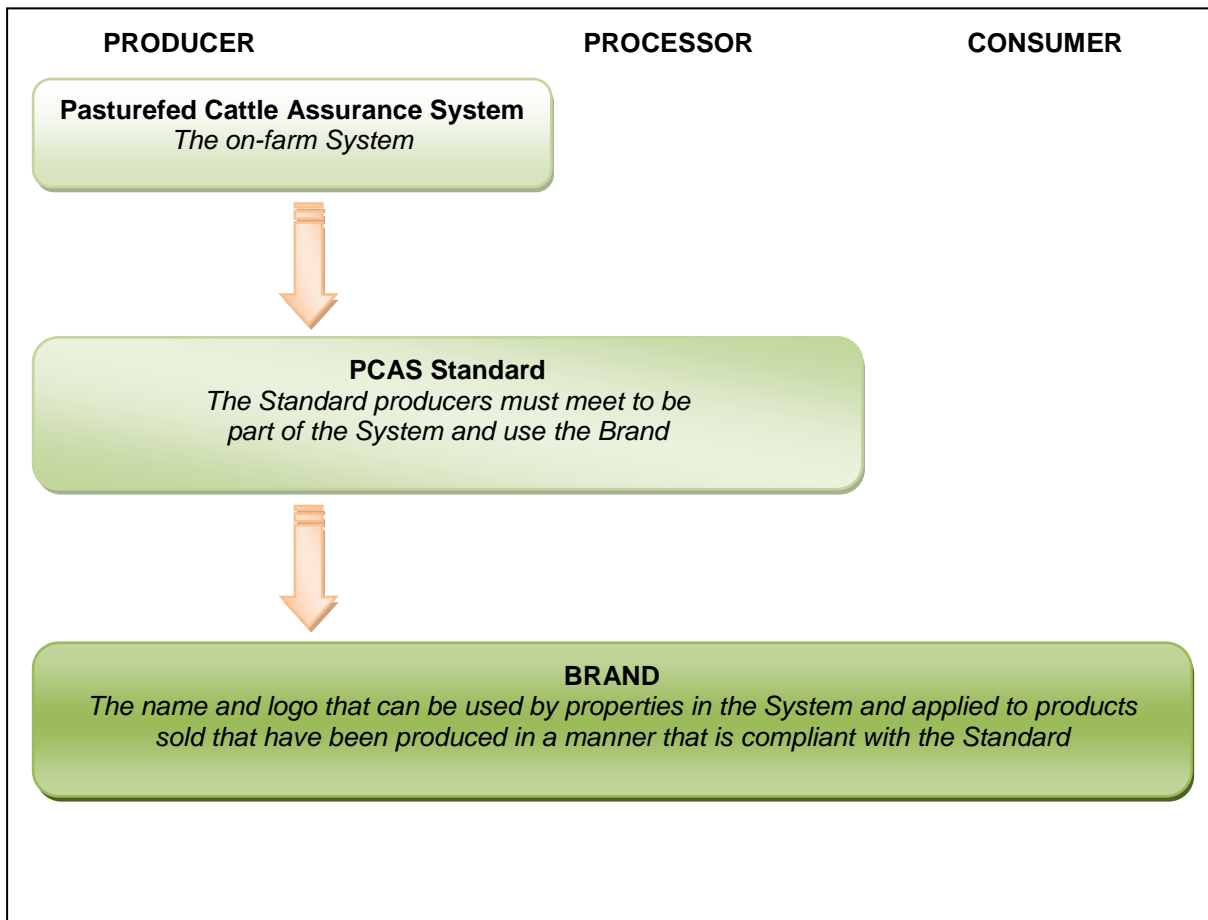
3.3 Recommendations for the branding and strategy

These recommendations relate to an industry-facing brand platform for PCAS which would be used by producers and processors participating in the PCAS program.

Where there is a potential divergence, an alternative consumer-facing brand platform has been included for consideration.

NB: Consumer may refer to retailer, food service or end consumer.

3.3.1 Program hierarchy (with possible extension to consumer)



Brand promise	
Industry-facing	Consumer-facing
<ul style="list-style-type: none"> To provide an independently audited quality assurance system that enables cattle producers to verify claims made in regard to how their cattle have been produced. 	<ul style="list-style-type: none"> To provide verifiable assurances to customers and industry regarding the feeding, confinement, chemical treatment and traceability status of the pasturefed cattle in the Australian supply chain.
Brand essence	

- **Lifetime pasturefed**
 - Cattle have been fed a lifetime diet of 100% pasture; never grain or grain by-products.
- **Lifetime traceability**
 - Cattle are individually identified and have a lifetime traceability status.
- **Unconfined**
 - Cattle have continuous access to graze pasture and have never been confined for feeding or intensive finishing.
- **HGP and antibiotic free**
 - Cattle have never in their lifetime been treated with HGPs or antibiotics.
- **Eating quality guaranteed**
 - The eating quality of pasturefed cattle products is guaranteed.

Brand attributes	
Industry-facing	Consumer-facing
<ul style="list-style-type: none"> • Verification <ul style="list-style-type: none"> ○ Production practices can be verified according to PCAS requirements. • Assurance <ul style="list-style-type: none"> ○ Industry and consumers can be assured that cattle have been raised as claimed. • Demonstrable <ul style="list-style-type: none"> ○ Producers can demonstrate appropriate records and practices to support their claims about production process and the provenance of their product. • Recognition <ul style="list-style-type: none"> ○ Producers are recognised as progressive in their industry. 	<ul style="list-style-type: none"> • Provenance <ul style="list-style-type: none"> ○ The history of the cattle can show they have only been fed pasture, have not been confined or treated with HGPs and antibiotics over their lifetime. • Assured <ul style="list-style-type: none"> ○ There are methods in place that provide assurances regarding the provenance of the product.

Brand name		
Industry-facing	Consumer-facing	
<ul style="list-style-type: none"> • Australian Pasturefed 	<ul style="list-style-type: none"> • Consumer facing brand would require extensive qualitative, quantities research, through focus groups and market testing. 	
Brand value		
Producers	Processors	Consumers

<ul style="list-style-type: none"> • Provides a standardised production framework that enables producers to demonstrate the practices and procedures to back up the claim of 'pasturefed'. • Provides a form of recognition for the practices and procedures maintained on-farm. • Can improve recording keeping, reporting and management systems. • Facilitates differentiation in the marketplace. • Can help maintain or gain market access. 	<ul style="list-style-type: none"> • Assists processors in identifying and accessing consistent, well described product and, in turn, supplying this to market. • Provides verifiable assurances for all markets. • Presents opportunities differentiate their product and promote as such. 	<ul style="list-style-type: none"> • Provides assurances that the product comes from cattle that have been fed a lifetime diet of pasture and have never been confined for intensive feeding. • Provides assurances that the product is free from HGP's, antibiotics and any other potential chemical residues. • The eating quality is guaranteed by Meat Standards Australia.
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3.3.2 Communications strategy

3.3.2.1 Target audience

Three audience groups exist:

- Cattle producers
- Supply chain participants (ie: Processors, agents etc).
- PCAS certified producers (when operational)

3.3.2.2 Messaging

Messaging for the overall introduction of PCAS will revolve around answering the "What, who, why and how?" questions:

- What - is the program?
- Who - is behind the program?
- Why - should I belong?
- How - do I become involved?

What

- PCAS represents a standardised production framework that enables producers to demonstrate the practices and procedures to back up the claim of 'pasturefed'.
- PCAS is an independently audited, certification program that provides a form of recognition for the practices and procedures maintained on-farm..
- Facilitates differentiation in the marketplace and can help maintain or gain market access.
- PCAS Standards are similar to other programs (such as EUCAS) so in many cases producers only need to make minimal changes to become certified.

Who

- PCAS is an industry initiative run by the Cattle Council of Australia (CCA).

Why

- PCAS enables producers to:
 - *Verify* - Production practices can be verified according to PCAS requirements.
 - *Assure* -Industry and consumers can be assured that cattle have been raised as claimed.
 - *Demonstrate* - Producers can demonstrate appropriate records and practices to support their claims about production process and the provenance of their product.
 - *Recognise* - Producers are recognised as progressive in their industry.

How

- Messages should relate to the application process, fees, desktop audit, on-site audit etc as outlined in section 3.2 - *Recommendations for the audit process and administration.*

3.3.2.3 Communications mix

	General producers	Processors, agents	PCAS certified producers
Direct mail and email	<ul style="list-style-type: none"> • Brochure drop to postcodes in NSW, VIC and QLD. • Announcement through CCA channels, MLA channels such as More Beef from Pastures eNewsletter, Fridayfeedback etc. 	<ul style="list-style-type: none"> • Via AMIC and ALPAA • Announcement of program • Brochure for them to provide to producers 	<ul style="list-style-type: none"> • Quarterly eNewsletter
feedback articles	<ul style="list-style-type: none"> • Announcement • Case studies on pilot producers 		<ul style="list-style-type: none"> • Announcement • Case studies on pilot producers
Media releases	<ul style="list-style-type: none"> • Announcement • Major producers that join or any processor support 		
Events	<ul style="list-style-type: none"> • Use of pilot program producers as champions • Brochure and application form 		
Advertising	<ul style="list-style-type: none"> • Advertise availability of program 		
SFO, DPIs and merchandise channels (magazines, newsletters etc)	<ul style="list-style-type: none"> • Provide articles and media releases • Provide case studies • Add program information to MLA, CCA and other industry websites 		

Appendix 1: Changes made to the PCAS Standard prior to pilot

Element 1: Identification and lifetime traceability		
Performance Indicator/Checklist	Previous Requirement	Updated Version for Pilot and Reason
<p>Indicator: 5</p> <p>Checklist item 9 also updated to reflect change to Performance Indicator</p>	<ul style="list-style-type: none"> All transactions and movements of eligible cattle off the PIC are accompanied by a PCAS Declaration and a separate LPA NVD. 	<ul style="list-style-type: none"> All transactions and movements of eligible cattle off the PIC are accompanied by appropriate vendor declarations and movement documents such as a Livestock Production Assurance National Vendor Declaration and Waybill (LPA NVD/Waybill), MSA Vendor Declaration and that appropriate declarations relating to the Lifetime Pasturefed Standard have been made where necessary. <i>Reason: To allow for variations in documentation that may be required state-to-state. For consistency – to allow for the inclusion of the MSA declaration and the PCAS declarations.</i>
<p>Indicator: 7</p> <p>Checklist item 13 also updated to reflect change to Performance Indicator</p>	<ul style="list-style-type: none"> Introduced cattle must be sourced from a PCAS certified PIC with the exception of breeding stock. A comment was also included regarding checking EUCAS for a definition of breeding stock. 	<ul style="list-style-type: none"> With the exception of "non-PCAS breeding females", vendors are satisfied that introduced cattle meet the PCAS Standard eligibility requirements. Note: Non-PCAS breeding females are HGP-free cows, heifers or pregnant females intended for use in breeding. Non-PCAS breeding females must have a LT status on the NLIS Database. Cows with calves at foot are not eligible to enter a property as non-PCAS breeding females as the status of the calf may not be clear. <i>Reason: The updated version was modified based on ECUAS definition and requirements. It was initially considered that placing a restrictive requirement on introduced cattle may limit the number of producers that would qualify and the number of cattle processed through the system therefore it was suggested vendors only need to be "satisfied" introduced cattle meet the requirements.</i>

Element 3: Pasturefed only		
Performance Indicator/Checklist	Previous Requirement	Updated Version for Pilot and Reason
Checklist item 2	<ul style="list-style-type: none"> Facilities and equipment are never used to feed cattle grain or grain by-products. 	<ul style="list-style-type: none"> Removed. <i>Reason: Some cattle on the property may require feeding either for welfare reasons or as part of an alternative production system in which case the cattle become ineligible.</i>
Checklist item 4	<ul style="list-style-type: none"> Records of home grown stockfeed must be maintained including the quantity grown and disposal (date, quantity, destination). 	<ul style="list-style-type: none"> Records of crops grown and/or supplements produced for stockfeed must be maintained including the quantity grown and disposal (date, quantity, destination). <i>Reason: The reference to home-grown stockfeed was ambiguous and required further defining.</i>
Checklist item 5	<ul style="list-style-type: none"> Where cattle are grazed on a grain or a cereal crop, photos have been taken prior to the cattle accessing the paddock that demonstrate the crop was still in a Pre-grain state. 	<ul style="list-style-type: none"> Where cattle are grazed on a grain or a cereal crop, photos have been taken when the cattle are moved off the crop that demonstrates the crop was still in a pre-grain state. <i>Reason: To verify the crop was not in the Ripening stage when cattle were moved off, rather than when they were moved on – to avoid the crop ripening while being grazed.</i>

Element 5: Lifetime Free from Antibiotics and Hormonal Growth Promotants		
Performance Indicator/Checklist	Previous Requirement	Updated Version for Pilot and Reason
Indicator 2	<ul style="list-style-type: none"> Cattle have never been treated with antibiotics, whether through feed or water, or by injection, from birth to slaughter. Antibiotics include low-level (sub-therapeutic) or therapeutic level doses; sulphonamides, ionophores, coccidiostats; or any other synthetic antimicrobials. 	<ul style="list-style-type: none"> To the best of the producers knowledge, cattle have never been treated with antibiotics, whether through feed or water, or by injection, from birth to slaughter. Antibiotics include: Low-level (sub-therapeutic) or therapeutic level doses; sulphonamides, ionophores, coccidiostats; or any other synthetic antimicrobials. <i>Reason: To ensure the requirement was reasonable and realistic.</i>
Checklist item 3	<ul style="list-style-type: none"> Records of introduced Antibiotics are maintained to account for the purpose and disposal. 	<ul style="list-style-type: none"> Records of introduced antibiotics are maintained to account for the purpose and disposal, antibiotic purchase records must also be retained such as receipts. <i>Reason: This was a requirement in the AGA Grassfed Standard – introduced to further align the PCAS Standard to this.</i>
Checklist item 4	<ul style="list-style-type: none"> A declaration from the consulting veterinarian (s) concerning the supply of prescription Antibiotics must be available at the time of audit. 	<ul style="list-style-type: none"> Removed. <i>Reason: Unnecessarily onerous.</i>

Appendix 2: Producer Guide

Provided as a separate document

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Appendix 3: PCAS Standard (based on recommendations)

Provided as a separate document

Appendix 4: Example audit document

PCAS Audit **Property:** _____

Date of audit: _____

ELEMENT 1: IDENTIFICATION AND LIFETIME TRACEABILITY (LT)

OUTCOME: On-farm systems have been implemented to ensure that cattle are individually identified and that they retain a Lifetime Traceable (LT) status on the National Livestock Identification System (NLIS) Database.

PERFORMANCE INDICATORS:

LT1. NLIS Database reflects the Lifetime Traceable (LT) status of cattle on the property.

LT2. Cattle are positively and uniquely identified.

LT3. The management system must permanently identify cattle that become ineligible.

LT4. Records of cattle movements on and off the PIC are maintained.

LT5. All transactions and movements of eligible cattle off the property are accompanied by a PCAS Declaration as well as other appropriate vendor declarations and movement documents such as a Livestock Production Assurance National Vendor Declaration and Waybill (LPA NVD/Waybill) and MSA Vendor Declaration.

LT6. For transportation, eligible and ineligible cattle must be positively and clearly identified and the method of identification recorded.

LT7. All introduced cattle that are intended to be sold as PCAS eligible must be accompanied by a PCAS Declaration

Element	Checklist Items	Yes	No	N/A	Audit Comment
LT1.	Can the enterprise demonstrate that records on the NLIS Database correlate to management records regarding the Lifetime Traceable (LT) status of cattle on the property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
LT1.	Can the enterprise demonstrate that systems are in place to confirm the Lifetime Traceable (LT) status and eligibility of cattle including lifetime traceability for all introduced cattle? This may be achieved by: <ul style="list-style-type: none"> • Ensuring every animal is correctly identified with an approved NLIS device. • The Vendor answering 'Yes' to the Lifetime Traceable question on the LPA NVD/Waybill. • Retaining copies of the LPA NVD/Waybill. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
LT1.	Can the enterprise demonstrate that movements of introduced cattle onto the property have been updated on the NLIS Database within seven (7) days of arrival onto the property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Element	Checklist Items	Yes	No	N/A	Audit Comment
LT2.	Can the enterprise demonstrate the systems in place to positively and uniquely identify cattle on the property and is there evidence that this system is used and up-to-date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
LT3.	<p>Can the enterprise demonstrate the systems in place to ensure that cattle that are ineligible for PCAS are permanently identified and is there evidence that this system is used and up-to-date?</p> <p>This may be achieved by:</p> <ul style="list-style-type: none"> Identifying cattle with visual ear tags. Using different coloured tags to differentiate between eligible and ineligible cattle. If purchasing through a saleyard, also ensuring that the saleyard has scanned the lot and has verified the Lifetime Traceable status of every animal in the lot. If an eligible animal loses its visual tag that demonstrates its eligibility, replacing the visual ear tag prior to dispatch. If there is any uncertainty regarding an animal's eligibility, deeming the animal ineligible and applying an appropriately coloured visual tag. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
LT3.	Can the enterprise demonstrate that eligible cattle have had approved NLIS devices prior to despatch from the property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
LT3.	Can the enterprise demonstrate the systems in place to identify lost ear tags attach approved replacement tags and ensure these correlate to management records and is there evidence that this system is used and up to date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ALL.	<p>Are sufficient records available to demonstrate that eligible cattle have been on a PCAS certified PIC/s since birth?</p> <p>This can be achieved by recording cattle movements onto the property including:</p> <ul style="list-style-type: none"> Date Number of head Breed, description and purpose Sex and age Old and new identification Vendor/Agent details NLIS tag number Eligibility for NLIS LT status LPA NVD/Waybill number Eligibility for PCAS 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Element	Checklist Items	Yes	No	N/A	Audit Comment
LT4.	<p>Are sufficient records available to enable the enterprise to demonstrate that they maintain records of cattle movements on and off the property?</p> <p>This may be achieved by recording:</p> <ul style="list-style-type: none"> • Date of movement • Breed of livestock, purpose and number of head • Sex and/or age • Old identification - number or description • New identification - number or description • Selling vendor or agent's details • NLIS device number • NLIS Lifetime Traceable (LT) status • LPA NVD/Waybill number • PCAS eligibility status • Retaining copies of the LPA NVD/Waybill 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
LT5.	<p>Are sufficient records available to enable the enterprise to demonstrate that appropriate vendor declarations and movement documents are accurately completed and accompany all cattle dispatched from the property?</p> <p>This may be achieved by retaining copies of documents such as:</p> <ul style="list-style-type: none"> • LPA NVD/Waybill • MSA Vendor Declaration • Transported Stock Statements • BJD National Animal Health Statement or Vendor Declaration • Other Waybills, Health Certificates or Transport statements 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
LT5.	<p>Do records show that all introduced cattle that are intended to be sold as PCAS eligible were accompanied by a PCAS Declaration?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
LT6.	<p>Can the enterprise demonstrate the systems in place that enable them to identify eligible and ineligible cattle?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Element	Checklist Items	Yes	No	N/A	Audit Comment
LT6.	During transport, can the enterprise demonstrate the systems in place that ensure that eligible and ineligible cattle are positively and clearly identified and the method of identification is recorded and that a separate movement document accompanies each mob? Evidence may include: <ul style="list-style-type: none"> • Copies of separately completed LPA NVD/Waybills and MSA Vendor Declarations for eligible and ineligible cattle with the identification methods noted on the LPA NVD/Waybills. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ALL	Can the enterprise demonstrate through other procedures or practices that outcomes and performance indicators for this element have been met?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

ELEMENT 2: NO CONFINEMENT FOR THE PURPOSE OF INTENSIVE FEEDING FOR PRODUCTION (NC)					
OUTCOME: On-farm systems have been implemented to ensure that cattle are not confined for the purpose of intensive feeding for production.					
PERFORMANCE CHECKLIST:					
NC1. Cattle are not confined for the purpose of intensive feeding for production.					
NC2. Cattle must have continuous access to graze.					
Element	Checklist Items	Yes	No	N/A	Audit Comment
NC1.	Are sufficient records available to enable the enterprise to demonstrate that PCAS-eligible cattle are never in their lifetime confined for the purpose of intensive feeding for production?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
NC1.	Can the enterprise demonstrate the systems in place that ensure stocking rates are consistent with the size and type of operation? Evidence may include records of: <ul style="list-style-type: none"> • Livestock purchases • Breeding numbers • Stocking rates 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
NC1.	Are sufficient records maintained to enable the enterprise to demonstrate that feed on offer during management activities requiring confinement is only that which is defined in the PCAS Standard as an Eligible Diet? Management activities requiring confinement may include: Weighing, drafting, marking, weaning, treatment and preparation for transport. This may be achieved by recording: <ul style="list-style-type: none"> • Period of confinement (date and time commenced and ended) • Reason for confinement • Identification and description of cattle confined • Feed offered during confinement 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Element	Checklist Items	Yes	No	N/A	Audit Comment
NC1.	<p>Are sufficient records maintained to enable the enterprise to demonstrate that the use, introduction and/or production of stockfeed is consistent with the absence of an intensive feeding program?</p> <p>This may be achieved by recording the production and/or introduction of stockfeed and supplements including:</p> <ul style="list-style-type: none"> • Type of stockfeed, supplement or crop produced or introduced • Ingredients and quantity (volume or tonnes etc) • Purpose or destination • Date purchased and date disposed/used • Feed and Fodder Declaration number 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
NC2.	Can the enterprise demonstrate the systems in place that ensure PCAS-eligible cattle have continuous access to graze feed which consists only of Eligible Diet items as defined under the PCAS Standard, and is there evidence that this system is used and up-to-date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ALL	Can the enterprise demonstrate the systems in place to permanently identify and record as ineligible for PCAS any cattle on the property that are confinement fed for the purposes of production?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ALL	Can the enterprise demonstrate through other procedures or practices that outcomes and performance indicators for this element have been met?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

ELEMENT 3: PASTUREFED ONLY (PF)					
OUTCOME: On-farm systems have been implemented to ensure that cattle have never been fed separated grain or grain by-products and have access to graze pasture with an Eligible Diet.					
PERFORMANCE CHECKLIST:					
<p>PF1. Cattle are not fed separated grain or grain by-products.</p> <p>PF2. Cattle have continuous access to graze pasture.</p> <p>PF3. Cattle may be fed an Eligible Diet which must be derived solely from forage consisting of grass (annual and perennial), forbs (eg: Legumes and Brassica etc), browse, or cereal grain crops in the vegetative (pre-grain) state for the lifetime of the cattle, with the exception of milk consumed prior to weaning. Hay, haylage, baleage, silage, crop residue without grain and other roughage sources are also included as acceptable feed sources. Routine mineral and vitamin supplementation may also be included in the feeding regime.</p>					
Element	Checklist Items	Yes	No	N/A	Audit Comment
PF2 PF3	Are sufficient records available to enable the enterprise to demonstrate that PCAS-eligible cattle have access to graze pasture or an Eligible Diet at all times?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
PF1.	<p>Are sufficient records maintained to enable the enterprise to account for the purpose and disposal of introduced grain, grain by-products or supplements?</p> <p>This may be achieved by recording:</p> <ul style="list-style-type: none"> • Type of grain, grain by-product or supplement • Ingredients • Quantity (volume etc) • Purpose • Date purchased and date disposed/used • Feed and Fodder Declaration number 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ALL	<p>Are sufficient records maintained to enable the enterprise to account for the crops grown and/or supplements produced for stockfeed, including the quantity grown and disposal.</p> <p>This may be achieved by recording:</p> <ul style="list-style-type: none"> • Type of stockfeed, supplement or crop produced • Ingredients and quantity (volume etc) • Purpose or destination • Date produced and date disposed/used 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Element	Checklist Items	Yes	No	N/A	Audit Comment
PF3.	Where cattle intended to be sold under PCAS are grazed on a grain or a cereal crop, can the enterprise demonstrate the systems in place to ensure photos have been taken when the cattle are moved off the crop so as to show the crop was still in a pre-grain state at this point?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
PF3.	Can the enterprise demonstrate that the photos taken to show grazed crops in a pre-grain state correlate to management records?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
PF3.	Can the enterprise demonstrate the systems in place to record cattle movements on and off grain or cereal crops? This may be achieved by recording: <ul style="list-style-type: none"> • Type of crop (Eligible Diet description and code) • Identification of mob/s • Feeding period - start and end 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ALL	Can the enterprise demonstrate the systems in place to permanently identify and record as ineligible for PCAS any cattle that consume any item that is not specified as an Eligible Diet item?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ALL	Can the enterprise demonstrate through other procedures or practices that outcomes and performance indicators for this element have been met?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

ELEMENT 4: MINIMUM EATING QUALITY STANDARDS (ON-FARM) (EQ)					
OUTCOME: On-farm systems have been implemented to ensure that cattle are eligible to be accompanied by a Meat Standards Australia (MSA) Vendor Declaration.					
PERFORMANCE INDICATORS:					
EQ1. The PCAS certified property must be MSA accredited.					
EQ2. All cattle consigned for slaughter as eligible under PCAS must be accompanied by an approved MSA Vendor Declaration.					
Element	Checklist Items	Yes	No	N/A	Audit Comment
EQ1.	Can the operator demonstrate that the property is an MSA accredited supplier? This can be achieved by retaining appropriate documentation that demonstrates accreditation status including: <ul style="list-style-type: none"> • MSA Licence Notification • A valid MSA registration number 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
EQ2.	Can the enterprise demonstrate the systems in place that ensure all cattle consigned for slaughter as eligible under the PCAS Standard are accompanied by an approved MSA Vendor Declaration. This can be achieved by: <ul style="list-style-type: none"> • Retaining copies of MSA Vendor Declarations. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

ELEMENT 5: LIFETIME FREE FROM ANTIBIOTICS AND HORMONAL GROWTH PROMOTANTS (LF)

OUTCOME: On-farm systems have been implemented to ensure that cattle have never been treated with hormonal growth promotants (HGP) or antibiotics including; Low-level (sub-therapeutic) or therapeutic level doses; sulphonamides, ionophores, coccidiostats; or any other synthetic antimicrobials.

PERFORMANCE INDICATORS:

LF1. Cattle have never been treated with hormonal growth promotants (HGPs).

LF2. Cattle have never been treated with antibiotics, whether through feed or water, or by injection, from birth to slaughter. Antibiotics include: Low-level (sub-therapeutic) or therapeutic level doses; sulphonamides, ionophores, coccidiostats; or any other synthetic antimicrobials.

Note: If an animal is in need of medical attention, proper treatment should be administered as required.

Element	Checklist Items	Yes	No	N/A	Audit Comment
LF1.	Can the enterprise demonstrate the systems in place to record the use of HGPs, and is there evidence that this system is used and up-to-date? This may be achieved by recording: <ul style="list-style-type: none"> • Identification and description of stock treated • Number of stock treated • Product used (chemical or drug name and brand) • Batch number • Treatment date 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
LF1.	Can the enterprise demonstrate the systems in place to permanently identify and record as ineligible for PCAS any cattle on the property that are treated with HGPs, and is there evidence that this system is used and up-to-date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
LF2.	Can the enterprise demonstrate the systems in place to record the use of antibiotics, and is there evidence that this system is used and up-to-date? This may be achieved by recording: <ul style="list-style-type: none"> • Identification and description of stock treated • Number of stock treated • Product used (chemical or drug name and brand) • Batch number • Treatment date 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Element	Checklist Items	Yes	No	N/A	Audit Comment
LF2.	Can the enterprise demonstrate the systems in place to permanently identify and record as ineligible for PCAS any cattle on the property that are treated with antibiotics, and is there evidence that this system is used and up-to-date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
LF2.	Can the enterprise demonstrate the systems in place to record the introduction onto the property of antibiotics, and is there evidence that this system is used and up-to-date? This may be achieved by recording: <ul style="list-style-type: none"> • Date purchased and evidence of purchase (ie: receipt) • Antibiotic name (chemical and brand name) • Batch number • Date disposed and purpose 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
LF2.	Can the enterprise demonstrate that the records of introduced antibiotics correlate to the records of antibiotics used?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
LF2.	Can the enterprise demonstrate the systems in place to permanently identify and record as ineligible for PCAS any cattle on the property that are treated with antibiotics, and is there evidence that this system is used and up-to-date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ALL	Can the enterprise demonstrate through other procedures or practices that outcomes and performance indicators for this element have been met?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Appendix 5: PCAS Declaration

Provided as a separate document.