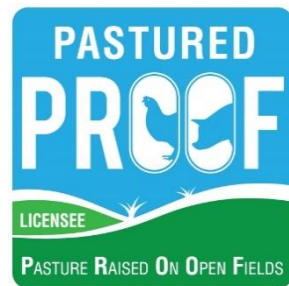


Animal health and welfare, a sustainable pastured farming environment and the production of wholesome, healthy food are the cornerstones of this guideline. Our Core values lay the foundation for the ethical and sustainable production expected of pastured producers. We have further built on these commitments to bring to the consumer all the proof they need.



Retailer /
Processor
Standard
2017

Version: 1

PROOF Retailer / Processor Certification Standard

Introduction

This document contains the **PROOF – Pasture Raised On Open Fields**[®] (PROOF) Standards for certification and licensing with PROOF. These standards are designed to protect:

- The correct presentation and use of the PROOF Trademarks
- The integrity of the PROOF Core Values
- The reputation of PROOF

This standard applies to retailers that wish to label processed or cooked product, that is produced using PROOF certified raw ingredients, as PROOF Certified. In addition to processed or cooked product, this standard applies to the use of the PROOF logo to promote PROOF certified unprocessed meat and eggs.

All sections of this standard must be used jointly. Certain sections may not be applicable for a specific business, process or activity. It is the user's responsibility to determine and justify why any sections do not apply.

This standard is complementary and additional to other health, codes of practice or regulatory requirements at federal, state, territory or other relevant levels.

Reference to PROOF certification and use of the PROOF logo requires audit, certification and licensing and conformance to this Standard.

Legal or other means shall be pursued where incorrect or unauthorised use of the logo or the name PROOF is found to be occurring.

Operators wishing to utilise the PROOF logo for PROOF certified processed and/or cooked products as well as unprocessed certified product, are required to undertake the steps outlined next.

PROOF Certification Process

1. Application Process

- 1.1. Prior to certification with PROOF, the operator must:
 - a) apply for and enter into to a PROOF Licensing Agreement;
 - b) complete a self-assessment and declaration questionnaire;
 - c) satisfy PROOF that the operator will comply with these standards.
- 1.2. The operator must maintain a Quality Management System outlining plans to enable ongoing adherence to the PROOF standards. This plan should be HACCP based. This plan may be incorporated as part of existing plans and management systems. This plan must be available at audit. Refer to section 6 of this standard.
- 1.3. Onus is on the operator and their employees/contractors to ensure at all times that they are fully aware of all relevant aspects of the PROOF Standard relating to their operation. It is also the responsibility of the operator to be aware of extra regulatory or market requirements that are in addition to the PROOF standard.
- 1.4. An application for PROOF certification, including payment, shall be made to PROOF, and completed documents submitted for review, before an initial assessment and audit shall be arranged. All documents shall be signed and/or witnessed as required prior to final approval. Application shall be made online.
- 1.5. Certification of preparation/processing, manufacturing or related retail facilities may be given following a systems audit by PROOF of the applicants signed documentation. The operator must be able to verify adherence to the relevant PROOF Standards and any special conditions set out by PROOF in the retailer/ processor licence agreement.
- 1.6. Following initial approval, a compliance audit may be conducted to verify compliance to this standard and any special conditions applicable.
- 1.7. Upon review and audit, approval may be granted and a Licensing Agreement is offered to the operator. Certification is not finalised until the Licensing Agreement is in place.
- 1.8. PROOF certification of a retail operation applies to the operator who owns, leases or has legally recognised and enforceable management control of such retail outlet or facility. PROOF certification therefore is not transferable but applies to both the operator and the retail or preparation facilities.

2. Restrictions to Granting of Certification

- 2.1 No certification shall be given where PROOF is not supplied with sufficient verifiable information as to the history of the operation, where it is deemed that the Standard has not been fully complied

with, or where management, processing or retailing aspects of the operation are not deemed to satisfy the requirements for certified PROOF products.

- 2.2 Certification may terminate at such time that a production unit changes ownership or management hands. In such instances, the new operator shall apply for certification if they wish to continue certification. New management shall require assessment by PROOF for continuity and ability to manage in conformance with this Standard. New processes or products shall also require assessment by PROOF for conformance with this Standard prior to certification.

3. Denial of Certification

- 3.1 When PROOF has reviewed an application and has found that the applicant is not able to comply with the relevant Standard, written notification of denial / non-compliance of certification must be made, inclusive of the following points:

- Description of each non-compliance;
- Facts upon which the non-compliance is based;
- Date by which the applicant must correct the non-compliances and submit supporting documentation.

Upon receipt of the notification of non-compliance the applicant may:

- Correct non-compliances and submit supporting information within the time frame noted;
- Appeal the decision in writing, which will instigate an appeals committee review.

4. Maintaining Certification

- 4.1 Note that PROOF reserves the right to refuse certification to operators at any time, where such certification is deemed to detract from the aims or principles of PROOF and this Standard. Such issues may include labelling or marketing of products by the operator in question that may potentially mislead the consumer. The operator must be aware of Core Values of PROOF which are:

- All animals* are able to range freely in open fields or paddocks
- Animals will not be kept in cages, stalls or crates
- All animals are kept at stocking densities that will ensure access to forage and grazing and; in the case of layer hens, shall not exceed 1,500 per hectare
- Densely confined production systems and feed lotting are not practiced
- All animals are able to interact with their herd or flock and to carry out natural behaviours
- All animals should thrive in their environment and not just cope with it
- All animals will be protected from predators
- Illness or injury will be addressed promptly so that no animal will be left to suffer
- Animals will be fed to meet their welfare needs as well as production requirements
- Surgical treatments that inflict unnecessary pain will not be performed
- There will be no use of growth promoters
- Pastured free range should be environmentally, economically and socially sustainable

*with the exception of very young poultry that are not yet sufficiently feathered and poultry that must be protected from predation at night.

4.2 To maintain certification, the operator shall, at a minimum, commit and allow all resources and personnel to achieve the following:

- a) Annual audit will be carried out by an auditor assigned or approved of by PROOF (see section 12);
- b) Provide any assistance reasonably required by a PROOF auditor to perform an audit;
- c) Produce to the PROOF auditor all information, records or documents (in hardcopy or softcopy) requested to facilitate an audit;
- d) Random or special (unscheduled) audits;
- e) The operator acknowledges that it will be responsible for the payment of all fees, costs and expenses associated with audits including additional audits for non-conformances or corrective action requests;
- f) An annual license fee is paid to PROOF;
- g) Upkeep of the relevant records as required as well as annual updates of the QMS, maps and related information, to be made available at the time of auditing and to PROOF as requested;
- h) Ensure compliance with this Standard, or immediate written notification to PROOF of deviation from the Standard;
- i) Ensure compliance with special conditions or directives as specified in licence agreements or stemming from correspondence with PROOF;
- j) Keep updated and familiar with the Standard, especially pertaining to modifications or updates as they occur;

- k) Ensure compliance with regulatory requirements, including but not limited to health requirements for food quality and safety.

5. Non-compliance and Corrective Action Requests

5.1 The raising of Corrective Action Requests (CARs) is a core component of the PROOF certification program, and enables a simple, transparent means of communicating, and closing out, non-complying aspects of the operation between the operator and the PROOF. Non-compliances with this Standard may take the form of one or more of the following:

- a. Operator failure to conform to the Standard;
- b. Operator failure to conform to their licence agreement;
- c. Operator failure to verify effective management control deemed essential by PROOF for ongoing conformance to the Standard;
- d. Failure to comply with relevant industry sector Standards or Statutory Regulations.

5.2 Whilst being audited, or following review by PROOF, operations or operators may receive notice of performance, which might include feedback relating to certification maintenance. CARs can be generally categorised as follows:

5.3 Minor Non-conformity

A problem detected that in the opinion of the auditor or PROOF will not, or is unlikely to result in, a significant non-conformance with the Standard, but which requires corrective action to ensure that the issue does not become a major non-conformity.

5.4 Major Non-conformity

A problem detected that in the opinion of the auditor or PROOF is likely to result in, or has resulted in, a breach of the Standard.

5.5 Critical Non-conformity

Where the system is clearly not operational and/or where the participant is clearly not committed to the maintenance of, or able to maintain, certification and the requirements as specified in this Standard.

5.6 Certain non-compliances or non-conformities may be able to be closed out if addressed within 30 days of issue or at the next annual audit, however other non-compliance or non-conformity with the Standard or licence agreement may lead to one or more of the following:

Suspension

- a) If a PROOF certified operator is found to have not complied with requirements laid out to an extent deemed sufficient by PROOF to jeopardise the reputation or integrity of PROOF labelled products, the operator's certification will be suspended.
- b) Suspended clients shall not use the PROOF logo, or make any reference to certification in labelling or marketing, until such time that suspension is lifted by PROOF.
- c) During the period of suspension, no affected product may be sold or disposed of by or on behalf of the operator as PROOF certified.

Decertification

- d) Decertification includes the termination of current licence agreement/s with PROOF and shall occur at such times where the operator cannot demonstrate compliance with requirements.
- e) Decertification excludes the operator from using the PROOF logo and making labelling or marketing reference to any certified products or production. This shall also entail removal from the marketplace of all existing PROOF certified product that is not deemed to conform to this Standard.
- f) In circumstances where the operator is unable to verify ability to conform to the Standard, or where a serious and deliberate breach of the Standard has occurred, PROOF shall not allow recertification.
- g) Also taken into consideration shall be the client's past and current conformance to the requirements. In exceptional cases PROOF shall pursue legal means in order to protect the PROOF logo.
- h) In instances of low risk, or where non-compliance is deemed a minor non-conformity only, communication shall be requested from the operator to outline confirmation of management commitment to rectifying the non-conformance.
- i) Lack of response by the operator to requests from PROOF, or lack of commitment to management and resources to ensure ongoing compliance with the Standard, shall lead immediately to suspension, followed by decertification unless corrective actions are taken.

5.7 Other reasons for Suspension or Termination

PROOF may, at its absolute discretion, suspend or terminate an operator's PROOF certification and

license if:

- j) The operator goes into liquidation, has a receiver and manager appointed to it or any part of its assets, enters into a scheme of arrangement with creditors or suffers any other form of external administration;
- k) Cease to operate its business for a period of more than six consecutive months;

- l) Breaches any PROOF standard or license agreement requirements and, if the breach is capable of remedy, fails to remedy the breach within 7 days after notice has been given by PROOF.

Disputes and Appeal

- m) The certified operator always has the right of appeal of decisions by either the auditor or PROOF;
- n) Such appeals will usually be at the expense of the operator, except where it is shown that fault lies with PROOF.
- o) An appeal of a non-compliance decision must be filed within 30 days from the receipt of the notification.

6. Documents, Records and Audit Trails

Quality Management System (QMS)

The requirements for and the extent and nature of this plan shall be determined by PROOF depending on complexity and nature of the operation.

6.1 The Quality Management System must contain procedures or information that address the following:

- a) An outline of production activities that pertain to the production of PROOF certified products and the operator's ongoing compliance with the Standard.
- b) Aspects of this QMS shall be based upon HACCP principles where relevant, which identify all significant hazards associated with maintaining certification, and which outline procedures for reducing or eliminating such hazards, and monitoring procedures that ensure ongoing effective management. This shall include procedures for handling CARs, complaints and potential product recalls.
- c) For processing and handling operations, the QMS may be incorporated into existing plans (such as food safety) or other handling manuals, but must clearly define how PROOF certified products are to be handled, stored and processed in a manner that ensures maintenance of integrity of the products and the prevention of co-mingling with non-certified product.
- d) Records of production activities shall enable the tracing of all products arriving on, stored at, and leaving the operation. Records should be kept in a manner that allows a reconciliation of output of PROOF certified products against inputs.

6.2 At a minimum, operators shall maintain and make available at any time to PROOF and auditors for PROOF, the following documents:

- a) Updated facilities layout, showing present production activities, all significant site features, all neighbouring activities and all relevant environmental aspects

- b) Transaction Certificate (a document for the sale and movement of PROOF certified products) or its equivalent (may be an invoice with relevant details) supplied by the PROOF certified operator, shall be completed for sale and movement of PROOF certified product, where the purchasing party requires certified product (for resale or processing). This shall include clear statements regarding the certification status/level and respective PROOF certification numbers.
- c) A Product Form will be submitted to PROOF for every product that is offered for sale as PROOF certified. This form shall be in a format provided by PROOF and made available on the PROOF website.
- d) PROOF certified operators are required to take appropriate action on complaints related to their products' compliance with this Standard and to keep a record of corrective actions taken.

Labelling, Packaging, Marketing

7. Material and Ingredient Specifications

- 7.1 All products, raw or processed, marketed as certified PROOF products, shall include the following details on all packaging bound for retail sale
- a. Appropriate reference to certification
 - b. Certification number of operator;
 - c. Name of certified operator and PROOF logo;

8. Marketing Claims and Labels

- 8.1 No claims may be made as to the chemical-residue-free status of PROOF certified products for sale, except where this can be verified by the operator. No claim shall be made on the label or advertising material that suggests to the purchaser that the certified PROOF status of the product constitutes a guarantee of organic, nutritional or salubrious quality.
- 8.2 For processed food products, where a minimum of 100% of all ingredients (excluding water and salt) come from certified PROOF sources, reference may be made to “100% PROOF CERTIFIED” on the label.
- 8.3 For processed food products, where a minimum of 95% weight/weight of all ingredients (excluding water and salt) come from certified PROOF sources, and where all other materials are allowed under this Standard for use in certified processed product, reference may be made to “Certified PROOF” on the label. In the instance of the product and all ingredients being liquid (e.g. soups or stock), the calculation of percentages above shall be done by fluid volume.
- 8.4 For processed food products, ingredients of non-PROOF origin are only allowed where unavailable in the certified PROOF form, where specified under this Standard as allowed. Ranking in order of concentration is required for all ingredients.

- 8.5 If herbs and/or spices constitute less than 2% of the total weight of the product, they may be listed as “spices” or “herbs” without stating the percentage. Any non-certified PROOF ingredients of agricultural origin shall be:-
- a. Where less than 95% but not less than 70% weight/weight of all ingredients (excluding water and salt) are of PROOF certified origin, and where all other materials are allowed under this Standard for use in PROOF certified processed product, the statement “Made with PROOF certified ingredients” may be made on the label.
 - b. Where less than 70% of ingredients are from PROOF certified origin, the ingredients that comply with this Standard shall appear in the same colour and with an identical style and size of lettering as the other ingredients listed in the ingredients list.
- 8.6 Onus is on the operator to ensure that all legal and other label requirements are met in regard to labelling and packaging.
- 8.7 Ingredients shall be listed in the order of concentration in the end product, clearly noting and differentiating certified ingredients from non-certified ingredients.
- 8.8 Certified PROOF ingredients shall be sourced, in preference to uncertified PROOF ingredients, wherever available in commercial quantities. The aim of the operator at all times shall be to source 100% of ingredients from certified PROOF sources.
- 8.9 Multiple-ingredient products shall be constituted of a minimum of 95% certified PROOF ingredients, the remaining (uncertified) ingredients shall only be approved for inclusion where they are approved by PROOF to use.
- 8.10 Processing/preparation and other marketing and handling operations may be PROOF certified for parallel production where effective procedures are in place to ensure product authenticity and segregation are maintained – including separation in time or space between certified and non-certified products.

9. Marketing & Handling

- 9.1 The key objectives of certification of market outlets, which may include online and home delivery services, are to provide the following assurances to customers:
- a. A clear audit trail of all PROOF certified produce handled and marketed from point of production to end point of sale;
 - b. Clear identification and demarcation in store and at point of sale of PROOF certified and noncertified products;
 - c. Management and staff control of PROOF certified produce at all times to achieve the objective of maintaining the integrity of the PROOF certified product;
 - d. Where preparation of any kind takes place to PROOF certified materials that it takes place in accordance with the guidelines regarding product processing/preparation.

10. Retail and Butcher Outlets

- 10.1 A HACCP-based plan is to be submitted to the PROOF outlining plans for management structure, product handling, storage and sale, staff education and labelling systems.
- 10.2 A minimum of one audit per year shall be undertaken to ensure compliance with this Standard, and to ensure audit trail is being maintained.
- 10.3 Packaging occurring instore shall conform to requirements for preparation of certified PROOF products.
- 10.4 Certified PROOF produce shall be displayed and sold in block sections, and/or shall not be mixed in with conventional or uncertified products. There shall be barriers or other physical means of separation of uncertified and PROOF certified products, with designated areas for storage.
- 10.5 Where non-certified PROOF products are also traded in the fresh produce section(s), signage shall be such as to clearly demarcate such produce from certified PROOF produce.
- 10.6 Products marketed as certified PROOF shall refer only to certified PROOF products. No reference to certified PROOF products may be made for products that are not certified by PROOF.
- 10.7 Labels shall clearly define “Certified with PROOF”
- 10.8 A clearly traceable audit trail shall be maintained by the retailer for all certified PROOF products handled and traded, to be made available to PROOF at any time on request. Where non-certified products are also traded, the audit trail shall clearly enable tracing of both PROOF certified and non-certified traded products.
- 10.9 Onus is on the retailer to ensure all produce traded as certified PROOF produce is sourced from currently certified PROOF producers. This shall include maintenance of updated certificates or similar documentation that outlines producer certification number, certification status and expiry date.

11. Retail Chains

- 11.1 Whole retail chains, multistore outlets or selected retail outlets within a retail chain or group may be certified under this Standard where there is single ownership and full management control exercised by one single commercial entity.
- 11.2 All staff directly responsible for, or directly in contact with, certified products shall be comprehensively briefed as to all requirements for handling and storage of certified PROOF products.
- 11.3 Bulk commodities arriving shall have documentation and signage defining the product, the certification level and the certification number or numbers of the primary producers or suppliers.
- 11.4 A clearly traceable audit trail shall be maintained by the operator, enabling trace-back to all suppliers.
- 11.5 Onus is on the operator to ensure all traded produce is sourced from currently certified PROOF producers.

- 11.6 This shall include maintenance of updated certificates or similar written documentation that outlines producer PROOF certification number.
- 11.7 Labelling of, and documentation for, all incoming products shall be the responsibility of the operator. Where products are not appropriately labelled with relevant documentation, corrective action shall be taken that may include rejection of products with notification to the supplier.
- 11.8 All produce leaving the premises shall be accompanied by labelling systems and/or documentation that shall include the relevant certification number which shall be made available to the next purchaser on request.

12. Auditor requirements

- 12.1 All Auditors must be approved in writing by an Authorised Authority and must meet the qualifications set out in this paragraph 12.

Without limiting the requirements of an Authorised Authority, each Auditor must;

- a) Provide evidence of accreditation as a Lead Auditor of Quality Management or Food Safety systems
- b) Provide evidence of the successful completion of a course of instruction on the application and auditing of HACCP methodology

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