





Guidelines for Correcting Missing, Illegible and Incorrect Shipping Marks and 'Unders and Overs' using barcodes for Imported Meat Products from Australia

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Preamble

This guideline covers instructions for:

- The rectification of missing and illegible shipping marks.
- The rectification of incorrect shipping marks resulting in 'unders and overs'.

When an imported product is observed as failing to meet labelling regulatory requirements due to missing, incorrect or completely illegible shipping marks, Inspection Program Personnel (IPP) fail the Certification Type of Inspection (TOI) and an automatic refuse entry for the entire lot is triggered. This includes the "Under and Overs" circumstance where the total count of cases is correct against a foreign inspection certificate, but the individual lot counts do not match foreign inspection certificate.

The U.S. Department of Agriculture (USDA) Food Safety and Inspection Service (FSIS) has outlined procedures aimed at addressing and mitigating these issues when an official representative of the foreign inspection system is unavailable to present documentation to support re-certifying the product.

FSIS has established provisions that permit official inspection personnel the option to rectify the shipping marks on shipping containers, even in the absence of a representative from the foreign inspection system, under specific circumstances. The key provision is that FSIS Inspection Program Personnel (IPP) must be able to verify the non-compliant containers as part of the lot using the barcode as a unique identifier with the supporting documentation provided by the foreign country. These procedures apply only to countries that are eligible to use barcodes as a means of verifying missing or illegible shipping marks.

These provisions are outlined in <u>FSIS Directive 9900.5 Section VII.</u> Section E. "Procedures for Correcting Shipping Marks when Using Barcodes".

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The Rectification of Missing or Illegible Shipping Marks

In cases where shipping marks are missing or illegible, the rectification process is outlined in FSIS Directive 9900.5 Section VII D. Part 1.

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"When IPP refuse a lot because they observe cartons with partial shipping marks where a portion of a shipping mark is missing or illegible, and the remaining identifying characters are the same as the shipping mark on the other containers in the lot, the importer may rectify the refused entry by sorting the defective cartons from the lots. The importer also has the option to rectify (re-apply or correct) the shipping mark by either re-labeling or by stenciling the complete shipping mark on all containers in which only part of the shipping mark is legible. This may be carried out by the official import inspection establishment without a representative of the foreign government."

The Rectification of Incorrect Shipping Marks Resulting in 'Unders and Overs'

The rectification process for incorrect shipping marks requires verification of supporting documentation for the shipping container and the lot provided by the foreign country.

FSIS Directive 9900.5 Section VII E., explicitly states:

"E. Procedures for Correcting Shipping Marks when Using Barcodes - FSIS permits official import inspection establishment personnel to apply the shipping mark to shipping units without having an official representative of the foreign inspection system on-site to approve and observe this activity, when FSIS IPP can verify the unique identifier within a barcode on the shipping unit using supporting documentation provided by the foreign country."

The directive creates a clear connection between the barcode data on shipping units and the official foreign inspection certificates, providing an additional verification layer to ensure that non-compliant containers are identified and resolved effectively.

Using the barcode as a unique identifier in conjunction with supporting documentation enables FSIS IPP to validate and cross-reference shipment details without the need for direct observation by an official from the foreign country as stated in FSIS Directive 9900.5 Section VII E.

The important operational requirements for 'Unders and Over' is that the whole consignment related to the foreign inspection certificate MUST be considered when rectifying incorrect shipping marks. If there is an underage of one shipping mark on the foreign inspection certificate and an overage of a second shipping mark on the foreign inspection certificate, this indicates the some of the overage

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containers has had the incorrect shipping mark applied. The whole shipment must be held and the "Overs" case barcodes checked to identify those cases that have incorrect shipping marks. Once the cases that have incorrect shipping marks can follow the Directive's "Procedures for Correcting Shipping Marks when Using Barcodes".

Australian Meat Imports

Australia is recognized as an eligible country for the FSIS Directive 9900.5, which governs the use of alternative verification methods for rectifying shipping marks for refused entry lots entering the United States.

As a major exporter of meat to the U.S., Australia adheres to a comprehensive inspection and certification processes that aligns with the stringent requirements set out by the USDA FSIS. This process ensures that all meat products imported into the U.S. from Australia are safe, sanitary, and accurately labeled, meeting the necessary standards for public health and safety.

For Australian Meat Imports the Australian Meat Industry Program, Meat Messaging can be used by the IPP to verify the barcode for each shipping unit matches the documentation provided.

The relevant legislation for this process is outlined in FSIS Directive 9900.5 Section VII E. Part 4/b, which explicitly states:

"A report provided by the exporter that links the barcodes to the lot identified on the foreign inspection certificate."

How the Australian Meat Industry Program: Meat Messaging Fits into the Directive

For Australian meat imports, the use of Meat Messaging offers a significant advantage in addressing challenges associated with missing or illegible shipping marks. By utilizing GS1 barcoding standard and GS1 EANCOM electronic messaging standards, Meat Messaging gives the ability to accurately identify and track shipments, reducing the risk of lots being refused entry due to documentation non-compliance.

The Australian Meat Industry Program, Meat Messaging, performs several critical functions, including being a repository of shipment documentation for the rectification of missing or illegible shipping marks. This ensures shipments do not get delayed or rejected due to documentation non-compliance. Meat Messaging complies with regulatory standards, as stipulated in the FSIS Directive 9900.5. The use of barcodes and electronic messaging ensures that shipments from eligible countries, including

Australia, comply with FSIS regulations, reducing the risk of refused entries stemming from incorrect, missing or illegible shipping marks on shipping containers.

Meat Messaging facilitates the retrieval of shipment data, verification of shipment documentation and generates reports for presentation of verification for FSIS inspection personnel to authorize the rectification of incorrect shipping marks and subsequent release of the product by the IPP.

The Meat Messaging system supports three different methods to comply with the requirements of the FSIS Directive 9900.5 Section VII E 'Procedures for Correcting Shipping Marks when Using Barcodes', these methods are defined below:

- 1. The Meat Messaging website manual process of reading and checking the case barcodes against the Meat Messaging 'All Carton Serial Number Report' PDF for the shipment. This PDF document meets the Directive's IPP requirements of a report that links the barcodes to the lot identification on the foreign inspection certificate.
- 2. Barcode code scanning through the Meat Messaging App where the scan results are shown on the Meat Messaging 'All Carton Serial Number Report' PDF for the shipment. The Meat Messaging progressive web app (PWA) is available for web browser enabled mobile devices and supports barcode scanning either through a mobile device camera or ideally through a mobile device that has an inbuilt barcode scanner.
- 3. Integrated with the import inspection establishment software systems using the Meat Messaging Application Programming Interface (API) to record scan records the case shipment records and are shown on the Meat Messaging 'All Carton Serial Number Report' PDF for the shipment.

Worked Example for 'Unders and Overs' Incorrect Shipping Marks

This worked example uses Meat Messaging and follows the Directive's "Procedures for Correcting Shipping Marks when Using Barcodes" for a shipment with 'Unders and Overs'.

A shipment is presented for 'Label Verification' where the inspection certificate 9999999 shows 350 cases of shipping mark ABC123456789 and 350 cases of shipping mark ABC123456788.

When the cases have been staged for verification the import inspection establishment has noted that the counts are incorrect with shipping mark ABC123456789 having 345 cases and shipping mark ABC123456788 having 355 cases. When this occurs the import inspection establishment undertakes the following steps:

1. Log in to Meat Messaging and search for the shipment using the inspection certificate number 9999999, shipping mark ABC123456789 or ABC123456788, or any of the case barcodes. The search returns the shipment details and the 'All Carton Serial Number Report' PDF for the shipment. This PDF document meets the Directive's IPP requirements of a report that links the barcodes to the lot identification on the foreign inspection certificate.

- 2. Check the case labels (either manually reading barcode numbers or by scanning the barcodes, see instructions https://meatmessaging.org/instructions for rectifying shipping marks) against the 'All Carton Serial Number Report'. Those non-complying containers (I.E. having the incorrect shipping marks) are to be refused entry until corrected. The 'All Carton Serial Number Report' for the shipment showing the correct shipping marks for the case barcodes is to be held and presented to the IPP.
- 3. The steps as stated in Directive 9900.5 Section VII E. are followed for the IPP to permit import inspection establishment personnel to apply the shipping mark to the shipping units where the documentation links the barcode to the foreign inspection certificate. And the IPP to verify shipping units have been identified with the correct shipping mark and release the product.

Worked Example for Missing Shipping Marks

This worked example uses Meat Messaging and follows the Directive's "Procedures for Correcting Shipping Marks when Using Barcodes" for a shipment with missing shipping marks.

A shipment is presented for 'Label Verification' where the inspection certificate 9999999 shows 350 cases of shipping mark ABC123456789 and 350 cases of shipping mark ABC123456788.

When the cases have been staged for verification the import inspection establishment has noted that 3 cases are missing shipping marks. One case for ABC123456789 and 2 cases for shipping mark ABC123456788. When this occurs the import inspection establishment undertakes the following steps:

- Log in to Meat Messaging and search for the shipment using the inspection certificate number 9999999, shipping mark ABC123456789 or ABC123456788, or any of the case barcodes. The search returns the shipment details and the 'All Carton Serial Number Report' PDF for the shipment. This PDF document meets the Directive's IPP requirements of a report that links the barcodes to the lot identification on the foreign inspection certificate.
- 2. Check the case labels (either manually reading barcode numbers or by scanning the barcodes, see instructions https://meatmessaging.org/instructions for rectifying shipping marks) against the 'All Carton Serial Number Report'. Those non-complying containers (I.E. having the missing shipping marks) are to be refused entry until corrected. The 'All Carton Serial Number Report' for the shipment showing the correct shipping marks for the case barcodes is to be held and presented to the IPP.
- 3. The steps as stated in Directive 9900.5 Section VII E. are followed for the IPP to permit import inspection establishment personnel to apply the shipping mark to the shipping units where the documentation links the barcode to the foreign inspection certificate. And the IPP to verify shipping units have been identified with the correct shipping mark and release the product.

Further Information on Meat Messaging

For more information on Meat Messaging and the utilization of the program for rectification of missing, illegible or incorrect shipping marks, as well as reporting issues with shipments, please visit: meatmeassging.org Or contact Meat Messaging via email at info@meatmessaging.com

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Resolving "Overs and Unders", Incorrect, Missing or Illegible Shipping Mark Issues Following FSIS Directive 9900.5 and Using Meat Messaging

