

## Department of Agriculture, Food, and the Marine

### Trader Notice MH No. 08/2023

**To: All operators of DAFM-approved meat establishments**

**Subject: Procedures for the export of chilled or frozen beef, beef offal, minced beef, or beef burgers to Japan.**

#### Background

In May 2019 the Japanese Government agreed to allow the export of chilled or frozen beef and beef offal **of all ages** from Ireland to Japan.

In October 2020, the Japanese authorities agreed to allow the export of minced beef and meat preparations including beef burgers manufactured from beef of all ages.

In 2022, Ireland agreed to replace the previously mandated red stripe with a black stripe on the vertebral columns of all beef carcasses over 30 months of age.

In 2023, the requirement for a single tongue cutting method was applied in all plants approved to export tongues to Japan, in order to ensure compliance with Japanese requirements.

#### Repeal of Previous Trader Notices

This Trader Notice repeals the following Trader Notices:

- Trader Notice MH 35/2013,
- Trader Notice MH 1/2014,
- Trader Notice MH 15/2019,
- Trader Notice MH 6/2021, and
- Trader Notice MH 1/2023.

#### Scope

This Trader Notice applies to the production of eligible beef and beef offal, including minced beef and meat preparations (beef burgers) intended for export to Japan which is produced according to the **Export Verification Programme (EVP)** drawn up by the Japanese Authorities. The EVP is available at [Annex 1](#) of this Trader Notice.

#### Approval of Plants

Plants seeking to be approved for the production, storage and export of eligible beef, offal, minced beef, and meat preparations (beef burgers) to Japan must complete an Application Form available from Meat Policy Division and undergo a pre-approval inspection by the VI in charge.

A list of approved plants is maintained here [gov.ie - Meat Policy - Japan \(www.gov.ie\)](http://gov.ie - Meat Policy - Japan (www.gov.ie))

FBOs are reminded that, for the purposes of the list enclosed here under the **Operations** column, “Cutting” refers only to the cutting done on the carcass in the boning hall, while the cutting where the beef tongue and offal is harvested is

conducted during the slaughter process and is covered by the “Slaughtering” designation.

The plant labelling must reflect what the plant is approved for, under the **Operations** column, as this is what the Japanese check for in ports on arrival. Only plants with the listed operation of ‘Cutting’ may label their beef products with the plant function ‘Cutting’. Beef exports with labels that do not conform to the operations given on the enclosed list **will be rejected** by quarantine officers at the relevant Japanese port of entry.

### **Role of the Food Business Operator (slaughter, boning and storage)**

Before being approved for the export of beef and offal to Japan, FBOs applying for approval must draw up a specific Japanese SOP which documents how the plant intends to select, produce, and store eligible beef and beef offal in accordance with the EVP.

This SOP must, at a minimum, state that:

1. Only cattle born and reared in Ireland (or other state eligible to export to Japan) will be selected for production of beef and offal for export to Japan.
2. Carcases of cattle over 30 months will be marked by a **Black**-striped label attached to the vertebral column.
3. When approved to export tongues to Japan, all tongues harvested at the plant, regardless of destination will be harvested according to the method described in [Annex 2](#).
4. Tongues harvested from eligible cattle will be cut with a straight cut behind the last vallate papillae in accordance with the method described in [Annex 2](#) to ensure that no tonsillar tissue is included.
5. Ongoing monitoring of the compliance of tongues to this standard will be carried out at all stages of production – harvesting, chilling, and packing. Corrective action will be taken in the event that non-compliant tongues are found.
6. Tongues and offal harvested from eligible batches of cattle will be placed in or on specifically identified trays or racks for chilling after slaughter and segregated from ineligible tongues or offal.
7. Boning of eligible meat will only take place when no other ineligible meat is present in the boning hall and eligible batches will be identified in such a way as to be traceable back to batches of eligible animals (in general all beef will be eligible).
8. Meat, tongues, and offal harvested from eligible cattle will be packed into boxes and labelled in such a way as to indicate that the meat or offal inside came from cattle born and raised in Ireland (or other state eligible to export to Japan).
9. Eligible meat and offal will be stored (in plant or at a public Cold Store) in such a way that its identification and traceability are maintained at all times.

## **Role of the Food Business Operator (minced beef, meat preparations, incl. beef burgers)**

Before being approved for the export of minced beef, meat preparations, incl. beef burgers to Japan, FBOs applying for approval must draw up a specific Japanese SOP which documents how the plant intends to produce and store eligible minced beef, meat preparations, incl. beef burgers in accordance with the EVP.

This SOP must, at a minimum, state that:

1. Beef used to manufacture minced beef, meat preparations, incl. beef burgers will only come from Japanese eligible beef from beef slaughter plants and boning halls approved to export to Japan.
2. The slaughter plants and boning halls used to source beef will belong to the same group of companies (sister plants) and no beef from non-sister plants will be used to manufacture minced beef, meat preparations, incl. beef burgers for export to Japan.
3. Eligible beef will be accompanied by a Pre-Export Certificate marked "Japan".
4. Minced beef and meat preparations, incl. beef burgers eligible for export to Japan will be segregated after production and clearly labelled to be traceable back to eligible beef.
5. Eligible minced beef, meat preparations, incl. beef burgers will be stored (in plant or at a public Cold Store) in such a way that its identification and traceability are maintained at all times.

### **Ongoing Approval**

To remain approved to export beef and beef offal to Japan, FBOs will be subjected to ongoing verification of compliance with their own SOP and the Japanese EVP.

Tongue cutting will be subject to weekly DAFM checks and, at least annually, VIs will be required to carry out a full Japanese audit and recommend (or otherwise) ongoing approval to export to the Japanese market.

## **Annex 1**

### **Standards for slaughter of cattle and processing of beef and beef offal eligible for export to Japan**

#### ***Export Verification Program***

This Export Verification Program (EVP) provides the specified products processing requirements and requirements for facilities for the export of beef and beef offal to Japan from Ireland. This EVP comes in addition to the Irish and EU regulations but might include some relevant domestic requirements. The Department of Agriculture, Food and the Marine (DAFM) is the competent authority overseeing the implementation of the EVP in Ireland.

#### **1 Purpose**

This EVP describes the standards that slaughterhouses and processing facilities shall meet in producing beef and beef offal for export to Japan in order to meet the following objectives:

- Ensure removal from cattle carcasses of all tissues ineligible for export to Japan;
- Prevent cross contamination of eligible beef and beef offal for export to Japan from ineligible tissues during slaughter and/or processing;
- Enable verification of compliance with Japan import condition relating to Bovine Spongiform Encephalopathy (BSE), in addition to Irish and EU domestic requirements.

#### **2 Scope**

This EVP applies to Irish facilities producing beef and beef offal for export to Japan from Ireland. The facilities shall meet the specified processing requirements and requirements for facilities for beef and beef offal for export to Japan from Ireland. These facilities shall be designated and listed by the DAFM by agreement with the Japanese Ministry of Health, Labour and Welfare (MHLW).

### **3 Identification and traceability records**

3.1 Live cattle shall be domesticated bovine animals (*Bos taurus* or *Bos indicus*) born and raised in Ireland or imported into Ireland from countries eligible for export beef and beef offal to Japan.

3.2 Live cattle shall be individually identified.

3.3 Live cattle shall be sent to slaughterhouses with individual documents recording the exact date of birth and identification information of each animal.

3.4 All carcasses greater than 30 months shall be clearly identified with a visible black strip.

3.5 An identification mark allowing the verification that the beef and beef offal is eligible for export to Japan is applied on the product at each level of processing.

3.6 Records and identification information through the process shall be sufficient to trace:

3.6.1 Beef and beef offal for export to Japan to carcasses;

3.6.2 Individual carcasses to individual animal;

3.6.3 Individual animal to farm records.

### **4 Specified Products Requirements**

4.1 Beef and beef offal for export to Japan shall be exclusively meat, offal, and their products which the MHLW and DAFM recognize as eligible for export to Japan.

4.2 Beef and beef offal for export to Japan shall not include any Specified Risk Material (SRM) as defined by the enforced Japanese regulation, that is to say beef and beef offal for export to Japan shall not include any of the following tissues:

4.2.1 Tonsils (palatine and lingual tonsils) from all cattle;

4.2.2 Distal ileum (two meters from connection to caecum) from all cattle;

4.2.3 Spinal cord from all cattle;

4.2.4 Head (except for hygienically removed tongues and cheek meat) from cattle older than 30 months of age;

4.2.5 Vertebral column (excluding vertebrae of the tail, the spinous and transverse processes of the cervical, lumbar and thoracic vertebrae, the median sacral crest and wings of the sacrum) from cattle older than 30 months of age.

4.3 Beef and beef offal for export to Japan, and the carcasses and cattle from which they are derived should be traceable to production records.

## **5 Processing requirements**

5.1 Beef and beef offal for export to Japan shall be processed using procedures ensuring compliance with point 4 and integrated into the facility HACCP/SSOP.

5.2 Verification activities for age requirements as described above must be conducted at the slaughter and processing levels.

5.3 Beef and beef offal for export to Japan shall be processed in a manner to ensure the hygienic removal of the SRM as described above in point 4.2. and to prevent any cross-contamination by these SRM.

5.4 The facility HACCP/SSOP shall include internal verification activities that allow to control the specified requirements of this EVP are effectively implemented and met.

## **6 Designated facilities for export to Japan**

6.1 The designated facilities for export beef and beef offal to Japan from Ireland shall be facilities (slaughterhouses, cutting plants, processing plants, and cold stores) approved by the DAFM following an on-site inspection. The approval of the designated facilities is under the responsibility of the DAFM in accordance with the MHLW.

6.2 The designated facilities shall meet the specified products and processing requirements for beef and beef offal for export to Japan from Ireland.

6.3 The designated facilities for export to Japan shall be listed by the DAFM; the DAFM shall provide annually to the MHLW an official listing of the designated facilities for export beef and beef offal to Japan.

6.4 The designated facilities for export beef and beef offal to Japan from Ireland are responsible for the compliance with all requirements outlined in this procedure and the Irish and EU regulations.

6.5 All necessary information to verify the enforcement of the EVP by the designated facilities shall be available to the DAFM for review.

## **7 Export certificates**

7.1 Beef and beef offal for export to Japan shall be accompanied by an export certificate issued by the DAFM when exported to Japan.

7.2 The export certificate shall include the information as required by the Food Sanitation Act of Japan.

7.3 The export certificate shall mention the following statement: "The beef and beef offal meet the EVP requirements".

## **8 Audit and import inspection of the MHLW.**

8.1 The MHLW may conduct on-site audits of the Irish inspection system including visit of the DAFM, designated facilities that export beef and beef offal to Japan and relevant facilities.

8.2 If non-compliance with these standards is found as a result of the audit or the import inspection of the MHLW, the DAFM shall take appropriate measures including corrective or preventive action.

**These requirements for beef and beef offal for export to Japan from Ireland will go into effect on 6 February 2022.**

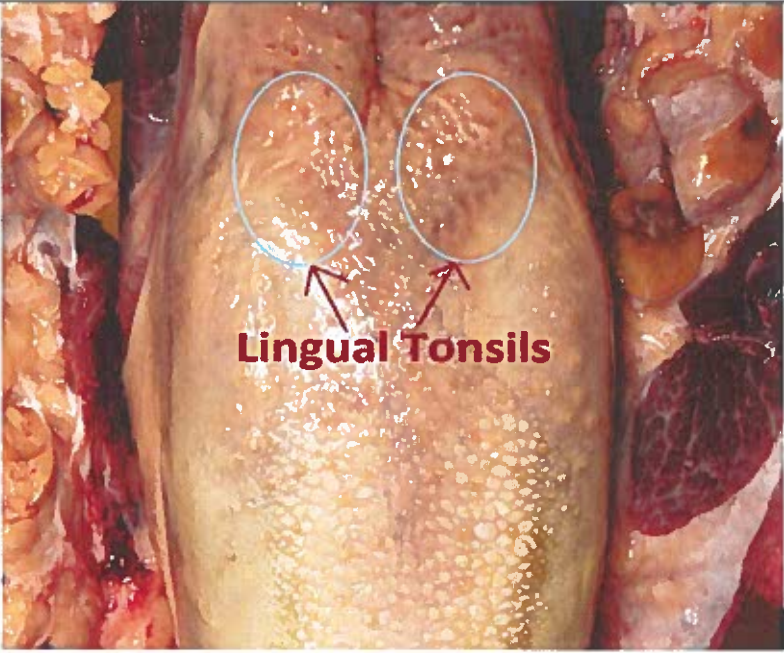

## Annex 2

### Correct Harvesting of Bovine Tongues destined for Japan

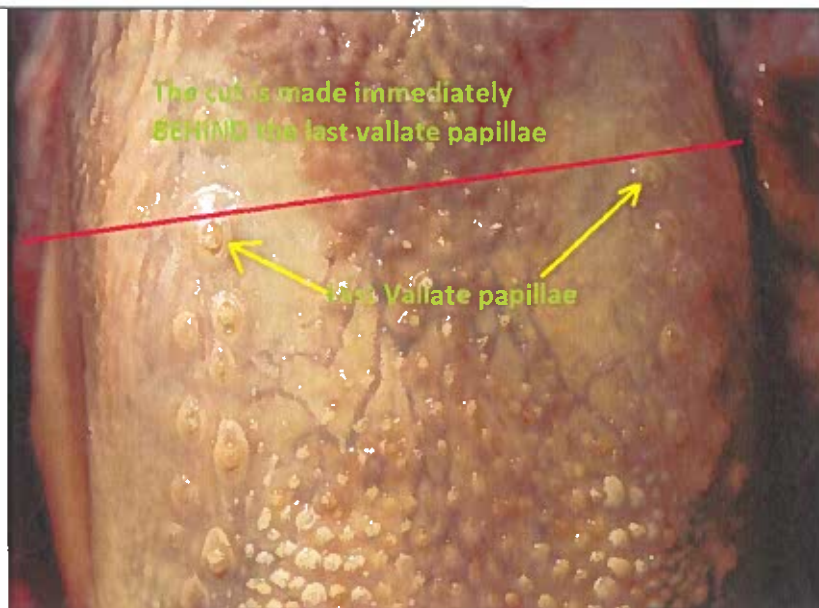
Section 4 of the Japanese EVP ([Annex 1](#)) clearly states that bovine tonsils, including lingual tonsil, must be excluded from Japanese trade.

It is incumbent on FBOs wishing to export tongues to Japan that they have a Japan tongue harvesting SOP and that they rigidly follow the harvesting method described below.

FBOs must put in place ongoing monitoring and verification of compliance with this and all Japanese requirements.

	<p>The lingual tonsils are situated under the mucosa of the tongue behind the vallate papillae.</p>
	<p>The vallate papillae are a double line of nodules on each side of the back of the tongue. The total number varies and there can be two rows on each side.</p>



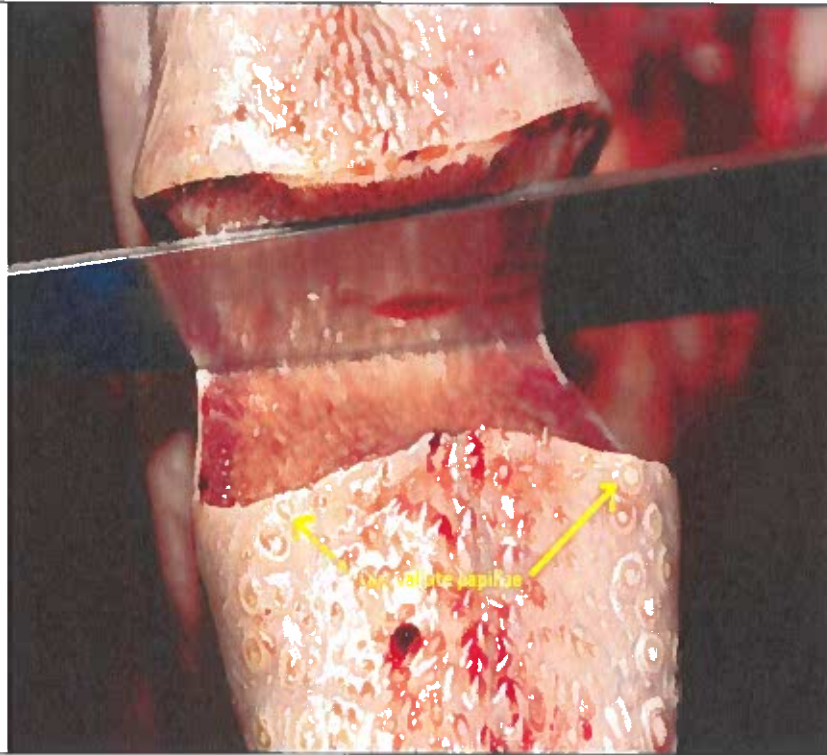


The "Last Vallate Papilla" is the one furthest back on the tongue. This is where the FBO must make the cut on the tongue.



The cut should be made just behind the last vallate papillae and should be made at a right angle to the surface of the tongue





This photo shows the correct location of the cut. All the vallate papillae may remain on the harvested tongue