Safe livestock feed:
Alternate feedstuff (cotton gin trash)

Livestock Production Assurance

As a Livestock Production Assurance (LPA) accredited red meat producer you can access cotton gin trash from approved gins as a form of feed for your livestock or for use as mulch. This is permitted under a strict protocol developed by industry, approved by SAFEMEAT and incorporated into the LPA program.

Before taking delivery of cotton gin trash you should understand how this will affect your LPA accreditation and the implications it will have for your Property Identification Code (PIC) on the National Livestock Identification System (NLIS) database.

You should also be aware that some buyers may choose not to purchase cattle or sheep that have been fed cotton gin trash.

This may compromise the value of your livestock and/or your ability to sell into your usual markets.

What do I need to do to source cotton gin trash?

As an LPA-accredited red meat producer you are responsible for making sure contaminants from feedstuffs given to your livestock do not enter the human food chain. LPA allows the feeding of cotton gin trash and its use as mulch under strict conditions.

Whenever you acquire cotton gin trash from an approved gin, as the owner/manager of the property receiving the shipment you must:

1. Complete and sign an Alternate Feedstuff Declaration (Cotton Gin Trash) which can be downloaded from **integritysystems.com.au/globalassets/isc/pdf-files/alternate-feedstuff-declaration-form-cotton-gin-trash/**. This document records the details of the gin; your trading name and details; and the amount and delivery date of the cotton gin trash order. In making this declaration you agree to abide by all requirements of LPA and NLIS in relation to cotton gin trash.
2. Send the completed Alternate Feedstuff Declaration (Cotton Gin Trash) to the approved Supplying Gin prior to delivery, and to LPA Administration at **operations@integritysystems.com.au** within seven (7) days of receival. The Supplying Gin must also then send a copy of the Declaration to LPA Administration.
3. Receive a completed Commodity Vendor Declaration (CVD) from the supplying gin.
4. Retain copies of the Alternate Feedstuff Declaration (Cotton Gin Trash) and Commodity Vendor Declaration for seven years as part of your LPA record keeping practices. Provide these documents on request to an LPA auditor.

Steps to source cotton gin trash to feed to livestock:

1	Producer contacts approved cotton gin **(cottonaustralia.com.au/approved-gin-trash-suppliers)**
2	Gin checks producer's LPA accreditation via the LPA Service Centre
3	Producer completes Alternate Feedstuff Declaration (Cotton Gin Trash) and provides a copy to: • Supplying gin to secure order • LPA Administration
4	Gin delivers cotton gin trash and a completed Commodity Vendor Declaration to the producer
5	Gin lodges copy of Alternate Feedstuff Declaration (Cotton Gin Trash) with LPA Administration (at **operations@integritysystems.com.au**) to activate NLIS status
6	The Property Identification Code (PIC) and individual devices are manually assigned an Accessed Cotton Gin Trash status on the NLIS database by an NLIS System Administrator
7	Producer files the Commodity Vendor Declaration and Alternate Feedstuff Declaration as per LPA record keeping requirements

Does this affect my NLIS status?

Once you sign the Alternate Feedstuff Declaration (Cotton Gin Trash) and it is sent to LPA Administration, the status "Accessed Cotton Gin Trash" will be assigned to your PIC on the NLIS database and will show against your individual NLIS devices (eartags and boluses). This information will be available to potential buyers of your livestock.

The PIC status remains until it has been independently verified that cotton gin trash is no longer accessible to cattle and sheep on your property, and a verification form has been submitted to LPA Administration. The device-based status will be removed once your livestock have been quarantined from cotton gin trash for a 60-day 'clean feed' period, during which they can be fed pasture, crop, fodder, silage or any other feed except for cotton gin trash.

Steps to remove the Accessed Cotton Gin Trash status on the NLIS database:

1. Producer stops feeding cotton gin trash to livestock
2. Producer engages independent Approved Auditor
3. Approved Auditor provides LPA Clean Feed Verification Form to the producer verifiying that animals no longer have access to cotton gin trash
4. Producer lodges verification form with LPA Administration at **operations@integritysystems.com.au**
5. LPA Administration initiates the 60 day countdown period on animals verified to be grazing on clean feed

Can I still move my livestock?

While your PIC has an "Accessed Cotton Gin Trash" status, whenever you move livestock to another PIC (whether it's your own or someone else's) you must complete the declaration at Question 9 (cattle) or Question 7 (sheep) on the relevant LPA National Vendor Declaration (NVD) by writing "Accessed Cotton Gin Trash".

Within two days of having moved the livestock, you must also notify the NLIS database of the movement.

Where do I send a copy of my signed Alternate Feedstuff Declaration to?

The producer must send the signed Declaration to the supplying gin AND to LPA Administration at **operations@integritysystems.com.au**.

How do I get the status removed?

Prior to consigning your livestock for slaughter or live export, they must complete the 60-day Export Animal Feed Interval. This time period has been set by SAFEMEAT as the minimum time needed to allow potential residues from cotton gin trash to leave your animals, making their meat eligible for domestic and export markets.

This must be verified at your expense by an Approved Auditor. A copy of the resulting signed LPA Clean Feed Verification Form must be sent to LPA Administration within two days. Once received by LPA Administration, the 60 day countdown period will be automatically initiated on the NLIS database.

Producers should be aware of the need to schedule an appointment for the verification audit with their preferred Approved Auditor at least two to three weeks in advance. Currently AUS-MEAT is the only Approved Auditor for clean feed period audits. Contact AUS-MEAT on telephone 07 3361 9200 or email at **ausmeat@ausmeat.com.au**.

What will an auditor want to look at during the audit?

When acquiring cotton gin trash for livestock feed or mulch, producers need to implement a management plan to manage potential food safety risks associated with feeding livestock cotton gin trash. The following list outlines the type of evidence that auditors may request to view to verify that livestock are grazing on clean feed and to determine when the clean feed period commenced.

- Purchase records – showing the date of purchase and the quantity of cotton gin trash introduced to the PIC.
- Feed records – which livestock have been fed cotton gin trash, when and quantity fed.
- Mulch records – which locations on the property have had cotton gin trash applied for use as mulch, including quantity and date
- Ability to reconcile the quantity of cotton gin trash acquired for each order (Declaration) with what has been fed to livestock or used as mulch on farm, and what remains in storage on farm.
- Photo evidence of the clean feed on the PIC and also of livestock moving onto clean feed (date and time stamped).
- Record of the area of clean feed and description of the clean feed to demonstrate that the clean feed is the primary source of nutrition for the livestock.
- Movement records of livestock being moved onto clean feed.
- Ability to record devices attached to cattle that have been moved onto clean feed (where specific animals need to be verified as grazing on clean feed).
- A record of livestock that have had access to cotton gin trash (individual or mob-based identification).
- Access to the NLIS database via an NLIS account to record movements off the PIC (as required).
- Incorporate the storage sites where cotton gin trash is stored on the Property Risk Assessment map.
- Auditors will want to be able to inspect storage sites, paddocks where cotton gin trash has been fed or is being used as mulch, and paddocks that have been identified as clean feed and sight the livestock grazing in the clean paddocks.

Do I have to wait for an audit to be conducted for the Clean Feed Period to commence?

No. The commencement of the Clean Feed Period can occur prior to the audit being undertaken, providing that the management plan implemented by the producer provides sufficient evidence to substantiate verification that the livestock have been grazing on clean feed from the stated date, by the Approved Auditor. This is the commercial decision of the producer.

If a producer does not have the evidence at audit to satisfy the Auditor that the clean feed period has commenced, the Auditor may determine that the clean feed period can only commence from the Audit Date (providing that any subsequent evidence requested by the Auditor satisfies the Clean Feed Period audit requirements).

What does the audit verify?

The audit will verify one of two situations:

(1) That the PIC no longer has access to cotton gin trash. In this situation, the Approved Auditor will verify that there is no longer cotton gin trash available on the PIC. This type of verification will allow a producer to request that the cotton gin trash status be removed from their PIC. Once the PIC status is removed, the Clean Feed Period will commence, and all livestock and devices residing on the PIC will have their individual cotton gin trash statuses removed.

(2) That a select group of livestock no longer have access to cotton gin trash and will verify when the Clean Feed Period commenced. By verifying the commencement of the Clean Feed Period for selected livestock, a producer will be able to have the individual cotton gin trash status removed from these livestock 60 days after the commencement of the Clean Feed Period as determined by the Auditor. This will then allow these animals to be consigned for slaughter, following the 60-day Clean Feed Period.

What happens if I don't pass the audit?

If a producer does not have the evidence at audit to satisfy the Auditor that the Clean Feed Period has commenced, the Approved Auditor may determine that the Clean Feed Period can only commence from the Audit Date. The Approved Auditor may request additional information following the audit to demonstrate that the management system implemented satisfies the requirements for the commencement of the Clean Feed Period.

An LPA Clean Feed Verification Form will only be completed, signed and provided to a producer following successful completion of the verification audit and payment of any fees associated with the audit.

Can I appeal the Auditor's findings?

No. The determination of the Auditor is final.

Will I need to have more than one audit?

Where cotton gin trash is fed over an extended period of time to numerous mobs, there may be a need for multiple verification audits to verify individual animals that have commenced the Clean Feed Period at different stages. It is recommended that you discuss your situation with the Approved Auditor when arranging for your audit.

Will anything else be covered in the audit?

The Clean Feed Verification audit will look specifically at the management practices you have implemented to manage cotton gin trash on your property.

Some Approved Auditors may conduct a full LPA audit while they are conducting the Clean Feed Verification audit. This is a voluntary audit at no additional cost, and if a producer agrees to a full LPA audit, they will be excluded from the LPA random audit pool for a period of three years. Completing a voluntary LPA audit will not exclude producers from the LPA Targeted Audit program.

What is the LPA Clean Feed Verification Form and why do I need it?

The LPA Clean Feed Verification Form is the official document that is required to enable any change in PIC of device-based status relating to Cotton Gin Trash to be removed from a PIC.

The form must be completed and signed by an Approved Auditor to provide evidence to LPA Administration that the Clean Feed Period has commenced. LPA Administration will use the information on the form to either remove the cotton gin trash PIC status from your PIC, or to commence the Clean Feed Period 60-day count-down on a specific list of livestock.

You will only receive a copy of the LPA Clean Feed Verification Form if the Approved Auditor is satisfied that livestock are grazing on clean feed, and you have paid for your audit.

Where do I send a copy of the signed Verification form to?

The producer must contract an Approved Auditor, and then lodge their Clean Feed Verification Form (provided by the auditor) with LPA Administration at **operations@integritysystems.com.au**. This will initiate a 60 day countdown on the NLIS database. Once completed, the Accessed Cotton Gin Trash status will be automatically removed from the PIC and individual devices.

Why do I need to follow this protocol?

Following the requirements of LPA ensures that potential chemical residue from cotton gin trash does not pose any risk to markets and protects the integrity of the red meat industry as a whole.

These requirements are critical, as Australia's red meat industry has been affected by this issue in the past. During the 1980s and 1990s, some of Australia's trading partners suspended imports of Australian beef after chemical residues were detected in meat from cattle that had either consumed cotton gin trash or grazed on land previously used for growing cotton. The chemicals responsible are no longer registered for use in Australia.

Where can I find out more?

Red meat producers can access further information via LPA. Resources developed specifically to cover feeding cotton gin trash to cattle and sheep or for use as mulch include this factsheet, frequently asked questions, the Alternate Feedstuff Declaration (Cotton Gin Trash), and the NLIS Database User Guide. The "**LPA Requirements: #3 Fodder crop, grain and pasture treatments and stock foods fact sheet**" may also be useful.

Visit **integritysystems.com.au/on-farm-assurance/alternative-feedstuff/**, call 1800 683 111 or email **info@integritysystems.com.au**.

Who is responsible for this protocol?

The protocol has been decided by SAFEMEAT in collaboration with the cotton industry. Integrity Systems, a business unit of Meat & Livestock Australia, is responsible for the administration of the LPA program, which underpins the protocol. Integrity Systems delivers the red meat industry's integrity system, including LPA, National Vendor Declarations (or eNVDs) and the NLIS.

Notes