



Chain of Custody Requirements

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Canadian Roundtable for Sustainable Beef
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The CRSB reserves the right to update this document at its sole discretion at any time. It is the user's responsibility to ensure that they are using the most current version of the document.

Versions:

Version no.	Publication date	Description
1.0	December 7, 2017	First published final version.
1.1	August 28, 2018	Clarifications in mass balance and addition of group level

The CRSB is not liable for any costs, or any potential, real or estimated loss of earnings resulting from any actions taken by a person or entity related to their participation in the program, including, without limitation, any actions taken prior to applying to become a participant.

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1.0 RESPONSIBILITY

The CRSB is responsible for the Chain of Custody Requirements. Readers should confirm they are using the most recent version of these requirements. The definitive version is kept on the CRSB's website: www.crsb.ca

2.0 EFFECTIVE DATE

These requirements are effective December 7, 2017.

3.0 REVIEW DATE

These requirements will be reviewed on an ongoing basis.

4.0 AIM

This document contains the chain of custody requirements that individuals or organizations making CRSB Off-Product and On-Product claims shall have in place to confirm that live cattle have moved through CRSB certified operations (up to the primary processor) and then the beef (after slaughter) has been sourced from CRSB certified operations.

Beef producers certified to the Sustainable Beef Production Standard do not require a chain of custody audit. Beef processors certified to the Sustainable Beef Processing Standard can be certified to the Standard but are not authorized to sell beef with a CRSB Claim unless they successfully complete a chain of custody audit.

The Certification Body will issue a CRSB Chain of Custody certificate when the requirements in this document are met via a successful audit.

5.0 DEFINITIONS

CRSB Claims: see the CRSB's Communications, Claims and Labelling Guide.

Certification Body – an organization or company that is approved to conduct CRSB chain of custody audits.

Chain of custody – The custodial sequence that occurs as ownership or control of the material supply is transferred from one custodian to another in the supply chain. Documenting chain of custody describes the list of all organizations (supply chain) that take ownership or control of a product during production, processing, shipping and retail (physically and/or administratively) (from ISEAL Alliance, 2016)

Chain of custody certification – formal recognition that a Participating Operator's chain of custody model meets the CRSB Chain of Custody Requirements.

Chain of custody model – the general term to describe the approach taken to demonstrate the link (physical or administrative) between the certified unit(s) of production and the claim about the final product (from ISEAL Alliance, 2016).

Chain of custody system – The complete set of documents and mechanisms used to verify the traceability between the certified unit(s) of production and the claim about the final product. The chain of custody system is the detailed application of the chain of custody model. The system normally includes requirements, a monitoring mechanism and sometimes an associated reporting system (usually online) (from ISEAL Alliance, 2016).

Conversion factor – a scientifically credible mathematical factor, rate or measure that is applied to a Participating Operator’s certified input that accounts for any potential losses during packing and/or processing. The conversion factor for Participating Operators must be based upon the Agriculture and Agri-Food Canada Red Meat Conversion Factors¹ or another scientifically acceptable method.

CRSB certified operations – operations certified to the Sustainable Beef Production and Sustainable Beef Processing Standards.

Entity – organization or individual operating in the certified supply chain.

Identity Preservation – Beef from each place of origin is uniquely identifiable to the birth farm. Beef from one certified place of origin is not mixed with product from another certified place of origin or beef from non-certified operations.

Input – cattle purchased from CRSB certified operations that are in scope for an audit, from birth through to and including the primary processor.

Mass balance – Physical mixing or blending of beef from CRSB certified operations and beef from a non-certified supply chain is allowed during processing; quantities are documented and controlled.

Output – beef from CRSB certified operations, being sold to one or more customers in the supply chain.

Participating Operator – facility seeking CRSB Chain of Custody certification.

Primary processor – a facility where live cattle are slaughtered and processed for human consumption.

¹ Agriculture and Agri-Food Canada. (2017). Red meat conversion factors. Available online: <http://www.agr.gc.ca/eng/industry-markets-and-trade/statistics-and-market-information/by-product-sector/red-meat-and-livestock-sector/red-meat-and-livestock-market-information/carcass-weight/conversion-factors/?id=141586000020>

Segregation – beef from a CRSB certified operations is kept separate from, and not mixed with, beef from a non-certified operations throughout acquisition, handling, processing, storage, packaging, delivery, transport and re-sale.

6.0 SCOPE

The scope for CRSB Chain of Custody Requirements include the management system and processing requirements for making claims about beef sourced from CRSB certified operations.

The requirements are applicable to any Participating Operator making Off-Product and/or On-Product claims to its customers. For the CRSB Certified Sustainable Beef Framework, chain of custody audits are required at the primary processor all the way through the supply chain and ends with the company or organization that is packaging the final product for sale to the end consumer.

Entities that are exempt from these Chain of Custody requirements include:

- i. Entities purchasing labelled product ready for sale to the end consumer
- ii. Entities purchasing labelled product in consumer-ready tamper-proof packaging for further distribution.
- iii. Entities in the supply chain prior to primary processing that are out of scope for CRSB sustainability audits (e.g. auction markets, transport)
- iv. Entities that do not take legal ownership of beef products from certified operations after the primary processor (e.g. transportation/logistics companies).

7.0 CATTLE TRACEABILITY BACKGROUND

As per the Canadian Food Inspection Agency (CFIA), all cattle born in Canada must be tagged with an approved Canadian Cattle Identification Agency (CCIA) radio frequency identification (RFID) ear tag upon leaving the farm of origin. All tags are visually and electronically embedded with a unique identification number. Learn more at <http://www.canadaid.com/>.

In order to enable labelling and sale of beef from CRSB certified operations and provide options for making CRSB approved claims, source cattle must be tracked from birth farm or ranch through the beef supply chain through to the processing plants where they are slaughtered.

8.0 MANAGEMENT SYSTEM REQUIREMENTS FOR PRIMARY PROCESSORS AND ENTITIES INVOLVED IN FURTHER PROCESSING OR PACKAGING OF BEEF PRODUCTS

The Participating Operator will have a documented management system that maintains the integrity of the information about cattle/beef that have moved through CRSB certified operations from birth through to and including primary processing. It must meet the following requirements:

- a. The Participating Operator shall identify a representative that is responsible and accountable for the chain of custody management system.
- b. The Participating Operator shall maintain a list of personnel involved in the implementation of the chain of custody management system.
- c. The Participating Operator shall provide training to all personnel involved in the implementation of the chain of custody management system.
- d. **For primary processor only:** Participating Operators shall have documented records (which must include evidence derived directly from a Certification Body) demonstrating that cattle have moved through the applicable CRSB certified operations using RFID and only beef from these animals shall be eligible to carry a CRSB Claim.
 - Cattle must move through CRSB certified operations (that are in scope for a certification audit in the Sustainable Beef Production Standard and Sustainable Beef Processing Standard) from birth up to and including the primary processor to qualify for a CRSB Claim.
 - If animals move out of certified management system to an operation that is out of scope for a CRSB audit and move back in within 6 months, they will still qualify for a CRSB Claim
 - Breeding stock qualify for a claim after 6 months on the operation (change of ownership required)
- e. Following the primary processing stage, the Participating Operator shall have written procedures in place for controlling the acquisition, handling, processing, mixing, storing, packaging, delivery, transport and resale of beef products coming from a CRSB Certified operations.
- f. As applicable, the Participating Operator shall identify the main processing steps and specify the conversion factor for each step. Conversion factors used within the processing facility must be based on Agriculture and Agri-Food Canada's Red Meat Conversion Factors or another scientifically accepted method. The calculations shall be documented and kept up-to-date.

- g. A yearly internal review of the chain of custody management system to confirm conformity with these requirements shall be conducted. Non-conformities must be addressed through a corrective action plan.
 - a. The internal review shall include at least one individual animal traceback to birth farm through CRSB certified operations to confirm the effectiveness of the chain of custody system.
- h. The Participating Operator shall document procedures to demonstrate how it avoids contamination or uncontrolled mixing (unless the mass balance model is adopted).
- i. The Participating Operator shall have a recall procedure for beef in the event that there is a break in their applicable chain of custody (e.g. contamination, uncontrolled mixing).
- j. All documentation shall be legible, dated, current, and kept for a minimum of five years.
- k. The Participating Operator shall only make CRSB approved claims, in accordance with the CRSB Communications and Claims Policy. The claims shall be approved by CRSB prior to use.

9.0 CHAIN OF CUSTODY MODELS

There are three allowable Chain of Custody models that a Participating Operator can use. Participating Operators cannot choose a model that is stricter than any previous link in the supply chain. For example, beef from CRSB certified operations can start in one chain of custody model and then transfer to another as it moves through the supply chain; however, it can only move from most strict to least strict (i.e., move in this order: identity preservation → segregation → mass balance → non-certified).

Identity Preservation

Beef originating from one birth farm that has moved through a CRSB certified operations cannot be mixed with beef from another birth farm, whether or not the other beef has moved through CRSB certified operations.

- Example: Processor or retailer wants to make a claim about the identity of the farm/ranch/feedlot the beef came from, the claim only applies if traced back through CRSB Certified operations to the birth farm
 - a. The Participating Operator shall track volumes of beef sold with a CRSB Claim.

Segregation

Beef that has moved through CRSB certified operations must be kept separate from beef that has not moved through CRSB certified operations.

- a. The Participating Operator shall track volumes of beef sold with a CRSB Claim.

Mass Balance

Physical mixing or blending of beef from CRSB certified operations and beef from a non-certified operations is allowed.

- a. The Participating Operator shall develop and maintain records to document volumes of beef from CRSB certified operations for the following: a) purchased as inputs that meet the claim requirements; b) inputs and outputs in stock; and c) outputs sold.
 - Volumes must be reconciled bi-annually. Outputs shall not exceed inputs at the time of reconciliation. Overages can be carried over for one reconciliation period.
- b. The Participating Operator shall ensure that the allocation of beef from CRSB certified operations being delivered and/or sold to its customer is consistent with the data to support the claim being passed on.
- c. The Participating Operator shall track volumes of beef sold with a CRSB Claim.
- d. Shortages shall not be permitted (i.e. outputs cannot exceed inputs). Shortages shall be reported immediately to the Certification Body and the CRSB. The Participating Operator shall be given 45 days to correct the shortage. If the shortage is not corrected in the given timeframe, the Chain of Custody certification shall be suspended, use of the certification mark shall cease, and this will be communicated to the applicable customers.

Group Level

This option is provided to Participating Operators with multiple sites. All of the requirements in the respective chain of custody model apply to the group level. In addition:

- a. the Participating Operator shall identify and define the facilities, applicable chain of custody models and the types of operations covered by their multi-site chain of custody system. Volumes must be tracked and reconciled at each individual site.

GENERAL CHAIN OF CUSTODY REQUIREMENTS

- a. The Participating Operator shall assume responsibility for the compliance of any sub-contractors to the CRSB Chain of Custody Requirements and shall have a documented system in place to ensure compliance.
- b. A copy of the CRSB Chain of Custody Certificate shall be provided to the customer (other than an end consumer) purchasing beef from a CRSB chain of custody certificate holder that carries a CRSB approved claim.
- c. The CRSB Chain of Custody Certificate number and the name of Participating Operator will be posted on the Certification Body's website, upon approval of the Participating Operator.
- d. Any information related to these requirements must be provided to the Certification Body or the CRSB upon request; timeframe dependent upon the nature of the request, to be specified by the Certification Body or CRSB in their request. The Certification Body and the CRSB reserve the right to conduct random audits at any time.
- e. The Participating Operator shall notify the Certification Body immediately regarding any substantive changes to the chain of custody management system.
- f. The Participating Operator will be audited by the Certification Body to these requirements according to the audit cycle set by the CRSB (see Assurance Protocol for details). Note that it is possible for one Participating Operator to have more than one chain of custody system.

Upon successful completion of a CRSB Chain of Custody audit, the Certification Body will issue a CRSB Chain of Custody Certificate.

References

International Social and Environmental Accreditation and Labelling (ISEAL) Alliance. (2016). Chain of custody models and definitions: A reference document for sustainability standards systems, and to complement ISEAL's Sustainability Claims Good Practice Guide. ISEAL Alliance, London, UK.