



Application and Assessment Form for Exemption

to HARPS Element 13.3 *Requirement for Process Treatment to AS4454*

Details of Application:

- Requests for exemptions must first be made with the HARPS administrator, using this form.
- A business that wishes to seek exemption from the requirement of Element 13.3 i.e. having their compost processes certified against AS4454, will need to:
 - complete relevant sections of this form, and
 - provide evidence of compliance, as outlined in the “Details of Evidence Required to be Provided by the Applicant” section below.
- Please email this completed form, along with all requested information/evidence to harps@harpsonline.com.au.
- In the subject header please type HARPS EXEMPTION TO ELEMENT 13.3 Request and Company Name.
- The cost of application will be **\$450 + GST** to process. An invoice will be generated, with a 14-day payment term applied. This application fee is non-refundable, irrespective of the outcome of the assessment
- The completed exemption request form and supporting information/evidence will be independently assessed by a HARPS appointed assessor.
- The assessor may contact you directly, if further evidence is required. Please provide all requested evidence to facilitate the review.
- HARPS will notify your business via email of the outcome once the request has been processed by the HARPS appointed assessor.
- Exemptions will be granted for a 12-month period. Upon payment of the invoice, the successful business will receive an approved HARPS exemption document with an assigned expiration date.
- The supplier will be required to sign an acknowledgment prior to this expiration date to extend this exemption for an additional 12-month period.
- The extension will be granted provided there has been no changes to the following criteria:
 - Change of ownership - if there has not been a significant change in the ownership or management of the site.
 - Change in scope of operations - if there have not been significant changes to existing processes, including changes to any control points.
 - Major structural or facility changes - if there have not been significant changes to the physical structure or layout of the facility, including relocation.
 - After a serious food safety incident - if there has not been a serious food safety incident, such as a major foodborne illness outbreak linked to the site.
 - Changes to legislative requirements - if there have not been any changes in local or international regulations that significantly affects the standards of the site.

- Changes to the HARPS standard – if there has not been a change to the HARPS standard that includes either a significant change to relevant clause or a significant update to the overall standard itself.
- If changes have been made to any of the above criteria, HARPS should be notified, and a decision for reassessment shall be provided by the HARPS standard owner. Reassessment would be needed to maintain the integrity and accuracy of the exemption.
- A full reassessment will be required every two years, with the assessment fee of **\$450 + GST** applicable.

Details of Evidence to be Provided by the Applicant:

To ensure your application has a strong chance for approval, please ensure your application contains evidence for each of the following:

1. Quality Management System Documentation

Provide documents showing consistent and controlled compost production, including:

- A **Process Flow Diagram** and **Process Description** detailing the compost treatment steps.

2. Process Records

Records showing compliance with your documented process, including:

- Information for the last 3 released batches: turning dates, dates of achieving core temperature, and daily core temperatures.
- Process documentation and records must clearly outline at a minimum:
 - Details in relation to the turning of outer material,
 - Internal core temperatures of the compost mass achieved,
 - The length of time taken, and
 - How raw manure is segregated from treated manure.

3. Risk Assessment

Submit a risk assessment that includes:

- Classification of manure risk level (low or high) based on the provided definitions.
- Consideration of human pathogens, pesticides, heavy metals, and other physical contaminants.
- Consideration of historical or current testing information.

4. Testing Records

Provide testing records for the last 3 batches, including:

- E.coli and Salmonella testing.
- Additional tests for pesticides and heavy metals if identified as risks.
- Use a NATA-accredited lab and approved test methods (see definitions section of the Application Form).
- Indicate the sampling plan for each batch.

5. Health Warning Confirmation

Submit written confirmation of health warnings provided to customers (e.g., on shipment documents for bulk products).

| HARPS Exemption to Element 13.3 Applicant Details (Completed by Applicant) | | |
|--|--|--|
| Company Name: | | |
| Address | | |
| Contact Name: | | |
| Position Title: | | |
| Telephone: | | |
| Email: | | |
| Full Assessment Details and Evidence Required for Submission (Evidence to be Provided by Applicant) | | |
| Requirement: | Detail: | Evidence Reviewed <i>(Reviewer Use Only)</i> |
| Quality Management System | The producer must demonstrate that they have implemented a quality management system that oversees the consistent and controlled production of treated compost. | |
| Process Risk Assessment | A risk assessment must determine whether the manure requires a lower or higher risk-appropriate treatment according to AS4454. The risk assessment must cover human pathogens, pesticides and heavy metals. Processes to eliminate hazards from physical contaminants such as plastics must also be evaluated. | |
| Description of Treatment Process | The producer must include a description of the treatment process (including target temperatures and times, and segregation of raw from processed manure). The process requirements must be no less rigorous than for AS4454. | |
| Test Certificates | The producer must demonstrate that they can provide production and batch testing records for each batch of treated product (i.e. a Certificate of Treatment for the buyer or user) showing what is being tested along with what are considered acceptable levels. Tests must cover <i>E. coli</i> and <i>Salmonella</i> as a minimum; pesticide residues and heavy metals must be included if the risk assessment | |

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| | determines that they pose a significant risk. | |
| Test Methodology (pathogens, pesticides, heavy metals) | Test methodologies must meet the requirements of AS4454 or suitable tests for the material tested as conducted by a NATA-accredited laboratory. | |
| Health Warnings | Health warnings should be provided to any purchaser in an appropriate form, for example as part of the delivery form. | |

| Definitions | | | | | | | | | | | | | |
|---|--|--|----------------------|------|----|------|----|------|----|------|----|-------|----|
| Lower risk materials process (AS4454:2012) | Where lower risk materials (including plant materials or vegetation) are used as feedstock, there shall be turning of outer material to the inside of the composting mass so the whole mass is subjected to a minimum of three turns with the internal temperature being maintained at a minimum of 55°C for three consecutive days or longer before each turn. | | | | | | | | | | | | |
| Higher risk materials process (AS4454:2012) | Where higher risk materials (including manure, animal waste, food or grease trap wastes) are used as feedstock, a longer process is necessary to counter risk of reinfection by the outside of the pile when turned. For these higher risk materials, the core temperature of the compost mass shall be maintained at 55°C or higher for 15 days or longer, and during this period the composting mass shall be turned a minimum of five times, turning outer material to the inside of the composting mass, so the whole mass is subjected to the required temperature/process conditions. | | | | | | | | | | | | |
| Sampling plan | <p>Sampling frequency must be determined by a risk assessment that includes consideration of previous testing.</p> <p>Suitable numbers of subsamples for different pile sizes are (AS4454:2012):</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th style="text-align: center;">Composting pile volume (m³)</th> <th style="text-align: center;">Number of subsamples</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><575</td> <td style="text-align: center;">12</td> </tr> <tr> <td style="text-align: center;">1000</td> <td style="text-align: center;">16</td> </tr> <tr> <td style="text-align: center;">2000</td> <td style="text-align: center;">23</td> </tr> <tr> <td style="text-align: center;">3000</td> <td style="text-align: center;">28</td> </tr> <tr> <td style="text-align: center;">>3600</td> <td style="text-align: center;">30</td> </tr> </tbody> </table> | Composting pile volume (m ³) | Number of subsamples | <575 | 12 | 1000 | 16 | 2000 | 23 | 3000 | 28 | >3600 | 30 |
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| 2000 | 23 | | | | | | | | | | | | |
| 3000 | 28 | | | | | | | | | | | | |
| >3600 | 30 | | | | | | | | | | | | |
| Microbial limits | <ul style="list-style-type: none"> • <i>Salmonella</i> spp.: Absent in 50g (dry weight equivalent) (AS4454:2012) • <i>E. coli</i>: <100 cfu/g • Faecal coliforms: <1,000 MPN/g (dry weight equivalent) - (AS4454:2012) | | | | | | | | | | | | |
| Pathogen indicator test methodologies (AS4454:2012) | <ol style="list-style-type: none"> 1. AS/NZS 4276:7:2007, Water microbiology-Escherichia coli and thermotolerant coliforms-Membrane filtration method. 2. AS 5013.10-2009, Food microbiology-Method 10: Microbiology of food and animal feeding stuff-Horizontal method for the detection of <i>Salmonella</i> spp. (ISO 6579:2002, MOD). 3. AS 5013.15-2006, Food microbiology-Method 15: Microbiology of food and animal feeding stuff-Horizontal method for the detection and enumeration of presumptive <i>Escherichia coli</i>-Most probable number technique. | | | | | | | | | | | | |
| Health warning (AS4454:2012) | <p>Health warnings include:</p> <p>Health Warning</p> <ul style="list-style-type: none"> • This Product Contains Microorganisms • Avoid Breathing Dust or Mists • Wear Particulate Mask If Dusty • Wear Gloves and Keep Product Moist When Handling • Wash Hands Immediately After Use | | | | | | | | | | | | |

| Full Assessment Outcome <i>(Reviewers Use Only)</i> | |
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| Reviewer: | |
| Date of Approval: | |
| Summary of Assessment: | |
| Recommendation: | An exemption to implementing AS4454 is recommended / not recommended. |