



Question & Answer Document

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

Dear HARPS Community

HARPS have launched an exemption process to HARPS Element 13.3 Treatment of Manure.

HARPS Element	Requirement	Document	Tier
13.3	<p>Treatment of Manure</p> <p>Businesses that purchase treated manure must buy this from a company where the process is certified to AS4454 Composts, Soil Conditioners and Mulches (or an international equivalent).</p> <p>Businesses that treat their own manure must have their process certified to AS4454 (or an international equivalent).</p> <p>Green waste must not be introduced into the process.</p>	Record	1 & 2

The following document provides guidance and answers to common questions about the new HARPS exemption process for Element 13.3 Treatment of Manure.

Questions and Answers:

Q1. What is the process of application for an exemption to Element 13.3?

A2. To apply for an exemption, follow these steps:

1. Submit a request through the HARPS administrator using the **Application and Assessment Form for Exemption to HARPS Element 13.3**.
2. Complete the relevant sections of the form and provide supporting evidence as outlined in the "Full Assessment Details and Evidence Required for Submission" section.
3. Email the completed form and all supporting documents to harps@harpsonline.com.au with the subject line: "HARPS EXEMPTION TO ELEMENT 13.3 Request - [Company Name]."
4. A non-refundable application fee of \$450 + GST will be invoiced, with a 14-day payment term.
5. The HARPS appointed assessor will review the exemption request and may contact you for additional information if necessary.
6. HARPS will notify your business via email of the outcome once the request has been processed by the HARPS appointed assessor.

Please refer to the **Application and Assessment Form for Exemption to HARPS Element 13.3** for full details on the application process.

Q2. Who should apply for exemption to Element 13.3?

A2. The applicant should be the business seeking exemption from Element 13.3, specifically those needing an exemption from AS4454 certification for their manure treatment process. This could be a HARPS supplier if the process occurs on-site or an independent producer of treated manure.

Q3. Who is the Independent Reviewer selected by HARPS and why is an Independent Reviewer Required?

A3. HARPS requires an independent expert to thoroughly assess each application. Andreas Klieber from Quality Associates has been appointed due to his familiarity with HARPS standards and assessment criteria, ensuring a thorough and consistent review.

Q4. Why has HARPS only selected one reviewer for exemptions in relation to Element 13.3?

A4. Using a single reviewer ensures uniformity and consistency in assessment, reducing discrepancies and maintaining high standards across all exemption applications.

Q5. What documentation must be submitted as part of the application process for exemption?

A5. For further details, please refer to the **Application and Assessment Form for Exemption to HAPRS Element 13.3**. To improve your chances of approval, ensure your application includes:

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).

Q6. How long does the exemption last?

A6. Approved exemptions are valid for 12 months and will be recorded in the “Approved Exemption Record.”

After 12 months, an additional 12-month extension can be granted once the applicant signs an acknowledgment. This extension will be added to an updated “Approved Extension to Exemption Record.”

A full reassessment will be required every 2 years, with the assessment fee of \$450 + GST applicable.

Q7. What criteria must I meet to receive a 12-month period of extension?

The 12-month extension will be granted provided there has been no change 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 not have 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.

Q8. What must I do if there have been changes to my business during my exemption period?

A8. If any of the following changes occur, HARPS must be notified immediately:

- Ownership or management changes at the site
- Changes in operations scope, such as updates to key processes or control points
- Major structural or facility changes, including significant layout adjustments or relocation
- Serious food safety incidents, like a major foodborne illness outbreak linked to the site

HARPS will decide if a reassessment is needed to ensure the exemption remains valid and accurate.

Q9. Why is there a cost for the exemption request?

A9. The exemption process requires an independent reviewer to assess data for AS4454 compliance, ensuring accuracy and consistency. The independent reviewer’s fee and HARPS administrative costs are covered by the \$450 + GST application fee.

The application fee is non-refundable, irrespective of the assessment outcome.

Q10. Is there a fee for re-application?

A10. Yes, reapplication is required if the initial exemption is denied or every two years if approved. The full application fee of \$450 + GST is required each time.

Q11. When is the application fee be payable?

A11. HARPS invoices the \$450 + GST fee once the application is received, with a 14-day payment term. The fee is payable regardless of the exemption outcome.

Q12. What is the likely turnaround time for an exemption request assessment?

A12. Provided all documents are included, the assessment should take about 7 working days. Missing documentation or additional evidence requests may delay the process.

Q13. Will I have a chance to submit additional information for my application, if it is required during the assessment process?

A13. Yes, if further information is needed, the reviewer will contact you once with specific requests. You must submit all requested information, as the reviewer will not ask twice. The final review will conclude the process.

HARPS will inform you of the exemption approval or provide reasons for rejection.

If you have any additional questions or queries in relation to the above information, please feel free to reach out.

Best regards,

HARPS Management Team

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