



Egg Standards of Australia

Certifying Body Protocol

March 2023

This information introduces the Egg Standards of Australia program and details the requirements of Certifying Bodies and auditors

Background

Egg Standards of Australia (**ESA**) is a voluntary quality assurance program that has been developed through an extensive consultation process, to provide a practical mechanism to demonstrate compliance with egg production standards.

ESA replaces the previous egg industry scheme, Egg Corp Assured (**ECA**). ESA provides greater clarity and a more robust set of compliance standards that have been independently reviewed against current Australian customer and regulatory requirements.

ESA has been developed (based on the principles of Hazard Analysis Critical Control Point - **HACCP**) to provide a compliance framework for egg farmers in meeting the needs of regulators, retailers, and egg buyers in areas including hen welfare, egg quality, biosecurity, food safety, work health and safety and environmental management.

1. Introduction

Australian Eggs Limited (ACN 102 859 585) is a member owned not-for-profit company providing marketing and research & development (R&D) services for the benefit of Australian egg farmers.

1.1 Criteria

The criteria set out in this Protocol has been developed to;

- Enable ESA Program Manager to receive applications from and register Certifying Bodies to the ESA
- Enable ESA Program Manager to register Auditors to the ESA
- Enable Certifying Bodies to certify new, and maintain certification of existing Rearing and Laying and Grading and Packing sites.

1.2 Contact

Contact details for all Auditor correspondence:

ESA Program Manager
Mérieux NutriSciences
U2/120 Fison Avenue, West Eagle Farm, QLD, 4009, Australia
Mobile: 0439 747 219
esaaudits.au@mxns.com.

1.3 Reference documents

Egg Standards of Australia Introduction and Rules – November 2018

Egg Standards of Australia for Rearing and Layer Farms – November 2019

Egg Standards of Australia for Grading and Packing Floors – November 2019

Model Code of Practice for the welfare of Animals, Domestic Poultry 4th edition

2. Definitions, interpretations and abbreviations

2.1. Definitions

Within this document, the following terms and abbreviations are defined as:

- **Approved** means approved by Australian Eggs Limited
- **Audit** means a systematic and independent examination to verify that an Establishment is acting in accordance with the ESA Standards
- **Auditor** means a person approved by ESA to conduct Audits against the Standard.
- **Australian Eggs** means Australian Eggs Limited ACN102 859 585
- **Anniversary month** means the month in which the initial ESA certification audit was conducted. Recertification audits must occur during or before this month each year
- **CAR(s)** means Corrective Action Request(s)
- **Certification** means certification of a Site by Australian Eggs in accordance with the ESA
- **Introduction and Rules.** The following terms can be used to describe a Site's ESA Certification Status:
 - **"Applied"** status means the Egg Business is new to the program and is currently going through the certification process
 - **"Certified"** status means the Site has demonstrated compliance across all elements of the Standard(s) in the most recent audit, which was less than 12 months ago
 - **"Certification Pending"** status means the Site is in the process of re-certification or attaining certification for the first time. This status is used where: the Site has recently undergone a re-certification Audit and is in the process of closing out its CARs or where the Sites' Certification has expired but a re-certification Audit is scheduled in the three months' following certification expiry
 - **"Suspended"** status means the Site is currently uncertified due to failing to close CARs in the appropriate time frame, or having unresolved Critical CARs
 - **"Audit Deferred"** status means the Site has been granted an extension on their current certification, despite not undertaking a successful re-certification Audit within the standard 12-month period
 - **"Cancelled"** status means the Site has been removed from the ESA Program upon written request from Australian Eggs
 - **"Withdrawn"** status means the Site has in writing notified the ESA Program Manager or Certification Body that they have voluntarily stopped participating in the ESA program
- **Certification Body** means a JAS-ANZ (or equivalent) Accredited Assessment Body approved by Australian Eggs to provide auditing services to ESA:

- **Egg Business** means a business which produces and/or sells eggs
- **Site** means an Egg Business or a unit of an Egg Business which requires ESA certification.
- This includes Rearing and Layer farms and Grading and Packing Floors
- **ESA** means Egg Standards of Australia
- **ESA Program Manager** means the independent company contracted by Australian Eggs to manage and oversee the administration and day-to-day operations of ESA
- **Grading and Packing Floor** means a Site primarily involved in the processing of eggs, this includes the grading and packing of eggs
- **Rearing and Layer Farm** means a Site primarily involved in the primary production of eggs, this includes the rearing of pullets to the point of lay and up to the collection of the egg
- **Registration** means the receipt and recording of an Egg Business' details with the ESA Program Manager
- **Standard(s)** means ESA Certification Program which encompasses ESA for Rearing and Layer farms and ESA for Grading and Packing floors and any amendments made hereto from time to time
- **Trademark** means registered trademarks of Australian Eggs Limited relating to conformance with the Standards
- **Verification** means confirmation, through the review of objective evidence, that requirements have been fulfilled.
- **Remote Audits** are conducted upon application to the ESA Program Manager. Remote audits are considered for approval on a case by case basis and are not conducted consecutively.
 - A blended audit can be considered where a minimum of 50% of allocated time at audit can be conducted on farm with remaining time completed via remote audit on documentation review only.

1.2. Variation

Australian Eggs may from time to time by notice to the ESA Program Manager, Certification Body or Auditor vary this Protocol. A variation takes effect seven (7) days after Australian Eggs sends the notice or from any other date specified in the notice and has effect despite any accidental failure to give notice.

1.3. Use of information

Each Certification Body and Auditor acknowledge that Australian Eggs may use information concerning the Certification Body or Auditor or the business of the Certification Body or Auditor obtained in connection with this Protocol or Registration in such manner as Australian Eggs considers appropriate for the purposes of this Protocol including:

- i. Providing any or all such information to Department of Agriculture in connection with the activities of the Auditor;

- ii. Providing any or all such information to the relevant State or Territory Authority in connection with the activities of the Auditor; and
- iii. Publishing any or all such information as Australian Eggs considers necessary or desirable for the purposes of the ESA program.

1.4. Use of logos

- i. Australian Eggs Limited Logo (registered trademark)

The Australian Eggs logo is the trademark of Australian Eggs Limited and must not be used by a Certification Body or Auditor without the written permission of Australian Eggs Limited. Permission will only be given on such terms and conditions as Australian Eggs Limited determines permission and use of the ESA logo will be revoked where a farm's certification is suspended or withdrawn, the farm will be required to immediately cease use of the logo in all forms..

- ii. ESA logo

The Egg Standards of Australia logo is the trademark of Australian Eggs Limited and must not be used by a Certification Body or Auditor without the written permission of Australian Eggs Limited.

Permission will only be given on such terms and conditions as Australian Eggs Limited determines.

3. Protocol – Certification Body and Auditor

3.1. Certification Body – Registration

- i. Only JAS-ANZ accredited Certification Bodies will be eligible to be considered for approval to provide Audits against the ESA standard.
- ii. Prior to the ESA Program Manager registering additional Certification Bodies, Australian Eggs will determine if the need exists, that any new Certification Body will provide a benefit to the industry and that the Certification Body has the ability to develop and maintain a sustainable presence in the Egg Industry.
- iii. Only Certification Bodies Registered by ESA Program Manager may offer certification services for the ESA Program.
- iv. Australian Eggs will maintain a list of Certification Bodies approved to provide Audits against the ESA.

3.2. Certification Body – Audits

- i. A Certification Body via its Auditors may in accordance with this Protocol:
 - (a) conduct Audits at Sites to assess the Sites compliance with the ESA; and

- (b) carry out any other activities referred to in the Protocol, including making recommendations to the ESA Program Manager concerning the continued Certification of the Site pursuant to the Protocol.
- ii. Each Audit must be conducted in accordance with the requirements set out in the International Standard: ISO 19011: 2018 Guidelines for Auditing management systems.
- iii. The Certifying Body will plan and schedule Audits in accordance with the following sampling regime:
 - (a) Each production system within the Site's certification scope must be Audited (e.g. rearing, free range, barn and cage). Sheds must be populated and not under vaccination.
 - i. Farms who undertake a successful free range audit are entitled to a barn certificate. A shed operating as 'barn' does not need to be audited.
 - ii. Farms who undertake a successful barn audit are not automatically entitled to a free range certificate.
 - iii. Farms who undertake a successful barn audit and later request a free range certificate will need to have their range area audited (in a full or gap audit) in order to attain a free range certificate.
 - (b) for each production system the total number of sheds inspected should be based on the below table.

Sheds per Production System	Required Sample Size
1-3	2
4-8	3
9-15	4
16-24*	5

*Where number of sheds exceed 25 sample size should be calculated using the formula; $\sqrt{\text{shed number}} + 1$, where number equals <0.5 or 0.5> round the sample size number up or down respectively.

3.3. Certification Body – Records

- i. Certification Bodies must maintain records of each ESA Audit in a format and to a level of detail acceptable to the ESA Program Manager.
- ii. Without limiting the generality of the above paragraph, the records must:
 - (a) demonstrate that Audit activities have been carried out in accordance with this Protocol;
 - (b) contain complete assessment reports for each ESA Site, prepared immediately following each Audit of that Site; and
 - (c) be identified, managed, maintained and disposed of in a manner which ensures the confidentiality of the information contained in them.
- iii. The records referred to in clause 3.3.i must be kept by the Certification Body for at least 7 years and must be provided to the ESA Program Manager on request.

3.4. Auditor – Registration

ESA Auditor Registration requires:

- i. Each Auditor must, at all times be providing their services to an ESA Certification Body and fulfil the requirements of the Certification Body
- ii. Each Auditor must keep their registration current through participating in any required ESA training, including the annual ESA Auditor calibration and pass all associated examinations.

Auditors failing to meet any of the above requirements are not permitted to conduct activities associated with the ESA program.

4. Obligations – Certification Body and Auditor

4.1. Confidentiality

- i. Except as required by law, no Certification Body or Auditor may:
 - (a) except in the proper course of performing the activities or its obligations under this Protocol, disclose to any person without the prior written consent of the Site any information obtained from the Site; or
 - (b) use or attempt to use any information obtained from the Site in any manner which may cause or be calculated to cause injury or loss to the Site or in any manner other than that contemplated by this Protocol.
- ii. The Certification Body and/or Auditor must at all times take all necessary precautions to maintain the secrecy and confidentiality of information obtained from each Site and must:
 - (a) prevent its disclosure directly or indirectly to any person other than in accordance with this Protocol.
- iii. Where a Certification Body or Auditor is required by law to disclose information obtained from a Site, the Certification Body or Auditor must, immediately on becoming aware of that requirement, inform Australian Eggs and the Site of the required disclosure.

4.2. Sub-contracting

- i. A Certification Body or Auditor must not subcontract any part of their activities to any other body or person without the prior written consent of the ESA Program Manager.
- ii. If a Certification Body or Auditor proposes to subcontract any part of its activities to another body or person, the Certification Body or Auditor must apply to the ESA Program Manager in writing stating:
 - (a) which of the activities are proposed to be subcontracted;
 - (b) the name of the person or organisation to whom the activities are proposed to be subcontracted; and

- (c) the relevant licenses and qualifications held by the organisation or person, enabling them to effectively carry out activities outlined in this document.

1.3. Comply with all laws

Each Certification Body and Auditor must comply with all laws when performing its obligations under this Protocol.

1.4. Notifications to the ESA Program Manager

The Certification Body and/or Auditor must, within 24 hours of becoming aware of any of the points listed below notify Australian Eggs in writing providing details of:

- (a) perceived or actual conflict of interest;
- (b) cancelation of registration by JAS-ANZ or equivalent; and
- (c) other changes in circumstances which may affect the Certification Body or Auditors ability to undertake the activities specified in section 3 of this Protocol.

1.5. Certifying Body and Auditor Withdrawal

A Certification Body may by written notice to the ESA Program Manager withdraw their Registration under this Protocol.

In the event that an Auditor expresses to their Certification Body they no longer wish to Audit ESA Sites, the Certification Body must notify the ESA Program Manager of this.

5. Protocol – ESA Program Manager

5.1. Site certification database

ESA Program Manager will maintain the database of all ESA Certified Sites; containing for each Site:

- (a) the name and contact details of the ESA representative
- (b) scope of Certification
- (c) flock number at Site
- (d) level of Certification
- (e) Certification expiry date.

5.2. Certification Body and Auditor register

- i. The ESA Program Manager will maintain a register containing (in addition to any other information that may be considered appropriate by Australian Eggs):

- a) the name, and contact details for the ESA contact within each Certification Body;
 - b) the name, and contact details for each ESA Auditor;
 - c) the date of Registration of each ESA Auditor; and
 - d) a record of all ESA training and assessments undertaken by each ESA Auditor and, where relevant, result of assessments
- ii. The ESA Program Manager may use the information contained in the register as it considers appropriate.

1.3. Certification Body and Auditor breach

If a Certification Body or Auditor breaches any term of this Protocol, the ESA Program Manager may give a written notice to the Certification Body or Auditor specifying the breach and doing one or more of the following:

- (a) require the Certification Body or Auditor to rectify the breach within a period specified in the notice;
- (b) suspend the Registration of the Certification Body or Auditor, the length of suspension must be justified and specified in the breach notification provided to the Certifying Body or Auditor;
- (c) following thorough investigation of the breach and after consultation with Australian Eggs, withdraw the Registration of the Certifying Body or Auditor.

1.4. Notification

ESA Program Manager will notify Australian Eggs in all events of:

- (a) Certifying Body or Auditor Breach
- (b) Critical CAR raised on ESA Site
- (c) Suspension of an ESA Site
- (d) Auditor and Certification Body reporting Critical CAR with a Standard(s) or Site
- (e) Incidents which could adversely affect the quality or reputation of the ESA program.

6. Protocol-site certification

6.1. Responsibilities

- i. Certifying Body Responsibilities

It is the responsibility of the Certification Body:

- (a) to provide the Site with an Auditor before the Site's Certification expiry date, preferably within a timeframe that enables sufficient time for any CARs to be closed out prior to Certification Expiry date
 - (b) to provide a registered and capable Auditor for every ESA Audit
 - (c) to incur only those costs necessary for Audit to the Site
 - ii. Auditor Responsibilities
- Each Auditor must carry out all ESA Audit activities:
- (a) thoroughly and comprehensively
 - (b) in a manner which respects the workers, protocols and the rules of the Site
 - (c) in a manner which enables the ESA Program Manager to determine conclusively from a review of the Audit documentation whether the Site complies with the Standard(s).

6.2. Process

6.2.1 Site Detail Registration

- i. In order to gain Certification with the ESA, Sites are required to register their details with the ESA Program Manager, as described in 5.1 points (a)-(d).
- ii. The ESA Program Manager is required to provide the Site with contact details for Certifying Bodies

6.2.2 Initial certification

- i. Sites are required to contact a Certification Body of their choosing to schedule their initial ESA Audit.
- ii. Site to undertake initial certification Audit with ESA Auditor. The date of the Site's initial ESA Audit will be their Certification expiry date.
- iii. Following the Audit, Site Certification will be granted upon the Certifying Body and the ESA Program Manager being satisfied the Site complies with the ESA.
- iv. A Site attaining Certification will be issued with an electronic Certificate from the Certifying Body, with a 12-month expiry from the Audit date.
- v. Sites that are certified free range production systems are eligible to apply for a barn certification without audit.
- vi. Sites that are certified barn production systems require a gap audit to attain free range certification.

6.2.3 Re-certification

- i. After an initial Audit, the Site must ensure that it is Audited within 11 months to maintain ESA certification

- ii. The Site should schedule their re-certification Audit (i.e. each subsequent Audit) a minimum of three months before their Certification expiry date
- iii. It is the responsibility of the Site to schedule subsequent Audits with a Certification Body
- iv. Sites can voluntarily shift their Certification expiry date forward by scheduling an earlier recertification Audit with their Certification Body
- v. In all other circumstances, the date of the initial Site Audit will continue to be the Certification expiry date, regardless of Audit being delayed or deferred

6.3. Audit

6.3.1 Process

The Audit process is comprised of, in chronological order:

- i. Onsite- an opening meeting between the Site's ESA representative and/or business management representative and the Auditor
- ii. Onsite- full evaluation of all elements of the Standard(s), including physical operations and all supporting documentation by the Auditor
- iii. Onsite- a closing meeting where the Auditor will clearly present the results of the Audit, including providing in writing all CARs raised to the Site representative.
- iv. Offsite- completion of a full Audit Report by the Auditor, in the format stipulated by the Certifying Body
- v. Offsite submission of completed report to the Certifying Body within the timeframe stipulated by Certifying Body

6.3.2 Element

For each element of the Standard(s) the Auditor will deem the Site:

- i. Compliant
- ii. Non-compliant with a Critical CAR issued – an issue presenting an immediate risk to food safety, animal welfare, the environment, or a breach of legislation, or when the integrity of the ESA Program has been compromised.
 - (a) Critical CAR(s) must be addressed within 24 hours; and
 - (b) The Sites certification status will be 'Suspended' by the ESA Program Manager within the ESA database until the Critical CAR(s) have been addressed.
 - (c) Refer to section 6.5 for further action required in the case of a Critical CAR.
- iii. Non-compliant with a Major CAR issued – raised when there is the potential to compromise food safety, animal welfare or the environment, or the potential to compromise the integrity of the ESA Program.

- (a) Major CARs must be addressed within 14 days of Audit; and
 - (b) If the Major CARs are not resolved within the nominated 14-day period, the Sites certification status will be 'Suspended' by the ESA Program Manager within the ESA database until such time as the corrective action request(s) are addressed.
- iv. Non-compliant with a Minor CAR issued – raised where the issue is in contradiction to the requirements stated in the ESA but is not likely to directly impact on food safety, animal welfare or the environment, or on the integrity of the ESA Program. a. Minor CARs must be addressed within 28 days of Audit; and
 - (a) If the Minor CARs are not resolved within the nominated 28-day period, the Site's certification status will be 'Suspended' within the ESA database until such time as the corrective action request(s) are addressed.
 - (b) If the same Minor CAR is identified at the next Audit, it will be immediately raised as a Major CAR and the associated close out times apply.

6.4. Corrective Action Requests (CARs)

- i. Sites will be required to provide evidence to their Auditor or Certification Body (as stipulated by the Certification Body) of action taken to address CARs. On acceptance (close out) of all CARs, ESA certification can be granted by the Certification Body.
- ii. Sites are able to dispute a CAR with the Certification Body should they feel there is insufficient evidence of non-compliance. The Certification Body is responsible for assessing the dispute and overturning or upholding the given CAR. (a) All CAR objections from the Site should be lodged with the Certifying Body in writing.
- iii. Wherever practical, outstanding issues will be 'closed out' remotely through written or photographic evidence. However, in the event where evidence of 'close out' for outstanding issues cannot be provided remotely, a follow-up Audit may need to be scheduled, at the expense of the Site.

6.5. Critical CARs

6.5.1 Auditor Action

If an Auditor identifies a Critical CAR during a Site Audit the Auditor must:

- i. Immediately, or as soon as is practical notify the Certifying Body and ESA Program Manager and relay all relevant information in writing regarding the Critical CAR;
- ii. Recommend appropriate action(s) to the Site at the time of the Audit;
- iii. Provide all assistance reasonably required by the ESA Program Manager to investigate the matter.

In the event of a Critical CAR having been identified by the Auditor, the Auditor may use their judgement in deciding whether to complete the Audit or not.

6.5.2 Australian Eggs and ESA Program Manager action

Critical CARs require immediate action. The ESA Administration should notify Australian Eggs within the hour once they have been made aware of a Critical CAR.

6.5.3 Site Action

The Site should act immediately to rectify the given CAR. Critical CARs must be closed out within 24 hours. The Site's Certification will be Suspended until the CAR closure is verified by the Certifying Body.

6.6. Certification decision

- i. A Site can only receive 'Certified' status when compliant with all elements of the Standard(s). Therefore, any CARs must be addressed before Certification is provided. In the meantime, a Site which has undergone a re-certification Audit but has CARs to close out will be given a 'Certification Pending' status.
- ii. Auditor is to submit the full Audit report to the Certification Body. The full Audit report will be reviewed by the Certification Body prior to a Certification decision.
- iii. The Certification decision will be communicated to the Site and the ESA Program Manager by the Certification Body within 10 working days of the Audit completion date. The Certification Body must complete an initial review prior to sending audit report and decision to the ESA Program Manager for upload, followed by a final review report for certification issue. The process is required to be and documented by the Certification Body electronically. Possible Audit results are:
 - (a) 'Certified' – a Site has demonstrated adequate compliance and commitment to all elements of the Standard(s), with no Critical, Major or Minor CARs raised at Audit; or
 - (b) 'Certification pending' – a Site has outstanding Critical, Major or Minor CARs raised at Audit. Where CARs have been raised, the Certifying Body will communicate the information to the Site, providing the timeframes and process for correction.
- iv. Following corrective actions being taken by the site as per the requirements of the Audit, and these being accepted by the Certifying Body, Site will be 'Certified'. This will be reflected in the ESA Program Managers' database.

7. Representation

All eggs represented for sale as 'ESA' must be:

- i. Produced by a Site with current ESA certification or 'in recognition' certification
- ii. Packed by a Site with current ESA certification or 'in recognition' certification

8. Certification

- i. The electronic certificates provided to the site are in the format approved by Australian Eggs.
- ii. Once issued, ESA certificates are not transferrable to other Sites or business names.
- iii. The certification status of all ESA certified Sites is accessible to the public via the ESA Program Manager's website.

8.1. Certification expiry

- i. Sites with a certification which has been expired for less than three months (i.e. their most recent Audit was between 12 and 15 months ago) will be given 'Certification Pending' status
- ii. Any Site which allows their certification to become expired for longer than three months will be given a 'Suspended' status
- iii. In this instance, the Certifying Body will notify the Site in writing at least 10 working days prior to the change in status
- iv. A Site's 'Suspended' status will be reverted to 'Certified' upon compliance being demonstrated through Audit
- v. Sites with an Expired or 'Suspended' status will not be able to represent their eggs as 'ESA'

8.2. Certification suspension

In addition to the information given in clause 8.1, Sites may be given a 'Suspended' status if:

- i. For any reason the Auditor cannot complete an Audit in full, including because the Site fails to provide appropriate access to facilities or records, or otherwise fails to cooperate in the Audit process;
- ii. The Site fails to pay any fees in connection with the ESA Program;
- iii. The Site supplies false or misleading information to the ESA Program Manager, Certification Body or Auditor;
- iv. A Critical CAR is raised;
- v. A Major or Minor CAR is raised and the required action to rectify the non-conformance has not occurred within the required timeframe; or
- vi. Australian Eggs or the Certification Body has reason to believe that the Site has breached a material provision of ESA Rules or is not maintaining compliance with the stated requirements of the relevant ESA Standard and is unable or unwilling to do so.

9. Notification

Australian Eggs has the right to inform a Sites' customers, and where relevant, the appropriate authorities of changes to a Sites ESA certification status.

10. Site audit deferral

Where a Site is unable to host an Audit due to adverse circumstances and this unexpectedly jeopardises their Site Certification, Sites can apply to their Certifying Body to defer their Audit.

- i. Successful applicants will be placed on 'Audit Deferred' status
- ii. Applications for an Audit Deferral (i.e. to postpone re-certification Audit until past the anniversary date) should be made by the Site, in writing, to the Certifying Body
- iii. It is the responsibility of the Certifying Body to grant or deny the Site a deferred Audit
- iv. Audit deferrals must not exceed two months
- v. The outcome of the application for deferral should be communicated in writing to the Site within 10 working days
- vi. In the event an Audit deferral is granted, the Certifying Body must notify the ESA Program Manager within 12 hours of notifying the Site of the outcome.
- vii. 'Adverse circumstances' refer only to an unforeseen, unpreventable incident which prevents the Site from hosting an Audit.

11. Site withdrawal from ESA

- i. Voluntary

Sites may voluntarily withdraw from ESA upon written advice to the ESA Program Manager. The business will be marked as 'Cancelled' and must cease representing itself as ESA Certified. Sites may re-join ESA at any time through the process outlined in 6.2.

- ii. Administrative

If a Site's certification is suspended and the Site does not take the necessary action(s) to rectify within a timeframe specified by the Certification Body, the Site's Certification may be withdrawn by written notice from the ESA Program Manager. The Site's certification status will then be 'Cancelled'.

12. Review

12.1. Verification

Australian Eggs and ESA Program Manager may, as it considers appropriate, review the performance of each Certification Body and/or Auditor for the purpose of determining their compliance with the terms of this Protocol.

- i. Reviews will take place in a manner, at frequencies and at times determined by Australian Eggs including Site visits (as permitted by the Site) onsite witness Audits.
- ii. Australian Eggs or the ESA Program Manager must, if reviewing performance of any Certifying Body or Auditor, make that Certifying Body or Auditor aware of their intentions to review prior to any review activities taking place.
- iii. In the event of a review of performance the Certification Body and/or Auditor must on request from the ESA Program Manager or Australian Eggs give either body access to all required records concerning the relevant ESA activities.

12.2. Unscheduled audits

If Australian Eggs has reason to believe a Site is conducting itself in a way which poses a significant risk to food safety or the reputation of ESA they are able to instigate an unscheduled Audit of the Site at any time