

Quality Welsh Food Certification Ltd

Producer Manual

for the Welsh Government's Quarantine Unit Scheme

QWFC Ltd

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QWFC Ltd - Certification process: Terms & conditions

Introduction:

Quality Welsh Food Certification Ltd (QWFC) is a Certification Body accredited by the United Kingdom Accreditation Service (UKAS) to ISO17065, an internationally recognised standard for certification bodies.

This document contains information that you need to read before you decide to join any scheme certified by QWFC or to maintain your certification for a scheme, including information on how we conduct assessments: it must also be read in conjunction with the scheme standards that will be the subject of assessment and certification activity. Please be sure to read all documents in full before you make your application for certification or before your next assessment.

Application for certification

Applicants must complete an application form and submit payment to QWFC before initial assessments. Payment must be made as specified in the Scheme Fees Leaflet and re-assessment undertaken according to and at times stipulated in scheme rules to maintain certification.

Assessments

We check whether applicants or clients are complying with the scheme standards by assessments which may be undertaken by one of our assessors or an assessor from another assessment body. An initial assessment is required before certification may be granted and re-assessments are carried out at the prescribed frequency for each scheme also a number of Clients will be selected, at random, for an Assessment in addition to the routine assessment.

Assessments may be carried out at 'Short Notice' typically 4 working days or 'Unannounced'. Where notice is to be given an assessor will contact you when your assessment is due to arrange a mutually convenient date If you are unable to agree an appointment by the date the assessment is due, your certification will be delayed or may be suspended pending assessment.

The Welsh Government Quarantine Unit Scheme is subject to 'in-use' inspection by the Animal Health & Plant Agency (APHA). If APHA identify a non-conformance against the QU Scheme Standard, QWFC will need to investigate further. This may require a further visit which may incur a fee; you will be contacted to agree to this before we proceed. Fees are not refundable.

Please try and prepare for the Assessment so that it can be carried out as effectively and efficiently as possible. If the Assessor is unable to complete the process because for example, some records may not have been immediately available, processes in operation or facilities may not be to hand, it may be necessary to re-visit & unfortunately, we will need to pass on the extra cost.

The Assessor will need to:

(a) talk to the person responsible for the operation of the activity for which certification is being applied for (b) review relevant records (c) have access to facilities, buildings or processes (d) evaluate samples of inputs or outputs. Please make sure that the assessor will be able to evaluate all the different elements of a process; service or facility that is to be certified. If you only have part of an operation available for assessment, you may only be certified for the activities assessed or you may be declined certification. If you wish to increase or change the scope of certification to, you'll need to notify QWFC and a further assessment may be required. Check your documents carefully to make sure that the scope of certification meets your requirements.

Any aspects of an operation found during assessment that don't comply with the requirements of a scheme's standards, will be recorded by the assessor on a "Non-Conformance Form" which you will be asked to sign to confirm your agreement. This form is to provide information only and is not indicative of whether certification will be granted or declined.

The "Non-Conformance Form" together with the assessor's report will be forwarded to QWFC for review and a decision on certification: QWFC will write to you to notify you of the results of the assessment. If any non-conformances require action, you will be sent a "Non-Conformance Action Report" explaining what is required and the date by which it needs to be completed. In some circumstances, re-assessment may be necessary which may incur a fee; you will be contacted to agree to this before we proceed. Fees are not refundable.

If you have no non-conformances or have rectified any raised; you may be granted certification against the scheme. You will be issued with a Certificate or Letter to confirm certification & permitted to use the appropriate scheme mark and QWFC logo on products, literature, stationery, and advertising where relevant. Use of scheme marks must be in

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accordance with the rules specified in the QWFC document "Conditions Governing the Use of Certification Marks" which you can find on the QWFC website www.qwfc.co.uk or request on 01970 636688.

QWFC Certificates of Conformity are not transferable and are the property of QWFC. Certificates are valid until the expiry date stated on them unless surrendered; replaced or revoked & should be reproduced in their entirety when required. QWFC's certificates can only be used in relation to activities; facilities or products that are included in the scope of certification.

Certification may be suspended If you fail to rectify non-conformance raised by the due date and do not contact us; if you fail to pay any fees due, or whilst we investigate a compliant received. Whist certification is suspended, and you will be unable to market your output, undertake a service or operate a facility as certified against the scheme. You will be notified of the suspension and informed of the reason and what is required to regain your certified status. Permanent withdrawal of certification may follow suspension and you need to re-apply for certification. You cannot claim to be certified against the scheme and any QWFC Certificate of Conformity and scheme marks must be returned. In cases of serious breaches of the requirements of scheme standards or 'terms & conditions', or if an applicant or client has been abusive towards any person who is part of the certification process, or if the applicant or client is bringing the relevant scheme into disrepute, or subject to legal action certification may be withdrawn at our absolute discretion.

You must inform us, without delay, of any change in your circumstance, for example a change in the structure of a company or partnership or the scope of activities following expansion or significant investment. Such notification should be made in writing. Certification is non-transferable and a change of ownership requires a new application. If you do not inform us of the scope of your activities, it could lead to your products being rejected or use of facilities suspended. In certain situations, failure to notify us of a change of circumstance may result in your certification being suspended until an assessment and follow up procedures can be completed.

It is a condition of certification that you inform us immediately if you or any organisation; business or individual that you are associated with is / are subject to investigation by, prosecution by or issue of a statutory notice from a statutory body relating to animal health or welfare, the environment, feed or food safety. Failure to immediately notify us of such action being taken may result in your certification being suspended. Conviction resulting from such action may result in certification being withdrawn.

You must also notify the competent authority should there be an issue of which you are aware that could affect human or animal health.

It is a condition of certification that you cooperate in the investigation of any complaint by QWFC & record any complaints received & action taken: this record and actions taken will form part of the assessment

RULES GOVERNING CERTIFICATION

Clients shall:

At all times comply with these rules as amended from time to time;

- Comply with the requirements of the Scheme Standard. Repeated failure to comply with any of the specified requirements of the Scheme Standard may result in suspension or withdrawal of Certification
- Retain a copy of the most recent Scheme Standard;
- Give representatives of QWFC, and 'observers as required, access during normal working hours to establishments.
- Nominate a management representative and one or more deputies authorised to act in the main nominee's absence (and replacement nominees as may be necessary) who shall be responsible for all matters in connection with the requirements of the Certification
- Correct any deficiencies identified during continuing assessments;
- Ensure that products; activities or facilities continue to fulfil requirements & not deliver or knowingly permit the delivery or sale of downgraded products as products conforming to the Scheme Standard;
- Use a Mark of Conformance or make claims regarding certification only in respect of products; activities or facilities which are subject to the Certification, produced at the address stated, and strictly in accordance with the conditions for its use;

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- Discontinue any use of a Mark of Conformance which is outside the scope of the conditions for its use, or which is unacceptable to QWFC, and any form of statement with reference to the authority of the Client to claim compliance with a Certification Scheme which in the opinion of QWFC might be misleading;
- Upon withdrawal of the Certification (however determined) forthwith discontinue use of any Mark of Conformance for which a licence has been issued and all advertising matter which contains any reference thereto. In addition, any other documents in possession of the Client which bear reference to the Certificate of Conformance shall, if QWFC requires, be so treated;
- Not conduct operations in a manner which may affect the confidence of buyers and consumers in the reliability of QWFC's Certification Schemes.

Having regard for QWFC administrative costs, Clients and Applicants shall pay:

- the relevant annual fee for assessment and Certification;
- the cost of any additional assessment deemed to be necessary;
- the cost of assessment where less than 24 hours' notice of the need to cancel is given; or it has been cancelled on more than 2 consecutive occasions
- the cost of any additional sampling or testing deemed to be necessary;
- any additional costs incurred by QWFC due to non-conformance with these Rules.

Further Information

For further details on the operation of any QWFC certification scheme and the QWFC certification procedure, please visit our website <u>www.qwfc.co.uk</u> or contact us directly on 01970 636688.

If you wish to appeal against any decision on certification, please write to us at QWFC, Gorseland, North Road, Aberystwyth, Ceredigion, SY23 2WB within 14 days of receiving notice of the decision. Please give your reasons why you believe the decision to be wrong. if we are unable to resolve this issue, a tribunal appointed by QWFC will consider the appeal: you will be entitled to make representations to that tribunal. Full details of the QWFC appeals procedure can be requested by ringing 01970 636688.

Any complaint regarding the operation of the certification system by QWFC should be forwarded to QWFC, Gorseland, North Road, Aberystwyth, Ceredigion, SY23 2WB; for investigation

Statement of Policy

QWFC undertake to administer Schemes and their certification activities effectively and efficiently at all times. However, we cannot be held responsible for any losses that arise from, including without limitation, any industrial action or the failure of any machine, data, processing system, transmission link or any other event outside our reasonable control.

Scheme standards may change over time, for example in response to new or amended legislation. You will be informed of any changes to scheme standards and the timeframe for their implementation, and you must ensure full compliance with any changes to scheme standards and relevant legislation to retain certification. Scheme standards and scheme regulations may be in addition to any statutory requirements. Nothing in any scheme standards or scheme regulations shall be deemed to provide any exemption from the legislation and you must comply with all legislation relevant to the scope of the relevant scheme at all times. Under no circumstances shall QWFC, their employees or agents be liable for any losses, damage, charges, costs or expenses of whatever nature (including consequential loss) which you may suffer or incur by reason of, or arising directly or indirectly from the administration by QWFC, their employees or agents or the performance of their respective obligations in connection with a certified scheme save to the extent that such loss, damage, charges, costs and/or expenses arises as a result of finally and judicially determined gross negligence or wilful default of such persons.

It is a condition of certification that you agree to abide by the scheme standards at all times and implement as appropriate, any changes that may be communicated to you. QWFC reserves the right to implement alterations to scheme standards and operating procedures where, at its absolute discretion, it considers it necessary to do so. Scheme standards, scheme regulations and Producer Manual represent the entire understanding between applicants or clients and QWFC and applicants or clients will need to acknowledge that they have not relied upon any other statement (written or oral) in applying for certification or claims to be certified against the scheme

The Welsh Government's Guidance for Livestock Keepers - Version 2.1

Introduction

Livestock movement controls were first introduced after the Foot and Mouth disease outbreak in 2001. Prior to that no standstill period existed and movements of livestock were considered to be responsible for significant spread of disease. The Disease Control (Wales) Order 2003 requires that when cattle, sheep, goats and/or pigs are moved onto a holding, a standstill period on that holding is triggered preventing any of those species moving off the holding, except direct to slaughter. The standstill period for cattle, sheep and goats is six days, the 'Six Day Standstill' (6DSS). Pigs moving onto a holding trigger a 20 day standstill on all pigs on the holding, but only a 6DSS on any cattle, sheep and goats on the holding.

This guidance sets out the Principles, Requirements and Operational Rules for Quarantine Units (QUs) as an exemption to the 6DSS for cattle, sheep and goats on the main holding. **The exemption does not apply to pigs.**

QU Principles

- 1. Approved QUs provide an exemption to the 6DSS arrangements for cattle, sheep and goats. Movements into an approved QU will not trigger a 6DSS on the main holding, allowing animals to be moved off a main holding while incoming cattle, sheep and goats observe the 6DSS requirements in a QU.
- 2. Livestock keepers can choose between using approved QUs to manage the movements of cattle, sheep and goats or adhering to the 6DSS on their whole holding.
- 3. Holdings can have up to two QUs and each QU can comprise up to two sites.
- 4. QUs can be indoors and/or outdoors provided they meet the Requirements and Operational Rules.
- 5. QUs must be certified by a Certification Body accredited by the United Kingdom Accreditation Service (UKAS). Certification Bodies will charge the livestock keeper a fee for this service.
- 6. QUs are allocated a unique County Parish Holding (CPH) number.
- 7. QUs can only be established on holdings with permanent CPHs. They cannot be established on land that is linked to the main holding by a temporary land association (tLA) or on a temporary CPH (tCPH).
- 8. QUs are certified for 18 months only, after which recertification is required. Certification Bodies will charge a fee for recertification.
- 9. Incoming cattle, sheep and goats must remain in a QU for six days (six whole 24 hour periods) before they are moved to the main holding. Animals must be moved to the main holding before they can be sold or transferred to another holding. The movement of cattle, sheep and goats from a QU to the main holding does not trigger a 6DSS on the main holding. Different rules apply for attending shows and animals can be moved direct to slaughter from a QU at any time (see QU Operational Rules).
- 10. Livestock keepers **must** report individual movements into QUs electronically within 24 hours, via the Cattle Tracing System (CTS) or EIDCymru for sheep and goats. Movements out of a QU to the main holding must be reported within three days. A record of the movements into and out of QUs must be maintained in the holding register / flock register and these records must be updated within 36 hours of the movement.
- 11. QUs will be subject to unannounced in-use inspections by the Animal and Plant Health Agency (APHA) to ensure compliance with the Requirements and Operational Rules. If non-compliant, QUs may, subject to the severity of that non-compliance, be suspended or revoked. Livestock keepers have a right to appeal any decision by a Certification Body to suspend or revoke a QU.

Quarantine Unit Scheme Standard The Welsh Government's Guidance for Livestock Keepers - Version 2.1

QU Requirements

12. Cattle, sheep and goats within a QU must be prevented from making direct contact with other animals. 'Animals', as defined in the Disease Control (Wales) Order 2003, means cattle (excluding bison and yak), deer, goats, pigs and sheep.

Indoor QU

- 13. An indoor QU should be a building that is separate from others on the holding. Were a QU is adjoining another building or buildings on the holding that is/are:
 - a. used by animals, there must be no shared airspace and no opportunity for direct contact between animals in the QU and those in the adjoining building or buildings and/or
 - b. used for storage of machinery/equipment, feed or bedding that is intended for use on the main holding, animals within the QU must not be able to make direct contact with that machinery/equipment, feed or bedding.
- 14. Infrastructure must be suitable for the intended species.
- 15. Must have dedicated access (see 'Biosecurity' section of Operational Rules), effluent/manure management, feeding/watering and welfare/handling arrangements.
- 16. Can include a contiguous area such as a yard, paddock or field provided that any outdoor areas meet the outdoor QU requirements.

Outdoor QU

- 17. An outdoor QU must, at all times, provide separation between quarantined cattle, sheep and goats and other animals with stock proof double-fencing, including gateways, that is:
 - a. at least two metres apart if the QU is intended for sheep and goats only or
 - b. at least three metres apart if the QU is intended for cattle.
- 18. Double-fencing is not necessary where a QU is adjacent to a natural or man-made boundary (excluding hedges) that would provide the same separation as 17 a) or b) above.
- 19. Infrastructure must be permanent and suitable for the intended species.
- 20. Must have dedicated access (see 'Biosecurity' section of Operational Rules), effluent/manure management, feeding/watering and welfare/handling arrangements. The provision of water for animals in an outdoor QU must not be via direct access to a stream, river or ordinary watercourse.

QU Operational Rules

The Six Day Standstill

21. Cattle, sheep and goats must remain in a QU for six whole days (six whole 24 hour periods). If animals are part way through a quarantine period when others are introduced the 6DSS restarts and all animals must remain in the QU for six whole days from the day that the last animal(s) were brought in.

Biosecurity

- 22. No other animals, including horses, donkeys and camelids (llamas, alpacas etc.) are allowed in a QU when cattle, sheep or goats are in quarantine.
- 23. Incoming cattle, sheep and goats must be transported directly into a QU and must not be walked through any part of the holding that is not part of the QU. Vehicles used to move animals can be driven into a QU or backed-up and the tailgate lowered up to or into the QU. The vehicle must be thoroughly cleansed and disinfected before being used again.
- 24. Where more than one trip is required to collect and deliver animals from a **single premises** (which may be a market) to a QU:

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- a. that is **not in use**, the vehicle does not need to be cleansed and disinfected between each trip, provided no other premises are visited between trips. Once all animals have been moved into the QU the vehicle must be thoroughly cleansed and disinfected before being used again.
- b. that is **in use** (i.e. animals part way through a quarantine period), the vehicle must be thoroughly cleansed and disinfected between each trip and before being used again.
- 25. Animals in a QU and animals on the main holding must not share milking facilities. Animals **must not** leave a QU to be milked. Milk from animals in quarantine can be sold in the normal way, but **must not** be fed to other animals on the main holding (including cats and dogs).
- 26. An application for a QU must be accompanied by a 'Biosecurity Plan' (see section on Application and Approval Process). The plan should detail how the following rules will be met, along with the location of facilities, equipment and materials for cleansing and disinfection of vehicles, equipment, clothing and footwear:
 - Any person entering a QU must wear footwear and clothing that is appropriate for the work being carried out.
 Footwear and clothing must either be dedicated for use in the QU or be cleansed and disinfected before entering and leaving a QU.
 - b. Facilities must be available for hand washing/cleaning and any person entering a QU must wash/clean their hands before entering and leaving a QU.
 - c. Appropriate signage must be displayed when a QU is in use so that farm staff and visitors know to follow the required biosecurity procedures.
- 27. Only approved disinfectant should be used. A list of approved disinfectants is available on the Defra website.

Machinery and Equipment

28. Consider having machinery and/or equipment that is dedicated to, and remains within, a QU for the entire period that a QU is in use. Machinery and/or equipment can be brought into a QU at any time. Any machinery and/or equipment leaving a QU during the 6DSS period (i.e. whilst it is **in use**) must be thoroughly cleansed and disinfected before being used on another part of the holding.

Feed and Bedding

- 29. Feed and/or bedding can be brought into a QU whilst it is in use. If machinery has to be taken into a QU whilst it is in use it must be thoroughly cleansed and disinfected before being used on another part of the holding. Machinery that is used to drop or propel feed and/or bedding into a QU does not have to be cleansed and disinfected, provided it does not enter the same enclosure as, or come into contact with, the quarantined animals. Alternatively, machinery can remain in the QU without having to be cleansed and disinfected between uses.
- 30. Under no circumstances should feed be taken from a QU that is **in use** and fed to livestock or stored on another part of the holding.
- 31. Under no circumstances should bedding, manure or effluent be taken from a QU that is **in use** and used, stored or disposed of on another part of the holding.

Animal Welfare

- 32. Animals in a QU should be checked regularly for any signs of disease or illness.
- 33. Animals may leave a QU and be taken to a veterinary premises for treatment. On their return, which should be direct to the QU, provided they have not been in contact with any other animals, they must complete the remainder of their 6DSS.
- 34. The Regulation requires that an animal must be fit for the intended journey before the journey starts and must remain sufficiently fit throughout the journey. This means the animal should be healthy enough to tolerate the entire journey it is about to make (including loading, unloading and any journey breaks) with no or very little adverse effect on it; the journey should not cause the animal any suffering or injury. Fitness to travel rules do not normally allow the transport of pregnant females where 90% or more of the expected gestation period has already passed or females who have given birth in the previous week.

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- 35. When QUs are being used for quarantine purposes they are considered a separate holding to the main holding. This means that separate ear tags would be required for any animals born in a QU. All QU CPHs will be allocated unique herd/flock marks, should ear tags be needed. The herd/flock marks will be on the QU certificate. Important: Animals must be tagged before they leave the holding where they were born
- 36. The death of an animal in a QU must be recorded in the holding register. The holding register must be made available during inspections. The death of any cattle must also be reported to the British Cattle Movement Service (BCMS) within seven days of the death taking place.

Bovine TB – Important Information for Cattle Keepers

- 37. Only cattle that have tested negative to TB within 60 days of the date that a herd test is scheduled on the main holding are allowed to be serving quarantine in a QU.
- 38. Once the herd test has been carried out, and before the results have been read, cattle keepers can bring any cattle, including those that have **not** been Pre-movement Tested (PrMT) into a QU, as they can at other times.
- 39. In the event of Officially TB Free Status being Suspended (OFTS) or Withdrawn (OFTW) in a herd on a holding where a QU is in operation, any movement restrictions and associated TB testing requirements will apply to both the main holding and any associated QUs i.e. they are treated as one unit.
- 40. After cattle have observed quarantine in the QU they do not need to be PrMT before being moved to the main holding.

Attending Shows

- 41. QUs can be used to manage movements to and from shows. If an animal that has attended a licensed show is returned to a QU it can then attend subsequent consecutive licensed shows, by leaving and returning via the QU, without incurring a 6DSS. A 6DSS will only need to be applied to the animal in the QU following its return from the last show.
- 42. If other animals are part way through a quarantine period when animals returning from a show are introduced the 6DSS restarts and **all** animals must remain in the QU for six whole days from the day that the last animal(s) were brought in.
- 43. Livestock keepers that do not have a QU cannot send animals to consecutive shows within six days and on return from a show the whole holding will be subject to 6DSS.
- 44. Individual animal movements to and from shows must be reported electronically within 24 hours via the Cattle Tracing System (CTS) or EIDCymru for sheep and goats.

Movements to Slaughterhouses

45. Animals may be taken from a QU direct to a slaughterhouse at any time.

Using a QU for Other Purposes

- 46. A QU can be treated as part of the main holding and used for other purposes when no animals are in quarantine. This can include storage of vehicles or equipment, use by animals (of any species) from the main holding and, for outdoor QUs, growing a forage crop.
- 47. Between uses, it is good practice to remove all animal bedding and uneaten feed/forage and thoroughly cleanse and disinfect indoor QUs.

Record Keeping

- 48. QUs are allocated a unique CPH number. Livestock keepers must report individual animal movements electronically into QUs within 24 hours, via the Cattle Tracing System (CTS) or EIDCymru for sheep and goats. Movements out of a QU must be reported within three days..
- 49. For cattle, the move out of a QU and the move onto the main holding must be reported at the same time.
- 50. As a QU has a separate CPH number to the main holding a record of the movements into and out of QUs must be maintained in a separate holding register / herd or flock register to that maintained for the Main Holding. These records must be updated within 36 hours of the movement.

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51. Movements of animals between the main holding and the QU when the QU is **not being used** for quarantine purposes do not need to be reported on CTS or EIDCymru or recorded in the holding register.

Multiple QUs and Multiple Sites

- 52. Farmed holdings can have up to two QUs and each QU can comprise up to two sites.
- 53. For two QUs to be independently managed they must be certified separately. Certification Bodies will charge livestock keepers a fee for the certification of **each** QU. Each QU will be allocated a separate CPH number so that livestock movements into and out of each QU can be reported.
- 54. Where a QU comprises two sites, which can be indoor, outdoor or a combination of both, both sites are treated as one for the purposes of the 6DSS and allocated one CPH number. If animals are brought onto one site then both sites are deemed to be in operation. If animals are part way through a quarantine period on one site when animals are introduced to the other site the 6DSS restarts on **both** sites.

Application and Approval Process

- 55. Before a QU can be used it must be inspected and approved by an accredited Certification Body. Application forms and guidance relating to the approval process are available from the Certification Bodies. A list of Certification Bodies is available on the Welsh Government website. Certification bodies will charge a fee for their service. This will be clearly set out in the guidance.
- 56. A map, or maps, of proposed QUs must be submitted with an application. The maps provided must be of an appropriate scale and clearly indicate the boundaries of the proposed QU. The requirements will be set out in the guidance.
- 57. A Biosecurity Plan must be submitted with an application. The requirements will be set out in the guidance.
- 58. QUs are allocated a unique CPH number so that livestock movements into and out of QUs can be reported electronically via the Cattle Tracing System (CTS) or EIDCymru, for sheep and goats. Livestock keepers do not have to apply to the Welsh Government for QU CPH numbers; if a QU is approved the Certification Body will do this on their behalf using information provided in the QU application form.
- 59. The Welsh Government will create new CPH numbers for QUs and inform the Certification Body and APHA. APHA needs this information for inspection purposes.
- 60. The Certification Body will present the livestock keeper with a certificate, which will include the new CPH number, the date from when the QU can be used, the end date and information on the species for which the QU is intended. The map submitted by the livestock keeper at application stage will also form part of the certificate.
- 61. Livestock keepers must retain the certificate and ensure that it is available during inspections.
- 62. The livestock keeper must update EIDCymru and/or inform BCMS to register the new CPH on the CTS system.

In-use Inspections

- 63. QUs will be subject to unannounced in-use inspections by APHA to ensure compliance with the QU Requirements and Operational Rules. The Biosecurity Plan and the holing register/flock register must be made available for inspection.
- 64. During an inspection, APHA may wish to check the ear tags of the animals in a QU. Livestock keepers must comply with such a request and present animals for inspection.
- 65. Where non-compliant, QUs may, subject to the severity of the non-compliance, be suspended or revoked. Livestock keepers have a right to appeal any decision to suspend or revoke a QU with the Certification Body.
- 66. Levels of compliance and associated sanctions will be set out in guidance available from the Certification Bodies.

Maintaining a QU - 18 Month Re-approval

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- 67. QUs are certified for 18 months only, after which re-approval is required. Certification bodies will, before expiry, remind livestock keepers of the need to re-approve QUs. Certification bodies will charge a fee for recertification.
- 68. If a livestock keeper does not wish to continue using the QU they do not need to do anything. The QU CPH will no longer be available for use as an exemption to the 6DSS beyond its end date.