

## 7.2.1. Retention Sampling & Labelling of Bulk Raw Material

### Standard

Are retention samples of bulk raw materials taken and retained for at least three months?  
Are retention samples identified or labelled to allow trace back to individual deliveries?

*Bulk materials risk assessed (clause 5.2) as not requiring sample retention should have justification provided based on supplier sampling and/or provision of lab or assay test results.*

*The three-month retention period is a minimum, for some higher risk raw materials retention for a minimum 6 months may be required to assist in any potential recalls.*

### Purpose

A system is in place to ensure that retention samples of bulk raw materials are properly collected, labelled, and safely stored for a minimum of 3 months.

### Reason

Retention samples are important for quality and traceability purposes. The collection of a true representative sample requires training of personnel and tested procedures. This ensures repeatability, reduced sampling variation and ensure consistent collection methods.

Retention sampling in bulk raw material ensures quality control checks are implemented at the beginning of the supply chain. Thereby assuring regulatory and quality compliance, and customer confidence, in the final product.

Workplace Health and Safety regulations apply for personnel in feed mills, particularly where the collection of retention samples require safety training.

The correct labelling of retention samples is important for traceability and retrieval during a potential recall or feed safety risk.

### What is Acceptable?

Retention sampling should form part of your raw material quality control program (Fact Sheet 7.1.1 & 7.1.2). A sampling manual or procedure shall be made available to trained personnel conducting sampling. All bulk material shall be retained for a minimum period of 3 months, or until expiry of final product.

#### Sampling Procedure

The procedure should outline the steps involved for sampling each bulk raw material.

The following information should be included in your procedure, but not limited to:

1. Sampling equipment, type, cleaning, calibration.
2. Total sample size.
3. Point of sample collection (moving vs static grain).
4. Container or bag to store retention sample, including requirement of tamper seal stickers.
5. Labelling requirements, including UIN (if applicable), products name, batch number, date & personnel.
6. Inventory recording, including where retention sample is stored.
7. Storage period and type, i.e. room temperature, low relative humidity for 3 months.
8. Testing parameters and internal or third-party testing (Fact Sheet 7.1.3 & 7.1.4).

#### Sampling Equipment

Bulk raw material samples shall be collected upon arrival to mill or when loading into storage bins, this will be mill-specific, and risk assessed by operator (the sampling procedure will specify "point of sample collection"). The sampling equipment shall be cleaned and labelled as "Ready to use" with a date and signature. This ensures the sampling equipment has been cleaned and sanitised to prevent cross-contamination. Sampling equipment may require monitoring and calibration, the appropriate checks shall be conducted as per Fact Sheet 2.2.5 to 2.2.8. The operator may use:

1. Sampling spears, ideal for use when sampling from delivery truck.
2. Manually operated probes, ideal for large loads in the absence of power suction and extension rods may be used.
3. Auger-type sampling for light, low depth bulk material.
4. Pneumatic grain sampler which uses power suction and ideal for static stored grain.

The goal is to use material-specific sampling equipment, and this may differ for each bulk raw material. Importantly, the operator shall take into consideration a range of factors when selecting the appropriate sampling equipment, such as material size, type etc.

#### Sample Size

The sample size is dependent on several factors, including but not limited to:

1. Static sampling from road truck.
2. Manual or mechanical sampling from moving grain stream.
3. Kilogram/Tonnage of raw material.
4. Risk profile of raw material.

The Australian Grain Industry, Code of Practice provides Guidelines of sample size (in KG) per tonnage of material ([AGI, Code of Practice, 2021](#)). The sampling procedure shall specify the retention sample size (in KG) and amount allocated per container/bag.

In the event of a recall of feed safety concern, there should be enough retention sample to perform 3 laboratory tests.

#### Composite Sampling

Composite sampling is the aggregation of two or more sample taken from bulk material, combined and homogenised (ISO 24333:2009). Bulk raw material has natural variation across a load, and by collecting a composite sample the operator ensures a representative retention sample is collected.

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