

ANIMAL CARE PROGRAM

GUIDANCE: AUDIT TRAIL REQUIREMENT UNDER ANIMAL CONFINEMENT REGULATIONS



Mission of Animal Care Program

To serve animal agriculture producers and California consumers by promoting and protecting the welfare and care of animals in agriculture in order for Californians to have access to food that is sourced from humanely and sustainably raised animals.

Purpose

This guidance document is for buyers of *covered product* who are relying on a written certification from their suppliers that *covered product* is not from a *covered animal* confined in a cruel manner. This written certification is based upon an *audit trail* and is traceable to producer(s) compliant with all applicable species requirements of Proposition 12 (2018) Animal Confinement regulations, [Chapter 10 \(commencing with section 1320\) of Division 2 of Title 3 of the California Code of Regulations](#) (3 CCR) sections 1320.1, 1321.1 and 1322.1.

As of January 1, 2024, *shell eggs, liquid eggs, whole veal meat and whole pork meat* sold in California are required to be from *certified operations* (3 CCR section 1320.1(b), 1321.1(b) and 1322.1(b)).

This guidance document is for:

1. *Distributors*

This guidance document serves as a companion to the [Distributor On-Site Inspection Certification](#) guidance document. If you are a *distributor*, review both guidance documents to prepare for an on-site inspection as part of *distributor certification*.

2. Retailer or food processing facilities who are *end-users* and purchase *covered products* directly from establishments under mandatory inspection under the Federal Meat Inspection Act or the Egg Products Inspection Act.

If you are a retailer or food processor *end-user* who purchases *covered product* directly from a facility under mandatory inspection under the Federal Meat Inspection Act or the Egg Products Inspection Act and that facility is not a registered *distributor* with the Animal Care program, this guidance document will show you how to comply with the written certification requirements of 3 CCR sections 1320.8(b), 1321.8(b), and 1322.8(b).

3. Any buyer of *covered products* who is relying on a written certification from their supplier to ensure they are buying compliant *covered products*.

For purposes of section 25993.1 of the [California Health and Safety Code](#), any written certification from a supplier to a buyer engaged in *commercial sales* of compliant *covered product* shall be based upon an *audit trail* and shall be traceable to a *certified operation*. 3 CCR sections 1320.8(a), 1321.8(a), and 1322.8(a).

Audit trail means records that are in sufficient detail to document the identification, source, supplier, transfer of ownership, transportation, storage, segregation, handling, packaging, distribution, and sale of *covered products* that were derived from *covered animals* confined in compliance with Animal Confinement regulations, and from *egg producers, veal producers, or pork producers* that hold a valid *certification* as a *certified operation*. 3 CCR sections 1320(b), 1321(b) and 1322(b).

Additional key terms *italicized* in this guidance are described on [Key Terms for Stakeholders](#) guidance document.

ANIMAL CARE PROGRAM

GUIDANCE: AUDIT TRAIL REQUIREMENT UNDER ANIMAL CONFINEMENT REGULATIONS



Distributor Audit Trail Requirement

As of January 1, 2024, *shell eggs, liquid eggs, whole veal meat and whole pork meat* sold in California are required to be from *certified operations* (3 CCR section 1320.1(b), 1321.1(b) and 1322.1(b)). For a *distributor* they are required to demonstrate through an *audit trail* that *covered product* is traceable back to a *certified operation* and this will be verified during their annual *certification* by a *certifying agent*.

The *certified operation* as a source of the compliant *covered product* as shown through an *audit trail* can be a *certified producer* or a *certified distributor*.

A *certified producer* is an *egg producer, veal producer or pork producer* operation, or portion of such an operation, in the case of a *split operation*, that is *certified* by a *certifying agent* as complying with all applicable requirements under Animal Confinement regulations.

A *certified distributor* is an *egg distributor, veal distributor or pork distributor*, or portion of such an operation, in the case of a *split operation*, that is *certified* by a *certifying agent* as complying with all applicable requirements under Animal Confinement regulations.

To comply with applicable 3 CCR sections 1320.5(b), 1320.5(c), 1321.5(b), 1321.5(c), 1322.5(b), 1322.5(c), and 1326.2(b)(2), a *distributor* is required to maintain the following records related to an *audit trail*:

1. *Records* sufficient for purposes of an *audit trail* as defined in Animal Confinement regulations and the applicable recordkeeping requirements described in 3 CCR section 1326.2(b)(2). 3 CCR sections 1320.5(b), 1321.5(b), and 1322.5(b)
2. *Records* documenting in a traceable manner that *covered product* being distributed for *commercial sale* into or within California originates from compliant *producers*. 3 CCR sections 1320.5(c), 1321.5(c), and 1322.5(c)

AND

3. *Records* documenting the identification, source, supplier, transfer of ownership, transportation, storage, segregation, handling, packaging, distribution, and sale of *covered products* that were derived from compliant *producers*. 3 CCR section 1326.2(b)(2)

Review the different scenarios outlined below to further understand this *audit trail* requirement for registered *distributors*. The following scenarios are relevant to the designated *covered product* category:

Scenario 1: General for all *covered products*

For *Shell Eggs* and *Liquid Eggs*: Scenarios 3, 4, 5, 6, and 7

For *Whole Pork Meat*: Scenarios 8, 9 and 10

For *Whole Veal Meat*: Scenarios 11, 12 and 13



ANIMAL CARE PROGRAM

GUIDANCE: AUDIT TRAIL REQUIREMENT UNDER ANIMAL CONFINEMENT REGULATIONS

Retailer and Food Processor End-User Audit Trail Requirement Purchasing Covered Products Directly from Establishments Under Mandatory Federal Inspection Who Are Not Registered Distributors

As of January 1, 2024, *shell eggs, liquid eggs, whole veal meat and whole pork meat* sold in California are required to be from *certified operations* (3 CCR section 1320.1(b), 1321.1(b) and 1322.1(b)). For retailers and food processors who are *end-users* and purchase *covered products* directly from establishments under mandatory inspection under the Federal Meat Inspection Act or the Egg Products Inspection Act and those facilities are not registered *distributors* with the Animal Care Program are required to maintain *records* which include:

1. *Records* documenting written certifications that meet the requirements for *covered product* received during the preceding 12-month period.
2. *Records* documenting the address of the location where the retailer or food processor, as the buyer, *takes physical possession of covered product* for each sales transaction.

AND

3. Make these required *records* available on-site for inspection by the Animal Care Program upon request. Electronic records are considered on-site if they are accessible from an on-site location.

Review the different scenarios outlined below to further understand this *audit trail* requirement of *end-users* purchasing *covered products* directly from establishments under mandatory inspection under the Federal Meat Inspection Act or Egg Products Inspection Act who are not registered *distributors*. The following scenario is relevant to the designated *covered product* category:

Scenario 2: General for all *covered products*

For *Shell Eggs and Liquid Eggs*: Scenario 14

For *Whole Pork Meat*: Scenario 15

For *Whole Veal Meat*: Scenario 16

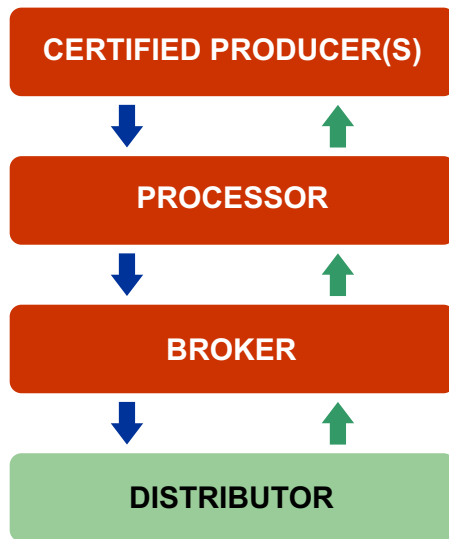


ANIMAL CARE PROGRAM

GUIDANCE: AUDIT TRAIL REQUIREMENT UNDER ANIMAL CONFINEMENT REGULATIONS

SCENARIO 1

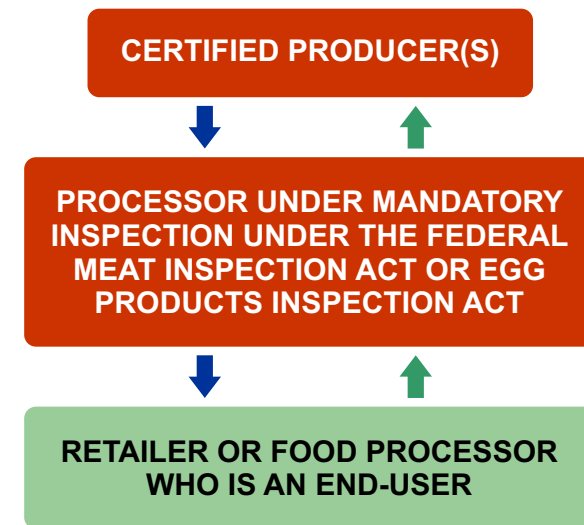
Scenario 1 – General *audit trail* (all types of covered products) for distributors:
Distributor (green box) who is requesting *certification* must show through an *audit trail* that *covered product* is traceable back to a *certified operation*.



Blue arrows show the flow of *covered product* through the supply chain from the *certified producer* to the *distributor* requesting *certification*. **Green arrows** show steps back through the supply chain that an *audit trail* will need to include to fulfill the requirement of *covered product* traceable back to a *certified operation*. In this scenario, the *audit trail* is back to a *certified producer*.

SCENARIO 2

Scenario 2 – General *audit trail* (all types of covered products) for retailer or food processor *end-users* who are purchasing *covered product* directly from establishments under mandatory inspection under the Federal Meat Inspection Act or the Egg Products Inspection Act and those establishments are not registered *distributors* with the Animal Care Program.



Blue arrows show the flow of *covered product* through the supply chain from the *certified producer* to the retailer or food processor *end-user*. **Green arrows** show steps back through the supply chain that a written *certification*, which is based on an *audit trail*, will need to include to fulfill the requirement of *covered product* traceable back to a *certified operation*. Retailers and food processors who are *end-users* and purchase *covered products* directly from establishments under mandatory inspection will need to maintain this written *certification* of *covered products* they purchase for one year. In this scenario, the *audit trail* is back to a *certified producer* because there is no *distributor*.



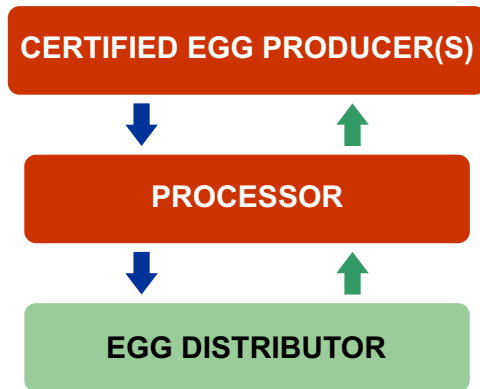


ANIMAL CARE PROGRAM

GUIDANCE: AUDIT TRAIL REQUIREMENT UNDER ANIMAL CONFINEMENT REGULATIONS

SCENARIO 3

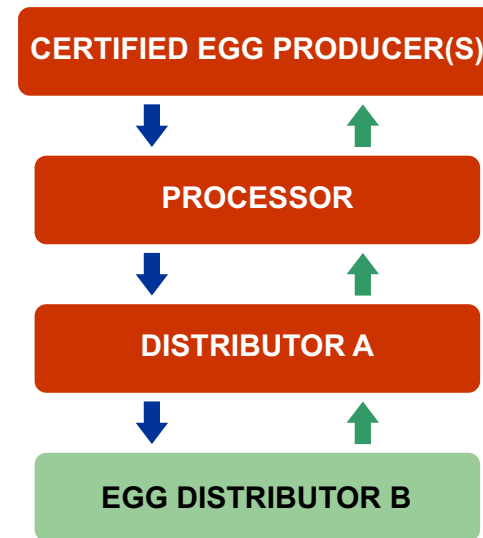
Scenario 3 – Egg: Egg Distributor (green box) who is requesting *certification* must show through an *audit trail* that shell eggs are traceable back to a *certified operation*.



Blue arrows show the flow of *shell eggs* through the supply chain from the *egg producer* to the *egg distributor*. **Green arrows** show steps back through the supply chain that an *audit trail* will need to include to fulfill the requirement of *shell eggs* traceable back to a *certified operation*. In this scenario, the *audit trail* is back to a *certified egg producer*.

SCENARIO 4

Scenario 4 – Egg: Egg Distributor B (green box) who is requesting *certification* must show through an *audit trail* that shell eggs are traceable back to a *certified operation*.



Blue arrows show the flow of *shell eggs* through the supply chain from the *certified egg producer* to Egg Distributor B. **Green arrows** show steps back through the supply chain that an *audit trail* will need to include to fulfill the requirement of *shell eggs* traceable back to a *certified operation*. In this scenario, the *audit trail* is back to a *certified egg producer*.



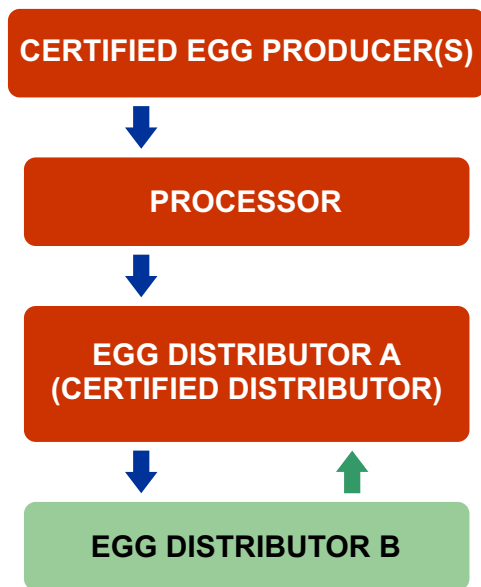


ANIMAL CARE PROGRAM

GUIDANCE: AUDIT TRAIL REQUIREMENT UNDER ANIMAL CONFINEMENT REGULATIONS

SCENARIO 5

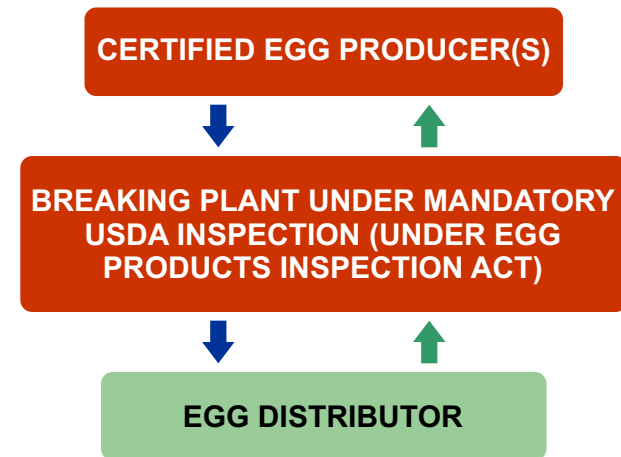
Scenario 5 – Egg: Egg Distributor B (green box) who is seeking certification must show through an audit trail that shell eggs are traceable back to a certified operation. In this example, Egg Distributor B is buying shell eggs from another certified Egg Distributor (Egg Distributor A).



Blue arrows show the flow of shell eggs through the supply chain from the certified egg producer to Egg Distributor B. **Green arrows** show steps back through the supply chain that an audit trail Egg Distributor B will need to include to fulfill the requirement of shell eggs traceable back to a certified operation. In this scenario, Egg Distributor B's audit trail is only back to Egg Distributor A because Egg Distributor A is a certified egg distributor. Therefore, the audit trail for Egg Distributor B stops at the point in the supply chain where Egg Distributor B can show the shell eggs are traceable back to certified Egg Distributor A. When Egg Distributor A is certified, they will show through an audit trail that shell eggs they distribute are traceable back to a certified egg producer (similar to Scenario 3 – Egg in this guidance document).

SCENARIO 6

Scenario 6 – Egg: Egg Distributor (green box) who is seeking certification must show through an audit trail that liquid eggs are traceable back to a certified operation.



Blue arrows show the flow of liquid eggs through the supply chain from the certified egg producer to the Egg Distributor seeking certification. **Green arrows** show steps back through the supply chain that the audit trail will need to include to fulfill the requirement of liquid eggs traceable back to a certified operation. In this scenario, the audit trail is back to a certified egg producer.



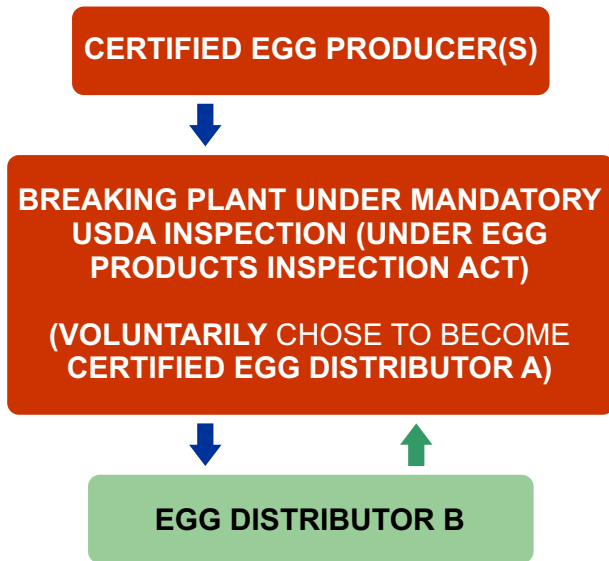


ANIMAL CARE PROGRAM

GUIDANCE: AUDIT TRAIL REQUIREMENT UNDER ANIMAL CONFINEMENT REGULATIONS

SCENARIO 7

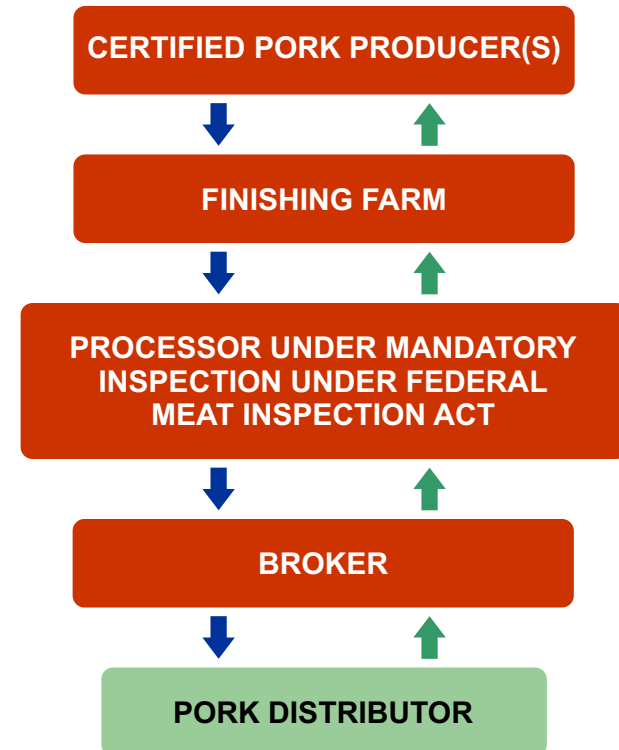
Scenario 7 – Egg: Egg Distributor B (green box) who is seeking certification must show through an audit trail that liquid eggs are traceable back to a certified operation.



Blue arrows show the movement of liquid eggs through the supply chain from the *certified egg producer* to Egg Distributor B who is demonstrating their compliance with *audit trail* requirement in this scenario. **Green arrows** show steps back through the supply chain that Egg Distributor B's *audit trail* will need to include to fulfill the requirement of *liquid eggs* traceable back to a *certified operation*. In this scenario, the *audit trail* for Egg Distributor B is back to a *certified egg distributor* (Egg Distributor A). Egg Distributor A is a breaking plant under mandatory USDA inspection under the Egg Products Inspection Act who has voluntarily chosen to become a *certified egg distributor*. Therefore, the *audit trail* for Egg Distributor B stops at the point in the supply chain where Egg Distributor B can show the *liquid eggs* are traceable back to *certified Egg Distributor A*. When Egg Distributor A is certified, they will show through an *audit trail* that *liquid eggs* are traceable back to a *certified egg producer* (similar to Scenario 3 – Egg in this guidance document).

SCENARIO 8

Scenario 8 – Pork: Pork Distributor (green box) who is seeking certification must show through an audit trail that whole pork meat is traceable back to a certified operation.

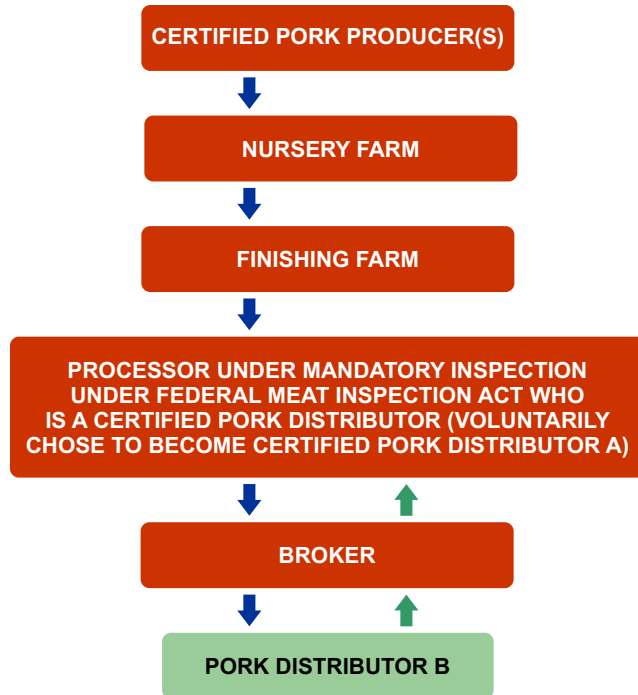


Blue arrows show the movement of animals and *whole pork meat* through the supply chain from the *pork producer* to the *pork distributor*. **Green arrows** show steps back through the supply chain that the *Pork Distributor's audit trail* will need to include to fulfill the requirement of *whole pork meat* traceable back to a *certified operation*. In this scenario, the *audit trail* is back to a *certified pork producer*.



SCENARIO 9

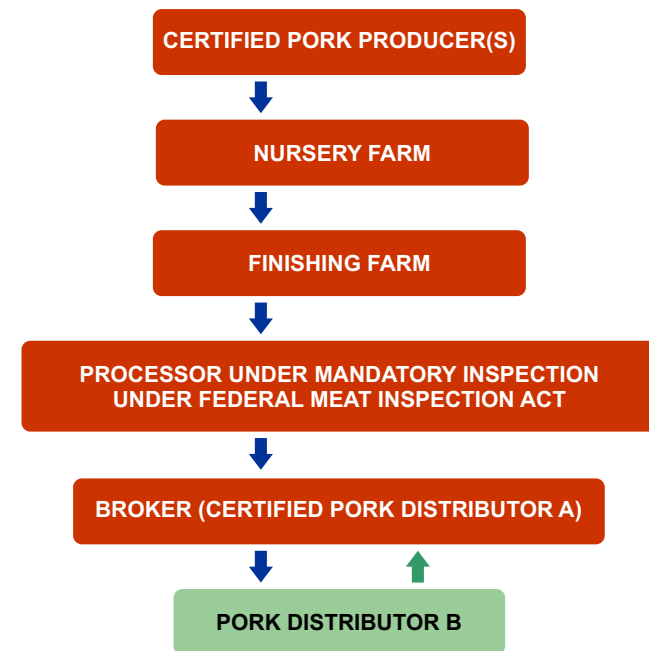
Scenario 9 – Pork: Pork Distributor B (green box) who is seeking certification must show through an audit trail that whole pork meat is traceable back to a certified operation.



Blue arrows show the movement of animals and whole pork meat through the supply chain from the certified pork producer to Pork Distributor B who is demonstrating their compliance with the audit trail requirement in this scenario. **Green arrows** show steps back through the supply chain that Pork Distributor B's audit trail will need to include to fulfill the requirement of whole pork meat traceable back to a certified operation. Pork Distributor B's audit trail is back to Pork Distributor A, a processor under mandatory USDA inspection under the Federal Meat Inspection Act who has voluntarily chosen to become a certified pork distributor. The audit trail for Pork Distributor B stops at the point in the supply chain where Pork Distributor B can show whole pork meat is traceable back to certified Pork Distributor A. When Pork Distributor A is certified, they will be required to show through an audit trail that whole pork meat is traceable back to a certified pork producer (similar to Scenario 8 – Pork in this guidance document).

SCENARIO 10

Scenario 10 – Pork: Pork Distributor B (green box) who is seeking certification must show through an audit trail that whole pork meat is traceable back to a certified operation.



Blue arrows show the movement of animals and whole pork meat through the supply chain from the certified pork producer to Pork Distributor B who is demonstrating their compliance with the audit trail requirement in this scenario. **Green arrows** show steps back through the supply chain that Pork Distributor B's audit trail will need to include to fulfill the requirement of whole pork meat traceable back to a certified operation. In this scenario, the audit trail for Pork Distributor B is back to a certified pork distributor, Broker (Pork Distributor A). When Pork Distributor A is certified, they will be required to show through an audit trail that whole pork meat is traceable back to a certified operation (similar to Scenario 8 – Pork in this guidance document).



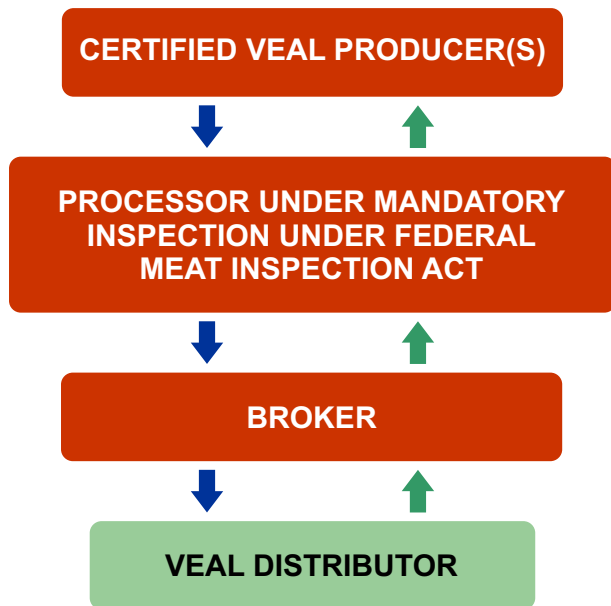


ANIMAL CARE PROGRAM

GUIDANCE: AUDIT TRAIL REQUIREMENT UNDER ANIMAL CONFINEMENT REGULATIONS

SCENARIO 11

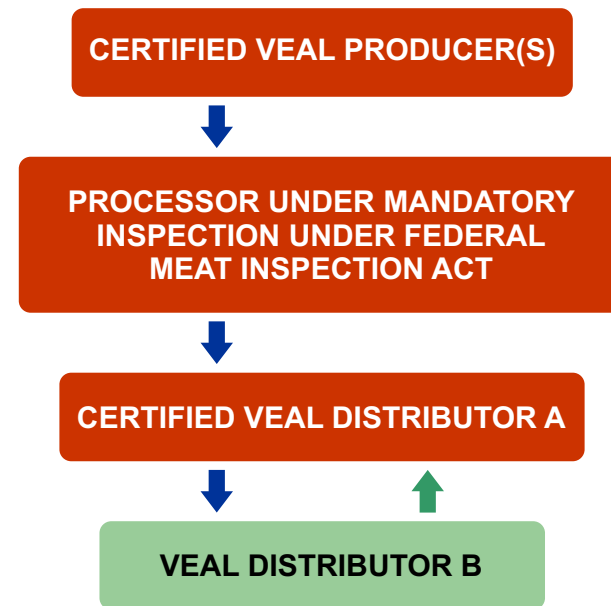
Scenario 11 – Veal: Veal Distributor B (green box) who is seeking *certification* must show through an *audit trail* that *whole veal meat* is traceable back to a *certified operation*.



Blue arrows show the movement of calves and *whole veal meat* through the supply chain from the *veal producer* to the *veal distributor*. **Green arrows** show steps back through the supply chain that the *Veal Distributor's audit trail* will need to include to fulfill the requirement of *whole veal meat* traceable back to a *certified operation*. In this scenario, the *audit trail* is back to a *certified veal producer*.

SCENARIO 12

Scenario 12 – Veal: Veal Distributor B (green box) who is seeking *certification* must show through an *audit trail* that *whole veal meat* is traceable back to a *certified operation*.



Blue arrows show the movement of calves and *whole veal meat* through the supply chain from the *veal producer* to Veal Distributor B. **Green arrows** show steps back through the supply chain that Veal Distributor B's *audit trail* will need to include to fulfill the requirement of *whole veal meat* traceable back to a *certified operation*. In this scenario, the *audit trail* for Veal Distributor B is back to a *certified veal distributor*, Certified Veal Distributor A. When Veal Distributor A is *certified*, they will be required to show through an *audit trail* that *whole veal meat* is traceable back to a *certified operation* (similar to Scenario 11 – Veal in this guidance document).



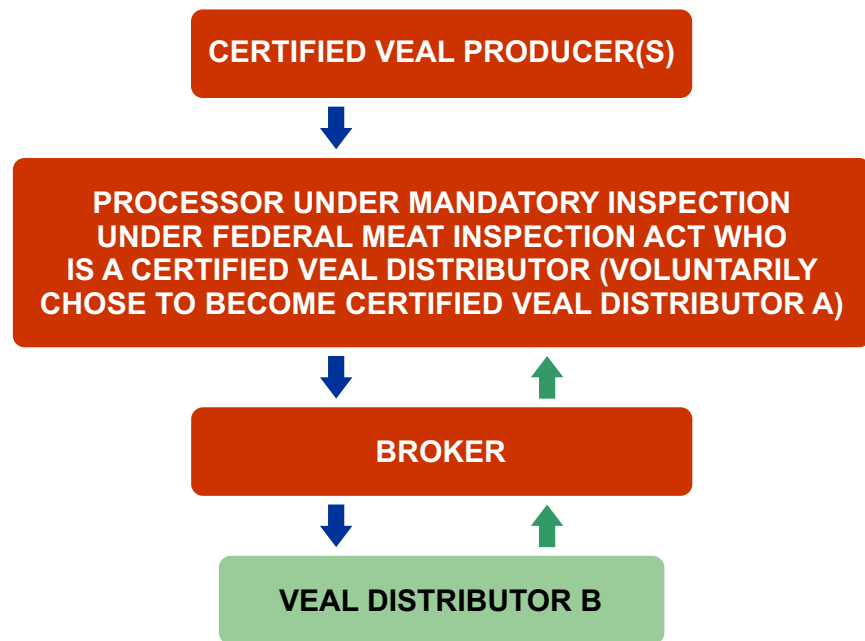


ANIMAL CARE PROGRAM

GUIDANCE: AUDIT TRAIL REQUIREMENT UNDER ANIMAL CONFINEMENT REGULATIONS

SCENARIO 13

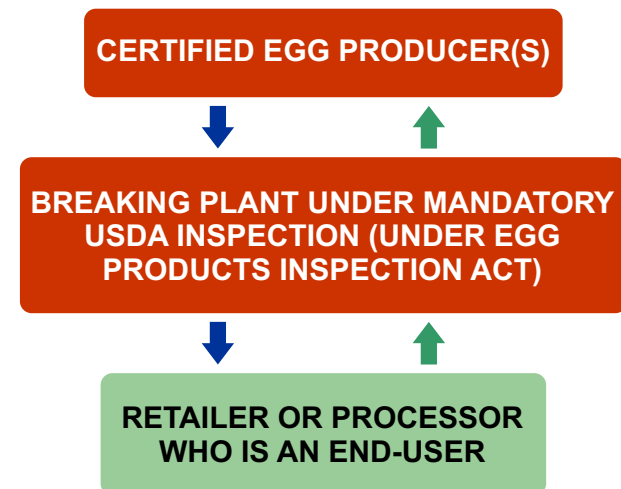
Scenario 13 – Veal: Veal Distributor B (green box) who is seeking *certification* must show through an *audit trail* that *whole veal meat* is traceable back to a *certified operation*.



Blue arrows show the movement of calves and *whole veal meat* through the supply chain from the *certified veal producer* to Veal Distributor B who is demonstrating their compliance with the *audit trail* requirement in this scenario. **Green arrows** show steps back through the supply chain that Veal Distributor B's *audit trail* will need to include to fulfill the requirement of *whole veal meat* traceable back to a *certified operation*. Veal Distributor B's *audit trail* is back to Veal Distributor A, a processor under mandatory USDA inspection under the Federal Meat Inspection Act who has voluntarily chosen to become a *certified veal distributor*. The *audit trail* for Veal Distributor B stops at the point in the supply chain where Veal Distributor B can show *whole veal meat* is traceable back to *certified Veal Distributor A*. When Veal Distributor A is *certified*, they will be required to show through an *audit trail* that *whole veal meat* is traceable back to a *certified operation* (similar to Scenario 11 – Veal in this guidance document).

SCENARIO 14

Scenario 14 – Eggs: for retailer or food processor *end-users* who are purchasing *shell eggs* and *liquid eggs* directly from establishments under mandatory inspection under the Egg Products Inspection Act and those establishments are not registered *distributors* with the Animal Care Program.



Blue arrows show the flow of *shell eggs* and *liquid eggs* through the supply chain from the *certified egg producer* to the retailer or food processor *end-user*. **Green arrows** show steps back through the supply chain that a written *certification*, which is based on an *audit trail*, will need to include to fulfill the requirement of *shell eggs* and *liquid eggs* traceable back to a *certified operation*. Retailers and food processors who are *end-users* and purchase *covered products* directly from establishments under mandatory inspection will need to maintain this written *certification* of *shell eggs* and *liquid eggs* they purchase for one year. In this scenario, the *audit trail* is back to a *certified egg producer* because there is no egg distributor.



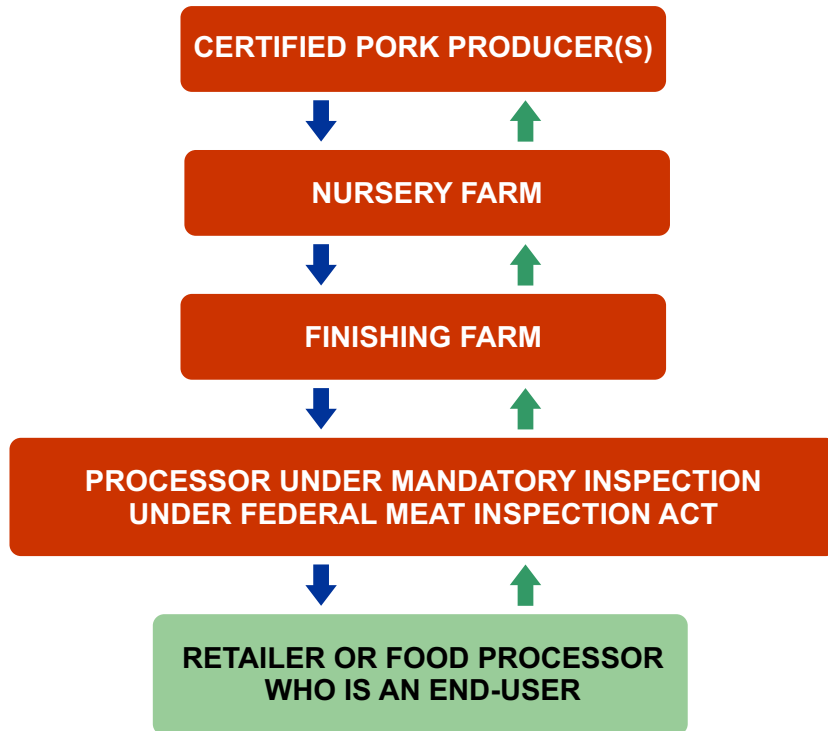


ANIMAL CARE PROGRAM

GUIDANCE: AUDIT TRAIL REQUIREMENT UNDER ANIMAL CONFINEMENT REGULATIONS

SCENARIO 15

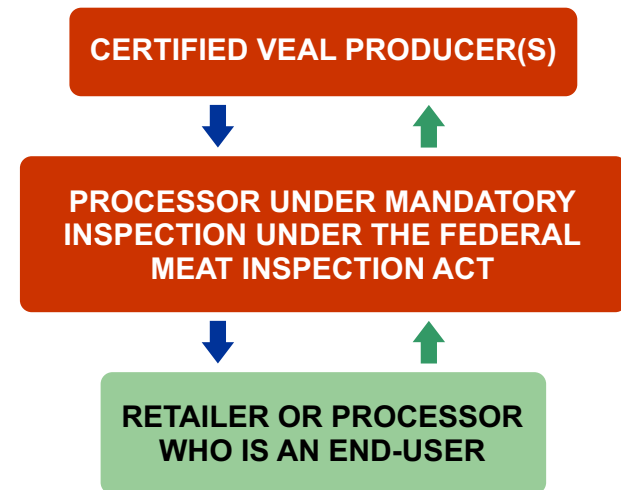
Scenario 15 – Whole Pork Meat: for retailer or food processor *end-users* who are purchasing *whole pork meat* directly from establishments under mandatory inspection under the Federal Meat Inspection Act and those establishments are not registered *distributors* with the Animal Care Program.



Blue arrows show the flow of *whole pork meat* through the supply chain from the *certified pork producer* to the retailer or food processor *end-user*. **Green arrows** show steps back through the supply chain that a written *certification*, which is based on an *audit trail*, will need to include to fulfill the requirement of *whole pork meat* traceable back to a *certified operation*. Retailers and food processors who are *end-users* and purchase *covered products* directly from establishments under mandatory inspection will need to maintain this written *certification of whole pork meat* they purchase for one year. In this scenario, the *audit trail* is back to a *certified pork producer* because there is no pork *distributor*.

SCENARIO 16

Scenario 16 – Whole Veal Meat: for retailer or food processor *end-users* who are purchasing *whole veal meat* directly from establishments under mandatory inspection under the Federal Meat Inspection Act and those establishments are not registered *distributors* with the Animal Care Program.



Blue arrows show the flow of *whole veal meat* through the supply chain from the *certified veal producer* to the retailer or food processor *end-user*. **Green arrows** show steps back through the supply chain that a written *certification*, which is based on an *audit trail*, will need to include to fulfill the requirement of *whole veal meat* traceable back to a *certified operation*. Retailers and food processors who are *end-users* and purchase *covered products* directly from establishments under mandatory inspection will need to maintain this written *certification of whole veal meat* they purchase for one year. In this scenario, the *audit trail* is back to a *certified veal producer* because there is no veal *distributor*.

