Egg Producers Federation of New Zealand Inc
Code Of Practice

(Includes requirements for Risk Management Programmes)
Contributors

This Code of Practice was developed by representatives of the industry, regulators and verifiers drawn from the following organisations:

Egg Producers Federation of New Zealand Inc.

Te Pou Oranga Kai O Aotearoa

NB: The New Zealand Food Safety Authority (NZFSA) was set up on 1 July 2002, and includes the food safety functions from both the Ministry of Health and the Ministry of Agriculture and Forestry (MAF). The NZFSA is a semi-autonomous body attached to MAF.
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Review of Code of Practice

This Code of Practice was up to date at time of going to print. Sections referring to legislation
may become out of date in between reviews of this Code. Egg producers are responsible for
keeping up to date with changes to legislation and for updating or amending their risk
management programmes to bring them into line with legislative changes where necessary.

The Egg Producers Federation of New Zealand Inc. is responsible for maintaining this
document to reflect new knowledge, technological changes etc. They must ensure that
relevant regulatory authorities are consulted in any review process to ensure that the Code of
Practice continues to meet regulatory requirements.

The coordinator welcomes suggestions for alterations, deletions or additions to this template,
to improve it or make it more suited to industry needs. Suggestions should be sent to the
coordinator on the form on Page iii, together with reasons for the change and any relevant
data.

The coordinator of this Code of Practice is:

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Suggestions for Change: Egg Producers Federation of New Zealand Inc.’s Code of Practice

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### Amendment Record

Amendments do not become part of this Code of Practice until they have been authorised by the Executive Director, Egg Producers Federation of New Zealand Inc., and issued with an amendment form. Amendments to this Code of Practice will be given a consecutive version number and dated.

Amendments to the Code of Practice can be identified by the version number and date issued in the header of each page.

Please ensure that all amendments are inserted, obsolete pages are removed and the record below is completed.

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Chapter 1: Introduction

1.1 Purpose of this Code of Practice

1.2 Scope of Animal Products Act 1999 as it applies to Eggs

1.3 Scope of this Code of Practice

1.4 Other Legislation

1.5 Other Information
1.1 Purpose of this Code of Practice

As professionals in the industry egg producers have a legal and moral responsibility to:

- Protect their customers
- Protect their businesses

Lack of control of hazards and other risk factors can affect businesses and result in:

- Loss of earnings
- Legal action
- Unemployment
- Loss of reputation

The Animal Products Act 1999 requires egg producers to have a risk management programme (RMP) to control hazards and other risk factors so that shell eggs are fit for their intended purpose. The RMP must cover their primary processing operations (from the laying farm through to packing of shell eggs).

Once registered, an egg producer’s RMP is a legally binding document that the egg producer must follow – otherwise they will be operating outside of the law.

This Code of Practice has been developed to provide a “one-stop-shop” with all of the information needed to assist an egg producer to set up their own RMP. Resources used to develop this Code are shown in the diagram on the next page. This Code incorporates industry agreed practices to meet the regulatory requirements for shell eggs. It has been based on the principles of HACCP (Hazard Analysis and Critical Control Point), which is the internationally recognised method for the control of hazards.

Using this Code of Practice is recommended by the Egg Producers Federation and the New Zealand Food Safety Authority. Alternative approaches are acceptable so long as regulatory requirements are met. Egg producers that do not use the Code of Practice will have to demonstrate that their RMP is equivalent to this and achieves similar product outcomes.

When developing their RMP, the egg producer should consider whether there are any additional hazards and other risk factors specific to their operation which are not covered by the Code. For this reason each egg producer should use the Code as a starting point but alter it so that it addresses all of their hazards and other risk factors for all of their operations.

If any part of the Code of Practice is referred to from the RMP then this referenced part becomes part of the legally binding RMP. The total RMP including the incorporated or referenced parts of the Code, will be subject to audit / external verification.
Egg Producers Federation of New Zealand Inc Code of Practice

Chapter 1: Introduction

Resources that have been used to develop this Code of Practice:

- Animal Products Act 1999
- Animal Products Regulations 2000
- HACCP Principles
- RMP template or Generic RMP
- Risk Management Programme Manual
- Egg Producers’ Code of Practice
- Risk Management Programme Specifications for:
  - Risk Management Programmes;
  - Operations;
  - Products; and
  - Approvals.

Egg producers may use this Code as a guide to develop their own risk management programme (RMP) ready for registration.

The RMP must ensure that eggs produced are fit for their intended purpose.
1.2 Scope of Animal Products Act 1999 as it applies to Eggs

1.2.1 Primary Processing

The Animal Products Act applies to all egg producers that are performing ‘primary processing’ of avian eggs from layer hens (Gallus domesticus); or any other bird species, including quail, geese, ducks, ostriches, and emus into products intended for human or animal consumption.

Primary processing includes harvesting and candling of those eggs and associated processes (as described in section 1.3). All egg producers MUST have a risk management programme for their primary processing.

"Candling" means the testing of eggs for freshness, fertility, or defects by use of light, electronic means, or any other commercially accepted means.

Primary Processing: Harvesting Candling / Grading Associated Activities

Egg producer must have an RMP under Animal Products Act

1.2.2 Secondary Processing

An egg producer that performs secondary processing of eggs has a number of regulatory options for this part of their process as shown in the bullets and diagram below. They can operate under:

1. the current Food Hygiene Regulations (FHR) under the Food Act, or
2. a Food Safety Programme (FSP) under the Food Act, or
3. a Risk Management Programme (RMP) under the Animal Products Act, or
4. options 2 and 3 as appropriate (known as “switching”).

Secondary Processing e.g. breaking, pulping, pasteurising

Option 1 → Food Hygiene Regulations under Food Act
Option 2 → FSP under Food Act
Option 3 → RMP under Animal Products Act
Option 4 → Switch between FSP and RMP
1.3 Scope of this Code of Practice

This Code Of Practice covers primary processing of shell eggs and other egg products that are intended for human or animal consumption.

It’s scope is clarified below.

- Hatchery
- Rearing farm
- bird receipt at laying farm
- bird management (feeding, watering, lighting etc)
- laying;
- harvesting /egg collection
- egg transportation to grading;
- egg grading / candling;
- egg packing;
- egg storage; and
- transport to customer or further processor.
- secondary processing of eggs (e.g. pulping and pasteurisation);
- bird welfare;
- environmental issues; and
- requirements of other legislation (except to mention the most relevant legislation in section 1.4).
1.4 Other Legislation

Despite having a risk management programme, the egg producer is still expected to comply with all other relevant legislation. These will not be covered in this Code of Practice except where directly relevant to the risk management programme. Egg producers are responsible for ensuring that they are familiar with and comply with all legislation.

1.4.1 List of Legislation Relevant to Egg Producers

Legislation that is likely to be relevant to egg producers includes (but is not limited to) the following Acts and their associated regulations and specifications:

- Agricultural Compounds and Veterinary Medicines Act 1997.
- Animal Products Act 1999
- Animal Welfare Act 1999
- Commerce Act 1986
- Consumer Guarantees Act 1993
- Fair Trading Act 1986
- Food Act 1981
- Food Regulations and Standards Made under the Food Act 1981:
  - Food Regulations 1984,
  - New Zealand Food Standard 1996,
  - The New Zealand (Mandatory) Food Standard 1997 (Prescribed Foods),
  - The New Zealand (Maximum Residue Limits of Agricultural Compounds) Mandatory Food Standard 1999
  - The Food Hygiene Regulations 1974
- Hazardous Substances and New Organisms Act (HSNO) Act 1996
- Health Act 1956
- Medicines Act 1981
- Resource Management Act 1991

1.4.2 The Joint Food Standards Setting System between Australia and New Zealand – a Joint Food Code in the near future

Food Standards Australia New Zealand (FSANZ, formerly ANZFA) is based on a partnership between the Australian and New Zealand governments, and is responsible for developing, varying, and reviewing food standards for food available in Australia and New Zealand. [web site: www.anzfa.gov.au]

In December 1995, the Australian and New Zealand governments signed a treaty to establish a “System for the Development of Joint Food Standards”. The Food Standards Treaty established the joint food standards setting system and came into force on July 1996. The underlying aims of the joint system are to consider the needs of both New Zealand and Australia, to protect the public health of both countries, and reduce unnecessary barriers to trade. This has resulted in a joint Australian New Zealand “Food Standards Code".
A number of areas are outside the scope of the joint system and are covered under the New Zealand food standards setting process:

- Maximum residue limits of agricultural compounds in foods
- Food hygiene and food safety provisions
- Export requirements relating to third country trade
- Dietary supplements (likely to be covered under future healthcare and therapeutic products legislation).

_Dual food standards will apply until the “Food Standards Code” is introduced (December 2002)._ 

The Australian Food Standards Code is an alternative to most of the Food Regulations 1984. Under the joint food standards setting system with Australia, food sold in New Zealand must fully comply with either the Australian Food Standards Code or the Food Regulations 1984.

During the transitional phase before the “Food Standards Code” becomes the sole food Code applying in New Zealand and Australia, food manufacturers/importers will have the option of complying with the Food Regulations 1984, the Australian Food Standards Code, or the “Food Standards Code”, but not a combination of these.

Additionally, under the Trans-Tasman Mutual Recognition Act 1997 (TTMRA) food produced in New Zealand or imported into New Zealand that meets New Zealand’s legal requirements, may also be sold in Australia and vice versa. There are some exceptions. For example, high-risk foods listed in either country require certification or testing before being permitted entry (peanuts, soft cheeses, molluscs).

Legislation can purchased from:

- Bennettts, Commerce House, 360 Queen Street, Auckland. Ph (09) 377 3496 Fax (09) 377 3497
- Whitcoulls, Shop 42 Centre Place, PO Box 928, Hamilton. Ph (07) 839 6305 fax (07) 834 3520
- Bennettts on Broadway, PO Box 138, Palmerston North. Ph (06) 358 3009 Fax (06) 358 2836
- Bennettts Government Book Shop, PO Box 5334, Wellington. Ph (040 499 3433 Fax (04) 499 3375
- Whitcoulls Cashel Street, Private bag, Christchurch. Ph (03) 379 7142 Fax (03) 377 2529
- Whitcoulls George Street, PO Box 1104, Dunedin. Ph (03) 477 8294 Fax (03) 477 7869

The Australian Food Standards Code and the “Food Standards Code” are available for viewing at:

- FSANZ web site: www.anzfa.gov.au
- Depository libraries throughout New Zealand.

The Australian Food Standards Code may be purchased from:
The Information Officer, FSANZ, PO Box 10559, The Terrace, Wellington. Ph (04) 473 9942, Fax (04) 473 9855.
1.5 Other Information

Further information is available from NZFSA’s web site or can be purchased as hard copies (See 1.5.2).

1.5.1 NZFSA’s Web Site

The following information is on NZFSA’s web site at www.nzfsa.govt.nz/animalproducts/

- Bulletins
- Manuals/Guides:
  - Exporters Guide
  - Risk Management Programme Manual
- Overseas Market Access Requirements
- Amendments
- Registers and Lists:
  - Risk Management Programmes Register
  - Transport Operators List
- Application Forms:
  - Exporter Registration – Application Form AP1
  - Identification numbers
  - Registration of Risk Management Programme – Application Form AP4
- Legislation:
  - Acts
  - Regulations;
  - Notices (Specifications); and
  - Orders
- Policy Statements
- Glossary of terms;
- Frequently asked questions (FAQs);
- Discussion Documents
- Brochures
- Letters to affected parties.
Even though these have been written for other food industries they may assist egg producers in the application of HACCP principles.

1.5.2 Hard Copies

The documents described in section 1.5.1 are also available through Manor House Press Ltd, phone 04 568 6071 or 04 568 89 14. Ask for a quote first as may be expensive for one off jobs.
1.6 Hazards and Other Risk Factors

There are four types of hazards and other risk factors:

- **Hazards to Human Health**
- **Hazards to Animal Health**
- **Risks to Wholesomeness**
- **Risks from False or Misleading Labelling**

1.6.1 Hazards to human health

There are 3 types of hazards:

- **B** = Biological hazards, e.g. pathogenic (harmful) bacteria
- **C** = Chemical hazards, e.g. chemical residues from pesticides
- **P** = Physical hazards, e.g. metal, glass

In New Zealand it is common for shell eggs to be eaten raw or only lightly cooked (either as an ingredient in another food, or on their own) so biological hazards are of particular concern.
Bacteria are the most likely biological hazard relevant to eggs. They can:

- multiply in eggs that are not kept at the correct temperature.
- survive in eggs if the cooking process is not thorough.
- produce toxins in eggs held at the wrong temperature (and most toxins won’t be destroyed by cooking).

New Zealand is fortunate that the most common egg-borne bacterium that causes illness overseas, *Salmonella enteritidis* phage type 4, has not been detected in New Zealand eggs. In New Zealand it is other types of *Salmonella* and some environmental bacteria that need the most attention.

Chemical hazards are most often due to incorrect use of chemicals.

Physical hazards are unlikely to be a problem for shell eggs as they are protected by the shell.

There are 3 sources of hazards:

- **Inputs**, e.g. raw materials, ingredients, packaging
- **Process**, e.g. metal from machinery
- **Other sources**, e.g. people, internal environment, pests

### 1.6.2 Hazards to animal health

Biological, chemical and physical hazards to animal health are likely to be similar to the ones identified as hazards to human health.

The 3 sources of hazards mentioned above will also apply here.

Eggs that are intended for animal consumption may have higher initial bacterial counts than other eggs. It is also likely that less care will be taken with this product (e.g. it may not be subject to chilled storage and may be held in containers that are open to the environment) so bacteria could be introduced and/or grow to higher numbers than in other eggs.

There is however insufficient data at present to establish the impact that this has on animal health.

### 1.6.3 Risks to Wholesomeness

Wholesomeness, in relation to any regulated animal product, is defined in the Animal products Act 1999 to mean that: “the product does not contain or have attached to it, enclosed with it, or in contact with it anything that is offensive, or whose presence would be unexpected or unusual in product of that description”.

### 1.6.4 Risks from false or misleading labelling

There are two possible ways that false or misleading labels can occur:

- Incorrect label design
- Eggs in pack do not match label
1.7 Seven HACCP Principles

The analysis and control of hazards must be based on the principles of the Hazard Analysis and Critical Control Point (HACCP) system. It is optional to use this approach for the other risk factors (risks to wholesomeness and risks from false or misleading labelling). There are seven principles:

1. Conduct a hazard analysis
2. Determine the Critical Control Points (CCPs)
3. Establish critical limit(s)
   - Examine all your processes.
   - Identify what hazards are likely to harm your customer and where they may occur.
   - Identify the steps in the process where you must control the hazard.
   - Define what is acceptable and what is unacceptable.

4. Establish a system to monitor control of the CCPs
5. Establish the corrective action to be taken when monitoring indicates that a particular CCP is not under control
   - Use the system to regularly check that the identified hazards are prevented, eliminated or reduced to acceptable levels.
   - Identify the person(s) responsible for this task.
   - When these checks indicate that there may be a potential problem immediate action must be taken to prevent unsafe food reaching the consumer.

6. Establish procedures for verification to confirm that the HACCP system is working effectively
7. Establish documentation concerning all procedures and records appropriate to these principles and their application
   - You will need to show that your controls are working both on a short term basis (daily) and in the longer term (1-3 monthly).
   - Keep up to date and maintain simple record of the checks and action taken.
   - Prove that it works to yourself / your regulatory body’s accredited verifier and your customer.