Draft Further Processing Code of Practice

Part 1: Overview
1.1 Prelims

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Review of Code of Practice

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1 Purpose and Scope of the Code of Practice

1.1 Purpose and Scope

This Further Processing Code of Practice (COP) has been developed by the Ministry of Agriculture and Forestry (MAF) in consultation with industry stakeholders. The COP has been developed to assist secondary processors who are producing products for human consumption to meet the requirements of the Animal Products Act 1999 (APA). It applies to the processing of non-dairy animal products, but has been more specifically written for the processing of meat and seafood. Other non-dairy animal products processors e.g. processors of eggs and egg products, may find the contents of use during RMP development and validation. The COP can also be used by operators under the Food Act regime to assist in producing safe and suitable food.

The COP contains guidance for good operating practices for a range of processing operations and it is MAF’s intention to develop further sections over time. It has been developed based on New Zealand regulatory requirements only and does not address overseas market access requirements for those who intend to export. Exporters must ensure that they meet the overseas market access requirements relevant to their product and intended market.

The COP is divided into three parts:

Part 1: Overview

Part 1 gives an overview of the COP and the requirements of the APA. It explains the options available to operators for the development of risk management programmes (RMPs), and provides guidance on the contents of RMPs. This Part also provides web links to other relevant documents published by the MAF that may be useful for operators during the development and operation of their RMPs.

Part 2: Regulatory Requirements

Part 2 provides a summary of the legislation under the APA that is directly relevant to each processing operation addressed in Part 3 of this COP. The legal references provided are specific to the processing activity only and not those that are more generic in nature such as design and construction, personnel health, hygiene etc. The legislation that has been referenced is limited to the APA and its subordinate legislation, and the Australia New Zealand Food Standards Code. It is the responsibility of the operator to ensure compliance with all other legislation applicable to their business.
Part 3: Good Operating Practice (GOP)

Part 3 provide guidance on the good operating practices that are relevant to the specific processing operations that are covered. This Part sets out the factors that should be considered by the operator when developing and validating a secondary process in an area covered by the COP.

This Part will continue to be expanded as new sections are developed.

1.2 Status of Code of Practice

The status of the COP as it applies to non-dairy operators (more specifically meat and seafood) who have a registered Risk Management Programme (RMP) under the Animal Products Act 1999 is explained below.

This COP contains:

- regulatory requirements;

- procedures for compliance; and

- guidance material (shown in boxes).

Secondary processors must comply with the regulatory requirements.

Secondary processors must comply with the procedures for compliance unless their alternative practices have been:

- documented within the operator’s Risk Management Programme, and

- approved through registration of that programme by MAF.

The guidance material in boxes in this COP is non-mandatory, and is given to help both operators and verifiers interpret MAF’s expectations.
2 Requirements of the Animal Products Act 1999

The Animal Products Act 1999 is New Zealand’s legal framework for the processing of animal products. It establishes a risk management system that requires all animal products traded and used to be “fit for its intended purpose”. The Act sets out the duties of the operator and the requirements related to risk management programmes (RMPs), regulated control schemes, and exporter controls.

2.1 Risk Management Programmes (Part 2 of the Act)

All secondary processors of animal products for human consumption who export products with official assurances are required to have a registered RMP. All other secondary processors must operate either under an RMP or the Food Act regime with either a food safety programme (FSP) or in accordance with the Food Hygiene Regulations. Secondary processing operations include those activities covered by this COP.

2.2 Regulated Control Schemes (Part 3 of the Act)

A regulated control scheme is a scheme developed by MAF and imposed by the Director-General to manage risks, where:

- RMPs would not be feasible or practicable;
- it is more efficient for the government to run the programme; or
- it is needed to meet the market access requirements of foreign governments.

2.3 Exporter Controls (Part 5 of the Act)

Exporters of animal products are required to register with the MAF. Exporters are responsible for exporting in accordance with the Act and, where appropriate, may be required to meet specified market access requirements of foreign governments that may be additional to the New Zealand standard.

Export requirements are excluded from this COP, as they are additional to RMP requirements. Operators who export need to be aware of these requirements and ensure that their documented systems include procedures and records necessary to demonstrate compliance with all relevant requirements notified in:
2.4 Imposition of Authorisations, Duties and Responsibilities (Part 8 of the Animal Products Act)

The Act provides for the recognition by the MAF of agencies and persons to undertake evaluation and external verification of RMPs. The MAF maintains a public register of all recognised agencies and recognised persons, which is available on the [MAF website](http://www.maf.govt.nz).

The Act imposes duties on these key persons:

- operators of RMPs (section 16 of the Act);
- exporters (section 51 of the Act);
- recognised agencies (section 106 of the Act); and
- recognised persons (section 107 of the Act).

The Act also provides for appropriate penalties to be applied when an offence occurs.
3 Risk Management Programmes

3.1 What is a Risk Management Programme?

A Risk Management Programme (RMP) is a documented programme designed to identify and manage hazards and other risk factors, in relation to the production and processing of animal material and animal products. This is to ensure that the resulting animal product is fit for its intended purpose. The risk factors that must be considered in the development of an RMP are:

- risks from hazards to human and animal health;
- risks from false or misleading labelling; and
- risks to the wholesomeness of animal material or product.

An operator’s registered RMP is “legally binding” so it must be developed and implemented in accordance with relevant New Zealand legislation. Overseas market access requirements and commercial quality issues are not required to be part of the RMP.

The Risk Management Programme Manual provides comprehensive information on the principles and components of RMPs and provides guidance for their development.

3.2 Contents of a Risk Management Programme

3.2.1 Contents

The documented RMP must include the following:

**Good Operating Practice**

Good Operating Practice (GOP) includes the practices and procedures that will ensure the consistent production of products that are fit their intended purpose, and that meet relevant regulatory requirements. It includes several interacting components such as hygienic practices, process control and quality assurance systems. GOP is usually documented in the supporting systems of an RMP.

GOP is the foundation for Hazard Analysis and Critical Control Point (HACCP) and RMPs.

Part 3 of this COP addresses GOP for each of the processing activities covered.
Application of HACCP principles

The operator must apply HACCP principles, as appropriate to the product and process, to ensure a systematic approach to the identification and analysis of hazards and their control.

Identification of other risk factors and their controls

Other risk factors related to the wholesomeness of the product and risks from misleading labelling must be identified in the RMP. The control measures for addressing the identified risk factors must also be documented in the RMP.

Other RMP requirements

Other RMP requirements such as business identification, operator’s details, physical boundaries, and provision for verifiers’ rights must also be documented in the RMP.

3.2.2 RMP Components

The RMP should include the following components:

- Operator, business and RMP identification;
- List of RMP documents;
- Management authorities and responsibilities;
- Scope;
- Animal material and animal product description;
- Process description;
- Good Operating Practice;
- Application of HACCP (identification, analysis and control of hazards to human or animal health);
- Identification and control of risks to wholesomeness;
- Identification and control of risks from false and misleading labelling;
- Identification and competency of responsible persons;
- Corrective action for unforeseen circumstances;
- Recall procedures;
- Validation;
- Operator verification;
- Notification requirements;
- Provision for verification activities & verifiers rights;
- Document control and requirements for records.

An operator’s documented RMP and its associated records must be kept for at least four years to facilitate traceback and regulatory verification.
4 Other Legislation

This COP will assist operators meet some requirements of the APA and aspects of the Australian New Zealand Food Standards Code. Operators are responsible for ensuring that they are familiar and comply with all legislation. Examples of the Acts and their associated regulations and specifications that are likely to be relevant to operators include:

- Animal Products Act 1999
- Commerce Act 1986
- Consumer Guarantees Act 1993
- Fair Trading Act 1986
- Food Act 1981
- Hazardous Substances and New Organisms Act 1996
- Resource Management Act 1991
- Health and Safety in Employment Act 1992
5 Other Sources of Information

The MAF website contains a lot of information that is of value to secondary processors. The following sections provide links to information that should be of particular relevance:

5.1 MAF Science Contracts

This page contains links to a wide range of scientific research undertaken by or on behalf of MAF. This can help assist operators in their understanding the food safety issues, their risk to the consumer, and the investigation of food safety incidents.

5.2 Microbial Pathogen Data Sheets

This page contains links to a series of microbiological data sheets that have been prepared for MAF by the Institute of Environmental Science and Research Limited (ESR).

These can be used to help operators understand the characteristics of the micro-organisms that need to be controlled by their process, their sources, growth parameters and examples of processing guidelines.

5.3 Risk Profiles

This page contains links to microbiological risk profiles that have been prepared for MAF by ESR. Risk Profiles provide information relevant to a food/hazard combination to help operators understand the micro-organisms they need to control in their processes and their associated public health significance.

5.4 Hazard Database

The hazard database is under development. It provides information on food safety hazards that are reasonably likely to occur in New Zealand foods. The search results list the hazard(s) associated with the food, the source of the hazard, the regulatory limit (if applicable) as well as actions an operator can take to control the hazard.