Code of Practice –
Processing of Meat Products

Part 1: Overview
Prelims

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Disclaimer

IMPORTANT DISCLAIMER

Every effort has been made to ensure the information in this report is accurate.

NZFSA does not accept any responsibility or liability whatsoever for any error of fact, omission, interpretation or opinion that may be present, however it may have occurred.

Website

A copy of this document can be found at: http://www.nzfsa.govt.nz/animalproducts/index.htm

Review of Code of Practice

This code of practice will be reviewed, as necessary, by the New Zealand Food Safety Authority. Suggestions for alterations, deletions or additions to this code of practice, should be sent, together with reasons for the change, any relevant data and contact details of the person making the suggestion, to:

Assistant Director (Production and Processing)
New Zealand Standards Group
New Zealand Food Safety Authority
P O Box 2835
Wellington

Telephone: 04 463 2500
Facsimile: 04 463 2643
Amendment Record

It is important that this publication is kept up-to-date by the prompt incorporation of amendments.

To update this publication when you receive an amendment, remove the appropriate outdated pages, destroy them, and replace them with the pages from the new issue. Complete instructions will be given on the covering letter accompanying the amendment. File the covering letter at the back of the publication and sign off and date this page.

If you have any queries, please ask your local verifier.

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1 Purpose and Scope of the Code of Practice

This code of practice (COP) has been developed by the New Zealand Meat Processing Industry in consultation with the New Zealand Food Safety Authority (NZFSA), to assist meat product operators to meet the requirements of the Animal Products Act 1999 and produce meat products for human and animal consumption that are safe and suitable for their purpose. In particular, it provides guidance for meeting the requirements for the development, registration and implementation of risk management programmes (RMPs).

This COP has been developed based on New Zealand requirements only.

This COP applies to businesses involved in the primary and secondary processing of meat products for human and animal consumption.

Examples of primary meat processing include, but are not limited to:

- slaughter and dressing of farmed mammals;
- dressing of wild mammals.

Examples of secondary meat processing include, but are not limited to:

- Boning or cutting meat;
- acidification, salting, brining, smoking, thermal processing, refrigeration, storage;
- addition of non-animal product ingredients to meat products e.g. breading, coating, saucing, assembling; and
- rendering, refining of material or product to produce meal and oils.
The COP is divided into four parts.

Part 1: Overview

Part 1 gives an overview of the whole code of practice and the requirements of the Animal Products Act 1999. It explains the options available to operators for the development of RMPs. It also provides links to other relevant documents published by the NZFSA.

Part 2: Good Manufacturing Practice (GMP)

Part 2 covers good manufacturing practice and process control. It sets out the regulatory requirements, and acceptable or agreed procedures for meeting the requirements of the Act, particularly the Specifications for Products Intended for Human Consumption. This will assist operators in the development and documentation of supporting systems that form part of RMPs.

It is proposed Part 2 would contain the following chapters:

- Chapter 1 – Introduction.
- Chapter 2 – Design and Construction.
- Chapter 3 – Cleaning and Sanitation.
- Chapter 5 – Slaughter and Dressing.
- Chapter 6 – Presentation for Post-Mortem Examination.
- Chapter 7 – Post-Mortem Examination.
- Chapter 8 – Disposition and Collection of Animal Product.
- Chapter 9 – Secondary Processing.
- Chapter 10 – Product for Pharmaceutical / Technical Use.
- Chapter 11 – Branding & Labelling (may be incorporated into one of the other chapters).
- Chapter 12 – Transport.
Part 3: HACCP Application

Part 3 shows how the principles of Hazard Analysis and Critical Control Point (HACCP) can be applied to meat product and processes and provides some generic HACCP models. This section has been produced as a stand-alone document (insert Title and reference).

Part 4: Identification and Control of Risk Factors Related to Wholesomeness and Labelling

Part 4 shows the identification of risk factors and controls related to the wholesomeness and labelling of meat products.

Exclusions

This code of practice does not apply to the following:

The Meat Code of Practice does not cover overseas market access requirements. Exporters must ensure that they meet the overseas market access requirements relevant to their product and intended market.
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 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 primary processors of meat products for human or animal consumption are required to have a registered RMP. Secondary processors of meat products must operate under an RMP except where their operations are covered by the Food Act regime. While secondary processors of meat intended for export to overseas markets are not obliged to have a registered RMP, an RMP is usually necessary to enable them to comply with overseas market access and official assurance requirements.

Operations that constitute primary processing of meat are slaughter and dressing of farmed mammals and the dressing of wild mammals, game estate mammals and farmed gone feral mammals.

Secondary processing of meat includes processes at any stage beyond primary processing.

2.2 Regulated control schemes (Part 3 of the Act)

A regulated control scheme is a scheme developed by the NZFSA 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 meat products are required to register with the NZFSA. 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 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:

- General Requirements for Export (GREX); and
- Overseas Market Access Requirements (OMAR).

The Guide for Exporters and the Official Assurances Programme discuss export requirements in more detail.

2.4 Imposition of authorisations, duties and responsibilities (Part 8 of the Animal Products Act)

The Act provides for the recognition by the NZFSA of agencies and persons to undertake certain functions and activities (e.g. evaluation and external verification) that are important to the management of RMPs. The NZFSA maintains a public register of all recognised agencies and recognised persons, which is available on the NZFSA website.

- 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 (accredited) persons (section 107 of the Act).

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

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, in order to ensure that the resulting animal product is fit for 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 will be “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 risk management programme.

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

3.2 RMP configurations

An RMP may be developed for a single business or for multiple businesses.

3.2.1 Single-business RMP (Sections 12(3) and 12(4) of the Act)

A single RMP that covers the operations of a single-business located in a single-site is the simplest form of an RMP and its use is encouraged, whenever applicable. This is likely to be the most suitable RMP configuration for the majority of meat processors.

A business may also decide to have more than one RMP. This may be useful when the operation can be logically and clearly split by product, process or premises. This arrangement can give flexibility to the operator in terms of making RMP amendments. It also allows for the suspension or deregistration of one RMP without affecting the other. However,
consideration should be given to the practicality and cost of managing more than one RMP within a single business, and how this may affect any market access requirements.

3.2.2 Multi-business RMP (Section 17A of the Act)

An RMP may apply to more than one business, if the Director-General approves such an arrangement for the particular business. The approval will depend on the operator being able to demonstrate that:

- the programme is appropriate to all businesses or part-businesses that it covers;
- the registered operator of the programme will have sufficient control, authority and accountability for all matters covered by the programme in relation to the other business or part-business subject to its coverage; and
- the applicant has obtained the consent or otherwise taken into account the views of any person whose business or part-business is to be covered by the programme.

Certain market access requirements, for example European Union (EU) listing requirements, do not allow this RMP configuration to be used. Therefore, this is not likely to be a suitable RMP configuration for the majority of meat processors.

3.3 Contents of a risk management programme

3.3.1 Contents

The documented RMP must include the following:

**Good manufacturing practice**

Good manufacturing practice (GMP) includes the practices and procedures designed to ensure the consistent production of products that are safe and suitable for their intended purpose, and that meet relevant regulatory requirements. It includes several interacting components such as hygienic practices, process control and quality assurance systems. GMP is usually documented by the operator in supporting systems of their RMP.

GMP is the foundation for Hazard Analysis and Critical Control Point (HACCP) and RMPs. It may also be referred to as Good Operating Practice (as used in the NZFSA Domestic Food Review discussion papers).

GMP for the processing of meat products is discussed in Part 2 of this COP.
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. This is covered in Part 3 of this COP.

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. These are presented in Part 4 of this COP.

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.

3.3.2 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 Manufacturing 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;
Risk Management Programme

- Recall procedures;
- Confirmation of validity;
- Operator verification;
- Notification requirements;
- Provision for verification activities & verifiers rights;
- Document control and requirements for records.
4 Development of an RMP based on an Approved Code of Practice

The Animal Products Amendment Act 2002 allows for an RMP to be based on a COP, a template, or a model if in the view of the Director-General it is valid and appropriate for businesses of that kind. A COP that is deemed as valid and appropriate after an assessment process carried out by the NZFSA will be formally recognised as an “approved code of practice”.

A COP is a valuable tool to use in the development of the RMP. Compliance with an approved COP will:

- ensure that the operator complies with current best practice or acceptable industry practices and procedures;
- ensure that the operator meets the relevant regulatory requirements; and
- simplify and reduce the cost of developing and evaluating the RMP.

The applicability of the approved COP to the particular business and the degree of the operator’s compliance with the approved COP will impact on the development approach, and, in some cases, to the evaluation requirements for the RMP.

4.1 Businesses whose products and processes are fully covered by an approved COP

4.1.1 Development

When a COP fully covers the scope of the operation of a business, the simplest approach for developing an RMP is to use the appropriate RMP template provided. The RMP template is a simple form that the operator completes by filling in the required information in the appropriate boxes.

Because of the variety and complexity of meat operations, NZFSA does not regard the template RMP as a suitable option for such processors. However, generic RMP models for some categories of meat processing have been developed. These will be especially useful for meat processors selling on the New Zealand market only and can be found at the following link (insert web link/reference).
4.2 Businesses whose products or processes are not fully covered by an approved COP, or those with significant variation from the COP

4.2.1 Development

Since the template RMP option is not available to meat processors, such operators must develop their own specific RMPs, incorporating or referencing relevant parts of the Meat COP.

Businesses whose products and processes are not fully covered by the COP, or who have decided to apply procedures or processing parameters that significantly differ from those given in the COP must write their own documentation for those parts of the RMP that are not covered by, or vary from, the COP (including HACCP application and GMP procedures).

The operator must be able to demonstrate the effectiveness of any alternative procedures or parameters to consistently meet all relevant regulatory requirements and produce products that are safe and suitable for their purpose. Demonstration of the effectiveness of such alternative procedures may involve the collection of evidence (e.g. data from testing or trials, published scientific information, report from an expert) by the operator for assessment by the recognised evaluator or the NZFSA.

4.2.2 Evaluation

Meat RMPs, whether they are based on the approved Meat COP or have procedures that vary from the COP, must be evaluated by an independent, recognised evaluator to confirm the adequacy of the RMP. Evaluation will involve a desk-top audit of the documented RMP and an on-site visit of the premises before registration of the RMP.

4.3 Steps for the development, registration and implementation of an RMP

The steps for the development, registration and implementation of an RMP are summarised in Figure 1.
**Figure 1. Steps for the development, registration and implementation of an RMP**

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<th>Development</th>
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<tr>
<td>• Operator to develop RMP and incorporate relevant parts of the COP into RMP by reference, and add own documents for products/processes/procedures not covered by COP; OR</td>
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<td>• Operator to develop own RMP</td>
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<td>• Operator to confirm effectiveness of any alternative procedures/parameters, and validity of RMP</td>
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<td>• Operator to write to recognised verifying agency requesting letter to confirm the agency’s agreement to provide verification services for the RMP</td>
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<td>• Operator to contract an evaluator</td>
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<td>• Recognised evaluator to carry out evaluation, prepare report and recommend RMP for registration</td>
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<td>• Operator to submit documents required for registration including RMP or RMP outline, application form and fee to NZFSA</td>
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<td>• NZFSA to assess and register the RMP application</td>
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<td>• Operator to notify recognised verifying agency of RMP commencement</td>
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<td>• Operator to implement the RMP, including operator verification</td>
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<td>• Recognised verifier to provide external verification</td>
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<td>• Operator to apply for registration of any significant amendment*</td>
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* Significant amendments will require evaluation prior to registration – refer to Appendix G of the Risk Management Programme Manual for information on significant amendments (*insert link*)
5 Other Legislation

This COP will assist meat product operators meet the requirements of the Animal Products Act 1999. Operators are responsible for ensuring that they are familiar and comply with all other legislation. Operators should not rely solely on this COP to provide them with information on the legal requirements under other legislation.

Legislation that is likely to be relevant to meat product operators includes, but is not limited to, the following Acts and their associated regulations and specifications:

- Agricultural Compounds and Veterinary Medicines Act 1997.
- Food Act 1981.
6 Sources of Other Information

Information specific to meat products is available on the Meat website of the NZFSA (insert link).

Other information about the Animal Products Act 1999 and RMPs can be obtained through the RMP Help Desk or the Animal Products website.