



## Petfood Processing

### Chapter 1 Overview

2/06/2016

## **TITLE**

Operational Code: Petfood Processing

## **COMMENCEMENT**

This Operational Code is effective from 2/06/2016

## **REVOCATION**

This Operational Code replaces the MAF Code of Practice: Pet Food Processing Part 1: Overview, December 2011.

## **ISSUING BODY**

This Operational Code is issued by the Animal Products Team, Regulation & Assurance Branch, MPI

Dated at Wellington this 2<sup>nd</sup> day of June 2016

Judy Barker  
Manager, Animal Products  
Ministry for Primary Industries  
(acting under delegated authority of the Director-General)

Contact for further information  
Ministry for Primary Industries (MPI)  
Regulation & Assurance Branch  
Animal and Animal Products Directorate  
PO Box 2526  
Wellington 6140  
Email: [animal.products@mpi.govt.nz](mailto:animal.products@mpi.govt.nz)

<b>Contents</b>	<b>Page</b>
<b>Introduction</b>	<b>3</b>
<b>Part 1: Recognition of this Code</b>	<b>4</b>
<b>Part 2: Purpose and Scope of this Code</b>	<b>5</b>
2.1 Application	5
2.2 Contents of the Petfood Operational Code	5
<b>Part 3: New Zealand legislation applicable to petfood</b>	<b>7</b>
3.1 APA and ACVM Act	7
3.2 APA requirements	8
3.3 Animal Welfare Act 1999	12
3.4 Other Legislation	12

# Introduction

## Purpose of Chapter 1

Chapter 1 of the Petfood Operational Code (Code) provides an introduction to the whole Code. It explains the Code's purpose, scope and application, and the legislative framework which underpins the requirements for petfood safety and suitability under the Animal Products Act 1999 (APA).

## Background on the Development of the Petfood Operational Code

- (1) A project plan, *Petfood Code of Practice Re-development Plan*, was prepared by the Ministry for Primary Industries (MPI) in January 2014 to address the identified need for a review and further development of the current Petfood Code of Practice. This plan was subsequently approved by the New Zealand Petfood Manufacturers Association (NZPFMA).
- (2) The redevelopment of the Code is currently being undertaken by MPI to:
  - a) update it in line with the amended Animal Products: Specifications for Products Intended for Animal Consumption Notice signed on the 6<sup>th</sup> October 2014 (AC Spec);
  - b) expand its scope to include further processed and manufactured petfood products covered by the APA;
  - c) increase focus on human health implications of petfood safety;
  - d) incorporate Agricultural Compound and Veterinary Medicines Act 1997 (ACVM Act) requirements relevant to the products and processes covered by the Code; and
  - e) align its format with MPI's new standardised templates for guidance documents.
- (3) The new Code will consist of seven Chapters and be renamed as the Petfood Operational Code. The development of the new Code, which involves the revision of existing chapters and development of new chapters, is being undertaken in stages. Chapter 1 Overview and Chapter 2 Good Operating Practice are the first two chapters to be completed. It is expected that the whole Code will be completed by the end of 2016.

## Who should read this Code?

- (1) This Code should be read by:
  - a) petfood risk management programme (RMP) operators;
  - b) further (petfood) processors;
  - c) suppliers of animal material for processing into petfood;
  - d) transport operators;
  - e) regulators; and
  - f) verifiers.

## Why is this Code important?

- (1) Petfood operators are expected to develop and implement their RMPs in accordance with this Code. This will:
  - a) ensure that the operator complies with acceptable industry practices and procedures;
  - b) ensure that they meet relevant regulatory requirements; and
  - c) simplify and reduce the cost of developing and evaluating their RMPs.
- (2) The Code clarifies MPI's expectations on how regulatory requirements may be met. This will assist operators and RMP verifiers to have a consistent understanding of the requirements and their applications.

## Part 1: Recognition of this Code

- (1) The Operational Code: Petfood Processing is recognised by MPI to be valid and appropriate as a Code for petfood processing operations under the APA. This recognition provides petfood operators a means of satisfying the requirements of an RMP for petfood processing, with respect to section 12 (3A) of the APA, which states that an RMP may be based, in whole or in part, on a code of practice that is recognised by MPI as valid and appropriate to the type of business for which it is intended to apply.
- (2) The whole or parts of the Code may be incorporated in a petfood operator's RMP (e.g. by copying or referencing the relevant part). Since the RMP is a legally binding document, any part of the Code incorporated in an RMP becomes mandatory for the petfood operator to comply with.

## Part 2: Purpose and Scope of this Code

### 2.1 Application

- (1) This Code has been developed by MPI, in consultation with the NZPFMA and industry operators, to:
  - a) assist petfood operators meet the requirements of the APA;
  - b) produce petfood that is safe and suitable for its purpose; and
  - c) prevent petfood material and product from entering the human food chain.
- (2) Petfood, as defined in the APA and used in this Code, means food intended to be fed to domesticated cats and dogs (including companion dogs, farm dogs and other work dogs) that is made of animal material or animal product. The requirements in this Code only apply to petfood that is intended to be sold or traded.
- (3) This Code applies to all business operators involved in the primary and secondary processing of petfood, and the transport of animal material or product for processing to petfood (refer to 3.2 for descriptions of these operations).
- (4) The following operations are excluded from the scope of this Code:
  - a) processing of petfood that is principally of dairy origin;
  - b) rendering of animal material (this is covered by the MPI [Rendering Code of Practice](#)); and
  - c) activities solely covered by the ACVM Act (refer to 3.1 (2) for clarification of these activities).
- (5) This Code has been written mainly for petfood processors and manufacturers operating an RMP. However, MPI recommends that 'further (petfood) processors' follow relevant procedures (e.g. Good Operating Practice) given in this Code, although they are not required to document and implement an RMP.
- (6) This Code focuses on managing risks to animal and human health from food safety hazards (biological, chemical and physical hazards) in petfood.
- (7) This Code has been developed based on New Zealand standards and requirements only. Export requirements are not covered in this Code.

### 2.2 Contents of the Petfood Operational Code

- (1) This Code is intended to consist of seven chapters:

#### **Chapter 1 Overview**

Chapter 1 (this document) provides an overview of the whole Code. It explains the purpose, scope and application of the Code, and the legislative framework which underpins the requirements for product safety and suitability.

#### **Chapter 2 Good Operating Practice**

Chapter 2 is a completely new chapter of the Code. It provides guidance on good operating practices covering hygiene and sanitation, documentation and record keeping, traceability, operator verification, and other quality assurance programmes. It applies to all petfood operators.

#### **Chapter 3 Supply of farmed animals for slaughter**

Chapter 3 is currently under development and will be a completely new chapter of the Code. It will provide guidance on the supply of farmed animals and birds for slaughter for processing into petfood, in line with Part 7 of the AC Spec.

**Chapter 4 Slaughter and dressing of farmed animals**

Chapter 4 is currently under development. Part 3.1 Slaughter and Killing of Farmed Mammals of the existing code of practice is being updated and expanded, and will eventually become Chapter 4 of the new Code.

**Chapter 5 Harvesting, refrigeration and processing of wild animals**

Chapter 4 is yet to be developed. Part 2.2 Harvesting and Processing of Wild Rabbits, Hares, Wallabies, Possums, Goats and Deer of the existing code of practice will be updated and become Chapter 5 of the new Code.

**Chapter 6 Post-slaughter processing and manufacturing of petfood**

Chapter 6 is yet to be developed. This will be a completely new chapter. It may provide guidance on the manufacturing of petfood such as:

- prepared raw petfood;
- cooked, refrigerated petfood;
- shelf stable petfood; and
- dried pet chews.

**Chapter 7 HACCP application**

Chapter 7 is yet to be developed. This will be a completely new chapter. It will show how the principles of Hazard Analysis and Critical Control Point (HACCP) can be applied to petfood processing. It will also provide generic HACCP models for the processing of some typical petfood products.

## Part 3: New Zealand legislation applicable to petfood

### 3.1 APA and ACVM Act

- (1) Product safety and suitability aspects of petfood production in New Zealand are primarily legislated under the APA and the ACVM Act.
- (2) Table 1 summarises the various activities generally undertaken by New Zealand petfood businesses and the legislation that apply to each of them. The APA requirements for primary and secondary processing of petfood are further explained in clause 3.2.

**Table 1: Applicable legislation for activities undertaken by petfood businesses**

Process/activity	Requirements that apply	
	APA	ACVM Act
Importation of any petfood.		✓
Primary processing of animal product for animal consumption (e.g. slaughter and dressing).	✓	✓
Preparation or manufacturing of food for pets that do not contain any animal product (e.g. plant-based food).		✓
Secondary processing (i.e. preparation or manufacturing) of any petfood for export requiring official assurance.	✓ An RMP is required	✓
Secondary processing defined as "further (petfood) processing" in the AC Spec.	✓ MPI listing and implementation of a tracking system are required	✓
Secondary processing of petfood that does not involve any processing of products for export requiring official certification or any "further (petfood) processing".		✓
Secondary processing by petfood operators that are not legally required to operate under an RMP, but voluntarily choose to do so for commercial reasons.	✓ An RMP is required	✓
Processing of petfood that is principally of dairy origin (if no dairy processing or export assurance requiring an RMP occurs at the premises).		✓
Domestic sale of all petfood.		✓
Transport of animal material during primary processing. Transport of animal material or product from primary processors to secondary processors and between secondary processors.	✓	



- (3) The main pieces of legislation under the APA that apply to animal product operators involved in the processing and manufacture of petfood are the:
  - a) Animal Product Regulations 2000;
  - b) Animal Products Notice: Specifications for Products Intended for Animal Consumption signed on the 6<sup>th</sup> October 2014;
  - c) Requirements for the On-Farm Killing of Farmed Mammals to be supplied for Petfood signed on the 22<sup>nd</sup> May 2013; and
  - d) Animal Products (Risk Management Programme Specifications) Notice 2008.
- (4) The main legislation under the ACVM Act that covers the requirements for the importation, manufacture and sale of petfood in New Zealand is the Agricultural Compounds and Veterinary Medicines (Exemptions and Prohibited Substances) Regulations 2011.
- (5) The ACVM Regulations 2011 requires the registration of manufactured petfood that has a therapeutic claim. Manufactured petfood that is marketed purely to provide nourishment to an animal does not require registration, however, it still needs to meet particular regulations related to the product's fitness for purpose, documented system for manufacturing, labelling and recording keeping.

For further information on the ACVM requirements refer to the MPI website or contact the MPI ACVM Programmes & Appraisals Team: [ACVM-info@mpi.govt.nz](mailto:ACVM-info@mpi.govt.nz).

## 3.2 APA requirements

### 3.2.1 Primary processing

- (1) Primary processing of petfood includes the following activities or processes:
  - a) supply and presentation of animals for slaughter;
  - b) slaughter and dressing of farmed animals; and
  - c) harvesting, refrigeration and dressing of wild animals.
- (2) All business operators involved in primary processing of petfood (i.e. primary processors) must operate under an RMP.

### 3.2.2 Secondary processing

- (1) Secondary processing includes all processing that occur after the carcass has passed post-mortem examination. These include:
  - a) cutting and boning of carcasses and cuts;
  - b) further processing and manufacturing of petfood;
  - c) packing;
  - d) refrigeration; and
  - e) storage.
- (2) Animal material for all secondary processing of petfood must be procured only from regulated sources. Regulated sources are registered or listed businesses that operate under regulatory control of MPI, such as:
  - a) abattoirs, slaughter plants and seafood processing premises that operate an RMP under the APA;
  - b) further petfood processors that implement a tracking system under the APA;
  - c) retail butchers registered under the Food Act 2014; and
  - d) petfood manufacturers that have a documented system for manufacturing under the ACVM Act.
- (3) To ensure that animal materials for processing of petfood are procured only from regulated sources, while at the same time providing flexibility to petfood operators, legislation allows for several regulatory scenarios under which petfood operators may operate, depending on the nature of their operation and

the type of petfood they produce. These scenarios and their applications are summarised in Table 2  
Secondary processors: Regulatory scenarios and applications.

**Table 2: Secondary processors: Regulatory scenarios and applications**

Regulatory scenarios	Application	APA requirements
(1) Secondary processors that <b>must</b> operate under an RMP.	Processors or manufacturers of any type of petfood for export that requires official certification.	<p>These secondary processors must develop, register and implement an RMP according to the RMP Spec and AC Spec.</p> <p>In addition to meeting New Zealand standards, exporters must also meet relevant export requirements and Overseas Market Access Requirements (OMARs). Refer to MPI's Exporting web pages for more details.</p>
(2) Secondary processors involved in "further petfood processing", as defined in the AC Spec, that <b>must</b> implement a documented tracking system.	<p>Processors or manufacturers involved in the processing of petfood that is:</p> <ul style="list-style-type: none"> <li>made from or contain any raw animal material (e.g. raw meat, offal, poultry or fish)</li> </ul> <p><u>and</u></p> <ul style="list-style-type: none"> <li>is for domestic sale only; or</li> <li>is for export but official certification is not required.</li> </ul> <p>Examples:</p> <ul style="list-style-type: none"> <li>A manufacturer that produces raw petfood (e.g. diced meat and offal) or processed petfood (e.g. cooked dog rolls) for domestic sale only.</li> <li>A manufacturer of processed petfood for export to a country that does not require official certification from MPI for petfood consignments.</li> </ul>	<p>These further petfood processors must:</p> <ul style="list-style-type: none"> <li>be listed with MPI; and</li> <li>implement a documented tracking system that shows that all animal material used in petfood processing are procured from regulated sources.</li> </ul> <p>Refer to the <a href="#">Further (petfood) Processors Documented Tracking System</a> for more details.</p> <p>Note that further petfood processors are exempt from having a documented tracking system if they voluntarily choose to operate under an RMP, since procedures for the procurement of raw materials and product traceability are required parts of an RMP.</p>
(3) Secondary processors of petfood that are not covered by scenario (1) or (2), i.e. they are not required to implement an RMP or tracking system.	<p>Manufacturers involved in the processing of petfood that is:</p> <ul style="list-style-type: none"> <li>made of rendered or manufactured animal product; or</li> </ul>	<p>These manufacturers must comply with the requirements of the ACVM Regulations 2011.</p> <p>They are not required to implement a tracking system under the APA because the businesses they procure their materials</p>

Regulatory scenarios	Application	APA requirements
	<ul style="list-style-type: none"> <li>made of raw meat, poultry or fish bought in a ready-for-sale form from a regulated source (e.g. meat bought from a retail butcher or supermarket)</li> </ul> <p><u>and</u></p> <ul style="list-style-type: none"> <li>is for domestic sale only; or</li> <li>is for export but official certification is not required.</li> </ul> <p>Examples:</p> <ul style="list-style-type: none"> <li>A manufacturer of dog biscuits and dry petfood.</li> <li>A manufacturer who uses raw meat trimmings bought from a retail butcher to produce pet jerky or dog rolls.</li> </ul>	<p>from are required to source animal material from regulated sources as part of the regulatory programme (e.g. RMP or Food Control Plan) they operate under.</p>
(4) Secondary processors that fall under scenario (2) or (3) and are not required to operate under an RMP, but voluntarily choose to do so.	<p>Examples:</p> <ul style="list-style-type: none"> <li>A further petfood processor that chooses to operate under an RMP for commercial reasons (e.g. customer requirement).</li> <li>A manufacturer of dry petfood for domestic sale that chooses to operate under an RMP.</li> </ul>	<p>These secondary processors must develop, register and implement an RMP according to the RMP Spec.</p>

### 3.2.3 Development of the RMP

- (1) When an RMP is required, the petfood operator must develop and document their own RMP that is specific to their own products, processes and premises. The MPI [RMP Manual](#) provides comprehensive information on the principles and components of RMPs and provides guidance for their development and registration.
- (2) An operator is expected to develop and implement their RMP in accordance with this Code. This will:
  - a) ensure that the operator complies with acceptable industry practices and procedures;
  - b) ensure that the operator meets relevant regulatory requirements; and
  - c) simplify and reduce the cost of developing and evaluating the RMP.
- (3) The whole or parts of the Code may be incorporated in a petfood operator's RMP (e.g. by copying or referencing the relevant part). Since the RMP is a legally binding document, any part of the Code incorporated in an RMP becomes mandatory for the petfood operator.

## 3.3 Animal Welfare Act 1999

- (1) Owners or people in charge of live animals must comply with the Animal Welfare Act 1999 and relevant Animal Welfare Codes.
- (2) Animal welfare requirements are not specifically covered in this Code, however, when appropriate, guidance (in boxes) on certain animal welfare requirements may be included to remind operators of their responsibilities under the Animal Welfare Act.
- (3) Petfood operators in charge of the handling of live animals should not rely on this Code to provide adequate information on animal welfare requirements. They should refer to documents available on MPI's animal welfare webpage [Codes of Welfare](#) for guidance.

## 3.4 Other Legislation

- (1) Petfood operators should not rely on this Code for information on legal requirements under other legislation. Operators are responsible for ensuring that they are familiar and comply with all other legislation relevant to their business.
- (2) Other legislation that are likely to be relevant to petfood operators include, but are not limited to, the following Acts and their associated regulations and specifications:
  - Biosecurity Act 1993;
  - Commerce Act 1986;
  - Consumer Guarantees Act 1993;
  - Fair Trading Act 1986;
  - Hazardous Substances and New Organisms Act 1996;
  - Health and Safety in Employment Act 1992;
  - Resource Management Act 1991; and
  - Weight and Measures Act 1987.