Draft Code of Practice: Processing of Seafood Products

Part 2: Good Operating Practice
Prelims

Amendment 0

August 2007

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Disclaimer

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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: 04 894 2500
Facsimile: 04 894 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To update this publication when you receive an amendment, remove the appropriate outdated pages, destroy them, and replace them with the pages from the new issue.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 Introduction

1.1 Purpose and Scope

Part 2 of this Code of Practice (COP) covers Good Operating Practice (GOP) essential for the consistent production of Seafood Products that is fit for its intended purpose, and that meets relevant regulatory requirements. It provides guidance on hygienic practices and process controls that directly or indirectly impact on the safety and suitability of products. Compliance with these GOP measures will assist operators meet the requirements of the Animal Products Act 1999, particularly the current version of the Animal Products (Specifications for Products Intended for Human Consumption) Notice. GOP measures provide the basis for development of an RMP.

GOP may also be referred to as Good Manufacturing Practice or Supporting Systems.

1.2 Layout of Part 2

The GOP programmes are laid out with the following subheadings:

Purpose and Scope

This describes the purpose of the GOP programme and its scope of application.

Sources of Hazards

This section identifies the sources of hazards that are controlled under the particular GOP programme, and gives examples of hazards associated with each source. It does not apply to those GOP programmes that do not directly address a particular source (e.g. inventory control, calibration).
Mandatory Requirements

These requirements are mandated by legislation, and must be met or complied with by the operator. Where the meaning is clear, mandatory requirements are directly quoted from legislation. In other cases, they have been paraphrased to make them easier to understand and to highlight their relevance to Seafood Products. The specific legislation from which each requirement has been derived is cited to assist those who may wish to read the actual piece of legislation referred to. Actual legislation will always take precedence, and it is the operator’s responsibility to check for changes to legislation.

Procedures

The procedures given are the accepted or industry agreed means of achieving or complying with the mandated requirements. These procedures cover control, monitoring, corrective action and verification. The operator must comply with the procedures that are applicable to their product and process.

In some cases the operator may decide to use an alternative process, procedure or parameter that is not provided for in this COP (e.g. when new technology becomes available). The operator must be able to demonstrate the effectiveness of any alternative process to consistently meet all relevant regulatory requirements and produce products that are fit for their intended purpose. Confirmation of the effectiveness of any alternative process, procedure or parameter may involve the collection and analysis of evidence by the operator (e.g. data from testing or trials, published scientific information, report from an expert). A protocol for the collection of data should be prepared by the operator as discussed in the Risk Management Programme Manual.

This COP will be reviewed as necessary, and the inclusion of any alternative process, procedure or parameter will be considered as part of any such review.

It is important to note that some mandatory requirements (e.g. those that are specific and clear in their intent) are not repeated or expanded further in relevant sections under Procedures. Operators must ensure that they read and comply with all requirements given under both Mandatory Requirements and Procedures that are relevant to their operation.
**Guidance**

Guidance material is presented in a box. It provides explanatory information and options for achieving a particular outcome or requirement. Operators may use alternative methods or measures to those set out in the guidance material provided they do not in any way compromise GOP and the achievement of regulatory requirements. Justification is not needed when deviating from guidance material.

**Records**

This section gives the list of records that the operator must keep.

1.3 **Documentation of GOP**

1.3.1 **Legal requirement**

The current version of the RMP Specifications requires the operator to document sufficient procedures to ensure that GOP is applied. These procedures must cover:

- the control measures to be used to control hazards and other risk factors;
- any parameters to be met;
- any monitoring procedures that are to be carried out; and
- any corrective action procedures that are to be applied in the event of loss of control, including restoration of control; identification and disposition of affected animal material or animal product; and any measures to be taken to prevent reoccurrence of the loss of control.
1.3.2 Contents of supporting systems

When documenting supporting systems, the operator should ensure that they cover the areas listed below.

- Purpose and scope
- Authorities and responsibilities
- Materials and equipment, as applicable
- Procedures (covering control measures, monitoring, corrective action and operator verification)
- Records
- References to other relevant documents, as applicable
2 Design, Construction, and Maintenance of Buildings, Facilities and Equipment

Amendment 0
August 2007

2.1 Purpose and Scope

To ensure that all buildings, facilities and equipment are designed, constructed, installed and operated in a manner that prevents or minimises contamination of Seafood Products, packaging, equipment, and the processing environment.

2.2 Sources of Hazards

<table>
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<td>Chemical residues (e.g. heavy metals from equipment)</td>
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<td>Physical hazards (e.g. metal, glass)</td>
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<tr>
<td>Maintenance compounds (e.g. lubricating fluids)</td>
<td>Chemical residues</td>
</tr>
<tr>
<td>Environmental contaminants (e.g. dust, fumes, pollutants, sewage)</td>
<td>Microbiological pathogens (e.g. Listeria monocytogenes, Salmonella, E. coli spp., Clostridium spp.)</td>
</tr>
</tbody>
</table>

2.3 Mandatory Requirements

2.3.1 AP Reg 10

The premises, facilities, equipment and essential services must be designed, constructed, located and operated in a manner that:

a. enables the suitability of any Seafood Products product to be maintained;

b. enables the fitness for intended purpose of any product to be achieved and maintained; and
c. minimises and manages the exposure of any product, packaging, equipment, and the processing environment to hazards and other risk factors.

2.3.2 HC Spec 5 (1)

Any material or exposed internal surface finish used in the building, manufacture, or maintenance of facilities, equipment, or internal structures, that may affect the suitability for processing of animal material (other than live mammals or live birds), or the fitness for intended purpose of animal product, must —

a. be impervious, non-absorbent, and free from depressions, pits, cracks, and crevices that may harbour contaminants; and

b. be easily cleaned and sanitised; and

c. be unaffected by any corrosive substance with which it is likely to come into contact, to the extent necessary to ensure that it will not harbour contaminants and is not a source of contamination; and

d. be durable, resistant to fracture, and capable of withstanding repeated exposure to normal cleaning and sanitising; and

e. in the case of surfaces (other than those used for walking or standing on during operations), be smooth and minimise the accumulation of condensation; and

f. in the case of materials lining the walls, floors, and ceilings, be of a colour that does not disguise contaminants having regard to the lighting arrangements.

2.3.3 HC Spec 5 (2)

The facilities, equipment, and internal structures, that may affect the suitability for processing of animal material or the fitness for intended purpose of animal product, must be of sanitary design.

2.3.4 HC Spec 6(3)

Temperature controlled rooms and equipment must be operated within their design capability and capacity, and must consistently deliver any temperature as required by this Notice or as specified in the risk management programme (as the case may require).
2.3.5 HC Spec 6 (4)

Cleaning and sanitation facilities, and equipment, must be provided to ensure that the hygiene of personnel, equipment and the premises or place can be maintained so that the suitability for processing of animal material and the fitness for intended purpose of the animal product is not adversely affected.

2.3.6 HC Spec 6 (5)

Access to facilities that are sufficient for official assessors and Animal Product Officers to perform their role must be provided.

2.3.7 HC Spec 7

Lighting must be of a sufficient intensity and quality to enable satisfactory performance of all operations which might affect the suitability for processing of animal material or the fitness for intended purpose of animal product.

2.3.8 HC Spec 15

Process gases that come into direct contact with animal material or animal product must meet 1 of the following current standards –

a. The “Food Chemicals Codex” published by the National Academy of Sciences and the National Research Council of the United States of America in Washington, D.C.:  

b. A “Food and Nutrition Paper” published by the Food and Agriculture Organisation of the United Nations in Rome:

c. The “Japanese Standards of Food Additives” published by the Federation of Food Additives Association in Japan:

d. The “British Pharmacopoeia or the Pharmaceutical Codex”:

e. The current Australia New Zealand Food Standards Code, Part 1.3 “Substances added to Food”, Standard 1.3.4 “Identity and Purity”.
2.3.9 HC Spec 16

1. When compressed air is generated on site for the purpose of processing and comes in direct contact with animal material or product, the air must be filtered and the source must be clean and external to the building.

2. The filters for filtering air that is used in contact with animal material or animal product, must comply with –

   a. the current International Organisation for Standardisation Standard on “Compressed Air for General Use Part 1, Contaminants and Quality Classes”: Ref. No. ISO 8573.1, 1991; or

   b. any other international standard recognised by the Director-General.

2.3.10 HC Spec 19 (1)

Equipment or storage areas used to store or contain any product that is not suitable for processing or not fit for human consumption, but is suitable or fit for some other purpose, must be clearly identified and not be a source of contamination to any other product that is intended for human consumption.

2.3.11 HC Spec 20 (2)

Equipment and storage areas, used to store or contain waste must:

   a. be clearly identified, and if equipment is permanently installed and in an identified storage area then either the equipment or storage area may be identified; and

   b. not be a source of contamination to other animal material or animal product.
2.4 Procedures

2.4.1 Site

2.4.1.1 The operator must consider potential sources of contamination when deciding where to locate the premises, and assess the effectiveness of any reasonable measures that might be taken to protect the product. Premises must be located away from:

- environmentally polluted areas and industrial activities that pose a serious threat of contamination;
- areas subject to flooding unless sufficient safeguards are provided;
- areas prone to infestation of pests; and
- areas where wastes, either solid or liquid, cannot be effectively removed.

2.4.1.2 Transport access ways, and areas between and around buildings, must be constructed and maintained so that they drain surface water, and minimise dust and other environmental contamination.

2.4.2 Buildings and facilities

2.4.2.1 Adequate facilities must be available for:

- the hygienic performance of all operations;
- storage of products, packaging, ingredients, cleaning materials, maintenance compounds, and other materials;
- storage and distribution of water;
- cleaning and sanitation of facilities and equipment;
- personnel hygiene (e.g. toilets, hand washing units, changing facilities); and
- effective drainage and disposal of wastes.
2.4.2.2 Adequate working space must be provided to allow for:

- the hygienic performance of all operations;
- access of personnel;
- installation of equipment;
- effective cleaning; and
- storage of, and access to, materials.

2.4.2.3 Internal structures of buildings, including floors, ceilings and walls, must be designed and constructed in a manner that:

- minimises contamination of the product;
- facilitates cleaning and maintenance;
- minimises the entrance and harbourage of pests; and
- minimises the entry of environmental contaminants.

Personnel making decisions on design and construction should be suitably qualified. Operators may seek guidance from local authorities or organisations (e.g. the Master Builders Association) regarding qualifications of contractors.

Rodents can climb up wires and the outside of vertical pipes less than 76mm in diameter, and up the inside of vertical pipes less than 102mm in diameter. They can also jump 660 to 915 mm both vertically and horizontally from a flat surface, and drop 15 to 25 metres without being killed. They can also gain entrance through holes 12.7mm in diameter (for rats) or 6.4mm (for mice).

2.4.2.4 Buildings and facilities must be designed to provide separation, by partition, location, or other effective means, between operations (including waste disposal) that may cause contamination of Seafood Products.

The processing areas of premises, including fishing vessels, should be separated by a physical partition from living quarters, retail shops and auction places.
2.4.3 Floors

2.4.3.1 The floor in a processing area must be:

- impervious to the effects of cleaning chemicals, Seafood Products and water;
- sufficiently strong to withstand its normal use (e.g. by foot traffic, forklifts); and
- easy to clean and sanitise.

Materials considered suitable for floors include concrete, floor tiles, concrete or mortar with a monolithic surface coating (e.g. a proprietary epoxy coating) and other synthetic material; and in the case of fishing vessels, painted steel.

2.4.3.2 The floor in a processing area must be adequately graded to prevent the pooling of water.

A gradient of 1 in 50 sloped towards drainage outlets will meet the requirement.

2.4.3.3 Floor and wall angles and joints must be constructed in a manner that allows effective cleaning.

To allow effective cleaning, the floor/wall joint should be coved in areas where wet operations or wet cleaning occur. A 75 mm radius coving will usually achieve this outcome. Several options are available for providing suitable angulations between walls and floors. These include:

- standard coving using concrete or other floor materials;
- covings recessed behind the wall surface; and
- covings made from aluminium (or other suitable material) attached over existing floor and wall surfaces.

All joints should be effectively sealed to prevent the entry of water.
2.4.4 Walls

2.4.4.1 The internal walls of processing areas must be:

- smooth;
- impervious to moisture and cleaning chemicals;
- of a colour that does not disguise dirt and contaminants; and
- easily cleanable.

2.4.4.2 Where sheeting is used, all joints must be welded, or effectively sealed with a sealing compound. The same applies to rivet holes and any holes created when fixtures have been moved.

2.4.4.3 Porous surfaces such as cement or plaster must be sealed to render them impervious to moisture.

2.4.4.4 Exposed pipes and/or ducting for cables must be designed and installed so they do not become dirt traps (e.g. use of a bracket to hold ducting away from the wall).

NZFSA approved sealing compounds are listed in Approved Maintenance Compounds Manual.

2.4.5 Ceilings

2.4.5.1 The ceilings of processing areas must be:

- smooth;
- impervious to moisture and cleaning chemicals;
- of a colour that does not disguise dirt and contaminants; and
- easily cleanable.
2.4.5.2 Overhead fixtures attached to ceilings (e.g. pipe work, overhead cranes and hoses) must be located so that they can be easily cleaned and are not a source of contamination.

2.4.5.3 The joints between the ceiling and the wall must be constructed and sealed so that they are easily cleanable.

Rounded joints will usually achieve this outcome. NZFSA approved sealing compounds are listed in Approved Maintenance Compounds Manual.

2.4.6 Doors

2.4.6.1 Door jambs and hatchway frames must be sealed to adjoining walls and floor junctions.

2.4.6.2 Doors in areas that open directly to the outside must be kept closed except when used for the movement of product, containers, personnel etc.

2.4.6.3 Doors in areas where processing and/or packing is carried out, and which open directly to the outside must be self-closing.

2.4.6.4 Doors in processing areas must be wide enough to ensure that unprotected Seafood Products does not come into contact with them during passage.

Sections 2.4.6.2 to 2.4.6.4 do not apply to emergency exit doors or to hatches on fishing vessels.

2.4.7 Access ways and traffic flows

Stairs in processing areas and walkways, which pass over conveyors or tables, must be constructed so as to prevent contaminants falling on to Seafood Products, ingredients, additives, containers or Seafood Products contact surfaces.
2.4.8 Windows

2.4.8.1 Windows in processing and packing areas (other than in fishing vessels) that may be kept open during operations must be covered by screens or similar material to prevent entry of pests.

2.4.8.2 Internal windows must be constructed so as to be easily cleanable and prevent accumulation of dirt.

Internal window sills should be sloped e.g. at an angle of 45°.

2.4.9 Drainage

2.4.9.1 The drainage system must have sufficient capacity to handle the wastewater and any particulate matter entering the system. Screens must be installed to prevent large fragments of solid material from entering the drains.

Drains should be covered by a grating that is slightly lower than floor level and has perforations of sufficient size and number to allow rapid drainage.

Operators should check with their territorial authority for any specific drainage requirements that apply.

2.4.10 Lighting

2.4.10.1 Lights and light fixtures over Seafood Products or exposed packaging material must be of a safety type or otherwise protected to prevent contamination of products in the event of breakage.

2.4.10.2 Lights must be of sufficient intensity to allow the required operations, checks, and inspections to be carried out effectively.

In areas where quality control inspection is carried out, illumination of at least 540 lux at the point of inspection is recommended. In other areas (e.g. areas used for cleaning appliances or for hand washing), illumination of at least 220 lux is usually adequate.
2.4.11 Ventilation

2.4.11.1 Adequate ventilation must be provided in processing areas to minimise steam and condensation, and to prevent airborne contamination of Seafood Products.

Options for ventilation in processing areas include natural ventilation using suitably screened air intakes or ventilating-type windows; or mechanical ventilation that is adequate for the size of the premises, the number of persons working there, and environmental conditions (e.g. heat gain from equipment, condensation).

The direction of air flow should minimise cross contamination from earlier to later stages of seafood processing (e.g. air should flow from cooked processing areas to uncooked processing areas and not the reverse).

2.4.11.2 Fresh air intakes for processing areas, stores and amenities must be located so that incoming air is not contaminated with odours, dust, smoke and other environmental contaminants.

Effective filters should be installed and maintained in accordance with the manufacturer’s recommendations.

2.4.12 Equipment

2.4.12.1 Equipment that comes into contact with any edible Seafood Products must be designed, constructed, installed and operated in a manner that:

- ensures the effective performance of the intended task;
- ensures effective cleaning;
- facilitates good hygienic practices, including monitoring; and
- does not cause contamination of the product.

2.4.12.2 Equipment must be:

- durable;
- resistant to chipping, flaking, delamination, abrasion;
• able to withstand exposure to heat, water and all Seafood Products under normal operating conditions;

• corrosion resistant;

• inert to Seafood Products, cleaning materials and other substances under normal conditions of use; and

• able to be cleaned without damage to the material’s surface.

2.4.12.3 The following materials must not be used in any equipment that may come into contact with Seafood Products:

• metals such as cadmium, lead and their alloys;

• metals whose contact with liquid or other material may create harmful chemical or electrolytic action;

• porous materials such as sponge rubber, stone slabs, linoleum, leather and fabrics (excluding strainers/filters); and

• wood.

Stainless steel (300 series or better) is the preferred material for equipment that comes into contact with Seafood Products.

Other suitable materials include:

* plastic materials and coatings that are abrasion- and heat-resistant, shatterproof and do not contain components that will adhere to Seafood Products when coming into contact with those materials or coatings;

* good quality galvanised iron, when used in bulk containers for transporting or holding whole headed or gutted fish; in fish scaler drums; and in thawing tanks and freezer trays used for whole and/or headed and gutted fish.

Aluminium should be used only for equipment that has short contact periods with Seafood Products. Aluminium sheet has a tendency to warp and is susceptible to the effects of both oxidation and certain types of corrosion, especially from alkaline cleaning chemicals. The soft nature of the metal also leaves it susceptible to pitting and scratching.
When purchasing new equipment for direct contact use with Seafood Products, the operator should obtain a letter of guarantee from the supplier certifying its suitability for food use.

2.4.12.4 Measuring equipment, such as weighing scales, thermometers (whether stand alone or forming part of a piece of equipment) must have the accuracy, precision, and conditions of use appropriate to the task performed.

2.4.12.5 Product contact surfaces

- The product contact surfaces of conveyor belts must be constructed of smooth material (e.g. intralok type belting), have undamaged edges, and be a colour that does not disguise contaminants.

- Cutting boards must be smooth, shatterproof, and of a colour that does not disguise contaminants.

- Welds in equipment must be smooth, complete, and without gaps, and angled so as to facilitate cleaning.

2.4.12.6 Storage equipment

- Containers used within the premises for holding Seafood Products, cleaning materials, wastes or other materials must be clearly identified and differentiated as to their use (e.g. by labels or colour coding);

- Outside waste bins must have tight fitting lids or covers.

- Storage racks or shelving must be a sufficient height off the floor to allow cleaning underneath.

2.4.12.7 Cleaning equipment

Suitable equipment must be made available for cleaning and sanitising equipment and facilities, and must be maintained in a hygienic and good working condition.
2.4.13 Amenities for Employees

2.4.13.1 The operator must provide sufficient space and facilities for employees to consume food, change clothes, store personal belongings and to attend to personal hygiene.

For land-based premises, the territorial authority can advise on the numbers of toilets required for staff employed on the premises, and on other amenities such as showers and hand wash basins.

For fishing vessels, the amenities may be located within the accommodation section of the vessel.

2.4.13.2 The amenities must not open directly onto food areas.

2.4.13.3 Lockers for storing employees’ clothing and personal belongings must be constructed in such a manner that they and the surrounding area can be easily cleaned.

Lockers should be off the floor (e.g. 300 mm higher) to allow for easy cleaning underneath. Alternatively lockers could be placed directly on the floor without any gaps.

2.4.14 Hand washing and Sanitising Facilities

2.4.14.1 Hand washing units must be not be operated by hand. The design must allow for either automatic or non-hand operation (e.g. operated by knee or foot).

2.4.14.2 Hand washing facilities must be located in every toilet and/or amenities area, and in places that are accessible to all persons working in rooms where Seafood Products is processed. This requirement does not apply to rooms used exclusively for smoking, cooking, drying, chilling, freezing or thawing Seafood Products.
2.4.14.3 Hand washing facilities must be provided with warm potable water, liquid soap dispensers and single use towels, or other hand drying facilities that do not contaminate washed hands or the surrounding area (e.g. roller towels fitted with a timed automatic retraction device that removes the soiled piece of towel immediately after use).

Potable water at about 30°C should be provided for hand washing. Note that there are specific hand washing temperature requirements for ISSC listed shellfish premises in the Model Ordinance (XI Shucking and Packing, Requirements for Dealers, .02 Sanitation, Section D. Maintenance of Hand Washing, Hand Sanitising & Toilet Facilities) and for premises exporting to the EU.

2.4.14.4 Hand sanitising units (where these are required) must be:

- designed to minimise potential for cross-contamination;
- provided with NZFSA approved hand sanitiser (see Approved Maintenance Compounds Manual); and
- located next to hand washing units.

2.4.14.5 Facilities for washing and, where necessary, sanitising waterproof protective clothing (e.g. boots, aprons, gloves) must be provided in or adjacent to the processing area.

2.4.15 Refrigeration Facilities

2.4.15.1 Refrigeration facilities must be designed and constructed to:

- be capable of reducing all part of the Seafood Products to required preservation temperatures (refer to Part 2 section 19 of this COP) within the required time, and/or holding and storing the Seafood Products constantly at or below those temperatures;
- minimise the possibility of contamination of Seafood Products; and
- minimise fluctuations in temperature caused by movement of products, people and equipment.
Temperature fluctuations can be minimised by using self closing doors, air curtains, plastic strip curtains and, in the case of doors that open to the outside, truck dock seals or full environmental facilities. Build up of snow and ice in a freezer indicates that a significant entry of warm air has been occurring over a period of time.

2.4.15.2 All chillers and cold stores must be fitted with calibrated automatic temperature recorders.

2.4.16 Repairs and Maintenance

2.4.16.1 The operator must develop a repairs and maintenance programme for the premises, facilities and equipment.

For small operations with simple processes, a checklist for Repairs and Maintenance, rather than a full programme, may be sufficient.

The repairs and maintenance programme must include the following information:

- roles and responsibilities;
- monitoring schedule for the plant, facilities and equipment;
- corrective action to be taken when defects are identified;
- target date or time for completion of repairs or maintenance;
- records to be kept; and
- signature of responsible person once work is completed.

The action taken and the target date for completion should be based on the seriousness of the problem identified and the extent to which it may affect the Seafood Products fitness for purpose. Serious non-compliances should be corrected immediately.
2.4.16.2 All alterations, repairs and maintenance work on buildings, facilities and equipment must be carried out in a manner that minimises exposure of Seafood Products to any hazards introduced by this work.

2.4.16.3 Chemicals used during repairs and maintenance must be NZFSA-approved (see Approved Maintenance Compounds Manual).

2.5 Monitoring

The responsible person must carry out regular checks for compliance with documented procedures.

The frequency and type of monitoring will depend on the nature of the operation, and on the degree of risk if hazards are uncontrolled. Monitoring options to identify repairs and maintenance problems include:

- daily checks on processing areas
- weekly checks on product support areas (e.g. chemical stores, packaging stores, dry stores)
- monthly check on the entire premises and surrounding areas.

2.6 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- site plans;
- equipment register;
- any problem detected regarding buildings, facilities and equipment;
- any alterations or repairs done; and
- any corrective action taken (including restoration of control, product disposition and prevention of recurrence).

Refer to Part 2, Section 24 of this COP for record keeping requirements.
3 Calibration of Measuring Devices

3.1 Purpose and Scope

To ensure that measurements taken to demonstrate conformity with mandatory and other requirements are accurate and valid.

3.2 Mandatory Requirements

3.2.1 HC Spec 28 (1)

Measuring equipment, such as scales, thermometers, pH meters, and flow meters (whether stand alone or forming part of a piece of equipment), that is used to provide critical measurements, must:

- have the accuracy, precision, and conditions of use appropriate to the task performed; and
- be calibrated against a reference standard showing traceability of calibration to a national or international standard of measurement (where available), or (if no such standard exists) be calibrated on a basis that is documented in, or incorporated by reference into, the risk management programme; and
- be uniquely identified to enable traceability of the calibrations and to identify calibration status.

3.2.2 HC Spec 28 (2)

Minimum frequencies of calibration must be specified in the risk management programme for each piece of measuring equipment used to provide critical measurements, or used as reference standards, taking into consideration the following (as appropriate):

- the stability of the piece of equipment; and
- the nature of the measurement; and
3.2.3 HC Spec 28 (3)

Safeguards must be in place to prevent unauthorised adjustments to the calibration of the measuring equipment, including movement of the equipment where this may invalidate the calibration.

Critical measurements are measurements taken to confirm (directly or indirectly) the fitness for purpose of the product (e.g. equipment used for taking measurements at a Critical Control Point (CCP)). Operators are responsible for determining the critical measurements for their operations.

3.3 Procedures

3.3.1 Measuring equipment (whether stand-alone or forming part of a piece of equipment) must have the accuracy, precision, and conditions of use appropriate to the task performed.

3.3.2 The operator must document a calibration programme, which should include the elements listed below.

3.3.2.1 A description of the type of equipment used to take critical measurements (e.g. its make, model and/or other identification characteristics).

Such equipment may include thermometers used for taking temperatures of heat-shocked product; moisture meters for measuring the moisture level in dried products; pH meters used for checking the pH of marinated product; scales used for measuring ingredients; and metal detectors.

3.3.2.2 A means of identifying the equipment (e.g. serial numbers, indelible tags) or other permanent means of identification. The identifying feature must be recorded on the calibration record sheet.
3.3.2.3 The frequency of calibration required for each piece of equipment.

It is important to consider the level of use of the instrument, its stability and the degree of accuracy required. Some pieces of equipment (e.g. scales), which become inaccurate if moved, may require calibration after any such movements.

<table>
<thead>
<tr>
<th>3.3.2.4 Procedure for calibrating the instrument, showing how the operator will meet the requirements of Clause 28 1(b).</th>
</tr>
</thead>
<tbody>
<tr>
<td>This can be achieved by using suitable testing facilities capable of providing certification to show the required traceability, or by using reference materials (e.g. certified test weights or standard solutions).</td>
</tr>
<tr>
<td>The calibration requirements specified in HC Spec 28 apply only to equipment used to provide critical measurements. When developing their RMP, seafood operators should determine which of their processes require critical measurements to be taken, and document the result of this determination in their RMP.</td>
</tr>
</tbody>
</table>

3.4 Monitoring

The responsible person must carry out regular checks for compliance with documented procedures and to demonstrate that equipment used remains within an acceptable range.

This is especially important for equipment that monitors CCPs. Monitoring options include use of certified test weights to check scales used for critical measurements, ice point checks for thermometers and standard pH solutions to confirm the accuracy of pH meters.

Monitoring should also include regular checks to ensure calibration is up-to-date. The level of monitoring will depend on how frequently the device is calibrated; for example if annual calibration is required operators should schedule six-monthly checks.
3.5 Records

3.5.1 The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- calibration records
- certificates showing traceability to appropriate standard measurement; and
- monitoring and verification records.

Refer to Part 2, Section 24 of this COP for record keeping requirements.
4 Water

Amendment 0

August 2007

This section is in the process of being written. When completed it will be published separately on the NZFSA website.
5 Cleaning and Sanitation

5.1 Purpose and Scope

To ensure the effective cleaning and sanitation of the premises, facilities and equipment so as to prevent or minimise the contamination of Seafood Products.

5.2 Sources of Hazards

<table>
<thead>
<tr>
<th>Source</th>
<th>Examples of hazards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facilities and equipment</td>
<td>Bacterial pathogens (e.g. <em>Listeria monocytogenes</em>, <em>E. coli</em> spp.)</td>
</tr>
<tr>
<td>Waste</td>
<td>Bacterial pathogens (e.g. <em>E. coli</em> spp., <em>Salmonella</em> spp.)</td>
</tr>
<tr>
<td>Cleaning chemicals</td>
<td>Chemical residues</td>
</tr>
<tr>
<td>Cleaning implements (e.g. mops, cloths)</td>
<td>Bacterial pathogens (e.g. <em>Listeria monocytogenes</em>, <em>E. coli</em> spp.)</td>
</tr>
</tbody>
</table>

5.3 Mandatory requirements

5.3.1 AP Reg 11

All operators must establish and carry out effective procedures to:

a. ensure appropriate and adequate maintenance, cleaning and sanitation of processing premises, facilities, essential services, and equipment (including conveyances); and

b. manage waste; and

c. control pests.
5.3.2 HC Spec 21 (1)

Only approved maintenance compounds may be used during processing operations or in the maintenance of processing areas, facilities and equipment.

5.4 Procedures

5.4.1 Cleaning programme

The operator must develop and document a cleaning and sanitation programme for processing areas, equipment, storage areas and support areas.

The programme must include the following information:

- areas/equipment to be cleaned;
- procedures and work instructions for all cleaning and sanitising operations, including any specific competencies required;
- detergents/sanitisers to be used;
- frequency of cleaning;
- recording of cleaning procedures;
- personnel responsible; and
- methods of verifying the cleaning and sanitation programme.

Verification methods may include:

- visual and other sensory assessment of equipment and the environment,
- visual checks of the cleaning programme in action including:
  - measurement and mixing of cleaning chemicals,
  - checks on the strength of cleaning solutions when prepared,
  - checks to ensure correct contact times are being observed;
- taking swabs and forwarding them to an approved analytical laboratory;
- use of contact slides and hygiene test swabs which are designed for operator use, analysis and interpretation according to the manufacturers’ criteria.

The following microbiological guidelines may be used for monitoring the efficacy of the cleaning and sanitation programme:

Grade per 10 square cm for total bacteria:
- 0-54 satisfactory,
- 540-2700 fairly satisfactory,
- over 2700 unsatisfactory;

Grade per square foot for total bacteria:
- 0-5000 satisfactory,
- 5000-25,000 fairly satisfactory,
- Over 25,000 unsatisfactory;

Contact slides and hygiene test swabs shall be used in accordance with the manufacturers’ instructions for application and, where appropriate, calibration.

5.4.2 General Cleaning

5.4.2.1 Cleaning and sanitising operations must be carried out in such a manner that they do not contaminate Seafood Products, ingredients, additives or containers.

5.4.2.2 All product surfaces, including equipment, must be cleaned:
- at least at the end of each working day;
- whenever surfaces become contaminated or come into contact with waste;
when changing from processing raw Seafood Products to processed Seafood Products, and from shellfish or freshwater fish (e.g. eel, salmon) to other types of fish; and

in the case of fishing vessels, at each break in processing.

Cleaning and sanitising of equipment used for ready-to-eat Seafood Products must be carried out:

- every half shift or every 4 hours; or
- at the end of each shift; or
- at the start of each new process operation (unless it has already been cleaned and sanitised); or
- at a frequency that has been demonstrated to achieve the same outcome.

5.4.3 Cleaning – processing area

5.4.3.1 Products, packaging material and other materials that may be contaminated during wash down must be removed from the area and stored in appropriate locations, or they must be protected by covers.

5.4.3.2 Floors must be cleaned by hosing or other effective means. Water must be drained or removed completely.

Only low to medium pressure hosing should be used to remove Seafood Products soil. High pressure hosing may contaminate floors and drains, cause splashing, and create aerosols capable of carrying contaminants and micro-organisms for considerable distances.

Other effective means of cleaning floors include sweeping, flushing and use of squeegees.
5.4.3.3 Drains in the processing area (other than on fishing vessels) must be sanitised daily to reduce contamination levels and prevent the formation of foul odours.

5.4.3.4 Before sanitising, Seafood Products contact surfaces and equipment must be washed in cold potable water or cold clean seawater, to remove fish residues.

Sanitising should be carried out using chemical sanitisers or hot water (82°C).

5.4.3.5 Equipment (e.g. tubs) that is used for conveying material nor for human consumption, must be cleaned and sanitised:

- at the end of each working day in the case of premises other than fishing vessels;

and

- at each break in processing in the case of fishing vessels.

5.4.3.6 Cleaned and sanitised portable appliances (e.g. knives, trolleys) must be stored so that they are protected from contamination (e.g. dust, splashes).

5.4.4 Cleaning of storage areas

5.4.4.1 Packed products, raw material, packaging and other materials must be stacked and stored in a tidy manner. Adequate space must be available to allow effective cleaning in the storage area.

5.4.4.2 Spills must be cleaned up immediately.

5.4.4.3 Damaged packaged products and other materials must be removed and disposed of as soon as possible.

5.4.4.4 Dry stores must be kept dry and must be cleaned regularly by sweeping or vacuuming.

5.4.5 Cleaning of amenities

Amenities must be cleaned regularly and maintained in a hygienic condition.
5.4.6 Maintenance and storage of cleaning equipment

5.4.6.1 Cleaning implements and equipment must be maintained in a hygienic condition and must not introduce any hazard or foreign object to any product, packaging or product contact surface.

5.4.6.2 Cleaning equipment that will be reused (e.g. brushes) must be sanitised after each use.

Reusable cleaning equipment may be stored in a container of sanitiser solution.

5.4.6.3 Equipment (e.g. brushes, brooms, etc.) used for cleaning and sanitising in Seafood Products premises, including fishing vessels, must be stored in a designated area in such a manner as to prevent contamination of Seafood Products, ingredients, additives or containers. In the case of land-based Seafood Products premises, this designated area must be separate from processing areas, support areas or stores.

5.5 Monitoring

The operator or responsible person must carry out regular checks on compliance with documented procedures and on the effectiveness of the cleaning and sanitation programme. The frequency of monitoring must be sufficient to give confidence that the cleaning and sanitation programme is operating effectively.

Monitoring options include:

- Before processing: daily, visual check of all processing areas to ensure they are clean and ready for processing

- During processing: daily, visual check of all processing areas to ensure the cleaning programme is effective.

- Weekly check of other product support areas (e.g. chemical stores, packaging stores, dry stores) to ensure the cleaning programme is effective.
5.6 Records

- The operator must keep relevant records demonstrating compliance with documented procedures. These could include:
  - pre-operational checks;
  - cleaning records;
  - list of approved chemicals;
  - training records; and
  - verification of cleaning records (e.g. reality checks, chemical strength tests, microbiological tests)

Refer to Part 2, Section 24 of this COP for record keeping requirements.
6 Personal Health and Hygiene

6.1 Purpose and Scope

To ensure that all personnel are medically fit to perform their duties, and that they comply with good hygienic practices. Personnel include all workers, contractors providing services, and visitors.

6.2 Sources of Hazards

<table>
<thead>
<tr>
<th>Source</th>
<th>Examples of hazards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Person</td>
<td>Bacterial pathogens (e.g. <em>Salmonella</em> spp., <em>E. coli</em> spp., <em>Staphylococcus aureus</em>)</td>
</tr>
<tr>
<td></td>
<td>Hepatitis A virus</td>
</tr>
<tr>
<td>Clothing, footwear</td>
<td>Bacterial pathogens (e.g. <em>Salmonella</em> spp., <em>E. coli</em> spp., <em>Clostridium</em> spp.)</td>
</tr>
<tr>
<td></td>
<td>Physical objects (e.g. parts of rubber gloves)</td>
</tr>
<tr>
<td>Personal items</td>
<td>Metal objects (e.g. jewellery, pens, hair clips)</td>
</tr>
</tbody>
</table>

6.3 Mandatory Requirements

6.3.1 AP Reg 12

The operator must ensure that all personnel whose presence or action within the premises may result in contamination of product:

- wear appropriate protective clothing, where necessary;
- follow an appropriate personal hygiene routine; and
- behave in such a manner as necessary to minimize contamination of product, other inputs, packaging and the processing environment.
6.3.2 HC Spec 23 (1)

The operator must take reasonable measures to ensure that a person (including any visitor or contractor) who is —

a. infected with, or a carrier of, an infectious disease in a communicable form as described in Section A, Part 1, of the First Schedule of the Health Act 1956 and that is likely to be transmitted through animal material, product or associated things; or

b. suffering from acute respiratory infection; or

c. suffering from boils, sores, infected wounds, or any other condition that cannot be adequately protected from becoming a source of contamination —

does not work as a product handler or enter an area where he or she may adversely affect the suitability for processing of animal material or the fitness for intended purpose of animal product.

6.3.3 HC Spec 23(2)

A product handler, or any other person who may affect the suitability for processing of animal material or fitness for intended purpose of animal product, after suffering from an illness described in subclause (1) (a) or (b) above, must provide a certificate from a registered medical practitioner confirming that the person is no longer likely to contaminate the animal material or animal product, prior to resumption of work in that role.

6.3.4 HC Spec 23(3)

A product handler, or any other person who may affect the suitability for processing of animal material or fitness for intended purpose of animal product, who suffers from a condition described in subclause (1) (c) above must, before resuming work, be assessed by a suitably skilled person to confirm that the condition is no longer likely to contaminate the animal material or animal product, or that the handler or other person is adequately protected from being a source of contamination.
6.4 Procedures

6.4.1 Health of personnel

6.4.1.1 The operator must ensure that all employees, visitors and contractors understand relevant health and hygiene requirements.

A documented health policy may be useful, covering matters such as working with wounds, communicable diseases, and notification procedures for workers suffering from any illness or injury.

6.4.1.2 Personnel must inform the person responsible for operations if they are (or suspect that they are) suffering from diarrhoea, acute respiratory infection; or if they are diagnosed with illness caused by *Salmonella*, *Shigella* spp., *E. coli* spp., *Campylobacter*, Hepatitis A virus infection or other infections likely to be transmissible via food. See Section A, Part 1, of the First Schedule of the Health Act 1956 for more details.

6.4.1.3 Seafood Products handlers suffering from any of the conditions identified in section 6.4.1.2 may not work in food contact areas until they have been examined by a registered medical practitioner and certified as being no longer infectious.

6.4.1.4 Seafood Products handlers suffering from boils, sores or open wounds may not work in food contact areas unless they have been assessed by a suitably skilled person nominated by the operator, as unlikely to contaminate the Seafood Products.

The suitably skilled person should have sufficient knowledge and experience to make this determination (e.g. a supervisor or someone with first aid or nursing qualifications).

6.4.1.5 Any injury, wound, or cut must be treated immediately and dressed with a secure waterproof dressing to prevent contamination of Seafood Products, packaging or equipment, with blood or other fluid discharge. The dressing must be kept clean and properly secured to prevent it from becoming loose or falling off.

To protect the dressing from moisture, workers should wear gloves (for wounds on the hands), and protective sleeves or clothing over other wounds.
6.4.2 Hygienic Practices

6.4.2.1 The operator must document and implement procedures for personnel hygiene that apply to all workers in food handling, preparation and related areas, and to all contractors and visitors.

6.4.2.2 Personnel in processing areas must not wear jewellery except for plain wedding bands (i.e. no stone), as long as the wedding bands cannot be easily dislodged and can be effectively cleaned in the same manner as hands.

6.4.2.3 Personal items such as sweets and cigarettes must not be taken into processing or packing areas.

6.4.2.4 The following activities are not permitted inside processing or packing areas:

- eating of any food;
- smoking;
- spitting; or
- any other activity that may cause contamination of any Seafood Products or Seafood Products contact services.

6.4.3 Protective clothing

6.4.3.1 All personnel who enter any processing or packing area must wear suitable, clean protective clothing and foot wear. Protective clothing (e.g. coats, overalls, aprons, waterproof armbands, hair restraints, and gloves) must be visibly clean at the start of each day’s operation and be of a colour that does not disguise contamination.

Hair restraints include paper, cloth or plastic hats or hair nets. Several types of beard masks and all-over hat styles are available for personnel with full beards. Each operator should set their own policy on acceptable beard lengths.
6.4.3.2 Personnel who handle exposed product must wear protective clothing with a water-proof front (or a waterproof apron). If clothing sleeves are below the elbow, personnel must wear waterproof arm covers or waterproof sleeves.

6.4.3.3 Any protective gloves used must be non-absorbent, and may be either single use or reusable. Reusable gloves must be washed and sanitised at meal breaks, at the end of each working day, or whenever contaminated.

6.4.3.4 Personnel who work in raw Seafood Products areas must change their protective clothing before entering areas where ready-to-eat Seafood Products is produced.

6.4.3.5 Personnel assigned to work in areas where materials for animal consumption (e.g. heads, frames) or waste are handled must wear some form of identification to distinguish them from other Seafood Products processors; and before entering areas processing Seafood Products for human consumption, such personnel must:

- remove any contaminated outer clothing, footwear or coverings;
- thoroughly wash any exposed contaminated skin surfaces; and
- dress in clean protective clothing as described in 6.4.3.1 and 6.4.3.2 above.

6.4.3.6 All protective clothing must be kept in good condition, changed (or in the case of waterproof clothing, cleaned) at least daily, or more often if it becomes excessively contaminated, and, while not in use, stored so as to protect it from contamination.

6.4.3.7 Workers must use boot wash facilities or foot baths to clean footwear before entering processing areas and must change other protective clothing if it becomes contaminated from the external environment.

6.4.3.8 Workers must not wear waterproof protective clothing (e.g. aprons, plastic sleeves, gloves) or equipment (e.g. knives and steels) outside the processing area unless they are in a “designated area”. For detailed information on “designated areas” see Part 2, Section 16 of this COP.
6.4.4 Hand washing and sanitising

6.4.4.1 All personnel must thoroughly wash (with hand detergent and water), sanitise (where appropriate) and dry hands:

- when entering any processing or packing areas;
- before handling any Seafood Products or exposed packaging;
- after using the toilet;
- after handling or coming into contact with waste and contaminated surfaces or material;
- if working in a raw product area, before entering a cooked or ready to eat product area; and
- any other time when hands may become contaminated (e.g. after coughing, sneezing or blowing the nose).

Hand sanitisers must be used in areas where cooked or ready-to-eat Seafood Products is processed or packed. These sanitisers must be NZFSA approved (see Approved Maintenance Compounds Manual) and used in accordance with the manufacturers’ instructions.

6.4.4.2 Hands must be thoroughly dried using disposable paper towels, or “roller” type towels that present a clean surface to each user.

6.4.5 Visitors and contractors

6.4.5.1 Visitors and contractors who wish to enter a Seafood Products processing or packing area must comply with the operator’s documented health requirements and follow all hygienic practices and procedures required for food handlers.

Visitors and contractors who wish to enter a processing or packing area should sign a visitors’ logbook on arrival.
6.5 Monitoring

The responsible person must regularly check compliance with documented procedures.

The frequency and type of monitoring will depend on the nature of the operation and the degree of risk if hazards are uncontrolled. Monitoring options could include the following daily checks:

- Before processing: checks to confirm all staff are following correct procedures for wearing protective clothing, and for entering the processing areas.

- During processing: checks to confirm that all staff are complying with requirements for personal hygiene and hygienic work practices.

6.6 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- pre-operational check results;
- any medical certificates;
- monitoring records of compliance to hygienic practices and/or of any problems observed and any corrective action taken (including restoration of control, product disposition and prevention of recurrence); and
- monitoring records of compliance with designated areas programme.

Refer to Part 2, Section 24 of this COP for record keeping requirements.
7 Control of Chemicals

7.1 Purpose and Scope

To ensure the proper use and storage of chemicals so as to prevent or minimise the contamination of Seafood Products, packaging, equipment, and the processing and storage environment. Chemicals include maintenance compounds used for cleaning, sanitation, fumigation, pest control and for repairs and maintenance of equipment.

See Approved Maintenance Compounds Manual for approvals and exemptions.

7.2 Sources of Hazards

<table>
<thead>
<tr>
<th>Source</th>
<th>Examples of hazards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maintenance compounds (e.g. cleaning agents, pesticides, lubricants)</td>
<td>Chemical residues</td>
</tr>
<tr>
<td>Chemical containers</td>
<td>Chemical residues</td>
</tr>
</tbody>
</table>

7.3 Mandatory requirements

7.3.1 HC Spec 21(1)

Only approved maintenance compounds (see Approved Maintenance Compounds Manual) may be used during processing operations or in the maintenance of processing areas, facilities and equipment.

7.3.2 HC Spec 21 (2)

All containers of chemicals held and used within the premises must be labelled with the name of the chemical as they appear in the list of approved maintenance compounds contained in specifications.
7.3.3 AP Reg 11(3)

Chemicals must be stored, handled, and used in a manner that minimises contamination of Seafood Products, other inputs, packaging, equipment, and the processing environment.
7.4 Procedures

7.4.1 The operator must maintain a list of all approved chemicals used and held in the premises.

7.4.2 When not in use, chemicals must be stored in a designated area (e.g. shelf, cupboard, room) and kept separate from Seafood Products, ingredients, and packaging.

7.4.3 All chemicals must be used according to the manufacturer’s directions and the conditions of the NZFSA approval. Directions for use must be readily available to the user (e.g. given in the label, posted on the wall or in product information data sheets).

7.4.4 Chemicals must be handled and used, by or under the supervision of, suitably trained personnel.

7.4.5 When specified in the conditions of use set out in Approved Maintenance Compounds Manual, products and exposed packaging must be removed from the area or kept protected (e.g. covered) prior to the use of chemicals which may result in their contamination.

7.4.6 When specified in the conditions of use set out in Approved Maintenance Compounds Manual, equipment and other product contact surfaces must be cleaned by thorough washing after exposure to any chemical (e.g. after spraying with insecticide).

7.4.7 Empty chemical containers must be disposed of in accordance with manufacturer’s instructions and must not be re-used for any other purpose.

7.4.8 When chemical contamination occurs:

- affected products must be considered unfit for human consumption;
- affected product contact surfaces must be cleaned and sanitised prior to re-use; and
- affected packaging materials that cannot be effectively cleaned and sanitised must not be used for packing of any Seafood Products.
7.5 Monitoring

The responsible person must regularly check compliance to documented procedures.

Monitoring options include:

- Daily and weekly checks to confirm chemicals are being handled and used correctly

- Annual (or when new chemicals are purchased) checks to confirm that all chemicals are approved and identified on the company register.

7.6 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- list of approved chemicals used and held in the premises;

- training records of workers trained on chemical handling and use; and

- records of any non-compliance or problems detected and any corrective action taken (including restoration of control, product disposition and prevention of recurrence).

Refer to Part 2, Section 24 of this COP for record keeping requirements.
8  Pest Control

8.1  Purpose and Scope

To ensure the effective control of pests so as to prevent or minimise the contamination of Seafood Products, packaging, ingredients, equipment, and the processing and storage environment. Pests include rodents, birds, insects, dogs and cats.

8.2  Sources of Hazards

<table>
<thead>
<tr>
<th>Source</th>
<th>Examples of hazards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Insects, rodents, birds, cats and dogs</td>
<td>Bacterial pathogen, e.g. <em>Salmonella</em>, <em>Campylobacter</em> spp., <em>E.coli</em> spp., <em>Listeria monocytogenes</em></td>
</tr>
<tr>
<td>Pesticides</td>
<td>Chemical residues</td>
</tr>
</tbody>
</table>

8.3  Mandatory Requirements

8.3.1  AP Reg 10

Premises, facilities, equipment and essential services must be designed, constructed, located and operated to minimise the exposure of animal product to hazards and other risk factors from pests.

8.3.2  AP Reg 11 (1) & (2)

Effective procedures must be established and carried out to minimise the exposure of Seafood Products, packaging, other inputs, equipment, and the processing environment to hazards associated with pests.
8.3.3 AP Reg 11(3)

Chemicals must be stored, handled, and used in a manner that minimises contamination of animal product, other inputs, packaging, equipment, and the processing environment.

8.4 Procedures

8.4.1 Pest control programme

The operator must document a pest control programme which includes the following information:

- the person or agency responsible for undertaking pest control activities;
- pest control procedures;
- monitoring and corrective action procedures;
- site plan indicating location of baits and other pest control devices;
- monitoring procedures and frequency; and
- corrective action procedures.

The operator may employ a pest control person or agency to develop and implement a pest control system (e.g. set up traps, spraying programme) and monitor the premises. The operator is responsible for ensuring that the person or agency employed is competent to perform the task.

Operators using a contracted pest control agency should also document procedures for addressing pest control problems that arise between scheduled agency visits.
8.4.2 Prevention of infestation and access of pests

8.4.2.1 Buildings and storage facilities (including water storage tanks) must be kept in good repair and condition to prevent pest access and to eliminate potential breeding sites.

8.4.2.2 Holes, drains and other places where pests are likely to gain access to processing and product support areas must be kept sealed, or provided with screens or similar materials that prevent the entry of pests.

To prevent the entry of insects, birds and other pests, mesh screens should be used on windows, doors, ventilators and any other openings in processing areas that may be kept open during operations.

8.4.2.3 External doors that are not screened must be kept closed at all times when not in use.

8.4.2.4 Internal and external areas of the premises must be kept clean and tidy. The external environment must be checked regularly and kept free of any food sources and breeding sites (e.g. long grass, bird’s nest).

Areas that are likely to attract flies and other insects should be sprayed, as necessary.

8.4.2.5 Waste materials must be kept in covered pest-proof containers and regularly collected and disposed of.

8.4.3 Use of pesticides

Pest control chemicals (rodenticides and insecticides) must be handled, used and stored according to the control procedures given in Part 2, Section 7: Control of Chemicals.
Insecticides that have any residual activity or are dispensed as continuous aerosols should not be used in any processing or storage area in a manner that could cause the contamination of Seafood Products product or product contact surfaces.

Seafood Products and exposed packaging should be removed from the area or kept protected (e.g. covered) prior to the use of chemicals that may contaminate them. Equipment and other product contact surfaces should be cleaned by thorough washing after exposure to any chemical (i.e. after spraying with insecticide is completed).

8.4.4 Use of pest traps

8.4.4.1 Pest traps (including rodent boxes, bait stations and electric insect traps) must be positioned so as to minimise contamination of Seafood Products, additives, ingredients or containers.

Bait stations should not be located inside any processing or product storage area. The location of pest traps should be identified on a site or building plan, or other suitable record.

8.4.4.2 Rodenticides must be used only in enclosed bait boxes.

8.4.4.3 Insect traps, which include ultra-violet lamps, pheromone traps and any form of attractant device, must:

- be constructed so they catch and secure insects in a suitable drawer, tray or adhesive mat that facilitates the capture and removal of insects;

- not cause any air-borne contamination; and

- be sited so there is no contamination from insects falling on to exposed Seafood Products, packaging, or product contact surfaces.

Adhesive traps may be suitable for processing areas. Operators should take care when using electric insect traps to ensure that they do not cause contamination of Seafood Products or product contact surfaces.
8.4.5 Handling and disposition of contaminated materials

When there is evidence of contamination from pests:

- the affected product must be considered unfit for human consumption and an assessment must be made to determine its suitability for animal consumption;
- the affected product contact surfaces must be cleaned and sanitised prior to reuse; and
- affected packaging materials that cannot be effectively cleaned and sanitised must not be used for packing any animal product.

8.5 Monitoring

The responsible person must regularly check ongoing compliance to documented procedures and the effectiveness of the pest control programme.

The frequency and type of monitoring will depend on the nature of the operation and the degree of risk if hazards are uncontrolled. Monitoring could include:

- Daily visual checks of processing and product areas for any signs of vermin activity, and for evidence that rubbish and food waste is properly managed.

- Monthly checks on integrity of vermin proofing (e.g. screens, seals)

- Monthly checks on bait stations to:
  * ensure their location complies with the documented plan or record, and that bait is present (the box should be cleaned and re-baited with an approved rodent bait, as necessary);
  * detect evidence of pest activity (e.g. nibbled bait, bait missing, droppings); and
  * ensure boxes are in good working condition.

When determining monitoring frequency for bait stations and pest traps, operators should consider the type of traps used and the level of pest activity. If the level of pest activity increases, they should increase monitoring frequency and take appropriate corrective actions.
8.6 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- observations from monitoring, including any evidence of pests;

- name, amount and point of use of any pesticides used; and

- any corrective action taken (including restoration of control, product disposition and prevention of recurrence).

Refer to Part 2, Section 24 of this COP for record keeping requirements.
9 Training and Competency of Personnel

9.1 Purpose and Scope

To ensure that all staff involved in the handling of Seafood Products are competent to perform their duties, and are aware of and comply with good hygiene practices and with operating procedures.

9.2 Mandatory Requirements

9.2.1 RMP Spec 13 (1)

The operator must document the identity (either by position, designation or name) of:

a. the day to day manager of the risk management programme; and

b. those persons authorizing all or part of the risk management programme on behalf of the operator in accordance with clause 16 (1); and

c. those persons performing key tasks under the risk management programme including monitoring, corrective action, and operator verification activities.

9.2.2 RMP Spec 13 (2)

The operator must document the competencies needed by the persons identified under clause 13 (1) to enable the effective operation of the risk management programme.

9.2.3 RMP Spec 13(3)

The operator must keep records demonstrating that the competencies documented under clause 13 (2) have been achieved and maintained.
9.2.4  HC Spec 25(1):

An operator’s risk management programme must make provision, where appropriate, for the following:

a. Not applicable

b. persons responsible for the supervision of thermal processing operations for the thermal processing of low-acid canned products must meet the competency specification set out in Schedule 3 for supervisors of thermal processing of low-acid canned products;

c. premises processing fish must have on-site during processing at least 1 person or persons who jointly or individually meet the competency specifications set out in Schedule 3 for persons involved with fish handling, and hygiene activities.

9.2.5  HC Spec 25(2)

Thermal processes for low-acid canned products must be developed under the supervision of a person who meets the competency specification set out in Schedule 3 for a qualified cannery person (thermal processing). The final process schedule must also be checked and signed off by a qualified cannery person who is independent of the development process.

9.2.6  HC Spec 25(3)

Processes involving the depuration of bivalve molluscan shellfish must be under the direct supervision of a person who has been assessed as competent in shellfish depuration as part of the attendance at a training course approved by the Director-General.

9.2.7  HC Spec 26(1)

The operator must ensure that the skills of those persons involved in key tasks that could have a significant impact on the suitability for processing of animal material or the fitness for intended purpose of animal product, or who are required to carry out the activities listed in clause 25, are maintained on an ongoing basis.
9.2.8    HC Spec 26 (2)

The operator must keep records demonstrating that skills identification, achievement and maintenance is being carried out effectively.

9.2.9    HC Spec Schedule 3, 2 (1)

The NZQA qualifications for persons involved with fish handling or hygiene activities are:

a. either:

   i. 5331: Handle Seafood Products; or

   ii. 15344: Handle bivalve shellfish products; and

b. 5332: Maintain personal hygiene and use hygienic work practices working with Seafood Products; and

c. 6212: Clean and sanitise plant and equipment in a Seafood Products processing plant.

9.2.10   HC Spec Schedule 3, 2 (2)

A person may also meet the requirements of subclause 1 if the risk management programme provides for equivalent competency to the qualifications specified in that subclause.

9.3    Procedures

9.3.1    Competencies

9.3.1.1   The day-to-day manager or person authorising all or part of the RMP must be familiar with the documented risk management programme and have the following competencies:

- knowledge of food safety related to the Seafood Products industry, and of hygienic procedures and practices documented in this COP;

- knowledge of regulatory requirements, including responsibilities, related to the effective development and implementation of the risk management programme;
• technical knowledge and experience in the relevant products and processes; and

• ability to liaise and communicate effectively with personnel and the regulator.

9.3.1.2 Personnel performing key tasks including monitoring, corrective action and operator verification must have:

• the knowledge and skill to carry out the relevant tasks; and

• knowledge of hygienic practices and procedures and the ability to consistently comply with these requirements.

Ideally, personnel performing key tasks should be employed in a supervisory or higher operational role within a premises for 6 months or longer

Equivalent competencies to the fish handling and hygiene qualifications listed in HC Spec Schedule 3 in sections 9.2.9 and 9.2.10 above include on the job or in-house training by qualified personnel in food safety, wholesomeness, control of risks to food safety and wholesomeness (e.g. by applying HACCP principles)

Persons responsible for the review of HACCP plan records should hold the following competencies (or other training or competency equivalent):

a) Hazard Identification - unit standard 17996 ‘Develop and review a hazard identification and analysis for a Seafood Products product’; or

b) HACCP Plan - unit standard 12316 ‘Coordinate the development and verification of a HACCP plan for a Seafood Products processing operation’.

Persons responsible for the development or review of a HACCP Plan should hold the following competency (or other training or competency equivalent):

HACCP Plan - unit standard 12316 ‘Coordinate the development and verification of a HACCP plan for a Seafood Products processing operation’.

For further information on training available for the Seafood Industry see the Seafood Industry Training Organisation (SITO).
9.3.2 Training programmes

9.3.2.1 The operator must document a training programme for Seafood Products handlers and associated staff that includes induction, skills maintenance, monitoring, corrective action and records.

9.3.2.2 Induction programmes must be provided for all new workers, informing them of their job description, health requirements and hygienic work practices. The operator must ensure that new workers are supervised until they can demonstrate the competencies required to carry out their tasks unsupervised.

9.3.2.3 The operator must also provide regular training for all workers in safe food handling, personal hygiene and sanitary practices to ensure they maintain the competencies required for their tasks.

On-going training may take the form of regular staff meetings, in-house on-job training or external training courses. Staff should be involved in some form of on-going training every 3-4 months.

Where appropriate, clear instructions on hygienic practices (e.g. hand washing, use of protective clothing) and on operational tasks should be posted in the premises to re-enforce the procedures.

9.4 Monitoring

The responsible person must regularly check compliance with documented procedures.

The frequency and type of monitoring will depend on the nature of the operation and the degree of risk if hazards are uncontrolled. Monitoring options include:

- Using personal hygiene checks to confirm that personal hygiene training is effective.

- Checks to confirm that staff who carry out key tasks (e.g. those responsible for monitoring and corrective action under the RMP) are appropriately skilled and are performing those tasks correctly.
9.5 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- training records for each employee including the type of training undertaken, dates when training occurred;

- a copy of certificates/results; and

- monitoring records of compliance to hygienic practices and/or any problems observed and any corrective action taken (including restoration of control, product disposition and prevention of recurrence).

Refer to Part 2, Section 24 of this COP for record keeping requirements.
10 Reception of Fish and Shellfish

10.1 Purpose and Scope

To ensure that all edible Seafood Products received for processing is fit for its intended purpose and meets the requirements of the current version of the Animal Products (Specifications for Products Intended for Human Consumption) Notice.

10.2 Reception of Wild Fish

10.2.1 Mandatory requirements

10.2.1.1 HC Spec 62

Suppliers of fish, other than live fish must ensure it is —

a. subjected to chilling or freezing from the time of catching or harvesting to the time of arrival at the processing premises; and

b. handled in a manner such that contamination and deterioration is minimised.

c. Fish, other than bivalve molluscan shellfish that is temporarily held prior to transfer to the primary processor, must be held on the vessel by the producer or the harvester of that fish or in an animal material depot that is listed for that purpose by the NZFSA.

10.2.1.2 HC Spec 102(1)

The operator must carry out an assessment to confirm that, from the time of catching to the time of arrival at the premises, —

a. the fish has been subjected to chilling or freezing (unless it is live fish); and

b. the fish has been handled, held, and transported so as to minimise deterioration and has been protected from contamination.
10.2.1.3 HC Spec 102 (2)

If the fish has passed through an animal material depot, the operator must confirm that the depot is listed for that purpose with the Director-General.

10.2.1.4 HC Spec 102 (5)

Despite clause 62 and clause 102(1) an operator may process fish that has been seized by the Ministry of Fisheries subject to the operator —

a. obtaining written approval from the Director-General prior to the processing of the fish; and

b. complying with any conditions specified by the Director-General in the approval for the processing or labelling of the fish.

10.2.2 Procedures

10.2.2.1 The operator must document procedures for the reception of wild fish into the premises. The procedures must include checks to determine if the fish is fit for its intended purpose, and specify corrective actions to be taken when requirements are not met.

10.2.2.2 Fish caught and processed on fishing vessels must be checked when the fish arrives on the fishing vessel or at the start of processing, for:

- contamination with foreign matter that cannot be completely removed during processing;

- contamination with chemicals (e.g. fuel oil, cleaning compounds, filth);

- the presence of strong odours or other indications of microbiological spoilage; and

- in the case of fish that must be alive before processing (e.g. rocklobsters), for signs that the fish is alive on arrival at the fishing vessel.
10.2.2.3 Fish received at all other premises (and Seafood Products transferred from one fishing vessel to another) must comply with the requirements of 10.2.2.2 above and, in addition, be checked for:

- evidence that the fish has been handled and transported in an appropriate manner (e.g. the presence of ice, temperature of the fish); and
- compliance of labelling or identification with current version of the Animal Products (Specification for Products Intended for Human Consumption) Notice.

10.3 Reception of Farmed Fish

10.3.1 Mandatory Requirements

10.3.1.1 HC Spec 62 – see 10.2.1 for text

10.3.1.2 HC Spec 102(3)

In the case of farmed fish (other than bivalve molluscan shellfish), the operator must not accept the fish for processing (except for initial storage) if —

a. the required supplier statement is absent or incomplete, unless —

i. the operator has a supplier guarantee programme and the supplier is a specified supplier within that programme; and

ii. the supplier has provided to the operator information in accordance with the supplier guarantee programme at least once every six months; and

iii. the animal material is of the type that is described in the supplier guarantee programme; or

b. the operator is aware of or has received information that would give reasonable grounds to suspect that the information in the supplier statement cannot be relied on.

10.3.1.3 HC Spec 102 (4)

For farmed fish (other than bivalve molluscan shellfish) the operator —
a. must inform the recognised verifier within 24 hours if a situation described in subclause (3)(b) occurs; and

b. may, despite subclause (3)(a) and (3)(b), hold the fish and give the supplier an opportunity to produce a completed or a replacement supplier statement that clarifies the status of the fish as suitable for processing to the satisfaction of the Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000 42 operator; and

c. must keep a copy of every supplier statement for a minimum of 2 years.

See the Supplier Statement for the Supply of Farmed Fish for Human Consumption (other than bivalve molluscan shellfish)

10.3.2 Procedures

The operator must document procedures for the reception of farmed fish into the premises. The procedures must include checks to determine if the fish is fit for its intended purpose and specify corrective actions to be taken when requirements are not met.

10.4 Reception of Bivalve Molluscan Shellfish

10.4.1 Mandatory Requirements

10.4.1.1 HC Spec 120 (1)

The operator must only accept shellstock if the operator has confirmed the shellstock complies with the specifications or requirements of the shellfish regulated control scheme, and, in particular, must ensure that —

a. the shellfish harvesting statement details are correct and complete (subject to subclause (2)); and

b. the containers are labelled correctly in accordance with the shellfish regulated control scheme; and

c. the containers are of an appropriate hygienic status; and
d. the shellstock is alive, and not damaged, and the shells are reasonably free of mud, marine flora, bottom sediments and detritus, and not contaminated by material potentially hazardous to human health; and

e. temperature control requirements have been complied with.

10.4.1.2 HC Spec 120 (2)

If the statement (referred to in subclause (1) (a)) or labelling (referred to in subclause (1) (b)) is incomplete or missing, the shellstock may only be accepted into the premises if —

a. the shellstock is kept separate from other shellstock; and

b. a regional shellfish specialist is notified of the non-compliance within 24 hours of the arrival of the shellstock; and

c. the shellstock is detained under refrigerated storage until the regional shellfish specialist has determined the disposition of the shellstock.

10.4.1.3 HC Spec 120 (3)

If shellstock has not been grown, harvested, handled, and transported according to the requirements of the shellfish regulated control scheme, and the operator prohibits the shellstock from entering the premises, the operator must advise the regional shellfish specialist of that within 24 hours after imposing the prohibition.

For detailed information on requirements for harvest declarations, refer to Animal Products (Specifications for Bivalve Molluscan Shellfish) Notice – Clause 61 BMS identification and harvest declaration.

10.4.2 Procedures

The operator must document procedures for the reception of bivalve molluscan shellfish to determine that the bivalve molluscan shellfish / shellstock meets regulatory requirements. The procedures must include checks to determine if the bivalve molluscan shellfish is fit for its intended purpose, and specify corrective actions to be taken when requirements are not met.
10.5 Reception of imported Seafood Products

Before receiving any imported Seafood Products into the processing premises, the operator must obtain sufficient information from the overseas supplier to ensure the Seafood Products is fit for purpose.

This information should include the following:

* species and form (e.g. frozen, chilled, canned) of the fish;
* details of any processing undertaken, including information (specifying amounts) on any additives or ingredients used;
* the country from which the Seafood Products will be imported;
* information regarding the health certification that will accompany the Seafood Products at the time of import (including an example if possible); and
* in the case of bivalve molluscan shellfish, information on the growing and harvesting areas and whether these areas are NSSP classified.

Further information regarding Imported Food can be found on the NZFSA website

The Biosecurity New Zealand website provides information on Import Health Standards for animal products, including a list of fish species not permitted entry into New Zealand.
http://www.biosecurity.govt.nz/

The Biosecurity New Zealand website also has information regarding the requirements for Sea Containers, e.g. facilities unpacking import sea containers must be NZFSA Approved.

10.6 Monitoring

The responsible person must regularly check compliance with documented procedures.

Every product consignment should be checked on arrival at reception. The nature and extent of the monitoring will depend on the type(s) of product received.

10.7 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:
• landing dockets;

• harvest declarations & tags;

• check sheets for each lot arriving at the premises;

• list of bivalve molluscan shellfish depots;

• list of bivalve molluscan shellfish sorting sheds; and

• observations from monitoring and any corrective action taken (including restoration of control, product disposition and prevention of recurrence).

Refer to Part 2, Section 24 of this COP for record keeping requirements.
11 Ingredients and Additives

11.1 Purpose and Scope

To ensure that additives, ingredients and other process inputs meet relevant regulatory requirements, and are received, handled and stored in a manner that minimises contamination and deterioration.

11.2 Mandatory Requirements

11.2.1 HC Spec 17

The identity and purity of additives, processing aids, vitamins, minerals, and other added nutrients must comply with the current Australia New Zealand Food Standards Code, part 1.3 “Substances added to Food”, Standard 1.3.4 “Identity and Purity”.

11.2.2 HC Spec 115

All process inputs, including ingredients, additives, processing aids, and packaging must be stored, handled, and transported so as to minimize any potential contamination or deterioration.

11.2.3 Australia New Zealand Food Standards Code, Part 1.3, Standard 1.3.1

This Standard regulates the use of food additives in the production and processing of food. A food additive may only be added to food where expressly permitted in this standard. Additives can only be added to food in order to achieve an identified technological function according to Good Operating Practice.
11.3 Procedures

11.3.1 Receiving

The operator must check all additives and other ingredients on receipt to ensure they comply with agreed specifications (including any temperature controls).

The operator should obtain a letter from the supplier guaranteeing that additives and other ingredients meet regulatory and company requirements.

11.3.2 Storage

11.3.2.1 Additives and other ingredients must be stored in a designated area (e.g. shelf, cupboard, or room) and kept separate from chemicals.

11.3.2.2 The method of storage must comply with instructions indicated on the label or provided by the supplier (e.g. some items may require clean, dry storage, others may require refrigeration).

11.3.2.3 Additives and other ingredients must be kept in sealed containers when not in use.

11.3.2.4 All containers of additives and other ingredients must be labelled with the name or names of the additives and other ingredients.

11.3.2.5 Storage areas must be kept clean and dry.
11.3.3 Use

11.3.3.1 All additives and ingredients must be checked before use to ensure they are within their recommended shelf life requirements (where relevant).

11.3.3.2 All additives and ingredients must be used in accordance with manufacturers’ instructions, and at levels to comply with any established limits (e.g. in the Food Standards Code).

Exporters should check Overseas Market Access Requirements for specific country regulations for additives and ingredients.

11.4 Monitoring

The responsible must regularly check compliance with documented procedures.

Monitoring options include:

- Checks of all additives and ingredients on arrival to confirm they have been transported in an acceptable manner and have no visual signs of contamination.

- Checks during processing to ensure that additives and ingredients are used correctly.

- Weekly checks to confirm that additives are labelled and stored correctly.
11.5 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- register of goods;
- register of suppliers;
- supplier statements;
- supplier guarantees (including, Certificates of Analysis, Guarantees, specifications);
- daily check sheets; and
- supplier audit results.

Refer to Part 2, Section 24 of this COP for record keeping requirements
12 Specification, Handling and Storage of Packaging and Containers

12.1 Purpose and Scope

To ensure that packaging materials, including fish bins and containers, plastic bags/liners and poly boxes, used for containing edible Seafood Products are fit for their intended purpose. This programme does not apply to packaging applied to bivalve molluscan shellfish while subject to the shellfish regulated control scheme.

12.2 Sources of Hazards

<table>
<thead>
<tr>
<th>Source</th>
<th>Examples of hazards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Product contact packaging (plastic bags, wraps, liners, and may include cardboard cartons)</td>
<td>Chemical residues</td>
</tr>
<tr>
<td>Reusable product containers (e.g. plastic bins, tubs)</td>
<td>Bacterial pathogens</td>
</tr>
<tr>
<td></td>
<td>Chemical residues (e.g. cleaning chemicals)</td>
</tr>
</tbody>
</table>

12.3 Mandatory Requirements

12.3.1 HC Spec 30 (1)

1. The composition and where appropriate, the conditions of use of packaging must —

   a. comply with the requirements specified in the current US Code of Federal Regulations, Title 21, Parts 170–199 (21 CFR 170–199), which applies equally to coatings and linings of containers and cartons where these are the direct product contact surface; or

   b. comply with the requirements specified in the current "Australian Standard for Plastics Materials for Food Contact Use, Australian Standard AS2070–1999"; or
c. be determined by the operator to be suitable for use, based on an analysis of hazards and other risk factors from the packaging.

12.3.2 HC Spec 30 (2)

If compliance with this specification is achieved through meeting the requirements of subclause (1) (a) or (b), the risk management programme must state the full reference to the regulation, part, section or standard with which the packaging complies.

12.3.3 HC Spec 30(3)

If the packaging is damaged such that suitability for processing of Seafood Products or fitness for intended purpose of Seafood Products product may be affected, the product must be appropriately disposed of or handled in a manner that minimises contamination until the damage to the packaging is rectified.

The Australia New Zealand Food Standards Code does not specify details of materials permitted to be added to or used to produce food packaging materials. However, the effect of the New Zealand Food Act 1981 Section 9 (4) (c) is that packaging must not cause food to be unsafe or tainted.

12.3.4 HC Spec 30 (4)

Reused and recycled packaging must not be a source of contamination to the animal material or product.

12.4 Procedures

12.4.1 Receiving and storage

12.4.1.1 Operators must obtain a written guarantee from the supplier stating that packaging meets mandatory requirements for composition and conditions of use.

Note that under Section 30 Clause 2 of the current version of the Animal Products (Products Intended for Human Consumption) Notice the risk management programme must document in full the regulation, part, section or standard with which the packaging complies.
12.4.1.2 All packaging and product contact containers must be checked on receipt to ensure they are received in a condition that is fit for purpose.

12.4.1.3 Once accepted into the premises, all packaging and product contact containers must be handled in a manner that minimises contamination and deterioration.

12.4.1.4 Containers and packaging held in a warehouse-type store must be securely wrapped and stored off the floor to minimise contamination from dust and vermin.

12.4.2 Use

12.4.2.1 Containers and cartons must be unwrapped only in a support area or processing area. After unwrapping, containers and cartons may be stored, handled or transported only in a support area or processing area. Refer to Part 2, Section 2 of this COP for information on the design of such areas.

Made-up cartons may be protected from dust by covering the top layer of cartons or inverting the topmost carton.

12.4.2.2 Operators must ensure that opened cartons are re-closed and covered during storage to prevent dust contamination. Any wet plastic packaging must be disposed of rather than stored.

12.4.2.3 Only containers or packaging required for immediate use may be held in any area where Seafood Products is processed or packaged.

12.4.2.4 New packaging and containers must be clean and undamaged at the time of use. Re-usable containers (e.g. fish bins) must be cleaned and sanitised before use.

12.4.2.5 All packaging materials must be removed from the processing area or adequately protected before any cleaning and sanitising operations are carried out.

12.4.2.6 Re-usable containers must be washed and sanitised:

- between uses;
• when contaminated; and

• when visibly covered in fish protein.

12.4.2.7 Re-usable containers that have been cleaned and sanitised must be protected from contamination.

12.5 Monitoring

The responsible person must regularly check compliance with documented procedures.

<table>
<thead>
<tr>
<th>Monitoring options for packaging and containers include:</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Checks on arrival to confirm they have not been damaged in transit, and show no visual signs of contamination.</td>
</tr>
<tr>
<td>- Checks before use to confirm they are clean and suitable for use.</td>
</tr>
<tr>
<td>- Weekly checks to confirm proper storage.</td>
</tr>
</tbody>
</table>

12.6 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

• daily checklists;

• audit results;

• register of suppliers; and

• supplier guarantees for Seafood Products contact packaging and containers.

Refer to Part 2, Section 24 of this COP for record keeping requirements.
13 Construction and Operational Requirements for the Swimming of Live Fish

Amendment 0
August 2007

13.1 Purpose and Scope

To ensure that premises and equipment used for the swimming and/or holding of live fish (including crustaceans and abalone) are suitable for their intended purpose and to minimise contamination of the live animals.

This programme does not cover marine farming operations nor the storage and/or depuration of molluscan bivalve shellfish. It does not cover areas of the premises where fish processing occurs.

13.2 Sources of Hazards

<table>
<thead>
<tr>
<th>Source</th>
<th>Examples of hazards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Swimming water</td>
<td>Chemical residues</td>
</tr>
<tr>
<td>Water</td>
<td>Chemical residues</td>
</tr>
<tr>
<td>Holding tank</td>
<td>Chemical residues</td>
</tr>
</tbody>
</table>

13.3 Procedures

13.3.1 Construction

13.3.1.1 Live fish swimming areas must be designed, constructed and maintained in such a manner so as to:

- minimise contamination of the live fish; and
- facilitate cleaning and maintenance.
Live fish swimming areas do not have to comply with construction requirements for Seafood Products processing premises – for example smooth impervious walls or exposed ledges are not mandatory.

Construction materials in such areas may include exposed wood and roofing iron provided they are not detrimental to the health of the live fish and do not contaminate the swimming water. In some instances materials such as wood or porous concrete may form part of the biofilter system used for maintaining water quality.

13.3.1.2 The area for the swimming and holding of live fish must be separated from any place used for the processing, packing or storage of fish, or from any living quarters by:

- doors made of permanent material; or

- other forms of physical separation that minimise contamination of live fish.

13.3.1.3 Toilet areas must not open directly on to any live swimming area.

13.3.1.4 Service lines such as cables and pipes must be located and installed in such a manner that they do not contaminate the live swimming area.

13.3.2 Water Supply

The quality of water used for the purpose of swimming live fish must be sufficient to maintain the fish in their live state.

Water containing treatment chemicals (e.g. chlorine) is unsuitable for swimming live fish as the chemicals will have an adverse effect on their health and welfare. Live crustaceans are sensitive to water quality and, hence, are good indicators of water quality.

Compounds (e.g. bacterial cultures, pH modifiers and salt) may be used to modify the water conditions to ensure survival of the fish.
13.3.3 Lighting

Refer to Part 2, Section 2 of this COP for relevant requirements.

13.3.4 Cleaning and Sanitising Facilities

13.3.4.1 Facilities for hand washing and for the cleaning of waterproof clothing must be available in or near the live swimming area. Refer to Part 2, Section 6 in this COP for further information.

13.3.4.2 Cleaning materials and cleaning equipment must be stored in such a manner as to prevent contamination of live Seafood Products, ice, water and containers.

13.3.5 Equipment

All equipment used in contact with live fish must be made of material that will not contaminate the live fish or the water.

13.3.6 Maintenance Compounds

Maintenance compounds that are used in a live swimming or holding area must meet the requirements of Approved Maintenance Compounds Manual and Part 2, Section 7 of this COP.

13.3.7 Compressed Air

Where compressed air is used it must be used in accordance with the requirements of Part 2, Section 2 of this COP.

13.3.8 Containers

Containers used in a live fish swimming and holding plant must meet the requirements of Part 2, Section 12 of this COP. Containers must be stored in such a way as to minimise contamination of the live fish and live swimming area.
13.3.9 Cleaning and Sanitation Programme

The operator must document a cleaning programme for all live swimming and holding areas to ensure that these areas are kept in a clean and tidy condition.

Chemicals for cleaning and sanitising should not be used in live swimming or holding areas because they may contaminate the swimming/holding water. Chemical exposure may have detrimental effects on the fish and could result in death.

13.3.10 Disposition of unsuitable material

13.3.10.1 Material that is unsuitable for further processing for human consumption (e.g. diseased or dead fish) must be transferred to a temporary holding area and physically separated from healthy live fish, until it is sent for further processing to products for animal consumption, or for disposal.

13.3.10.2 All live fish found to be unfit for human consumption must be handled and disposed of in a manner to minimise contamination and to prevent such fish entering the human food chain.

13.4 Monitoring

The responsible person must carry out regular checks on compliance with documented procedures.

The frequency and type of monitoring will depend on the nature of the operation and the degree of risk if hazards are uncontrolled. Monitoring options include:

- Weekly or monthly checks to confirm that the cleaning requirements have been met.
- Monthly checks on repairs and maintenance.
13.5 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- inventory;
- monitoring and corrective action; and
- cleaning and maintenance records.

Refer to Part 2, Section 24 of this COP for record keeping requirements.
14 Fish Processing

Amendment 0
August 2007

14.1 Purpose and Scope

To ensure that fish and fish product is processed in a manner that minimises its contamination and deterioration, and maintains its fitness for intended purpose.

This section covers only primary processing of fish. Further processing and manufacturing of fish (e.g. smoking, drying) will be covered in supplementary documents yet to be finalised.

This section applies to operators of land-based premises processing fish (including farmed fish) and to fishing vessels that process fish at sea and require risk management programmes.

For the purposes of this section, Fish means all finfish, crustaceans, echinoderms, and shellfish with the exception of bivalve molluscan shellfish.

14.2 Mandatory Requirements

14.2.1 AP Reg 9

All specified persons must ensure that animal material and animal product in their charge is processed in a manner that minimises the contamination or deterioration of the animal material or product.

14.2.2 HC Spec 26 (1)

The operator must ensure that the skills of those persons involved in key tasks that could have a significant impact on the suitability for processing of animal material or the fitness for intended purpose of animal product, or who are required to carry out the activities listed in clause 25 [which is related to canning], are maintained on an ongoing basis.
14.2.3 HC Spec 26 (2)

The operator must keep records demonstrating that skills identification, achievement and maintenance is being carried out effectively.

14.2.4 HC Spec 103 (1)

Handling and processing procedures must be carried out without unnecessary delay, and in a manner that minimises contamination and deterioration of the fish.

14.2.5 HC Spec 103 (2)

The level of histamine in fish or fish product must not exceed 200 mg/kg.

14.2.6 HC Spec 104 (1)

Any chilling or freezing must be conducted without unnecessary delay and in a manner that minimises any potential microbial proliferation, and contamination of the fish.

14.2.7 HC Spec 116

If pre-programmed process control parameters are used to operate and control a process that is critical to product safety, unauthorised access to the programmed parameters must be prevented.
14.3 Procedures

14.3.1 Packing live fish (other than bivalve molluscan shellfish)

14.3.1.1 Fish (e.g. lobsters) must be alive at the time of packing and in a condition such, that under normal circumstances, they will remain alive during transport to their final destination.

14.3.1.2 The outer surfaces of live fish, in particular paua and whelks, must be free from dirt, weed and marine organisms.

14.3.1.3 Live fish must be packed at a temperature sufficient to maintain the species in a live state during transport.

If appropriate, cooling media should be added to the container to maintain the required conditions during transit.

14.3.2 Heading, gutting and filleting

14.3.2.1 Where relevant, the operator must establish temperature and/or time parameters to ensure that fish and fish product are processed without unnecessary delay.

14.3.2.2 Wet fish must be stored chilled or frozen unless they are to be processed immediately.

14.3.2.3 Operations such as gutting, skinning and filleting must be carried out in a manner that minimises contamination of the fish or fish product. When fish are washed after gutting, potable water or clean seawater must be used.

14.3.3 Thawing

14.3.3.1 To minimise deterioration and contamination of the fish or fish product, the operator must establish and comply with process criteria for thawing fish, (including air and
water thawing), such as air temperature or water temperature, time of thawing and temperature of the fish at the completion of thawing.

| Practical factors such as number of staff, the speed at which a species can be processed, and equipment failure should also be considered when establishing thawing process criteria. |

14.3.3.2 Fish that have been thawed must be processed without unnecessary delay or must be held under chilled conditions.

14.3.4 Shucking Shellfish (other than Molluscan Bivalve Shellfish)

14.3.4.1 Shellfish to be shucked must be:
   - alive and undamaged;
   - held in cool conditions; and
   - protected from the sun and wind prior to shucking.

14.3.4.2 The shucking process must be separated from other processes (e.g. packing) by time, adequate space, or physical barriers.

14.3.4.3 Shucked shellfish must be stored chilled or frozen unless they are to be further processed immediately.

14.3.4.4 Paua, in addition to complying with the requirements in sections 14.3.4.1 to 14.3.4.3, must be washed in potable water or clean seawater immediately after shucking, and then drained.

When the paua is to be canned in a fish processing premises, the washing may be carried out in those processing premises.

14.4 Monitoring

The responsible person must regularly check ongoing compliance to documented procedures.
The frequency and type of monitoring will depend on the nature of the operation and the degree of risk if hazards are uncontrolled. Monitoring options include daily checks during processing to confirm that operations are carried out according to documented procedures.

14.5 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- parasite check sheets;

- thawing check sheets per batch; and

- CCP records.

Refer to Part 2, Section 24 of this COP for record keeping requirements.
15 Bivalve Molluscan Shellfish Processing

15.1 Purpose and Scope

To ensure that bivalve molluscan shellfish are processed in a manner that minimises contamination and deterioration, and maintains their fitness for intended purpose.

This section covers only primary processing of bivalve molluscan shellfish. Further processing and manufacturing of bivalve molluscan shellfish (e.g. smoking, acidification) are covered in supplementary documents yet to be finalised.

The mandatory requirements for primary processing of bivalve molluscan are extensive and detailed and, for this reason, are referenced in Section 15 rather than quoted in full as occurs in other COP sections. In addition, since the detailed mandatory requirements cover most aspects of primary processing of bivalve molluscan shellfish, few documented procedures are needed in this section of the COP.

Operators must therefore ensure that they study all relevant clauses (listed below) from the current version of the Animal Products (Specifications for Products Intended for Human Consumption) Notice and comply with their requirements.

15.2 Wet Storage

15.2.1 Mandatory Requirements

HC Spec 123 – General Requirements

HC Spec 124 – Wet storage process water supply

HC Spec 125 – Treatment of water for wet storage

HC Spec 126 – Continuous flow through wet storage system

HC Spec 127 – Recirculating water wet storage system

HC Spec 135 – Minimum requirements of depuration/wet storage operation
HC Spec 135A – Alternative means

15.3 Depuration

15.3.1 Mandatory Requirements

HC Spec 25 (3) – Competency of depuration supervisor

HC Spec 128 – Depuration

HC Spec 129 – Depuration process water: seawater supply

HC Spec 130 – Depuration process water: water standards

HC Spec 131 – Shellfish storage

HC Spec 132 – Depuration unit: Loading and unloading

HC Spec 133 – Cleaning and sanitising plan and equipment

HC Spec 134 – Depuration process operator verification

HC Spec 135 – Minimum requirements of depuration/wet storage operation

HC Spec 135A – Alternative means

15.4 Shucking, Processing and Packing

15.4.1 Mandatory Requirements

HC Spec 116 – Process control

HC Spec 121 – Raw harvested bivalve molluscan shellfish

HC Spec 122 – Processing bivalve molluscan shellfish

HC Spec 136 – Shucking, processing and packing
15.4.2 Procedures

15.4.2.1 During packing, processing and shucking, shellfish must be handled in such a manner that they are not subject to contamination, or unacceptable increases in temperature and/or bacterial levels.

15.4.2.2 When shellfish are processed in a room or area where other fish processing operations are performed, the operator must take adequate measures to minimise contamination of the shellfish by the other operations (e.g. by splash, personnel, dual use of appliances) or from any other source.

15.4.2.3 Shellfish storage areas must be off the floor and protected from contamination from floor water, splash water or foot traffic.

15.4.2.4 Shucking and packing operations must be carried out in separate rooms or in areas that are physically separated to ensure effective control of any potential contamination from either operation to the other.

15.4.2.5 Precautions must be taken to prevent food-contact surfaces of shucked shellfish containers from coming into contact with product handlers or their clothing, or with splash liquid.

15.4.2.6 Shucked shellfish containers must be completely emptied in the packing room and must be washed and sanitised before they are returned to the shucking room.

15.4.2.7 Shucked shellfish must be packed in clean containers made from safe materials. Returnable containers may only be used for interplant shipment of shucked shellfish and must be sealed during such transport. On receipt of shellfish in returnable containers the operator must repack the shellfish into single-use containers.

15.4.2.8 Containers of shucked shellfish must be closed promptly after filling.
15.4.2.9 Skimmer tables and other packing equipment must be located so that they are not contaminated by drainage from the delivery window or from shucking room equipment and utensils.

15.4.2.10 Shucked shellfish must only be packed into containers labelled in accordance with Part 2, Section 18 of this COP.

15.4.2.11 Ice used in direct or indirect contact with shellstock or shucked shellfish must be:

- manufactured in a premises operating under a registered RMP, an approved Food Safety Programme or registered under the Food Hygiene Regulations 1974;
- of potable water quality;
- manufactured, stored, handled and transported so as to prevent contamination; and
- when delivered from another premises, inspected on arrival at the processing premises, and rejected if delivered in a manner that may have permitted contamination (e.g. from dust, chemicals, foreign matter) or if contamination is evident.

15.4.2.12 Shuckers and other unauthorised persons must not be permitted entry into the packing room or packing area for any purpose except in a small operation where an employee may work in both the packing and shucking room. In such cases, the employees must put on a clean apron or other outer clothing, sanitise their footwear before entering the packing room and thoroughly wash their hands with an approved sanitiser after entering the room.
15.5 **Heat Shocking**

15.5.1 Mandatory requirements

HC Spec 137 – Heat shocking

15.5.2 Procedures

15.5.2.1 Operators who heat shock shellfish must develop a heat shock process schedule based on a comprehensive study of the process.

15.5.2.2 The heat shock process must not result in an increase in microbiological levels in the shellfish.

15.6 **Repacking**

15.6.1 Mandatory Requirements

HC Spec 138 – Repacking

HC Spec 139 – Bivalve molluscan shellfish labelling

For further information on shellfish labelling requirements see Part 2, Section 18 of this COP.

15.7 **Monitoring**

The responsible person must regularly check ongoing compliance to documented procedures.

The frequency and type of monitoring will depend on the nature of the operation and the degree of risk if hazards are uncontrolled. Monitoring options include daily checks during processing to confirm that operations are carried out according to documented procedures.
15.8 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- information necessary to trace all purchases and sales of shellfish back to their growing area source;
- dates of shellfish harvesting, arrival at processing premises, shucking, packing and despatch;
- CCP records; and
- validation records

Refer to Part 2, Section 24 of this COP for record keeping requirements.
16 Control of Contamination of Seafood Products

16.1 Purpose and Scope

To ensure that contamination of Seafood Products is minimised and that Seafood Products is fit for its intended purpose.

16.2 Mandatory Requirements

16.2.1 AP Regs 9

All specified persons must ensure that animal material and animal product in their charge is processed in a manner that minimises the contamination or deterioration of the animal material or animal product.

16.2.2 AP Reg 11

All operators must establish and carry out effective procedures to:

a. ensure appropriate and adequate maintenance, cleaning and sanitation of processing premises, facilities, essential services, and equipment (including conveyances); and

b. manage waste; and

c. control pests.

16.2.3 HC Spec 20 (1):

For the purposes of this clause waste includes animal material and animal product which has been assessed by an examiner who meets the competency requirements of clause 25(1) (a), or an animal product officer, and has been adjudged unsuitable or unfit for any purpose, and is awaiting disposal.
16.2.4 HC Spec 20 (2)

Equipment, and storage areas, used to store or contain waste must —

a. be clearly identified; and

b. not be a source of contamination to other animal material or animal product.

16.2.5 HC Spec 20 (3)

Waste must be kept under controlled conditions until adequately identified in a manner that will ensure that it will not be mistakenly or fraudulently released as suitable for processing or fit for human consumption.

16.2.6 HC Spec 20 (4)

Waste must be disposed of by a method that ensures that it will not become a source of contamination to other animal material or animal product.

16.3 Procedures

16.3.1 Design and layout

16.3.1.1 The design and layout of the processing facilities and equipment in the premises must:

- facilitate separation between Seafood Products for human consumption and Seafood Products for animal consumption, and between raw and ready-to-eat (RTE) products and processes;

- facilitate the control of movement of personnel, raw materials and products, and equipment;

- facilitate effective cleaning and sanitation between handling Seafood Products for human consumption and Seafood Products for animal consumption, and between handling of raw and RTE products; and

- minimise cross contamination between Seafood Products for human consumption and Seafood Products for animal consumption, and between raw and RTE products.
16.3.2 Water contamination

16.3.2.1 The operator must document procedures for controlling contamination from water, including product wash water, thawing tank water, defrost water and condensate from refrigeration units.

16.3.2.2 All processing areas must be maintained and operated so that water from unclean sources does not drip or splash onto Seafood Products, Seafood Products contact surfaces or onto any other areas where Seafood Products could become contaminated. This includes:

- water from condensation;
- water used to clean floors, walls, or appliances;
- excess water used during processing (e.g. product wash water, thawing-tank water, defrost water); and
- non-potable water.

16.3.2.3 All Seafood Products processing areas must, as far as practicable, be kept free from steam and surplus water.

16.3.3 Equipment

16.3.3.1 The operator must document procedures for controlling the movement of equipment from areas processing Seafood Products for human consumption to areas processing Seafood Products for animal consumption within the premises. The procedures must cover the following:

- construction, maintenance and cleanliness of the equipment;
- designation of specific areas within the premises in which particular categories of equipment can be used; and
- conditions for use of equipment in the premises so as to minimise contamination of equipment and products.
16.3.3.2 Equipment (e.g. slicers, conveyors, packing machines, containers, trolleys), maintenance tools and utensils that are used in areas for processing Seafood Products for animal consumption must not be used for processing Seafood Products for human consumption. Similarly equipment that is used for processing raw products must not be used for processing RTE products. If this is not possible, the equipment, tools, and utensils must be thoroughly cleaned and sanitised before being used in human consumption and/or RTE areas or for processing human consumption and RTE products.

Colour coding may be used to identify portable equipment and utensils (e.g. containers, knives, cutting boards, slicers) for exclusive human/animal consumption Seafood Products or raw/RTE Seafood Products.

Particular consideration should be given to the type of processing operation in an area when appliances are moved from areas processing Seafood Products for human consumption to areas processing Seafood Products for animal consumption. Use of floor markings to define areas for particular types of equipment movement may be helpful.

Exporters should note that wood is not permitted in the processing rooms of ICSS-listed bivalve molluscan shellfish premises. This is a USFDA requirement. In other premises the operator should, wherever possible, exclude unprotected wood from all processing areas.

16.3.3.3 All hand-held equipment designated for use in processing areas, must be stored in a manner that protects it from contamination, when not in use.

16.3.3.4 Seafood Products containers that can be stacked and/or have drain holes must be placed above the floor (e.g. on metal gratings, or on metal or plastic surfaces raised off the floor) so as to minimise contamination.

Operators should identify “bottom bins” i.e. bins that are placed at the bottom of a stack on the floor, but that are not used to contain Seafood Products.

16.3.4 Material

16.3.4.1 The operator must document procedures for controlling the movement of material from areas processing Seafood Products for human consumption to areas
processing Seafood Products for animal consumption and for dealing with Seafood Products that is unfit for human consumption (e.g. dropped product procedures).

16.3.4.2 Any exposed Seafood Products for human consumption that is moved into or through any non-processing area must at all times be contained and covered, to minimise contamination.

16.3.4.3 Waste or Seafood Products for animal consumption that are moved through any processing area must be handled in a manner that minimises contamination of Seafood Products for human consumption.

16.3.4.4 No parts of a Seafood Products premises used for the processing, packing, handling, holding or storing of Seafood Products for human consumption may be used for the processing, packing, handling, holding or storage of Seafood Products not fit for human consumption. Material derived from normal processing (e.g. fish offal, fish heads) and intended for processing for animal consumption or for disposal as waste, may be temporarily held in a processing area until removal for further processing or disposal.

16.3.4.5 Seafood Products intended for use as bait or for the manufacture of pet food may be stored in the same room as packaged Seafood Products intended for human consumption ONLY if it is enclosed in containers and if the risk of contamination is minimised.

16.3.4.6 Outside waste bins must have lids or covers.

16.3.5 Movement of Personnel

16.3.5.1 Personnel who work in raw Seafood Products areas must change their protective clothing before entering areas where ready-to-eat Seafood Products is produced.

16.3.5.2 Personnel assigned to work in areas where materials for animal consumption (e.g. heads, frames) or waste are handled must wear some form of identification to distinguish them from other Seafood Products processors; and before
entering areas processing Seafood Products for human consumption, such personnel must:

- remove any contaminated outer clothing, footwear or protective coverings;
- thoroughly wash any exposed contaminated skin surfaces; and
- dress in clean protective clothing as described above.

16.3.6 Designated areas

16.3.6.1 The operator must document procedures for the use of designated areas that include the following:

- the name of the person responsible for the procedures;
- a description (or diagram) of the areas where protective clothing may be worn;
- the cleaning programme for the designated areas,
- instructions for staff on the use of designated areas and conduct in those areas so that contamination of protective clothing is minimised;
- the checks to be carried out to ensure that personnel comply with the procedures; and
- the records to be kept to demonstrate compliance with these requirements.

The purpose of designated areas is to allow workers to go outside the premises during breaks without having to change out of all protective clothing, as long as precautions are in place to minimise contamination.

Businesses producing high risk products (e.g. ready-to-eat Seafood Products) should consider the potential for contamination of these products and of the processing environment before allowing workers outside in protective clothing.

16.4 Monitoring

The responsible person must regularly check compliance to documented procedures.
The frequency and type of monitoring will depend on the nature of the operation and the degree of risk if hazards are uncontrolled. Monitoring options include daily checks to confirm that procedures such as water containment, waste management, and movement of appliances, materials, equipment and personnel are carried out correctly.

16.5 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- Daily check sheets
- Monitoring and corrective action records

Refer to Part 2, Section 24 of this COP for record keeping requirements.
17 Products for Animal Consumption

17.1 Purpose and Scope

To ensure that products for animal consumption derived from Seafood Products processing (also referred to in the Seafood Products industry as “excess materials”) are managed so as to minimise contamination of Seafood Products for human consumption and to ensure that the products are fit for their intended purpose.

This section does not cover “waste”, which is defined in the APA regulations as “without limitation, all solids, liquids, and gases that the operator intends to dispose of as being unwanted and that may become a source of contamination or attract pests”.

Some material resulting from the processing of Seafood Products product for human consumption may be sold as bait. Under the Animal Products Act, bait is not considered to be material for animal consumption. Bait is often treated as product for human consumption up until the point of labelling. For example an operator may include production of fish heads within the scope of their RMP with 10% of these labelled and sold for human consumption, while the remainder, which have gone through identical processing, are deemed bait and labelled as inedible.

Operators should ensure that bait products likely to be re-introduced into the food chain are protected from bacterial contamination and growth.

Despite being destined for inedible use, bait should be handled and processed in a hygienic manner with as little delay as possible to prevent spoilage.
17.2 Mandatory requirements:

17.2.1 HC Spec 19(1)

Equipment or storage areas used to store or contain animal material that is not suitable for processing or animal product that is not fit for human consumption, but is suitable or fit for some other purpose, must —

   a. be clearly identified; and

   b. not be a source of contamination to other animal material or animal product that is intended for human consumption.

17.2.1.1 HC Spec 19 (2)

Animal material or animal product that is not suitable for processing or not fit for human consumption but is suitable or fit for some other purpose, must be kept under controlled conditions until adequately identified in a manner that will ensure that it will not be mistakenly or fraudulently released as suitable for processing or fit for human consumption.

17.3 Procedures

17.3.1 The operator must:

   • establish criteria for deciding which materials are to be classified as products for animal consumption; and

   • document procedures to control the handling, storage and disposal of such materials.

17.3.2 All Seafood Products material destined for further processing into products for animal consumption must be handled so that it is in suitable condition for its intended purpose.

Excess fish material for transferral to a fishmeal plant must not be spoilt to such an extent that it becomes unfit for animal consumption.
17.3.3 Equipment used to handle, contain or store Seafood Products material for animal consumption must be clearly identified (e.g. by labelling, colour coding). The equipment must not be used for Seafood Products for human consumption.

17.3.4 Bins with drainage holes must not be used for storing Seafood Products material for animal consumption unless the bins are located close to a drain, so as to minimise any contamination of Seafood Products for human consumption or product contact surfaces caused by splash from bins onto Seafood Products for human consumption or product contact surfaces.
17.4 Monitoring

The responsible person must regularly check compliance to documented procedures.

The frequency and type of monitoring will depend on the nature of the operation and the degree of risk if hazards are uncontrolled. Monitoring options include daily checks to ensure that procedures for identifying and managing products intended for animal consumption are carried out correctly.

17.5 Records

The operator must keep relevant records giving information on monitoring and corrective actions.

Refer to Part 2, Section 24 of this COP for record keeping requirements.
18 Labelling

18.1 Purpose and Scope

To ensure that labelling on Seafood Products meets the relevant labelling requirements under the Animal Products Act 1999 and the Food Standards Code.

18.2 Seafood and Seafood Products

18.2.1 Mandatory Requirements

18.2.1.1 HC Spec 32

1. This clause applies to transportation outers, but does not apply to the labelling of bulk transportation units.

2. This clause applies to animal material or product, once received by the primary processor but does not apply to animal material and product that is transferred within New Zealand between sites of a single company, subsidiaries of a parent company, or between subsidiaries of a parent company and the parent company, prior to the completion of processing, provided the operator has documented systems to ensure that traceability is maintained.

3. Labelling must be provided on transportation outers and must state:
   a. the product name or description;
   b. storage directions, where necessary to maintain the product as suitable for processing or as fit for intended purpose;
   c. lot identification (except that this requirement is optional if the application of lot identification to the retail packaging is a mandatory requirement under other legislation and that legislation is complied with); and
d. the scientific name of the fish (as specified in Schedule 4 or as approved by the Director-General); or

e. in the case of minced fish, surimi, reformed fish, or multi-ingredient fish products that have undergone further processing, the scientific name, either on the label of the transportation outer or on the accompanying documentation.

f. in the case of shucked paua that is intended for canning and is held at temperatures not exceeding 6°C, that the paua is for canning only in New Zealand.

4. Mandatory labelling must be clear, legible, indelible, and use terms that are commonly used in the English language or other language approved by the Director-General.

5. The label of the transportation outer, or accompanying documentation, of any product that is not intended for human consumption but has the appearance of, or could be mistaken for, animal material or animal product that is intended for human consumption, must clearly indicate that the product it contains is not intended for human consumption.

18.2.1.2 HC Spec 32 A

Transportation units used for the transportation of unpackaged bulk animal material or animal product that cannot practicably be labelled, must have the information specified in subclause 32(3) provided with the product or on the accompanying documentation.

18.2.1.3 HC Spec 32 B (1)

If the status of an animal material’s suitability for processing, or animal product’s fitness for intended purpose changes, and the animal material or product has been identified, all affected labelling or the accompanying documentation (where there is no label) must be amended to reflect its new status prior to its release for trade, or the packaging (including labelling) must be replaced.

18.2.1.4 HC Spec 32B (2)

If animal material or product is downgraded and is no longer intended to be traded for human consumption, any labelling on the transportation outer, accompanying documentation, inspection legends and any other identification of product as being suitable for human consumption must be removed or defaced at the consigning premises.
18.2.1.5 HC Spec 32B (3)

Any false or misleading labelling on reused or recycled packaging resulting from previous uses must be removed or defaced at the consigning premises.

18.2.1.6 Australia New Zealand Food Standards Code Part 1.2

This document contains information relating to mandatory labelling requirements for compliance with New Zealand Standards.

18.2.2 Procedures

18.2.2.1 The operator must develop labelling procedures to ensure that all information printed on a label or on packaging is correct and accurate, and that the correct label is applied to the appropriate product.

These objectives are particularly relevant to any foreign language label that may be applied at the request of an overseas market. While OMAR requirements (which are not specifically part of an RMP) deal with such labelling matters, operators should consider translating any such labels so that they are clear about statements made on these labels.

For exported Seafood Products, every container must be labelled with any information required by the country to which the Seafood Products is to be exported. This may include a requirement for the label to be in the language commonly used in the destination country.

For further information on labelling requirements for overseas countries see Information for Exporters on the NZFSA website.

18.2.2.2 Labelling on containers of Seafood Products must not contain any false or misleading statements, words, pictures or marks.

Documentation required by the Ministry of Fisheries may provide a simple means of meeting labelling requirements, as long as operators add storage conditions to these or label the containers.
18.2.2.3 Labelling is not required for:

- shipping containers; or
- an interior wrapper that is intended to facilitate packing and is not intended to serve as the sole container of the contents of a package; or
- any transparent wrapping material that has no label and encloses another container.

18.3 Bivalve Molluscan Shellfish and Bivalve Molluscan Shellfish Products

18.3.1 Mandatory Requirements

18.3.1.1 HC Spec 139 (1)

Containers of shellfish leaving the processing premises must be labelled with:

a. the growing area lease, licence, resource consent, or permit number; and
b. the date of harvest; and
c. the type and quantity (number or weight) of shellfish.

18.3.1.2 HC Spec 139 (2)

However, a lot number labelling system may be used to replace the requirements of subclause (1) (a) and (1) (b), if adequate traceback to the specific harvest dates and harvest areas provided in the risk management programme.

18.3.1.3 HC Spec 139(3)

If reshipping (the purchase and resale of shellfish without repacking) occurs –

a. the original labels on shucked shellfish and shellstock must be maintained on the product containers; and
b. the labelling information must not be altered or removed, nor the product mixed with other shellfish, resorted, or repackaged; and
c. the name of the operator responsible for reshipping must be added to the container.
18.4 Monitoring

The responsible person must regularly check ongoing compliance to documented procedures.

The frequency and type of monitoring will depend on the nature of the operation and the degree of risk if hazards are uncontrolled. Monitoring options include:

- daily labelling checks on specified products;
- checks on new labels at the design phase to ensure they are accurate, comply with regulations and are not misleading.

18.5 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- Copies of labels that have been checked and comply with requirements;
- label checklists.

Refer to Part 2, Section 24 of this COP for record keeping requirements.
19 Refrigeration and Storage of Seafood Products

Amendment 0
August 2007

19.1 Purpose and Scope

To ensure that all Seafood Products is refrigerated and stored under appropriate conditions so that it remains fit for its intended purpose.

19.2 Mandatory Requirements

19.2.1 HC Spec 104 (1)

Any chilling or freezing must be conducted without unnecessary delay and in a manner that minimises any potential microbial proliferation, and contamination of the fish.

19.2.2 HC Spec 104 (2)

Fish (other than live fish) that is preserved primarily by refrigeration must be reduced to the maximum chilled or frozen temperatures specified in the table below prior to release from any primary processing premises.

<table>
<thead>
<tr>
<th>Product type</th>
<th>Chilling / Freezing temperature</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shucked paua intended for canning in New Zealand</td>
<td>6°C</td>
</tr>
<tr>
<td>Chilled whole fish</td>
<td>-1°C to 1°C</td>
</tr>
<tr>
<td>Chilled fish product</td>
<td>-1°C to 4°C</td>
</tr>
<tr>
<td>Frozen fish or fish product (including shellfish)</td>
<td>-18 °C</td>
</tr>
<tr>
<td>Brine frozen fish</td>
<td>-15 °C</td>
</tr>
</tbody>
</table>
19.2.3 HC Spec 104 (3)

HC Spec 104 (2) does not apply if the further processing or transportation of the animal material or animal product is documented in a registered risk management programme or approved food safety programme, so that the relevant risk factors are managed.

19.2.4 HC Spec 104 (4)

If the documentation as described in subclause 93) forms part of another risk management programme or a food safety programme, the consigning operator must ensure that —

a. the operator of the receiving programme is identified in the consigning operator’s risk management programme; and

b. there is no gap in the process documentation as the animal material or animal product is transferred between programmes; and

c. all relevant programmes are registered or approved prior to the commencement of the operation.

19.2.5 HC Spec 104 (5)

A brief temperature fluctuation up to a maximum temperature of -15°C during transportation is permitted for any frozen fish. However, the temperature must be reduced to -18°C or colder without unnecessary delay.

19.2.6 HC Spec 104 (6)

Shucked paua must not be held at greater than 1 degree C for more than 3 days.

19.2.7 HC Spec 136 (7)

The temperature of shucked shellfish must be reduced to 4°C or less prior to leaving the premises and the temperature must be maintained during transport and storage.

19.2.8 HC Spec 136 (8)

The temperature of chilled live shellfish must be reduced to 10°C or less prior to leaving the premises and the temperature must be maintained during transport and storage.
19.2.9 HC Spec 136 (9)

Shellfish destined for the domestic market may leave the premises when the temperature is greater than 10°C, if they are stored in the premises for less than 12 hours and are maintained under temperature control at all times while in the premises.

19.2.10 HC Spec 136 (10)

Shellfish that are to be frozen must be arranged to ensure rapid freezing and must be frozen at a temperature of -18 °C or colder, with shellfish frozen solid within 12 hours from the start of the freezing process. Frozen shellfish must be held at -18 °C or colder during storage and transport.

19.3 Procedures

19.3.1 The operator must provide refrigeration facilities that are capable of achieving the outcomes listed below:

- rapid chilling of fish and fish products received at the premises to 1°C and holding the chilled fish and fish products at this temperature;

- rapid chilling of fish and fish products produced on the premises to 1°C and holding the fish and fish products between -1°C and +4°C;

- rapid freezing of fish and fish products produced on the premises to -18°C or colder; and

- maintaining frozen fish and fish products produced or stored on the premises at -18°C or colder.

Chillers may also be used for tempering product and for short term storage during processing. In such cases, there is no requirement to hold the product at 1°C.
19.3.2 Equipment for the control and monitoring of temperatures and other parameters (e.g. airflow) must be operating at all times while refrigeration facilities are in use.

19.3.3 Condensation drip on to Seafood Products or equipment must be minimised.

19.3.4 Products that may taint or contaminate other Seafood Products must be kept separately, or be prevented, by other effective means, from contaminating Seafood Products.

Seafood Products may be stored with other foods, provided the other foods are adequately enclosed in containers and handled in such a way that the Seafood Products is not contaminated.

19.3.5 Seafood Products materials that are intended for use as bait or for animal consumption must be stored separately from Seafood Products intended for human consumption, unless measures are put in place to minimise contamination.

19.3.6 Packed products, raw materials, packaging and other materials should be stored off the floor (e.g. on clean pallets).

19.4 Monitoring

The responsible person must regularly check ongoing compliance to documented procedures.

The frequency and type of monitoring will depend on the nature of the operation and the degree of risk if hazards are uncontrolled. Monitoring options include:

- Daily checks of refrigerated products and storage areas to confirm that storage temperature requirements are met.

- Checks of all storage areas to confirm that products are stored to minimise contamination.
19.5 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- temperature monitoring and corrective action records; and
- inventories.

Refer to Part 2, Section 24 of this COP for record keeping requirements
20 Transport

20.1 Purpose and Scope

To ensure all Seafood Products is transported in a manner that minimises contamination and ensures that it is fit for purpose.

20.2 Sources of Hazards

<table>
<thead>
<tr>
<th>Source</th>
<th>Examples of Hazards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transportation units &amp; loading equipment</td>
<td>Pathogens e.g. Bacterial pathogens (e.g. <em>E. coli</em> spp., <em>Salmonella</em> spp., <em>Listeria</em> spp.)</td>
</tr>
<tr>
<td></td>
<td>Chemical pollutants, oil, grease, dust</td>
</tr>
<tr>
<td></td>
<td>Physical objects (e.g. metal, plastic)</td>
</tr>
<tr>
<td>Personnel</td>
<td>Bacterial pathogens (e.g. <em>E. coli</em> spp., <em>Salmonella</em> spp.)</td>
</tr>
<tr>
<td>Other materials transported in the same vehicle</td>
<td>Bacterial pathogens (e.g. <em>E. coli</em> spp., <em>Salmonella</em> spp., <em>Listeria</em> spp.)</td>
</tr>
<tr>
<td></td>
<td>Viruses</td>
</tr>
</tbody>
</table>

20.3 Mandatory Requirements

20.3.1 HC Spec 143

This part (i.e. HC Specs 144 to 147) applies to transport operators who are transporting animal material during primary processing or animal product between –

a. premises or places operating under risk management programmes; or

b. premises or places operating under risk management programmes and premises operating under the Meat Act –
but does not apply to transport operators transporting live animals to the primary processor.

20.3.2 HC Spec 144

1. Transportation units and loading equipment must be designed, constructed, equipped and operated to maintain the status of the animal material as suitable for processing or the animal product as fit for intended purpose and to minimise hazards and other risk factors.

2. Transportation units must be constructed from materials that will maintain animal material as suitable for processing or animal product as fit for intended purpose.

3. If the transportation unit provides the means by which animal material or product is refrigerated, the unit must be designed, constructed and equipped to ensure that the specified temperatures are achieved and maintained throughout transportation.

4. Temperature measuring devices used to measure critical temperatures must be calibrated and located to measure the internal temperature of the transportation unit at the warmest point.

20.3.3 HC Spec 145

1. The hygiene and maintenance of the transportation unit and loading equipment must be such that contamination and deterioration of animal material and product is minimised.

Hygiene and behaviour of persons involved in transportation of animal material or product must be such that contamination and deterioration of animal material and product from this source is minimised.

2. The transport operator must take reasonable measures to ensure that exposed animal material or product is not handled by any person who is -
   a. infected with, or a carrier of, an infectious disease in a communicable form as described in Section A, Part 1, of the First Schedule of the Health Act 1956, that is likely to be transmitted through animal material, animal product or associated things; or
   b. suffering from acute respiratory infection; or
   c. suffering from boils, sores, infected wounds, or any other condition that cannot be adequately prevented from becoming a source of contamination.
20.3.4 HC Spec 146

1. Animal material or product that is conveyed together with any other animal material or product or any other thing that may be a source of contamination must be adequately separated from the source of contamination unless adequately protected in a manner that prevents cross-contamination.

2. Evidence of the maintenance of the preservation temperature, (if required) during transportation, must be available for verification to ensure that suitability for processing of the animal material or fitness for intended purpose of the product is maintained.

3. Determination of animal material or product temperature and the taking of any samples must be carried out in such a manner that contamination of that animal material or product is minimised.

4. Refrigerated animal material or product must not be accepted from the primary processor for transportation until the preservation temperature has been met, as specified in either:
   
   a. the Act or the Food Act 1981; or
   
   b. the registered risk management programme or the programme operating under the Meat Act.

5. The transport operator must have a documented contingency plan to deal with any failure to maintain preservation temperature during transportation that may affect suitability for processing of the animal material or fitness for intended purpose of the animal product, including:
   
   a. immediate notification of the person who has responsibility for the animal material or product; and
   
   b. actions to prevent recurrence.

6. The transport operator must ensure that persons transporting animal material or product are aware of the relevant specifications and are adequately trained.
20.3.5 HC Spec 147

The transport operator must comply with the records requirements of clause 34(2).

20.3.6 HC Spec 136 (8)

The temperature of chilled live bivalve molluscan shellfish must be reduced to 10°C or less prior to leaving the premises and the temperature must be maintained during transport and storage.

20.3.7 HC Spec 104 (5)

A brief temperature fluctuation up to a maximum temperature of -15°C during transportation is permitted for any frozen fish. However, the temperature must be reduced to -18°C or colder without unnecessary delay.

This specification allows for minor temperature changes during loading and unloading, short distance trips (e.g. processing premises to a neighbouring cold store) or unforeseen situations (e.g. mechanical breakdown), when a brief temperature increase in the Seafood Products may occur.

20.4 Procedures

20.4.1 Transport included in operator’s RMP

20.4.1.1 RMP operators who use their own vehicles for the transport of Seafood Products within the scope of their RMP are responsible for complying with all the requirements of HC specifications 143 to 147 quoted in section 20.3 above.

20.4.1.2 The operator must ensure that, before loading, the vehicle or shipping container used to transport Seafood Products is clean and free from odours, chemicals or other residues. Procedures for cleaning vehicles and containers used by the operator to transport Seafood Products must be documented in the RMP. Refer Part 2, Section 5 of this COP.
20.4.2 Transport NOT included in operator's RMP

20.4.2.1 Transport operators who provide vehicles for the transport of Seafood Products under contract to RMP operators are responsible for complying with all the requirements of HC specifications 143 to 147 quoted in section 20.3 above.

20.4.2.2 RMP operators must ensure that contracted vehicles used for the transport of Seafood Products are in a suitable condition to minimise contamination.

RMP operators who use contracted transport operators to transport Seafood Products from their premises should set up supplier agreements with these transport operators, as well as procedures for auditing the transport operator’s compliance with the terms of the agreement and with relevant HC specifications.

20.4.2.3 Where vehicle and container cleaning is the responsibility of the contracted transporter, the RMP operator must verify the state of cleanliness of each vehicle and of all containers prior to their use.

Operators should develop guidelines for staff on how to manage situations where they are confronted with a dirty vehicle or container. The guidelines should include advice on how to ensure that the vehicle or container is cleaned or sanitised as necessary, at an appropriate site.

20.4.3 Transport of fish to primary processor

20.4.3.1 Live fish (other than molluscan bivalve shellfish), and paua that are intended for canning in New Zealand, must be transported in cool conditions and protected from sun and wind, so that they are alive and undamaged on arrival at the processing premises.

20.4.3.2 All other fish must be:

- subjected to chilling or freezing from the time of catching to the time of arrival at the fish premises; and
- transported in clean containers and in a manner that minimises contamination.
20.4.4 Transport of bivalve molluscan shellfish to primary processor

For requirements for transport of bivalve molluscan shellfish from harvest to receipt at the primary processor, refer to Part 12 of the Animal Products (Specifications for Bivalve Molluscan Shellfish) Notice.

Operators who transport Seafood Products destined for export must also meet criteria in TD 02/107.

20.5 Monitoring

The responsible person must regularly check ongoing compliance to documented procedures.

The frequency and type of monitoring will depend on the nature of the operation and the degree of risk if hazards are uncontrolled. Monitoring options include:

- Checks of transport vehicles to confirm they are in a condition that minimises contamination of the Seafood Products.
- Temperature checks on refrigerated vehicles.

20.6 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- load-out checks;
- container / vehicle checks;
- cleaning checks
- CATR checks; and
- calibration records.

Refer to Part 2, Section 24 of this COP for record keeping requirements.
21 Handling, Disposition and Recall of Non-complying Products

Amendment 0
August 2007

21.1 Purpose and Scope

To ensure a system is in place for the handling, disposition and recall from distribution or sale, of Seafood Products that is not fit for intended purpose.

21.2 Mandatory Requirements

21.2.1 RMP Spec 12

1. Where, due to the nature of the animal material or animal product, it is possible to recall it from trade, distribution or from consumers, the operator must document a recall procedure, including—
   a. the criteria for deciding when a recall will be initiated; and
   b. how retrieval and disposition of the relevant animal material or animal product will be managed.

2. The operator must document a system for notifying the following people as soon as possible when animal material or animal product is recalled from trade, distribution or from consumers because it is not or may not be suitable for processing or fit for its intended purpose —
   a. the Director-General; and
   b. the accredited risk management programme verifier or recognised risk management programme verifying agency.
21.3 Procedures

21.3.1 Non-complying product must be:

- clearly identified and segregated from other products;
- assessed by a competent person for appropriate method of disposition; and
- included in the inventory.

21.3.2 Operators must designate a person to take overall responsibility for any recall of Seafood Products and allocate recall tasks to appropriately skilled people.

The person with overall responsibility may be the Day to Day Manager of the RMP or a person at a senior level of responsibility within the operation.

21.3.3 For more detailed information on establishing and implementing recall procedures, refer to the following:

- Recalls section of the RMP Manual;
- Recalls page on the NZFSA web site;
- Guidelines for Seafood Recall Programmes.

21.3.4 After a recall the recall plan must be reviewed and, if necessary, updated.

21.3.5 When Seafood Products is found to be non-complying but the decision is made not to carry out a recall, the operator must notify the recognised Risk Management Programme Verifier as soon as possible.
21.4 Monitoring

The responsible person must regularly check ongoing compliance with documented procedures.

Following a recall, the operator should review the procedures to determine their effectiveness and to make changes if necessary.

21.5 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- inventory;
- incident reports; and
- recall records.

Refer to Part 2, Section 24 of this COP for record keeping requirements.
22 Traceability and Inventory Control

Amendment 0
August 2007

22.1 Purpose and Scope

To ensure that procedures are in place to manage traceability and inventory control of Seafood Products.

22.2 Mandatory Requirements

22.2.1 AP Reg 18 (1)

All operators of risk management programmes, all exporters, and all other categories of person required by specifications to do so, must have a tracking system that –

a. allows for the identification of animal material and animal product; and

b. enables the movement of the animal material or animal product to be traced –

i. where required by specifications, from the origin, through the supplier and the operator’s business premises to the next recipient of the animal material or product; or

ii. where specifications do not require tracing from origin, from the supplier and the operator’s business premises to the next recipient of the animal material or product.

22.2.2 HC Spec 34 (3)

An inventory control programme must be documented for animal material and product and records maintained.
22.3 Procedures

22.3.1 The operator must document procedures for the identification of raw materials and products, including imported Seafood Products, that will allow any finished Seafood Products to be traced:

- back to the supplier of the Seafood Products and other raw materials; and
- to the next person or company that the Seafood Products is transferred to for further processing, packing, storage; distribution or sale.

22.3.2 All outgoing products must be clearly identified and accompanied by appropriate documentation.

22.3.3 Inventories must be maintained for all raw materials, including ingredients and additives, and finished products (including imported fish and fish products) and for any non-complying materials and products.

See the following table for an example of an inventory system.
NB: GUIDANCE MATERIAL ONLY - An example of an Inventory System

<table>
<thead>
<tr>
<th>Process Step</th>
<th>Inventory Records</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reception records</td>
<td>(a) Product received from</td>
<td>Reception Check Sheets, Unloading Documentation</td>
</tr>
<tr>
<td></td>
<td>catching vessel</td>
<td>Record date, vessel name, fish species, and quantity.</td>
</tr>
<tr>
<td></td>
<td>(b) Product received from</td>
<td>Purchasing Records</td>
</tr>
<tr>
<td></td>
<td>other premises in NZ – fresh</td>
<td>Details of product received.</td>
</tr>
<tr>
<td></td>
<td>or frozen</td>
<td></td>
</tr>
<tr>
<td>Processing Records</td>
<td>Reception, weighing &amp; grading</td>
<td>Reception Check Sheets, Unloading Dockets, Weigh Sheets</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Date received, weight, species, temperature, CATR recordings</td>
</tr>
<tr>
<td></td>
<td>Processing</td>
<td>Production Records</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Production lot ID, pack date, amount of product</td>
</tr>
<tr>
<td>Cold Store Inventory</td>
<td>Frozen Storage</td>
<td>Store Records</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Product ID, amount of product</td>
</tr>
<tr>
<td>Dispatch Records</td>
<td>Dispatch</td>
<td>Sales records</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Date, customer, product ID, pack date, amount of product</td>
</tr>
<tr>
<td>Non-compliance records</td>
<td>Returns, recalls</td>
<td>Non-conforming Products Register</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Recall records</td>
</tr>
</tbody>
</table>

For further detail related to exported Seafood Products, please refer to the Official Assurances Programme, especially the export requirements for inventory records, and to OMARS covering the countries targeted for export.

22.4 Monitoring

The responsible person must regularly check ongoing compliance with documented procedures.

The operator should check, at least annually, that the documented procedures are appropriate.
22.5 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- Inventories

Refer to Part 2, Section 24 of this COP for record keeping requirements.
23 Operator Verification and Other Operational Requirements

23.1 Purpose and Scope

To verify compliance to documented procedures and to confirm the appropriateness and effectiveness of the documented RMP by ensuring that operator verification, including internal audits, are undertaken at the required frequencies.

To ensure that other operational requirements are met by the operator.

23.2 Mandatory Requirements

23.2.1 RMP spec 11 (2) (d) (iv)

The operator must document sufficient procedures to cover any corrective action procedures to be applied when loss of control is due to unforeseen circumstances for which no specific corrective action is documented. These procedures must include nomination of a suitably skilled person to manage the corrective action, recording of the issue and corrective actions taken, and reporting of such matters to the recognised risk management programme verifier without delay.

23.2.2 RMP spec 14

The operator must document a an operator verification system including -

a. the activities to be performed, and their frequency; and
b. any actions to be taken when all or part of the risk management programme is not effective; and
c. any recording and reporting requirements.
23.2.3 RMP spec 25

The operator must notify the Director-General in writing, without unnecessary delay, of any change to the name or position or designation of the person(s) responsible for the day-to-day management of the risk management programme.

23.2.4 RMP Spec 26

The operator must document procedures for notifying the Director-General of any emerging, new or exotic biological hazards or new chemical hazards that come to the operator's attention in relation to the risk management programme without unnecessary delay.

23.2.5 RMP Spec 27

The operator must document procedures for notifying the recognised risk management programme verifying agency in writing, without unnecessary delay, of the following issues relating to the operation of the risk management programme —

a. any significant concern about suitability for processing of animal material or fitness for intended purpose of animal product:

b. where the cumulative effect of minor amendments necessitates the registration of a significant amendment to the risk management programme as provided in section 25 of the Act:

c. where the risk management programme is considered to be no longer effective;

d. where the premises are not or no longer suitable for their use;

e. where anything within the physical boundaries of the risk management programme is used for additional purposes or by other operators and the risk management programme has not adequately considered relevant hazards or other risk factors.

23.2.6 HC Spec 119A

All laboratories performing analyses to confirm compliance with clauses 120-139 must have International Accreditation New Zealand (IANZ) accreditation for the methods prescribed, or have written approval from the Director-General.
23.2.7 HC Spec 142

All laboratories performing analyses for *Listeria monocytogenes* must have International Accreditation New Zealand (IANZ) accreditation for the analysis of *Listeria monocytogenes* in food in accordance with one of the test methods identified in a laboratory scheme established by the Director-General.

23.3 Procedures

23.3.1 Scope and frequency of internal audit

23.3.1.1 Internal audits must be undertaken by the person responsible at a frequency sufficient to ensure compliance with the documented RMP, including GOP and process control procedures, and to enable prompt identification and correction of any problems.

23.3.1.2 A review of the RMP must be undertaken at least annually.

The review of the entire RMP may be undertaken as a single operation or it may be staggered throughout the year based on an established timetable (e.g. review specified parts of the RMP each month).

23.3.1.3 The RMP must also be reviewed when:

- significant changes are made to the product, process or premises; or
- the RMP or parts of it are not working effectively.

Indications that the RMP or parts of it are not working effectively include:

- a series or trend of non-compliance or out of specification product test results;
- customer complaints;
- product recall;
- failed external verification audit.
23.3.2 Audit procedures

23.3.2.1 The operator must keep records of observations made during the internal audit, as well as of any corrective actions taken.
(a) Operators should first review their procedures and systems to ensure that these systems are in compliance with regulatory requirements; then check that the systems are being followed.

(b) Internal audits should consist of a review of records, reality checks, and confirmation that deficiencies or non-compliances identified from the last audit have been rectified.

(c) Records should be reviewed for:
- completeness and accuracy of required information;
- documentation of corrective actions;
- any trends, new hazards, recurring problems; and
- compliance with documented control procedures.

(d) Reality checks should include observation of:
- workers' performance and compliance with documented hygienic procedures and operating procedures;
- compliance with process parameters such as processing times and temperatures; and
- hygienic status of the premises internal and external environment, facilities and equipment.

(e) All deficiencies found at previous audits should be followed up.

(f) When operator verification includes audit of monitoring and corrective action records, the operator should sign the records or otherwise indicate that they have been subject to internal audit.

23.3.2.2 When ongoing or recurring non-compliances occur, the operator must:

- investigate to determine possible causes of non-compliance;
- take appropriate corrective actions to regain control and prevent recurrence of the problem;
- increase surveillance of the system; and
- review the RMP or the relevant GOP programme and make necessary changes.
23.3.3 Amendments to the RMP

23.3.3.1 Significant amendments to the RMP must be evaluated and registered.

23.3.3.2 When the operator determines that an amendment is not significant, changes may be made at any time to update the RMP document(s).

Guidelines for determining significant amendments and for deciding whether an amendment is significant or minor are documented in Appendix G of the NZFSA RMP Manual. The Manual also provides examples of significant and minor amendments. If there is still some doubt as to whether proposed changes are significant or not, you should contact an RMP evaluator or the NZFSA RMP Help Desk.

The document control procedure may also allow for small changes to be made by hand. In such cases, the nominated person should sign and date the changes to indicate they are legitimate. This may occur at the time of annual review or more often as required.

23.3.4 Notification procedures

23.3.4.1 The day-to-day manager of the RMP must contact the NZFSA without delay when it is necessary to notify the Director-General for reasons specified in RMP Specs 25 and 26.

Such notifications should be sent to the Programme Manager, Production and Processing, Approvals and ACVM Standards.

23.3.4.2 The day-to-day manager of the RMP must notify the recognised risk management programme verifying agency in writing (e.g. by email or letter), as required by, and for reasons specified in, RMP Spec 27 and RMP spec 11 (2) (d) (iv).

23.4 Monitoring

The responsible person must regularly check ongoing compliance with documented procedures.
23.5 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- operator verification records;
- internal audit reports;
- RMP review records; and
- copies of any communication sent to the NZFSA or the recognised RMP verifying agency

Refer to Part 2, Section 24 of this COP for record keeping requirements.
24 Document Control and Record Keeping

Amendment 0
August 2007

24.1 Purpose and Scope

To ensure that all RMP documents, including records, are managed under a document control system that meets the requirements of the Animal Products Act 1999.

24.2 Mandatory Requirements

24.2.1 RMP Spec 16 (1)

Every document or part of a document that forms part of a risk management programme must be -

a. legible; and

b. dated or marked to identify its version; and

c. authorised prior to use, either directly or within the document control system, by —

i. the operator, or

ii. the day-to-day manager of the programme, or

iii. a person nominated to do so in the programme’s document control system; and

d. available when required to any person with responsibilities under the programme.

24.2.2 RMP Spec 16 (2)

The operator must document the procedures for effective document control of the documents that form the risk management programme including how —

a. significant and minor amendments are made to the risk management programme so that the programme is current and reflects the actual operation;
b. the amendments, or the nature of the amendments to the programme are identified or described; and

c. documents are authorised prior to issue and use; and

d. all amended parts of the risk management programme are replaced with the current versions at all distribution points without unnecessary delay after authorisation and, where necessary, registration in accordance with section 25 of the Act.

24.2.3 RMP Spec 16 (3)

The operator must retain for four years, one copy of all obsolete documents from a registered risk management programme in a manner that protects the documents from damage, deterioration or loss, and prevents confusion with current documents.

24.2.4 RMP Spec 16 (4)

The operator must ensure that the registered risk management programme and all reference material relating to the risk management programme, and any archived documents are readily accessible, or can be retrieved and made available within two working days of any request to:

a. accredited persons; and

b. animal product officers; and

c. the Director-General; and

d. persons authorised by the Director-General.

24.2.5 RMP spec 17 (1)

The operator must include record keeping procedures in the risk management programme to ensure that all records necessary to demonstrate compliance with the documented programme are legible, stored for four years in a manner which protects the records from damage, deterioration or loss and can be retrieved and made available to persons defined in clause 17(3) within two working days of any request.
24.2.6 RMP Spec 17 (2)

Records relating to the risk management programme’s monitoring, corrective action and operator verification activities must include —

- a. the date and time of the activity; and
- b. a description of the results of the activity; and
- c. a means to identify the person(s) who performed the activity.

24.2.7 RMP Spec 17 (3)

The operator must make all records relevant to the risk management programme available to the following persons as required —

- a. accredited persons; and
- b. animal product officers; and
- c. the Director-General; and
- d. persons authorised by the Director-General.

24.3 Procedures

24.3.1 Record keeping

24.3.1.1 All GOP and processing records must be kept, including inventories of raw materials and finished products.

24.3.1.2 Electronic records must be backed up and protected from corruption, damage or loss. The person entering the data must be identified according to systems developed for the protection of electronic records.
24.3.1.3 Records must:

- accurately reflect the observations made;
- facilitate verification; and
- be documented on permanent materials.

Consideration should be given to the durability of paper on which records are kept (pen does not write well on wet paper), and its suitability for storage (thermal papers can fade over time). Pencil is not suitable for recording information because it is easy to erase or alter.

24.3.1.4 Any alterations made to records must be made alongside the original entry and initialled by the person amending the record.

The use of white out products (such as Twink™) is not acceptable to auditors as it is not possible to see what the original entry was.

24.3.1.5 The manner in which the date and time are documented in the record must be appropriate to the activity being monitored. For some observations (e.g. process temperatures) the exact date and time must be recorded. However, for other observations (e.g. checking compliance with protective clothing requirements) a more general record over a specified time period may be acceptable.

24.3.2 Document Control

24.3.2.1 The operator must keep a register of all current RMP documents showing the current version and/or date of issue. This register must include the site plan and all record forms (e.g. blank check sheets used for monitoring and other operator verification activities).
It is common practice to include both the version number and date of issue of each RMP document. If more than one controlled copy of the RMP is issued, each set of documents should have additional identification showing the copy number. The operator should maintain a register of controlled copies showing who is responsible for each copy.

Authorisation of version control may be shown in several ways, including:
- signature & date on the cover page of each RMP document;
- initials & date in the header or footer of every page;
- signature & date on the document register.

24.3.2.2 Details of all amendments must be recorded in an amendment register.

The amendment register may be presented in a table with the following headings: document name or reference, details of amendment, reason for amendment, date of change, approved by.

24.3.2.3 Amendments to RMP documents must be clearly identified.

Options for identifying amendments include use of *italics*, [highlighting the amended text](highlight), or identifying the amended section(s) in the amendment register.

24.3.2.4 Electronic versions of RMP documents must be protected with an effective backup system.

Operators may wish to keep electronic copies off site in case of major loss.

24.4 Monitoring

The responsible person must regularly check ongoing compliance with documented procedures.

The operator should check, at least annually, that the documented procedures are appropriate.
24.5 Records

The operator must keep relevant records demonstrating compliance with documented procedures. These could include:

- list of documents; and
- amendment registers.

Refer to Part 2, Section 24 of this COP for record keeping requirements.