

# Animal Products - Official Devices Programme: Interim Requirements, and Guidance for Operator Seal use

## Animal Products (Export Requirements for Branding, Marking and Security Devices) Notice 2006

Date: 9 October 2006

### **1 Background**

1.1 The Animal Products (Export Requirements for Branding and Security Devices) Notice 2006 (referred to in this document as 'the notice') is the first stage in the transfer of export branding and sealing requirements from Meat Act publications to Animal Products Act 1999 provisions.

1.2 The notice establishes the legal foundation on which controls and procedures will be based. The notice establishes certain specific requirements (e.g. the use of official container seals on certain seafreight consignments) that affected operators must follow. It also puts in place more general principles that provide for control mechanisms to fit with local systems.

1.3 Some operator programmes or systems intended to address the general principles in the notice need to be accepted by the NZFSA as sufficiently meeting the requirements of the notice. To facilitate industry compliance in these situations, the NZFSA intends to publish an Official Devices Programme, which will constitute procedures that are generally acceptable to NZFSA. The programme will be written in consultation with affected industries.

## 2 Interim Programme

2.1 NZFSA regards compliance with [Manual 15: Approvals Brands – Inspection Legend Material – Container Seals](#) as meeting the needs of point 1.3 above on an interim basis until such time as the formal programme, based on industry consultation, can be published.

2.2 There are certain requirements in Manual 15 not intended to be carried forward into the final programme; they are either outdated or addressed in other specifications (e.g. the Brands and Associated Requirements Notice). Generally Part B2, 'Operational Use of MAF Devices – Brands' no longer applies; however the following sub-sections will continue to apply under the interim arrangement:

- i. sub-section 2.2.1 regarding the use of chocolate brown ink for branding purposes, and;
- ii. sub-section 2.4.2 regarding security of brands at export premises.

2.3 For the purposes of clarity, the Animal Products (Export Requirements for Branding, Marking and Security Devices) Notice 2006 overrides the Animal Products (Branding and Associated Requirements) Notice 2006 with respect to: carcasses being transferred between different RMPs under the same ownership. That is, all carcasses and part carcasses (e.g. beef quarters) leaving an RMP must be branded using an ink or hot brand as approved under the two notices mentioned in this paragraph. The export requirements permit non-branding in relation to carcasses that will be boned / cut on site.

2.4 The requirements of TD 00/41 'Control of Brands, Seals and Legend Bearing Packaging Materials in Export Establishments' continue to apply for relevant export production until similarly cancelled by the formal programme. With respect to verifier audits of carton seal reconciliations and legend material inventory at circuit premises: Except for EU listed operations, these may be conducted on the basis of a 2:1 ratio of desk-top audit to on-site audit.

2.5 Specific country export requirements are additional to, or in some cases supercede, the notice and any other general requirements or guidance.

### **3 Exemptions**

3.1 In accordance with clause 13 of the notice: Operator seals used with dairy export consignments that do not comply with the numbering format or the 3-year non-repetition requirements of the notice may continue to be used subject to:

- a. operators who use these seals not placing any further orders for non-compliant seals from the commencement date of the notice;
- b. operators immediately placing an order for seals that will be in compliance with the requirements of the notice;
- c. non-complying seals may be used until the operator has received and distributed complying seals to the various sites where container sealing takes place.
- d. failure to comply with the conditions of this exemption means operators / exporters must immediately start using compliant seals. In the absence of any compliant operator seals being available MAF seals must be used.

### **4 Operator Seals**

4.1 Compliant operator seals are seals with sequential alpha-numeric identification. The numbering of seals has 2 elements: the first characters of the seal number is the registered exporter or RMP identifier, or they uniquely reflect an element of the exporter or operator name, these characters are the identifying element of a seal number; the sequential element of a seal number must follow on from the identifying characters with no gap between the 2 elements, it may be entirely numeric or it may be alpha-numeric, provided the sequencing is obvious e.g. 0001 – 9999 or 111A, 111B...111Z, 112A, 112B...

4.2 Nothing in 4.1 prevents a group of operators electing to use seals with the same identifying element provided this element's uniqueness is as assured as using an exporter or operator ID, and the seals are distributed among the different operators in sequential lots.

4.3 Recognised agencies verifying operator seal use must be able to verify the unique nature of each operator seal numbering system. An inability to verify compliance with the

notice will necessitate use of MAF seals until a robust unique numbering system can be put in place by the operator or exporter. Where the exemption in section 3 is being used this paragraph does not come into effect until after the operator begins using compliant seals.

Authorised by:

(Signed)

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