

**CODE OF PRACTICE
FOR PETFOOD PROCESSING**

PART 1: INTRODUCTION

Notice of Copyright

© Crown Copyright Ministry of Agriculture and Forestry 1999 (for the New Zealand Food Safety Authority), publication date November 2001, protected under the Copyright Act 1994.

Important Disclaimer

This publication is not a legal interpretation of the Animal Products Act 1999 or the Animal Products (Ancillary and Transitional Provisions) Act 1999. Nor is it produced for the purpose of giving professional advice of any nature. While every effort has been made to ensure the information in this paper is accurate, the Crown, its employees and consultants do not accept any responsibility or liability whatsoever for any error of fact, omission, interpretation or opinion which may be present, however it may have occurred, nor for the consequences of any decision based on the information in this publication.

Without in any way limiting the above statement, the Crown, its employees and consultants expressly disclaim all and any liability to any person in respect of anything, and the consequences of anything, done or omitted to be done in reliance, whether wholly or partly, upon the whole or any part of the contents of this publication.

Review of Code of Practice

This Code of Practice will be reviewed, as necessary, by the NZFSA. The coordinator welcomes suggestions for alterations, deletions or additions to this document. Suggestions should be sent to the coordinator on the form on page P-3, together with reasons for the change and any relevant information.

The coordinator of this Code of Practice is:

Programme Manager (Byproducts)

Animal Products Group

NZ Food Safety Authority

P O Box 2835

Wellington

Telephone: 04 463 2500

Facsimile: 04 463 2643

Suggestions for Changes: COP for Petfood Processing, Part 1: Introduction

Name Organisation Address Email	
Phone	Facsimile
Section	Suggested improvements
Signature	Date
Please post to: Programme Manager (Byproducts) Animal Products Group NZ Food Safety Authority P O Box 2835 Wellington	Acknowledgement of receipt: Signature: Date:

Amendment Record

Amendments do not become part of this document until they have been authorised by the Director (Animal Products) and issued with an amendment form. Amendments will be given a consecutive number and dated. Amendments to the document can be identified by the version number in the page header. Please ensure that all amendments are inserted, obsolete pages are removed and the record below is completed.

Amendment No:	Date	Entered by:
0		
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		

Contents

	Page
Preliminaries:	
Notice of Copyright	P-2
Important Disclaimer	P-2
Review of the Code of Practice	P-2
Suggestions for Changes	P-3
Amendment Record	P-4
Contents	P-5
1. Purpose and Scope of the Code of Practice	1
2. Requirements of the Animal Products Act 1999	2
3. Risk Management Programme	3
4. Hazard Analysis and Critical Control Point (HACCP)	6
5. Other Legislation	7
6. Sources of Other Information	8

1. Purpose and Scope of the Code of Practice

This Code of Practice has been developed by the New Zealand Food Safety Authority (NZFSA) in consultation with industry, the Ministry of Agriculture and Forestry and other relevant organisations. It has been endorsed by the Petfood Industry Standards Council as the code of practice for the New Zealand petfood industry.

This Code of Practice applies to the processing of petfood produced using animal material or product. Petfood is defined as edible material intended for consumption by animals, that themselves as the consumer, are not intended for the human food chain. Petfood includes edible materials fed to companion animals (e.g. cats, dogs), exotic pets (e.g. turtles, lizards) and zoo animals.

The Code of Practice is divided into several parts, each of which is a stand-alone document that cross references to other parts.

Part 1: Introduction

Part 1 gives an overview of the whole Code of Practice and the requirements of the Animal Products Act 1999. It provides links to other documents published by the NZFSA that are of relevance to petfood operators.

Part 2: Guidance on Good Hygiene Practices and Operating Procedures

Part 2 provides guidance on good hygiene practices, process outcomes, and processing procedures and their parameters. It is expected that there will be separate documents for specific processes and products (e.g. slaughter and dressing, thermal processing, drying).

The control measures indicated in Part 2 have been established based on the principles of Hazard Analysis and Critical Control Point (HACCP). Compliance with these control measures will assist operators meet the requirements of the Animal Products Act 1999, particularly the Specifications for Products Intended for Animal Consumption, and produce animal products that are fit for intended purpose.

Part 3: Hazard Analysis

Part 3 provides background information on hazards associated with petfood from scientific literature, results of industry surveys, and discussions with experts. It supports the scientific basis for the control measures given in Parts 2 and 4 of the Code of Practice. This information will also help operators in the assessment of hazards that may be associated with their own products and processes.

Part 4: Generic risk management programme (RMP) template or model

The generic RMP model is intended to assist petfood operators in the development of their own risk management programmes.

Part 5: Validation and verification guide

Part 5 provides guidance on validation and verification of an RMP or specific control measures.

2. Requirements of the Animal Products Act 1999

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

2.1 Risk management programmes

All primary and secondary processors of petfood (except for certain exemptions) are required to have a risk management programme covering their operations.

Primary processing includes the:

- presentation of healthy animals for slaughter;
- slaughter or killing of mammals or birds;
- dressing of mammals or birds that were slaughtered or killed as wild animals;
- chilling of the dressed carcass; and the
- production of any products or by-products intended for animal consumption as a result of the primary process.

Secondary processing covers further processing after chilling of the dressed carcass. This includes processes such as cutting and boning, packing, freezing, and thermal processing.

All existing petfood operators licensed under section 20(1)(b) of the Meat Act 1981 are required to operate under a registered risk management programme from 1 July 2005. Application for registration should be made at least three months before this date.

New businesses established after 20 November 2000 are required to have a risk management programme from start-up (i.e. they cannot operate unless they have a registered RMP).

2.2 Regulated control schemes

These are schemes imposed by the NZFSA to manage risks where risk management programmes would not be feasible or practicable, or it is needed to meet market access requirements. Examples of regulated control schemes are the Residue/contaminant Control Scheme and the Tb Control Scheme.

2.3 Exporter controls

Most exporters of animal material and products are required to register with the NZFSA. Exporters are responsible for exporting in accordance with the Act and, where appropriate, may be required to meet specified market access requirements of foreign governments which may be additional to the normal New Zealand standard. Duties of exporters are given in section 51 of the Act.

The *Guide for Exporters* discusses exporter requirements in more detail. This can be found on: www.nzfsa.govt.nz/animalproducts/publications/manualsguides/

3. Risk Management Programme

3.1 What is a risk management programme?

A risk management programme is a documented programme designed to identify and manage hazards and other risk factors in relation to the production and processing of animal material and animal products, in order to ensure that the resulting animal product is fit for intended purpose. The risk factors that need to be considered in the development of a risk management programme are:

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

An operator's registered risk management programme will be "legally binding" so it must be developed and implemented in accordance with relevant New Zealand legislation. Overseas

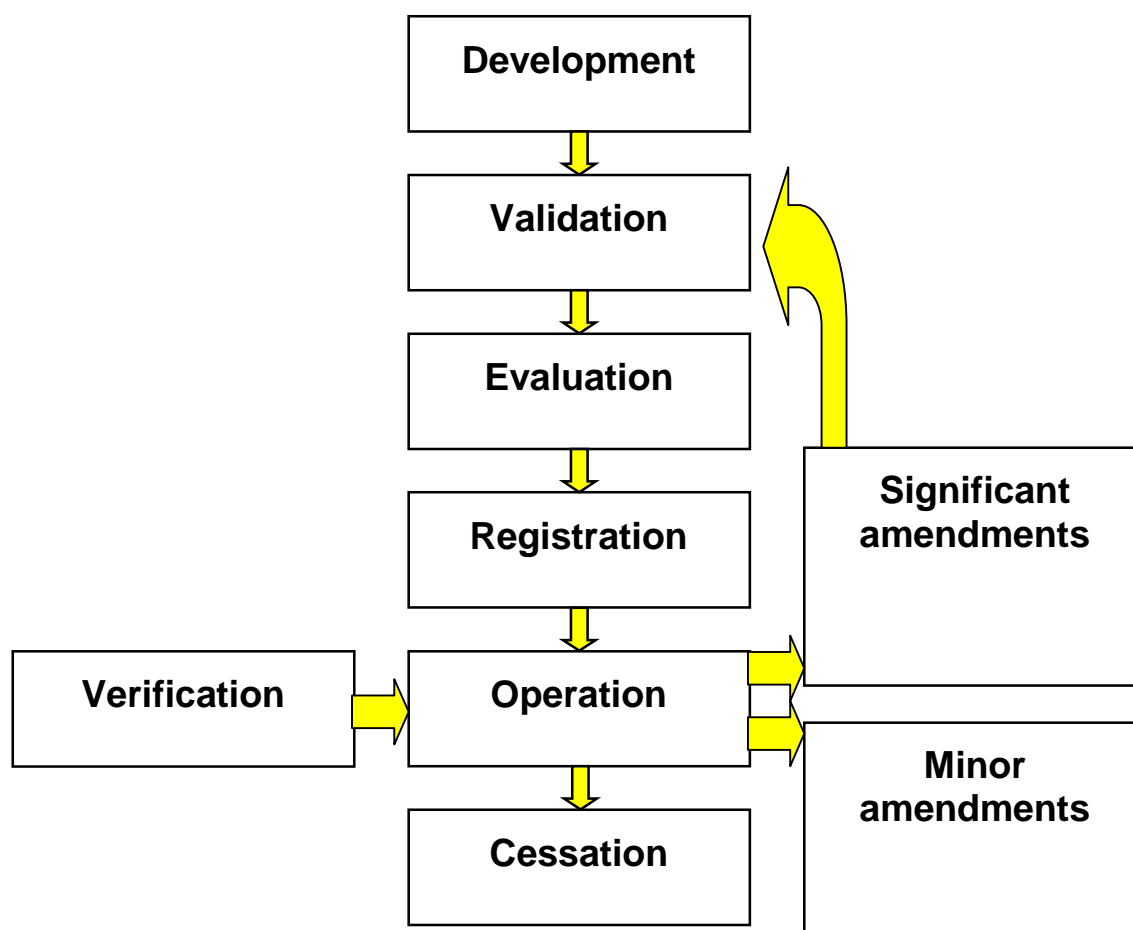
market access requirements and commercial quality issues are not required to be part of the risk management programme.

The *Risk Management Programme Manual* provides comprehensive information on the principles and components of a risk management programme and provides guidance for their development. This can be found on:

www.nzfsa.govt.nz/animalproducts/publications/manualsguides/

3.2 Steps for the development, registration and implementation of a risk management programme

The petfood operator will need to go through a sequence of activities in order to be able to register and implement a risk management programme. These activities are summarised in the diagram below. The operator's responsibilities in relation to these activities are shown in the table on the next page.



3.3 Summary of risk management programme tasks and responsibilities

Tasks	Responsibility	For more info refer to:
Development <ul style="list-style-type: none"> • Development of the programme 	<ul style="list-style-type: none"> • Operator 	Sections 1 to 3 of RMP Manual
Validation <ul style="list-style-type: none"> • Validation of the programme 	<ul style="list-style-type: none"> • Operator 	Section 4 of RMP Manual
Evaluation <ul style="list-style-type: none"> • Contracting an evaluator to obtain recommendation for approval of registration (recognition of the validity) of the programme • Evaluating and reporting on the risk management programme's validity 	<ul style="list-style-type: none"> • Operator • Accredited evaluator 	Section 5 of RMP Manual Evaluator's guide and specification
Registration <ul style="list-style-type: none"> • Identification of the verification agency that has indicated its willingness to verify the registered risk management programme • Submission of application for registration of the risk management programme • Registration of the risk management programme. 	<ul style="list-style-type: none"> • Operator • Operator • Director (Animal Products) 	Section 6 of RMP Manual
Operation <ul style="list-style-type: none"> • Contracting verification services to be used for verifying the registered risk management programme • Implementation of the programme • Specific operational duties • Operator verification • External verification • Application for amendments to registered risk management programme • Notification of minor amendments to the Director, Animal Products, as required 	<ul style="list-style-type: none"> • Operator • Operator • Operator • Operator • Accredited verifier • Operator • Operator 	Section 7 of RMP Manual Section 7.2.3 of RMP Manual Verifier's specification
Cessation <ul style="list-style-type: none"> • Surrender of the registration of the risk management programme • Suspension of registration • Deregistration 	<ul style="list-style-type: none"> • Operator • Director (Animal Products) and Director-General • Director (Animal Products) and Director-General 	Section 8 of RMP manual

4. Hazard Analysis and Critical Control Point (HACCP)

Hazard Analysis and Critical Control Point (HACCP) is currently accepted internationally as the foremost science-based control system for assuring food safety. Food safety is achieved primarily by systematically assessing hazards, developing control systems and focusing on preventive measures. HACCP has been largely applied to the safety of food for human consumption, however, the principles of HACCP can also be applied to ensure safety of products for animal consumption.

Risk management programmes are based on HACCP principles. It is therefore essential that people involved in the development and implementation of a risk management programme have an adequate understanding of HACCP. *A Guide to HACCP Systems in the Meat Industry* and *A Guide to HACCP Systems in the Seafood Industry* are available on: www.nzfsa.govt.nz/animalproducts/haccp/

4.1 HACCP Principles

The following seven principles are the basis of the HACCP system:

1. Conduct a hazard analysis
2. Determine the Critical Control Points (CCP)
3. Establish critical limits
4. Establish a system to monitor control of the CCP
5. Establish the corrective action to be taken when monitoring indicates that a particular CCP is not under control.
6. Establish procedures for verification to confirm that the HACCP system is working effectively.
7. Establish documentation concerning all procedures and records appropriate to these principles and their application.

4.2 Hazard

A hazard is a biological, chemical or physical agent in, or condition of food with the potential to cause an adverse health effect.

- Biological hazards – these include microorganisms, parasites and biotoxins that have the potential to cause adverse health effects.

- Chemical hazards – examples include heavy metals, pesticides, veterinary medicines, and cleaning compounds. Food additives may also be hazardous if present in excessive or toxic amounts.
- Physical hazards – these are objects that get into food, or already present in food that may cause illness or injury to the animal eating it. Some examples are: glass, metal fragments, bone slivers and shotgun pellets.

This Code of Practice covers the hazards and other risk factors associated with the three main sources of hazards, and the controls necessary to manage them. The three main sources of hazards that are considered during hazard analysis are:

- Raw material inputs - e.g. meat, other ingredients, packaging
- Process
- Other sources - e.g. people, internal and external environment, pests

5. Other Legislation

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

Legislation that are likely to be relevant to petfood operators include, but is not limited to, the following Acts and their associated regulations and specifications:

- Agricultural Compounds and Veterinary Medicines Act 1997
- Animal Products Act 1999
- Animal Products (Ancillary and Transitional Provisions Act) 1999
- Animal Welfare Act 1999
- Biosecurity Act 1993
- Commerce Act 1986
- Consumer Guarantees Act 1993
- Fair Trading Act 1986
- Hazardous Substances and New Organisms Act 1996
- Resource Management Act 1991
- Health and Safety in Employment Act 1992

6. Sources of Other Information

Other information about the Animal Products Act 1999 and risk management programmes can be obtained through the RMP Help Desk or the NZFSA website.

RMP Help Desk

Contact Bryan Anderson, Ph: 03 214 3594, Fax 03 214 4325, Email: andersonb@maf.govt.nz

Website

The following information are currently available on the NZFSA website at:
www.nzfsa.govt.nz/animalproducts/ :

- Bulletins
 - Manuals/Guides:
 - Exporters Guide
 - Risk Management Programme Manual
 - Overseas Market Access Requirements
 - Amendments
 - Registers and Lists
 - Risk Management Programmes Register
 - Transport Operators List
 - Application Forms
 - Exporter Registration – Application Form AP1
 - Identification numbers
 - Registration of Risk Management Programme
 - Application Form AP4
- Legislation:
 - Acts
 - Regulations
 - Notices (where specifications are found)
 - Orders
 - Policy Statements
 - Glossary of terms
 - Frequently asked questions (FAQs)
 - Discussion Documents
 - Brochures
 - Letters to affected parties

Hard Copies

Documents are also available through Manor House Press Ltd, phone 04 568 6071 or 04 568 8914. We suggest that you ask for a quote as it may be expensive for a single printing.