



MEMORANDUM

To	Operators of Risk Management Programmes for Primary Processing of Poultry Other interested parties
CC	Campylobacter Strategy Working Group Members (NZFSA) Carol Barnao (Director, Standards) Chris Mawson, Su Langdon, Catherine Sheerin (NZFSA VA) Dudley Morrison (CIG)
Date	24 August 2007
From	Judy Barker, Assistant Director (Production and Processing)
Subject	ISSUE OF CODE OF PRACTICE – PROCESSING OF POULTRY: Part 1 – Overview, and Part 2 – Good Manufacturing Practice - Chapter 5: Slaughter and Dressing.

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Background

For many years, including prior to the introduction of the Animal Products Act 1999 (APA), the poultry industry has used the Poultry Industry Processing Standard 5 (PIPS5) as their main standard or guidance document. NZFSA has mandated this as the general requirement for exports. PIPS 5 referred to a number of meat industry manuals. This caused confusion, with requirements scattered through several documents, and interspersed with red meat information that was not relevant to the poultry industry.

Since the introduction of the APA, the human consumption specifications have covered some poultry specific specifications which superseded the relevant parts of PIPS5. However, there were a number of areas that were not covered and hence a COP was necessary to clarify the expectations of Good Manufacturing Practice.

NZFSA, in consultation with the poultry industry, has been developing this new Code of Practice (COP) which is tailored to suit the sector. This COP is based on PIPS5 and incorporates:

- relevant information from the meat manuals;
- improvements for control of Campylobacter identified by NZFSA's Campylobacter Strategy Working Group;



- clarification identified through feedback from verifiers and industry; and
- changes required to align with requirements under the Animal Products Act 1999.

The COP is being developed in stages. The initial work has determined the overall structure and purpose of the document. Both of these can be found in the overview in Part 1 of the COP. The chapter on slaughter and dressing has also been developed.

Further chapters covering other topics will be developed and issued over time.

Issue of Parts of COP:

The following Parts of the COP are now issued:

Part 1: Overview.

Part 2: Good Manufacturing Practice (GMP), Chapter 5 Slaughter and Dressing.

The COP will contain the specific legal requirements provided for under the Animal Products Act 1999, and procedures for compliance which if applied is considered to be a means of meeting those legal requirements. Guidance material is also provided to help consistent interpretation of the COP. Each GMP chapter is presented in the following way:

- Purpose and Scope;
- Regulatory requirements;
- Procedures (for compliance);
- Guidance (boxed text);
- Any relevant appendices.

The text given in the boxes is guidance material only which the operator may or may not choose to follow.

Risk Management Programme (RMP) Operator's Responsibilities:

An RMP operator is expected to follow the COP unless an alternative is registered as part of their RMP.

Operators must therefore review their RMP and either:

- make any necessary changes to ensure that it aligns with the COP – this would be considered a minor amendment; or
- submit their alternative for evaluation (with validation evidence if appropriate) then apply for registration of a significant amendment to the RMP.



The latter is necessary even if the alternative has previously been incorporated in a registered RMP as the procedures in the COP are more stringent than those that were in effect when most RMPs were registered, and any alternative must be considered against the new requirements.

Status of PIPS5:

The new COP overrides PIPS5 where relevant, but PIPS5 will still be the base requirement for some export markets for those things that are not yet covered in the new COP. In practice this means that:

- Processors of non-broilers must continue to use PIPS5 as the basis of their export requirements or as guidance for their domestic requirements.
- Processors of broilers must comply with the new COP (unless an alternative is approved as part of their registered RMP as described earlier) but will default back to PIPS5 and the referenced meat manuals where the new COP does not yet cover the issue.

Implementation Date:

The COP comes into effect on the date of signing. Operators are expected to actively progress towards compliance with the COP from this date. They must have completed changes to the RMP and where alternatives to the COP are to be continued or introduced, have registered a significant amendment by 1 March, 2008.

Full implementation is therefore expected from 1 March 2008 except for the requirement in section 3.3.2.1 which relates to dedicated wash sink(s) in both primary and secondary processing. Operators have until 1 December 2008 to meet that particular requirement or to have an alternative registered in their RMP.

Verifiers will be instructed to check compliance with the COP or registered alternative from the above dates.

(Signed)

A handwritten signature in black ink, appearing to read 'Michael Brooks', is written over a faint, illegible printed name.

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Michael Brooks
Executive Director
Poultry Industry Association of New Zealand