

Attachment 1: Operators affected and verification background

1. Operators affected by the NZFSA's Animal Feeds Review

Background

As outlined previously, the Government has agreed to a number of changes in the way certain secondary processors of **pet food** are regulated. Pet food means any material prepared and traded as food for cats or dogs, and includes any such product intended for cats or dogs but fed to other pets or captive animals.

Amendment

The outcome of NZFSA's review of regulation of animal feed, including pet food is that, in general, secondary processors of pet food, where that is raw meat or other animal material or animal product that results from the death of the source animal (e.g. red meat, offal, poultry or fish), that are:

- regulated under the Agricultural Compounds and Veterinary Medicines Act 1997 (ACVM Act 1997); and
- were exempted from additional control mechanisms under the Animal Products Act 1999 (Animal Products Act)

are no longer exempt from additional control mechanisms of the Animal Products Act. This exemption will be replaced by specifications, issued by NZFSA, which would require secondary processors of pet food to maintain prescribed documentation to demonstrate that animal material has been procured from regulated sources and to list annually with NZFSA.

Some of the above secondary processors that are not affected by this change, and hence will continue to be regulated under the Agricultural Compounds and Veterinary Medicines Act 1997 (ACVM Act 1997), are those processors that handle:

- raw meat or animal material or animal product that has been rendered; or

- raw meat or animal material or animal product that:
 - is acquired in a ready-for sale state; and
 - has been subject to primary processing in accordance with a registered risk management programme by an earlier processor.

These changes do not affect secondary processors who are required to have a risk management programme.

Are you affected by these changes?

Secondary processors of pet food who will be affected by these changes have been defined in the 10 March 2008 amendment to Animal Products (Exemptions and Inclusions) Order 2000. **The Order requires operators that are secondary processing pet food that is raw meat or other animal material or animal product that results from the death of the source animal to comply with any applicable requirements of Parts 2 to 4 of the Act.** It should be noted that the Animal Products Act definition of process is “includes kill, slaughter, dress, cut, extract, manufacture, pack, preserve, transport, and store”, which is comparatively broad.

Examples of secondary pet food processors that are affected by the new requirements are operators who:

- manufacture dog rolls;
- manufacture baked biscuits using any animal product other than rendered product;
- receive bulk raw products that are not in retail ready packaging and then package it for retail sale. This may include slicing and/or dicing product prior to packaging.

2. Verification

Background

Verification, under the Animal Products Act 1999, relates to the ongoing checks carried out by recognised persons. An example of this would be checks to determine whether operations that are subject to a risk management programme (RMP) are in compliance with the requirements of the RMP.

Verification 2005 Statement of Policy (and subsequent amendment)

Existing verification requirements are outlined in the Verification 2005 Statement of Policy (March 2005) and the subsequent amendment (December 2005), available at <http://www.nzfsa.govt.nz/animalproducts/publications/policystatements/verification/index.htm>. This specifies the policy NZFSA applies relating to the performance of verification under the Animal Products Act for animal materials and products other than dairy, live animals and germplasm.

The Statement of Policy contains:

- the NZFSA requirements for the performance of verification activities for animal product businesses whether they supply the domestic market, the export market, or both; and
- the standard initial verification frequencies that will apply to an animal product business, the performance measures around changing verification frequencies and the ceiling (maximum) frequencies that apply to certain industries; and
- specific provisions allowing for variation of the standard verification frequencies, changes and ceilings for certain business situations.

The existing verification frequencies are given verification steps as shown in the following table:

Verification step	Verification frequency
Step 1	2 weekly
Step 2	1 monthly
Step 3	6 weekly
Step 4	2 monthly
Step 5	3 monthly
Step 6	6 monthly
Step 7	1 yearly
Step 8	5 yearly (20% of businesses within the business category each year)

The existing verification frequencies for a range of existing animal product businesses, which are directly relevant or useful for comparison, are shown in the following table:

Animal product business	Domestic	
	Highest initial frequency	Ceiling frequency
Primary processors of mammals and birds for animal consumption	Step 4	Step 5
Primary and secondary processors of seafood for human and animal consumption , including fishing vessels	Step 5	Step 7
Secondary processors of mammals and birds for human consumption	Step 5	Step 7
Secondary processors of mammals and birds for animal consumption	Step 7	Step 7
All other processors of animal product for animal consumption	Step 5	Step 7
Fish (other than bivalve molluscan shellfish) material depots, and apiarists	Step 8	Step 8

It should be noted that clause 24 of the Statement of Policy also outlines requirements regarding unscheduled verification visits. This is to assist in giving NZFSA confidence that verification results accurately reflect the ongoing performance of the operation.