Operational Code

Petfood Processing

Chapter 1 Overview

New Zealand Government

TITLE

Operational Code: Petfood Processing

COMMENCEMENT

This Operational Code is effective from .

REPLACEMENT

This Operational Code replaces the MAF Code of Practice: Pet Food Processing Part 1: Overview, December 2011.

ISSUING BODY

This Operational Code is issued

Dated at Wellington this ... day of 2016

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Draft for Consultation

Introduction

Purpose of Chapter 1

Chapter 1 of the Petfood Operational Code (Code) provides an introduction to the whole Code. It explains the Code's purpose, scope and application, and the legislative framework which underpins the requirements for petfood safety and suitability.

Background on the Development of the Petfood Operational Code

(1)   A project plan, *Petfood Code of Practice Re-development Plan*, was prepared by the Ministry for Primary Industries (MPI) in January 2014 to address the identified need for a review and further development of the current Petfood Code of Practice. This plan was subsequently approved by the New Zealand Petfood Manufacturers Association (NZPFMA).

(2)   The redevelopment of the Code is currently being undertaken by MPI to:

   a)   update it in line with the amended Animal Products: Specifications for Products Intended for Animal Consumption Notice 2014 (AC Spec);
   b)   expand its scope to include further processed and manufactured petfood products covered by the Animal Products Act 1999 (APA);
   c)   increase focus on human health implications of petfood safety;
   d)   incorporate Agricultural Compound and Veterinary Medicines Act 1997 (ACVM Act) requirements relevant to the products and processes covered by the Code; and
   e)   align its format with MPI's new standardised templates for guidance documents.

(3)   The new Code will consist of six Chapters and be renamed as the Petfood Operational Code. The development of the new Code, which involves the revision of existing chapters and development of new chapters, is being undertaken in stages. Chapter 1 Overview and Chapter 2 Good Operating Practice are the first two chapters to be completed. It is expected that the whole Code will be completed by the end of 2016.

Who should read this Code?

(1)   This Code should be read by:

   a)   petfood Risk Management Programme (RMP) operators;
   b)   further (petfood) processors;
   c)   suppliers of animal material for processing into petfood;
   d)   transport operators;
   e)   regulators; and
   f)   verifiers.

Why is this Code important?

(1)   An operator is expected to develop and implement their RMP in accordance with this Code. This will:

   a)   ensure that the operator complies with acceptable industry practices and procedures;
   b)   ensure that the operator meets relevant regulatory requirements; and
   c)   simplify and reduce the cost of developing and evaluating the RMP.

(2)   The Code clarifies MPI's expectations on how regulatory requirements may be met. This will assist operators and RMP verifiers to have a consistent understanding of the requirements and their applications.

Document history

(1)   This document replaces the MAF Code of Practice: Pet Food Processing Part 1: Overview, December 2011.

Draft for Consultation

Part 1: Purpose and Scope of the Petfood Processing Operational Code

1.1 Application

(1)   This Code has been developed by MPI, in consultation with the NZPFMA and industry operators, to:

    a)   assist petfood operators meet the requirements of the APA;
    b)   produce petfood that is safe and suitable for its purpose; and
    c)   prevent petfood material and product from entering the human food chain.

(2)   Petfood, as defined in the APA and used in this Code, means food intended to be fed to domesticated cats and dogs (including companion dogs, farm dogs and other work dogs). Also petfood is made of animal material or animal product. The requirements in this Code only apply to petfood that is intended to be sold or traded.

(3)   This Code applies to all business operators involved in the following activities:

    a)   supply of animal material to petfood operators for the production of petfood;
    b)   primary processing, i.e. slaughter/killing and dressing of farmed mammals and birds for petfood;
    c)   secondary processing of petfood (i.e. manufacture of petfood) from:

        i)   sourcing and receipt of raw materials and ingredients;
        ii)   processing;
        iii)   packing;
        iv)   labelling; and
        v)   storage and dispatch of finished products.

    d)   further processing of petfood (e.g. processing of raw petfood), as defined in the current AC Spec; and
    e)   transport of animal material during primary processing; and
    f)   transport of animal material or product to petfood operators:

        i)   between petfood operators; or
        ii)   to further petfood operators.

(4)   The following operations are excluded from the scope of this Code:

    a)   processing of petfood that is principally of dairy origin;
    b)   rendering of animal material (this is covered by the MPI Rendering Code of Practice);
    c)   activities solely covered by the ACVM Act (i.e. outside the scope of the APA), including the:

        i)   importation of petfood ingredients and retail-ready petfood;
        ii)   distribution of finished petfood products within New Zealand; and
        iii)   wholesale and retail sale of petfood in New Zealand.

(5)   This Code has been developed based on New Zealand standards and requirements only. Export requirements are not covered in this Code.

(6)   This Code has been written mainly for petfood processors and manufacturers operating an RMP. It is also recommended for 'further (petfood) processors' although they are not required to implement an RMP (refer 2.3).

(7)   The requirements discussed in this Code focuses on managing risks to animal and human health from food safety hazards (biological, chemical and physical hazards) that may be in petfood.

1.2 Contents of the Petfood Operational Code

(1)   This Code is intended to consist of six chapters:

1. Chapter 1 Overview

Chapter 1 (this document) provides an overview of the whole Code. It explains the purpose, scope and application of the Code, and the legislative framework which underpins the requirements for product safety and suitability.

2. Chapter 2 Good Operating Practice

Chapter 2 is a completely new chapter of the Code. It provides guidance on good operating practices covering hygiene and sanitation, documentation and record keeping, traceability, operator verification, and other quality assurance programmes. It applies to all petfood operators.

3. Chapter 3 Primary Processing - Slaughter and dressing of farmed animals

Chapter 3 is currently under development. Part 3.1 Slaughter and Killing of Farmed Mammals of the existing code of practice is being updated and expanded, and will eventually become Chapter 3 of the new Code.

4. Chapter 4 Harvesting, refrigeration and processing of wild animals

Chapter 4 is yet to be developed. Part 2.2 Harvesting and Processing of Wild Rabbits, Hares, Wallabies, Possums, Goats and Deer of the existing code of practice will be updated and become Chapter 4 of the new Code.

5. Chapter 5 Secondary processing and manufacturing of petfood

Chapter 5 is yet to be developed. This will be a completely new chapter. It may provide guidance on the:

- manufacturing of petfood, such as prepared raw petfood;
- cooked, refrigerated petfood;
- shelf stable petfood; dried pet chews; and
- dry extruded petfood.

6. Chapter 6 Generic RMPs for petfood processing

Chapter 6 is yet to be developed. This will be a completely new chapter. It will provide examples of RMPs for some typical petfood operations. The generic RMPs will include the application of the Hazard Analysis and Critical Control Point (HACCP).

Part 2: New Zealand legislation applicable to petfood

2.1 APA and ACVM Act

(1) Product safety and suitability aspects of petfood production in New Zealand are primarily legislated under the APA and the ACVM Act.

(2) The table below summarises the processes and activities generally undertaken by the New Zealand petfood industry, and the legal requirements that apply to each of them.

Process/activity	Requirements that apply	
	ACVM Act	**APA**
Importation of any petfood.	✓	
Primary processing of animal product for animal consumption (e.g. slaughter and dressing).	✓	✓ An RMP is required.
Secondary processing (i.e. manufacture) of petfood that does not contain any animal product.	✓	
Manufacture of petfood (i.e. secondary processing) that: • contains animal material/product; and • is for sale in New Zealand; or • is for export but an official assurance is **not** required.	✓	
Manufacture of petfood (i.e. secondary processing) that: • contains animal material/product; • is for export; and • an official assurance is required for the product to be exported. This excludes the manufacture of petfood that is principally of dairy origin.	✓	✓ An RMP is required.
Further petfood processing of animal product (e.g. processing of raw petfood).	✓	✓ Specific requirements for further processors of petfood apply.
Processing of petfood that is principally of dairy origin.	✓	
Domestic sale of all petfood.	✓	
Transport of animal material during primary processing. Transport of animal material or product to petfood operators: • between petfood operators; or • to further petfood operators.		✓

(3)   The main pieces of legislation under the APA that apply to animal product operators involved in the processing and manufacture of petfood are the:

a)   Animal Product Regulations 2000;
b)   Animal Products Notice: Specifications for Products Intended for Animal Consumption 2014;
c)   Requirements for the On-Farm Killing of Farmed Mammals to be supplied for Petfood 2013; and
d)   Animal Products (Risk Management Programme Specifications) Notice 2008.

(4)   The main legislation under the ACVM Act that covers the requirements for the importation, manufacture and sale of petfood in New Zealand is the Agricultural Compounds and Veterinary Medicines (Exemptions and Prohibited Substances) Regulations 2011.

(5)   The ACVM Regulations 2011 requires the registration of manufactured petfood that has a therapeutic claim. Manufactured petfood that is marketed purely to provide nourishment to an animal does not require registration, however, it still needs to meet particular regulations related to the product's fitness for purpose, documented system for manufacturing, labelling and recording keeping.

For further information on the ACVM requirements refer to the MPI website or contact the MPI ACVM Programmes & Appraisals Team: ACVM-info@mpi.govt.nz.

2.2 RMP requirements

2.2.1 Operators who require an RMP

(1)   All business operators involved in the primary processing of petfood must operate under an RMP. Primary processing includes the:

a)   supply and presentation of animals for slaughter;
b)   slaughter or killing and dressing of farmed mammals and birds;
c)   harvesting and refrigeration of wild mammals; and
d)   collection of any products or by-products intended for animal consumption.

(2)   Business operators involved in the secondary processing of petfood intended for export and requiring an official assurance (i.e. export certification) must operate under an RMP. Secondary processors who only produce petfood for sale in the New Zealand market do not need to operate under an RMP. They may choose to operate under an RMP for commercial or other reasons.

(3)   Secondary processing includes all processing that occurs after the carcass has passed post-mortem examination. This includes:

a)   cutting and boning;
b)   packing;
c)   freezing; and
d)   all petfood manufacturing processes.

2.2.2 Development of the RMP

(1)   When an RMP is required, the petfood operator must develop and document their own RMP that is specific to their own products, processes and premises. The MPI RMP Manual provides comprehensive information on the principles and components of RMPs and provides guidance for their development and registration.

(2)   An operator is expected to develop and implement their RMP in accordance with this Code. This will:

a)   ensure that the operator complies with acceptable industry practices and procedures;
b)   ensure that the operator meets relevant regulatory requirements; and
c)   simplify and reduce the cost of developing and evaluating the RMP.

(3) The whole or parts of the Code may be incorporated in a petfood operator's RMP (e.g. by copying or referencing the relevant part). Since the RMP is a legally binding document, any part of the Code incorporated in an RMP becomes mandatory for the petfood operator.

2.3 Requirements for further processors of petfood

(1) 'Further (petfood) processing' is the processing (other than transport or store) of raw petfood (e.g. red meat, offal, poultry, fish).

(2) Petfood operators solely involved in further (petfood) processing do not need to operate under an RMP, but they may choose to do so for commercial or other reasons.

(3) Further (petfood) processors must have a documented tracking system. Information on these requirements is available on the web page at: 'Further (petfood) processors documented tracking system'.

(4) Further (petfood) processors may be exempt from the documented tracking system requirements if they:

a) operate under an RMP; or
b) acquire petfood in a ready-for-sale state (and which has been subject to primary processing under an RMP by a previous processor); or
c) acquire the petfood in a rendered state.

2.4 Requirements for exporters

(1) Exporters are responsible for exporting in accordance with the APA. Exporters also, where appropriate, may be required to meet specified market access requirements of foreign governments which may be additional to the New Zealand requirement or standard. Operators of animal products must ensure that their documented systems include procedures and records necessary to demonstrate compliance with all relevant requirements. Export requirements are notified in General Requirements for Export (GREX) and Overseas Market Access Requirements (OMARs).

(2) MPI's Exporting web pages explain exporter requirements in more detail.

2.5 Other Legislation

(1) Petfood operators should not rely on this Code for information on legal requirements under other legislation. Operators are responsible for ensuring that they are familiar and comply with all other legislation relevant to their business.

(2) Other legislation that are likely to be relevant to petfood operators include, but are not limited to, the following Acts and their associated regulations and specifications:

- 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;
- Health and Safety in Employment Act 1992;
- Resource Management Act 1991; and
- Weight and Measures Act 1987.