Ministry for Primary Industries
Manatū Ahu Matua

Operational Code

Petfood Processing

Chapter 2 Good Operating Practice

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New Zealand Government

TITLE

Operational Code: Petfood Processing

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Introduction

(1) Chapter 2 of the Petfood Operational Code (Code) assists petfood processors and manufacturers to:

a) comply with the requirements of the Animal Products Act 1999 (APA) and relevant subordinate legislation of the Act); and
b) produce petfood that is safe and suitable for animal consumption.

The Code has been developed by the Ministry for Primary Industries (MPI), in consultation with the New Zealand Petfood Manufacturers Association (NZPFMA).

(2) This introduction is not part of the Operational Code, but is intended to indicate its general effect.

Purpose

(1) This Code provides guidance on Good Operating Practices (GOP) covering hygiene and sanitation and quality assurance. This Code has been developed mainly for petfood processors and manufacturers operating a Risk Management Programme (RMP). It is also recommended for 'further (petfood) processors' although they are not required to implement an RMP.

Scope and application

(1) This Code discusses the relevant GOP requirements under the APA and its subordinate legislation, particularly the Animal Products Notice: Specifications for Products Intended for Animal Consumption signed on the 6th October 2014, and how they can be practically met by petfood RMP operators.

(2) This document applies to all RMP operators involved in all types of petfood operations, including:

a) slaughter and dressing of farmed mammals and birds;
b) harvesting and refrigeration of wild animals; and
c) manufacturing of petfood.

(3) The *Australian Standard for the Hygienic Production of Pet Meat: PISC Technical Report 88 - Amended 2009* was taken into consideration during the development of this document since there is a significant amount of trade of petfood between New Zealand and Australia.

(4) This Code has been developed based on New Zealand requirements only. It does not include overseas market access requirements. Exporters must ensure that they meet all overseas market access requirements relevant to their product and intended market.

Who should read this Operational Code?

(1) This code should be read by:

a) petfood 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 important?

(1) This Code clarifies MPI's expectations on how relevant regulatory requirements may be met and the standard of hygiene that should be maintained. This will assist petfood processors and manufacturers and RMP verifiers to have a consistent understanding of the requirements and their applications.

(2) A Code is intended to be a guide on how to meet legislative requirements. If an RMP operator incorporates the whole or part(s) of the Code into their RMP, then the incorporated part(s) of the Code becomes mandatory (i.e. is no longer a guide) and legally enforceable.

Layout of Chapter 2

(1) Chapter 2 is divided into GOP programmes that cover:

a) hygiene and sanitation;
b) quality assurance; and
c) other RMP requirements.

(2) Each GOP programme is laid out with the following subheadings:

a) Scope

This describes the contents of the particular GOP programme and its application.

b) Requirements and procedures

This section discusses the regulatory and industry agreed requirements, and the control measures or procedures for meeting these requirements.

Three levels of information are provided in the programmes and they are distinctly differentiated in the document.

i) Regulatory Requirements

A regulatory requirement is identified by having a citation, at the end of the relevant sentence or clause, of the specific legislation from which the particular requirement is derived from. The word "must" is also used indicating its mandatory status. For example:

"All inputs, including raw materials, ingredients, additives and packaging must be handled, processed, and stored in a manner that minimises any potential contamination or deterioration [AP Reg 9]".

In many cases, the mandatory requirements have been paraphrased. Operators should refer to the cited legislation for the actual wording of the legal requirement.

The abbreviations used for legislation cited are:

AP Reg - the Animal Products Regulations 2000

AC Spec - the Animal Products Notice: Specifications for Products Intended for Animal Consumption signed on the 6th October 2014

HC Spec - the Animal Products (Specifications for Products Intended for Human Consumption) Notice 2013

RMP Spec - the Animal Products (Risk Management Programme Specifications) Notice 2008

ii) Industry agreed requirements and recommended procedures

Industry agreed requirements or recommended procedures are accepted or industry agreed means of achieving or complying with regulatory requirements. To differentiate from regulatory requirements, the word "should" is used rather than "must".

MPI expects RMP operators to comply with the recommended procedures ("should") that are applicable to their product and process unless they have proposed an alternative process, procedure or parameter that will achieve the same outcome. The operator should be able to demonstrate the validity and effectiveness of any proposed alternative. Any alternative process, procedure or parameter should be documented in their RMP.

Corrective action requirements are included when there are specific actions applicable to a particular GOP programme. Generic corrective actions, which apply to all programmes, are discussed in clause 2.5 and are not repeated for each GOP programme.

iii) Guidance or supplementary information

Guidance material is presented in a box. It provides explanatory information and options or examples for achieving a particular outcome or requirement.

c) Records

This gives the list of records that should be kept by the RMP operator to demonstrate compliance to requirements and procedures of the particular GOP programme.

Part 1: Definitions

(1) In this Code, unless the context otherwise requires:

amenities means toilets, wash rooms, locker rooms, change rooms, lunch rooms, and cafeterias

APA means Animal Products Act 1999

approved maintenance compound means any maintenance compound that is approved by MPI or listed in specifications made under the Animal Products Act 1999

animal product operator means an operator who processes animal material or product for animal consumption under a risk management programme; and **operator** when used in this document has a corresponding meaning

approved ink means an ink or stain that is approved for use for a specific purpose (and listed in Schedule 3 of the Animal Products Notice: Specifications for Products Intended for Animal Consumption signed on the 6th October 2014 (reproduced here as Appendix 3)

approved supplier means a person who is assessed by an animal product operator under clause 3.16 (3) as competent in accordance with clause 7.11 of the Animal Products Notice: Specifications for Products Intended for Animal Consumption signed on the 6th October 2014 to supply killed wild rabbits, hares, wallabies, possums, goats or deer

calibration means the procedure used for the comparison of a measuring instrument with a standard, under specific conditions, and adjustment of the instrument, if necessary

clean (verb) means to remove visible contaminants from any surface

clean sea water means seawater that is free of excessive turbidity, colour, offensive odour, and any contaminants

clean water means

a) in relation to water supplied by an independent supplier (including a public or private supplier), water of a standard administered by the independent supplier under the Health Act 1956 and any regulations made under that Act; or
b) in relation to water supplied by the animal product operator solely for the use of the animal product operator (such as bore water, rainwater or surface water), water that complies with the requirements in Schedule 1 of the Animal Products Notice: Specifications for Products Intended for Animal Consumption signed on the 6th October 2014 (reproduced here as Appendix 1)

contaminant means any biological agent, chemical agent, foreign matter or other substance not intentionally added to petfood which may compromise product safety or suitability

cooked product means product that has undergone a cooking step

cooking means the application of heat to a product to destroy vegetative pathogens that may pose a hazard to animal health

control measure means any action and activity that can be used to prevent or eliminate a product safety hazard, or reduce it to an acceptable level

corrective action means any action to be taken when the results of monitoring a process step or control measure indicate a loss of control

Critical Control Point (CCP) means a step at which control can be applied and is essential to prevent or eliminate a product safety hazard or reduce it to an acceptable level

critical limit means a criterion which separates acceptability from unacceptability at a CCP

critical measurement means a parameter identified as critical in any specification or regulated control scheme, or a critical limit for a critical control point (CCP) in an RMP

equipment includes:

a) the whole or any part of any utensil, machine, fitting, device, instrument, stamp, apparatus, table, or article, that is used or available for use in or for preparing, marking, processing, packing, storing, carrying, or handling of any product, ingredient, additive, or processing aid; and
b) any utensil or machine used or capable of being used in the cleaning of any equipment or facilities

essential services includes the provision of gases, lighting, ventilation, water and waste management

facilities includes amenities, storage areas, and processing areas

further petfood processing means the processing (other than transport or storage) of petfood that is raw meat or other animal material or animal product that results from the death of the source animal (for example red meat, offal, poultry or fish) but does not apply to the processing of petfood where the raw meat or animal material or product:

a) has been rendered; or
b) is acquired in a ready-for-sale state and has been subject to primary processing in accordance with an RMP by an earlier processor under an RMP

Good Operating Practice (GOP) means the documented procedures relating to practices that are required to ensure products are fit for their intended purpose (may also be referred to as Good Manufacturing Practice, GMP)

ingredient means any substance, including a food or additive, used in the manufacture or preparation of petfood and is present, whether in a modified form or not, in the final food

label includes any wording, tag, brand, symbol, picture, or other descriptive matter written, printed, stencilled, marked, embossed, impressed on, appearing on, attached to, or enclosed within any product

maintenance compound means any substance:

a) used for maintaining, repairing, servicing, cleaning, or sanitising equipment or surfaces that may be the source of, or result in, contamination of animal material, animal product, or associated things; or
b) used for treating water; or
c) used for pest control

minimise means to have taken all practical steps to substantially reduce the potential hazard of concern, consistent with what is technologically feasible

monitor means the act of conducting a planned sequence of observations or measurements of control parameters to assess whether a process step or control measure is under control

non-complying product means any product that does not meet a regulatory requirement (e.g. animal material eligibility, process or product criteria) or a limit or criteria defined by the operator in the RMP; or has not been processed in accordance with procedures written in the RMP

operator verification means the application of methods, procedures, tests and other checks by the operator to confirm the ongoing compliance of the RMP to legislative requirements, and processes and parameters documented in the RMP

packaging means any material that is intended to protect and that comes into immediate contact with the product; and

a) includes rigid materials such as cartons and containers where the product is filled directly into the carton and container; and
b) includes any other material contained with, in, or attached to, the product (such as labels, heat sensors, oxygen scavengers)

pathogen means a microorganism that causes illness

petfood means animal product intended for consumption by pets

petfood material means animal material, such as meat, poultry, fish and shellfish, used in the processing or manufacture of petfood

process control means all conditions and measures applied during the production process that are necessary to achieve safety and suitability of a product

processing areas includes all areas where ingredients and products are prepared (thawed, cut, weighed, pre-mixed, injected, cured, massaged, tumbled, emulsified, filled), processed (cooked, cooled, dried, baked, sliced), and packed

protected means sufficiently wrapped, packaged or enclosed to prevent the introduction of contaminants

protective clothing means special outer wear garments intended to preclude the contamination of product; and includes head coverings and footwear

rework (noun) means product which has been partially or fully processed and is incorporated and reprocessed into another batch of product

rework (verb) means to incorporate rework into another batch of product

RMP means a registered Risk Management Programme, and **programme** when used in this document has a corresponding meaning

sanitise means the application of a chemical or physical agent with the intention of reducing microbial contamination to a level that will avoid the creation of a hazard

suitably skilled person means a person who in the opinion of the operator is skilled in a particular activity or task through training, experience or qualifications

supplier means the owner or person in charge of animals who supplies these animals to the animal product operator and includes a sales yard operator. This does not include a person solely engaged in facilitating the transfer of animals such as a transport firm or purchasing agent

transportation outer means a package that:

a) encases any packaged or unpackaged animal material or animal product for the purpose of transportation and distribution; and
b) is either removed before the animal product is used or offered for retail sale, or is not taken away by the consumer of the product;

but does not include a transportation unit

transportation unit includes vehicles, aircraft, railway wagons, ships, shipping containers, bulk bins, bulk tanks, trailers and any other form of transport used in the transport of animal material or product

waste includes, without limitation, all solids, liquids, and gases that the operator intends to dispose of as being unwanted and that may become a source of contamination or attract pests

wild animal depot means a storage installation where petfood material is collected and held prior to transfer to a primary processor.

(2) References in this Code to subclauses, clauses, appendices and parts are references to subclauses, clauses, appendices and parts of this Code unless otherwise stated.

(3) Any term or expression used in this Code that is defined in the Act or Regulations made under the Act and used, but not defined, in this Code has the same meaning as in the Act or Regulations.

Part 2: General Principles and Requirements

2.1 Scope

(1) This Part describes the GOP principles and regulatory requirements that apply to all GOP programmes covered in this Code.

2.2 Hygienic Practices

(1) Operators must establish and carry out procedures to:

a) ensure appropriate and adequate maintenance, cleaning, and sanitation of premises, facilities, essential services, and equipment;
b) manage waste;
c) control pests; and
d) implement effective personnel hygiene practices [AP Reg 11].

(2) All inputs, including raw materials, ingredients, additives and packaging must be handled, processed, and stored in a manner that minimises any potential contamination or deterioration [AP Reg 9].

(3) The operator may process animal material or product for human consumption and animal consumption in the same facilities provided the operator has effective procedures in place to:

a) maintain separation of product intended for human consumption from that intended for animal consumption; and
b) prevent cross contamination or substitution between them [AC Spec 3.3 (7) and (8)].

2.3 Identification and Traceability Systems

(1) All petfood materials or products must be clearly identified that they are not intended for human consumption [AC Spec 4.3 (1)].

(2) The operator must document and implement a traceability system that:

a) allows for the identification of all raw materials, ingredients and products, from reception through production to finished products; and
b) enables the movement of raw materials and ingredients to be traced from the supplier; and to the next person or company that any product is transferred to for further processing, packing, storage, distribution or sale [AP Reg 18 (10), AC Spec 5.3 (1)].

2.4 Documents and Records

(1) Operators must document the following in their RMP:

a) processing procedures, and product and process parameters;
b) procedures for monitoring and verifying compliance to established processing procedures and parameters - in particular, critical limits at identified critical control points; and
c) corrective actions for any non-compliance or deviation to any regulatory limit or operator-defined limit, procedures, and product and process parameters [RMP Spec 8 and 11].

(2) Operators must maintain accurate records, particularly for the monitoring and verification of product and process parameters critical to product safety [RMP Spec 20 (2)].

(3) Operators should include the following in each of their documented GOP programmes:

a) purpose and scope;

b) authorities and responsibilities;
c) procedures (covering control measures, monitoring, corrective action and operator verification);
d) records; and
e) references to other relevant documents as applicable.

2.5 Monitoring and Corrective Actions

(1) Compliance to the requirements and procedures should be regularly checked by the responsible person at a frequency that will ensure consistent and ongoing effectiveness of the programme.

(2) Corrective actions for any non-compliance should include an assessment to determine the cause and extent of the non-compliance, and address:

a) immediate restoration of control;
b) identification and disposition of any affected petfood material or product; and
c) prevention of recurrence of the problem.

(3) The root cause(s) of the problem should be identified and addressed by the corrective actions.

(4) Corrective actions should be undertaken in an effective and timely manner. A register for internal audit corrective actions, including follow-up checks, should be maintained.

Part 3: Document Control and Record Keeping

3.1 Scope

(1) This Part discusses the requirements for the control of RMP documents, and record keeping.

3.2 Requirements and Procedures

3.2.1 Document control

(1) The operator must implement procedures to control documents and records; and ensure that the RMP is up-to-date and reflects actual operations [AC Spec 19 (2)].

(2) Every document that forms part of the RMP must be:

a) legible;
b) dated or marked to identify its version;
c) authorised (signed) prior to use, either directly or within the document control system, by:

i) the operator; or
ii) the day-to-day manager of the programme; or
iii) a person nominated to do so in the programme's document control system; and

d) available in a readily accessible form, when required, to any person with responsibilities under the programme [RMP Spec 19 (1)].

(3) The operator should keep a register of all current RMP documents showing the document titles, and their current versions and/or dates of issue.

(4) Details of all amendments to the RMP, including significant and minor amendments, must be recorded in an amendment register [RMP Spec 19 (2)(a) and (b)].

The amendment register may be presented in a table with the following column headings:

- document name or reference;
- details of amendment;
- reason for amendment;
- date of change; and
- approved by.

In addition to completing the amendment register, amendments should also be identified in the document itself (e.g. by use of *italics*, highlighting the amended text, etc.).

RMP operators should refer to Sections 3.3 and 3.19 of the RMP Manual for more detailed information regarding amendment requirements.

(5) All amended RMP documents or parts must be authorised (and registered in the case of a significant amendment to an RMP) prior to issue and use [RMP Spec 19 (2)(c)].

(6) Amended RMP documents or parts must be replaced with the current versions at all distribution points, without unnecessary delay [RMP Spec 19 (2)(d)].

3.2.2 Record keeping

(1) The operator must produce records demonstrating that the requirements of relevant animal product regulations, notices and the registered RMP are being met [AC Spec 5.2 (1)].

(2) The operator must ensure that all records are:

a) legible;
b) stored for four years, or for the shelf-life of the product to which the records relate (whichever is longer); and
c) stored in a manner which protects the records from damage, deterioration or loss [RMP Spec 20 (1)(a) and (b)].

(3) Records relating to the RMP's monitoring, corrective action and operator verification activities must include:

a) the date and, where appropriate, the time of the activity or observation;
b) a description of the results of the activity or observation; and
c) the identity of the person(s) who performed the activity [RMP Spec 20 (2)].

The requirements given in clause 3.2.2 (3) apply to both paper and electronic records.

Dates and times should be recorded appropriate to the activity being monitored. For example, the monitoring of certain critical process time and/or temperatures may require the recording of the exact date and time when the observation is made. Monitoring a more general time period may be acceptable (e.g. shift) for the observation of certain GOP programmes such as for checking compliance with protective clothing requirements.

(4) Records should accurately reflect any observations taken.

Consideration should be given to:

- the durability of paper on which records are kept (e.g. pen does not write well on wet paper); and
- its suitability for storage (e.g. thermal papers can fade over time).

Pencil is not suitable for recording information because it is easy to erase or alter.

Any alterations made to records should be made alongside the original entry and initialled by the person amending the record.

White out (e.g. Twink™) is not acceptable to auditors and verifiers as it is not possible to see the original entry.

3.2.3 Accessibility and retention of RMP documents and records

(1) The operator must retain one copy of all obsolete RMP documents and records for four years:

a) in a manner that protects the documents from damage, deterioration or loss; and
b) prevents confusion with current documents [RMP Spec 19 (3), AC Spec 5.2 (2)(b)].

(2) The operator should have an effective backup system for maintaining electronic RMP documents and records.

(3) The operator must ensure that:

a) RMP documents;
b) all reference material relating to the RMP; and
c) any archived documents are accessible or can be retrieved and made available within two working days of any request to:

i) recognised persons;
ii) animal product officers (or food officers);
iii) the Director General; and

iv) persons authorised by the Director General [RMP Spec 19 (4), RMP Spec 20 (1)(c) and 20 (3), AC Spec 5.2 (2)(a) and (c)].

3.3 Records

(1) Records of the following must be kept:

a) list of documents that make up the RMP;
b) amendment register; and
c) GOP and process control records, including monitoring, corrective action and verification records [RMP Spec 20 (2)].

Part 4: Design, Construction and Maintenance of Buildings, Facilities and Equipment for all Petfood Operations

4.1 Scope

(1) This Part discusses the requirements and procedures for:

a) ensuring that all buildings, facilities and equipment are designed, constructed and maintained in a manner that prevents or minimises contamination of petfood materials; and
b) products, packaging, equipment and the processing environment.

(2) The regulatory requirements and general principles given in this Part applies to all types of petfood operations including:

a) slaughter and dressing of farmed mammals and birds;
b) handling and refrigeration of harvested wild animals; and
c) manufacturing of petfood.

Additional requirements for slaughter and dressing facilities and specific requirements for wild animal depots are discussed in Part 5 Design and Construction – Additional or Specific Requirements for Primary Processing Facilities.

(3) The requirements of the Building Act 2004 are not covered in this document. Operators must comply with this and any other relevant legislation (refer to Chapter 1 – Overview).

4.2 Requirements and Procedures – Design and Construction

4.2.1 General requirements (applies to all types of petfood operations)

(1) The operator must ensure that the premises, facilities, equipment and essential services are designed, located and constructed in a manner:

a) that facilitates safe and hygienic processing; and
b) prevents contamination of any petfood material, ingredient or product [AP Reg 10].

(2) The facilities, equipment and internal structures, that may affect hygienic processing of any material or the safety and suitability of any petfood material or product, must be of sanitary design [AC Spec 3.2 (2)].

(3) Cleaning and sanitation facilities, and equipment, must be provided to ensure that the hygiene of personnel, equipment, vehicles, conveyances, premises or places can be maintained so that the processing of petfood is not adversely affected [AC Spec 3.3 (5)].

4.2.2 External areas

(1) Transport access ways and areas between and around buildings should be constructed and maintained to:

a) allow effective drainage; and
b) minimises contamination of the processing environment from dust and other contaminants.

Transport access ways and areas surrounding buildings should be sealed. There should be adequate space around buildings and other structures within the premises to allow for effective:

- cleaning;
- building maintenance; and
- pest control procedures.

4.2.3 Design and layout of buildings and facilities

(1) Facilities used for processing of petfood material or products must be physically separated from facilities used for processing products for human consumption. These facilities must only be used for the processing of animal material, except when clause 4.2.3 (2) applies [AC Spec 3.3 (7)].

(2) Despite clause 4.2.2 (1), the operator may process animal material or product for human consumption and animal consumption in the same facilities when the operator has effective procedures in place to:

a) maintain separation between human and animal consumption products; and
b) prevent cross contamination or substitution between them [AC Spec 3.3 (8)].

(3) Adequate facilities should be available for the:

a) hygienic performance of all operations;
b) storage of raw materials, ingredients, products, packaging and equipment;
c) storage and distribution of water, as appropriate;
d) cleaning and sanitation of facilities and equipment;
e) performance of personnel hygiene activities;
f) provision of essential services; and
g) drainage and disposal of wastes.

(4) Buildings, including internal structures such as floors, ceilings and walls, should be designed and constructed in a manner that:

a) minimises contamination of the product from pests and environmental contaminants; and
b) facilitates cleaning and maintenance.

(5) Adequate space in processing areas should be provided to allow the hygienic performance of:

a) all operations;
b) proper movement of personnel; and
c) effective cleaning and inspection.

(6) The design and layout of processing facilities and equipment in the premises should facilitate appropriate segregation and prevent cross-contamination between:

a) unprocessed and processed materials and products; and
b) products for human and animal consumption.

Segregation should take into account:

- product flow;
- nature of materials;
- types of equipment;
- personnel movement;
- waste management;
- airflow; and
- provision of services.

4.2.4 Floors, walls, and ceilings

(1) Floors, walls, ceilings and other exposed internal surfaces in processing areas should be:

a) impervious and non-absorbent when surfaces are subject to moisture (i.e. moisture from products, cleaning chemicals, water);
b) easily cleaned and sanitised;
c) durable and capable of withstanding repeated exposure to normal cleaning and sanitising; and
d) in the case of materials lining the walls, floors and ceilings, be of a colour that does not disguise contaminants (having regard to the lighting arrangements and the type of process carried out on the premises) [AC Spec 3.2 (1)].

Commonly used acceptable materials for floors are sealed concrete, floor tiles, and vinyl. Concrete or mortar floors which incorporate an approved latex or synthetic resin finish have better than ordinary resistance to meat, fats and acids.

Ideally insulated panels are used for walls in processing areas. Laminates and melamine face sheeting are also suitable construction materials. Porous surfaces such as cement or plaster are not acceptable unless they are sealed to render them impervious to moisture.

The floor/wall junctions and corners should be coved in areas where wet operations or cleaning occur.

Hollow coving should be avoided to prevent debris from accumulating and pest harbourage.

Floor joints and wall joints should be finished flush with the surface, and be sealed to prevent the entry of water, pests and contaminants.

Floors should allow effective drainage of water (i.e. no water pooling). Ideally they should be sloped so that water will run off to floor drains. Careful consideration should be given to the siting of machinery. Suitable drainage should be provided so that any discharge or overspill from processing goes directly into a drain rather than on the floor.

(2) Objects attached to walls and ceilings, such as:

a) pipes;
b) cables;
c) overhead cranes;
d) light fixtures; and
e) fans and hoses.

should be accessible for cleaning and located where they do become a source of contaminants of products (eg dust, dirt, rust particles, and peeling paint falling onto products or processing equipment).

(3) Product lines, service lines, and ducting that pass through walls, ceilings or floors should be sealed to prevent:

a) water seepage; and
b) harbourage and entry of pests.

4.2.5 Doors and windows

(1) Doors should be installed where their opening and closing from external surroundings or other areas of lower hygiene status (e.g. waste area) will not result in contamination of:

a) petfood material and products;
b) processing equipment and the processing environment.

Doors in areas where processing and/or packing is carried out should not open directly to the outside environment. An anteroom is recommended for providing two doors between the processing or packing room and the outside.

(2) Doors and windows should be properly sealed to prevent water seepage, and harbourage and entry of pests.

(3) When plastic strips are used in doorways, they should be maintained in a clean and good working condition.

(4) Glass windows should not be used where glass could contaminate product if the window breaks.

Alternatively safety glass is satisfactory.

4.2.6 Drainage

(1) The design and construction of the drainage system should prevent:

a) odours, pests, other objectionable material and storm water from entering the premises; and
b) prevent contamination of products, packaging and equipment from aerosols and splashes from drains.

(2) Drains should be of sufficient capacity (i.e. size and fall) to ensure liquid and solid waste is contained and rapidly removed to minimise the spread of waste across floors.

Screens or grating should be installed to prevent large fragments of solid material from entering the drains.

4.2.7 Lighting

(1) Facilities should have adequate natural and/or artificial lighting of sufficient intensity and quality to enable satisfactory performance of all operations, checks, and inspections [AC Spec 3.4 (1)].

The following lighting intensities are recommended:

- processing rooms – 500 lux, measured at working plane;
- areas where product is inspected and prepared to inspection standards – 750 lux, measured at the working plane;
- laboratories – 750 lux, measured at the bench;
- stores with constant operation – 300 lux, measured at the floor aisles; and
- staff rooms, changing rooms, lavatories – 150 lux, measured at the floor.

(2) Lights and light fixtures should be of a safety type, or protected to prevent contamination in the event of breakage, over:

a) products;
b) exposed packaging material; or
c) equipment.

4.2.8 Ventilation

(1) Adequate ventilation and air flow should be maintained in storage areas and the processing environment to:

a) prevent product deterioration;
b) remove excessive heat, steam and condensation; and
c) minimise the entry of odours, dust, vapours or smoke.

4.2.9 Water and steam

(1) To ensure the safety and suitability of product and the hygienic operation of the premises, the following should be available:

a) an adequate supply, volume and pressure of clean water; and
b) appropriate facilities for its storage, distribution and temperature control.

When hot water is used for the sterilisation of processing equipment and other product contact surfaces, it should be at least 82°C at the point of use.

(2) Steam used in direct or indirect contact with product or product contact surfaces should not contain any substances which may be hazardous to animal health. Steam should be produced from clean water.

4.2.10 Process gases and product contact air

(1) Gases used for processing that come into direct contact with petfood material or product must not result in contaminated product [AC Spec 3.10 (1)].

(2) When compressed air is generated on-site for the purpose of processing and comes in direct contact with any product, the air must be clean and filtered [AC Spec 3.11 (1)].

Product contact air includes:

- air used for cooling, drying, conveying, mixing and stirring; and
- compressed air that comes in contact with product or product contact surfaces.

Equipment using pressurised air in direct product contact should be fitted with a filter located as near to the use outlet as is feasible. The choice of filter will depend on the nature of the product and process, and the size, nature and concentration of the particulate matter to be removed.

Filters should be readily removable for replacement or cleaning.

4.2.11 Temperature-controlled processing rooms

(1) Temperature controlled processing rooms and equipment must be operated within their design capability and capacity, and must consistently deliver any temperature specified in legislation or in the RMP [AC Spec 3.3 (3)].

In the meat industry, it is common practice for processing areas to be maintained at ≤ 12°C, except when:

- conditions are sufficient to maintain the temperature of the meat and/or mix ≤ 7°C; and/or
- processing areas are used for thermal processing or where a higher temperature is either not detrimental to product safety or is required for its manufacture.

4.2.12 Refrigeration facilities

(1) Refrigeration facilities (chillers, freezers, thawing rooms) should have the:

a) capability to reduce product temperatures to the required temperature within the prescribed time or maintain product temperatures at or below the required temperature; and
b) capacity appropriate for the volume of products likely to be processed or held in the refrigeration facility any one time.

4.2.13 Waste facilities

(1) Equipment and storage areas that are used to store or contain waste must be clearly identified and not be a source of contamination to any product [AC Spec 3.13 (1)].

4.2.14 Processing equipment

(1) All equipment that come into contact with any product should be designed, constructed, installed and operated in a manner that:

a) ensures the effective performance of the intended task;
b) ensures effective cleaning and sanitation;
c) facilitates effective process control and monitoring; and
d) do not cause contamination of the product.

(2) Equipment must be:

a) durable;
b) resistant to chipping, cracking, flaking, delamination and abrasion;
c) able to withstand exposure to heat, water and all products expected to be processed under normal operating conditions;
d) designed to minimise build-up of food material and other residues; and
e) corrosion resistant [AC Spec 3.2 (1)].

(3) All surfaces in direct contact with any product should be inert to the product, cleaning materials and other substances that it is likely to be exposed to under normal conditions of use.

(4) The following materials should not be used in any equipment or product contact surface:

a) toxic metals such as cadmium, lead and their alloys;
b) metals whose contact with liquid or other material may create harmful chemical or electrolytic action;
c) porous materials such as sponge rubber, stone slabs, linoleum, leather and fabrics (excluding strainers/filters); and
d) wood.

Stainless steel (300 series or better) is the preferred material for equipment that comes into contact with meat products.

Aluminium is not recommended. It can:

- warp;
- be susceptible to the effects of both oxidation and certain types of corrosion, especially from alkaline cleaning chemicals; and
- be susceptible to pitting and scratching

Galvanised metal should not be used for product contact surfaces as the zinc coating:

- wears off to expose the base iron sheet, which corrodes; and
- is soluble in acidic food, and in acid and alkali detergents.

Galvanised iron cages and trolleys may be used provided they do not come in direct contact with any exposed product.

Wood is not a suitable material for product contact surfaces because its porous nature allows products to penetrate the surface, and once impregnated it cannot be cleaned effectively. Residual product in the wood provides a nutrient source for microorganisms.

New equipment which will be used in direct contact with meat products should be provided with a letter of guarantee from the supplier certifying its acceptability for food use.

(5) Effective cleaning of equipment, machinery, storage racks and shelving is enhanced if they are a:

a) sufficient height off the floor; and
b) sufficient distance from walls and other equipment.

(6) Containers used for holding petfood material, ingredients and products should be clearly identified and differentiated (e.g. by labels or colour coding) from those used for containing waste, cleaning materials and other purposes.

4.2.15 Monitoring equipment

(1) Monitoring equipment (e.g. thermometers, relative humidity gauges) should have the capability and accuracy appropriate for:

a) the product, process, facility or equipment it is fitted to; and
b) measurement being taken.

(2) Monitoring equipment should be:

a) installed where it can be easily read;
b) able to take accurate readings of the relevant parameter (e.g. warmest temperature of the refrigeration equipment or facility and the coldest temperature of the cooking equipment); and
c) adequately protected from physical and chemical damage.

(3) Measuring equipment that is used to carry out a critical measurement must be calibrated [AP Reg 14].

Refer to Part 12 Calibration of Measuring Equipment.

4.2.16 Cleaning facilities and equipment

(1) Cleaning and sanitation facilities, and equipment, must be provided to ensure that personnel hygiene, hygienic condition of equipment, vehicles, conveyances, premises or places can be maintained [AC Spec 3.3 (5)].

(2) Cleaning equipment should be maintained in a hygienic and good working condition.

(3) Cleaning equipment that comes into contact with petfood material, ingredients, products, and packaging should be:

a) clearly identified and differentiated (e.g. by labels or colour coding); and
b) stored separately from those used for other purposes e.g. cleaning of floors and drains.

4.2.17 Employee amenities

(1) There should be employee amenities that provides sufficient space and facilities for employees to:

a) consume food;
b) change clothes;
c) store personal belongings; and
d) attend to personal hygiene.

(2) Employee amenities should not open directly into any processing area.

(3) Lockers for storing employees' clothing and personal belongings should be provided. There should be adequate free space to for allow easy cleaning of lockers and their surrounding area.

(4) All opening windows or vents of amenities should be adequately screened against pests.

(5) Toilet vents should be sited far enough from ventilation intakes of processing and storage areas to prevent cross contamination of these areas.

4.2.19 Washing and sanitising units

(1) Hand washing units should be:

a) sufficient in number to allow for effective hygiene;
b) non-hand operable (e.g. foot, knee or automatic);
c) located in areas that are readily accessible to all persons working in or entering a processing area; and
d) provided with warm potable water and approved liquid soap.

(2) Disposable paper towels or other hand drying facilities that do not contaminate washed hands or the surrounding area should be provided.

(3) Facilities for washing waterproof protective clothing (e.g. boots, aprons, gloves) should be provided.

The facilities should be located in or adjacent to the processing area and designed and constructed in a manner that minimises splashes on to surrounding areas, products, and equipment.

4.3 Requirements and Procedures - Repairs and Maintenance

(1) The operator must document and implement a repairs and maintenance programme for the premises, facilities and equipment to ensure that they are maintained in good working and hygienic condition [AP Reg 11 (1)].

The repairs and maintenance programme should include the following information:

- identity of the responsible person;
- procedures for routine or programmed maintenance (i.e. preventive maintenance), including monitoring activities and their frequencies;
- procedures for facilities and equipment breakdowns;
- corrective actions;
- procedures for inspection of any completed repairs or maintenance work; and
- records to be kept.

For small operations with simple processes a documented system may consist of a checklist or register for repairs and maintenance. The register should include the following information:

- the item, equipment or facility that requires fixing;
- the date the problem was identified and by whom;
- the solution to the problem (may include short term or temporary fix and/or long term or permanent fix);
- target dates for undertaking and completing the work; and
- the identity of the person responsible for ensuring the work is done.

Target dates for undertaking and completing repairs and maintenance work should be based primarily on the problem's potential impact on product safety, such as:

- likelihood and severity of contamination exposed products;
- product contact surfaces; and
- the processing environment).

Other considerations that the operator may take into account are:

- Potential impact on product quality or operating efficiency;
- Potential impact on occupational safety; and
- Cost, disruption to operations, or size and complexity of the work required

(2) Repairs and maintenance work should be undertaken in a manner that minimises contamination of petfood material, ingredients, products, packaging, equipment and the processing environment.

(3) Prior to any alteration, repair or maintenance work on buildings, facilities or equipment, a suitably skilled person should:

a) assess its potential for contaminating ingredients, products, packaging, equipment and the processing environment; and
b) put in place appropriate controls to minimise their exposure to contamination.

(4) Major alterations on the premises and facilities, and routine or programmed maintenance of equipment that may affect hygienic operations should not be done during processing.

(5) All maintenance personnel must comply with the requirements for personnel hygiene appropriate to the area they are operating in, including access restrictions, hygienic practices, and protective clothing requirements.

(6) Chemicals used during repairs and maintenance must be used in accordance with any specified conditions of their approval and the manufacturer's instructions. RMP operators may only use approved maintenance compounds when carrying out repairs and maintenance activities.

Refer to Part 7 Control of Maintenance Compounds.

(7) Tools used for repairs and maintenance should not come in contact with, or cause the contamination of any ingredient, product, or packaging material.

Tools should be cleaned and whenever possible, be sanitised before being taken into processing areas. Tools should be immediately removed from the area after maintenance or repair work is completed. Tools should be stored in a designated place (if owned by the operator), and be maintained in a hygienic condition.

When practical, it is recommended that operators have maintenance tools dedicated for use in specific areas of their operation to avoid cross-contamination.

(8) After completion of any repair or maintenance work and prior to starting processing, the responsible person should check that:

a) the facility or equipment has been repaired to a satisfactory working condition;
b) all maintenance tools and pieces of equipment (e.g. nuts, bolts) are removed from the area to prevent contamination of products; and
c) the affected processing area and equipment are cleaned and sanitised, as needed.

4.4 Records

(1) Records of the following must be kept:

a) building layout and floor plans;
b) any engineering designs and specifications;
c) any equipment diagrams and specifications;
d) repairs and maintenance worksheets or registers; and
e) monitoring and corrective action records [RMP Spec 20 (2)].

Part 5: Design and Construction – Additional or Specific Requirements for Primary Processing Facilities

5.1 Scope

(1) This Part discusses the additional or specific requirements for the design and construction of primary processing facilities.

(2) RMP operators involved in the slaughter and dressing of farmed mammals and birds for processing into petfood should meet the specific requirements given in this Part that are applicable to their operation. Other relevant requirements in Part 4 Design, Construction and Maintenance of Buildings, Facilities and Equipment for all Petfood Operations should also be met.

(3) RMP operators involved in the harvesting of wild animals (rabbits, hares, wallabies, possums, goats and deer) for processing into petfood should comply with the requirements given in clause 5.2.4 Wild animal depots.

5.2 Requirements and Procedures

5.2.1 Animal holding facilities

(1) Appropriate animal holding facilities must be provided where animals are held prior to slaughter. These must be operated within their design and capacity [AC Spec 3.3 (1)].

(2) Animal holding facilities should be designed, constructed, and located to:

a) ensure compliance with animal welfare requirements;
b) effectively contain animals;
c) facilitate ante-mortem examination;
d) allow normal mobility and an easy flow of animals from holding facilities to the slaughter facilities
e) allow effective cleaning; and
f) minimise any adverse effects on the hygienic slaughter and dressing of animals and the processing, packing, storing and transport of petfood material.

(3) Animal holding facilities and unloading areas (pens, races, receiving areas) must comply with animal welfare requirements under the Animal Welfare Act 1999.

Refer to the Animal Welfare (Commercial Slaughter) Code of Welfare 2010 for animal welfare requirements, available on the MPI website at http://www.mpi.govt.nz/protection-and-response/animal-welfare/codes-of-welfare/.

(4) The outer perimeter of animal pens and races leading to the slaughter floor should be curbed to a height sufficient to contain liquid waste.

(5) The pen and race floors should be constructed of impervious material and allow water, and liquid waste to drain into a drainage system.

(6) Facilities should be provided for washing animals to remove contamination from the hide or the skin, when necessary.

5.2.2 Ante-mortem and post-mortem facilities

(1) Appropriate facilities for ante-mortem and post-mortem examination of mammals and birds must be provided, when appropriate [AC Spec 3.3 (2)].

(2) The site selected for ante-mortem examination should allow for animals to be effectively contained and viewed for examination purposes.

(3) Adequate space and facilities should be provided for post-mortem examination such that all parts of the animals can be examined effectively.

(4) Sufficient natural or artificial lighting must be provided to enable the effective examination of animals at ante-mortem examination and of animal materials at post-mortem examination [AC Spec 3.4 (1)]. Refer to clause 4.2.7 Lighting.

5.2.3 Slaughter and dressing facilities

(1) Slaughter and dressing facilities should be designed and constructed to:

a) ensure hygienic slaughter and dressing;
b) facilitate hygienic product flows;
c) allow effective cleaning;
d) ensure compliance with animal welfare requirements; and
e) facilitate post-mortem examination.

(2) Animal restraining and stunning equipment must comply with the requirements of the *Animal Welfare (Commercial Slaughter) Code of Welfare 2010*.

(3) Adequate facilities should be provided to ensure correlation of each carcass to its parts.

(4) Slaughter floors should have hand washing facilities and, where required, sterilisers readily accessible and at appropriate locations for use during processing.

(5) Where a moving chain system is used, chain stopping devices should be provided to facilitate hygienic processing and carcass examination, and ensure safe operations.

(6) Slaughter floors should have:

a) processing rails or other carcass elevating devices of a height sufficient to ensure there is adequate carcass clearance over, or from, operational equipment; and
b) structures and equipment should be built prevent any cross-contamination.

(7) Where carcass washing is carried out during processing, carcass wash areas should be constructed to confine wash water to that area and direct it to the drainage system.

(8) Where further inspection or treatment is necessary, slaughter floors should have facilities for retaining carcasses or carcass parts.

(9) Adequate facilities should be provided for secure holding and disposal of condemned material. Facilities and equipment used for condemned materials should be properly identified.

5.2.4 Wild animal depots

(1) Wild animal depots should be designed and constructed to facilitate the hygienic chilling and holding of the carcasses of harvested wild animals (rabbits, hares, wallabies, possums, goats and deer).

(2) The depot should be located on a readily drained site with firm and reasonably dust-free ground, away from stock and other animals.

(3) Buildings and facilities should be constructed to minimise the entrance, harbourage, or accumulation of pest and contaminants.

(4) All equipment used in contact with product should be constructed of materials that will not affect the suitability for petfood processing and that can be readily cleaned and sanitised. Materials should be: durable, non-toxic and free from defects.

(5) Adequate facilities should be provided for the suspension of carcasses to avoid contact with walls, floors, ceilings or other structures, fittings and equipment.

(6) The depot should have a refrigeration facility capable of achieving the required product temperature within the specified time, considering the refrigeration unit's maximum capacity.

(7) The internal temperature of carcasses of wild animals must be reduced to ≤ 7°C within 24 hours of killing. If carcasses are to be frozen, the internal temperature should be continuously reduced to ≤ -12ºC [AC Spec 7.19].

A refrigerator or box freezer may be considered a refrigeration facility.

(8) The refrigeration facility should have a calibrated temperature gauge for monitoring refrigeration temperature.

Temperature gauges should be calibrated annually and a record of the calibration should be kept.

(9) A supply of suitable water, with appropriate facilities for its storage and distribution, should be provided in sufficient volume and pressure for the hygienic operation of the depot.

Suitable water means water that is free of excessive turbidity, colour, offensive odour, and pollutants, such as human or animal waste and toxic chemicals.

(10) Suitable cleaning equipment should be available for the effective cleaning of the depot and its facilities and equipment.

Only approved maintenance compounds may be used for cleaning. Refer to the MPI Approved Maintenance Compounds (Non-dairy) Manual for a list of MPI approved maintenance compounds, available on the MPI website at: http://www.foodsafety.govt.nz/registers-lists/maintenance-compounds/.

(11) Adequate facilities should be provided for the collection and disposal of waste materials. All waste water should be adequately contained and ducted to a drain.

(12) Where a toilet facility is provided, it should be located and constructed so as not to adversely affect the hygienic operation of the depot.

5.2.5 Mobile slaughter premises

(1) The premises' location, design and construction should prevent contamination and comply with regulatory requirements by providing:

a) a hygienic environment for the holding, slaughter and dressing of animals; and
b) the hygienic processing, packing, storing and transport of petfood materials and products.

(2) Premises should be located, designed, constructed, equipped and serviced to provide a standard of operation equivalent in outcome to that required for fixed-location premises, in accordance with the applicable sections of:

a) Part 4 Design, Construction and Maintenance of Buildings, Facilities and Equipment for all Petfood Operations; and
b) Part 5 Design and Construction - Additional or Specific Requirements for Primary Processing Facilities.

5.3 Records

(1) Records of the following must be kept:

a) building layout and floor plans;
b) any engineering designs and specifications;
c) any equipment diagrams and specifications;
d) repairs and maintenance worksheets or registers; and
e) monitoring, corrective action and verification records [RMP Spec 20 (2)].

Part 6: Water

6.1 Scope

(1) This Part discusses the requirements for water for different applications and uses in a petfood operation.

6.2 Requirements and Procedures

6.2.1 Water (all types and sources) that comes into contact with petfood material or products

(1) Water (including ice and steam) that comes into direct or indirect contact with petfood material or products must be clean water or clean sea water (i.e. on fishing vessels) at the point of use [AC Spec 3.5 (1)].

6.2.2 Water management – applies to all petfood operations regardless of the type or source of water

(1) An adequate supply of clean water (or clean sea water, as appropriate) should be available for:

a) processing of products;
b) cleaning;
c) personnel hygiene activities; and
d) any other activity that requires water and which comes into direct or indirect contact with any petfood material or product.

(2) The water reticulation system within the premises must be designed, installed and operated in a manner that prevents:

a) cross connections between clean water and water of a lower standard;
b) stagnant water (i.e. no dead ends and unused pipes); and
c) back flow that may cause contamination of the clean water supply [AC Spec 3.8 (2)].

(3) Water pipes, storage tanks and other parts of the reticulation system must be maintained in good condition [AC Spec 3.8 (2)].

It is recommended that the operator periodically checks the condition of the reticulation system, and records of these checks should be kept.

(4) The reticulation system should be flushed to ensure that stagnant water, rust, scale or other material is flushed out of the system when:

a) water is not used for an extended period; and
b) repairs to the system have been made.

(5) When additional treatment is applied by the operator to make the water suitable for its intended use, the operator must include the following information in the RMP:

a) information about the additional treatment (including type of treatment, operating parameters, procedures for control, monitoring/testing and acceptable limits);
b) a water sampling and testing programme for monitoring the effectiveness of the specific water treatment applied; and
c) corrective action procedures for instances when the water source is found to be unsatisfactory based on the results of any test done [AC Spec 3.8 (2)].

The operator should obtain information from the supplier of the particular treatment method or equipment regarding the control and monitoring procedures (e.g. the types and frequency of water testing necessary

to confirm the effectiveness of the treatment). This ensures the treatment's effectiveness and prevents it from adversely affecting the safety or quality of the water (e.g. clogging of filters).

6.2.3 Clean water supplied by an independent supplier (without additional treatment)

(1) Water supplied by a local authority or council (i.e. town supply), or other independent supplier that meets the standards for drinking water under the Health Act 1956, is considered as clean water.

(2) When the operator is advised by the supplier that the water supplied is not fit for human consumption, the operator must cease all operations that involves the unfit water. Operations must remain ceased until the problem is rectified and clean water is available again [AC Spec 3.9 (2) (a)].

(3) Despite clause 6.2.3 (2), the operator may continue operations provided the operator is able to show that:

a) the RMP specifically provides a means for ensuring that water is still suitable for its intended purpose at its point of use (e.g. the operator applies a chlorination or filtration step); or
b) an assessment of water quality has been undertaken by the operator and the results indicate that the water is safe and suitable for its intended purpose [AC Spec 3.9 (2) and (3)].

(4) A record of the assessment carried out under 6.2.3 (3) must be kept.

6.2.4 Clean water supplied by the operator for their own use

(1) Operators supplying clean water solely for their use, within a premises or place, must assess all of their water sources (e.g. bore water, rain water, river water).

(2) Operators should demonstrate that the operator supplied water does not adversely affect the safety or suitability of any petfood material or product.

(3) The operator must keep a copy of the completed assessment as part of the RMP [AC Spec Schedule 1].

(4) The clean water supply must be reassessed:

a) every five years;
b) whenever a new source of water is used in the plant; and
c) within a month of there being a change to the environment around the water source that may affect the water quality [AC Spec Schedule 1].

(5) Clean water must be subject to ongoing monitoring according to the following requirements:

a) clean water must meet the criteria at the point of use according to the testing frequency, set out in 'Table 1: Water testing requirements for water supplied by the operator for their own use';
b) microbiological testing must be performed by or under the supervision of a recognised signatory of an ISO/IEC 17025 accredited laboratory with the required tests in the laboratory's scope of accreditation; and
c) the operator must ensure that the training of water samplers is undertaken by a laboratory referred to in clause (b) [AC Spec Schedule 1].

Table 1: Water testing requirements for water supplied by the operator for their own use

Measurement	Criteria	Test frequency
Faecal coliforms	Must not be detected in any 100 ml sample	6 monthly
Turbidity	Must not exceed 5 NTU	6 monthly
Chlorine (when chlorinating)	Not less than 0.2 ppm (mg/L) free available chlorine with a minimum of 20 minutes contact time	Daily
pH (when chlorinated)	6.6 to 8	6 monthly

(6) When the ongoing monitoring of water quality shows that any of the criteria in Table 1 is not met, the operator must cease all operations where water comes into direct or indirect contact with petfood material or product until the problem is rectified and clean water is available again [AC Spec 3.9(2)(c)].

(7) Despite clause 6.2.4 (4), the operator may continue operations provided the operator is able to show that it meets the conditions given in clause 6.2.2 (2) [AC Spec 3.9 (2) and (3)].

6.2.5 Clean seawater used on fishing vessels

(1) When seawater is used on fishing vessels, it must only be taken from places that are of a sufficient distance offshore to ensure that water quality is not at risk from any source of pollution [AC Spec 3.7 (1)].

(2) Any water treatment equipment used for clean seawater (including desalination plants), must be installed, maintained and operated in accordance with the equipment manufacturer's instructions [AC Spec 3.7 (2)].

6.3 Records

(1) Records of the following must be kept:

a) water assessment records;
b) any checks of the reticulation system;
c) any water testing results; and
d) monitoring, corrective action and verification records [RMP Spec 20 (2)].

Part 7: Control of Maintenance Compounds

7.1 Scope

(1) This Part discusses the requirements and procedures for the storage, handling, and use of maintenance compounds. Maintenance compounds refers to substances used for cleaning, sanitising, pest control, and repairs and maintenance of equipment and facilities.

7.2 Requirements and Procedures

7.2.1 General requirements

(1) The operator should develop written procedures for the handling, storage and use of maintenance compounds.

(2) Maintenance compounds must be stored, handled, and used in a manner that minimises contamination of ingredients, products, packaging, equipment, and the processing environment [AP Reg 11 (3)].

(3) Only approved maintenance compounds may be used during processing operations or in the maintenance of processing areas, facilities and equipment, except when clause 7.2.1 (4) applies [AC Spec 3.14 (1)].

Refer to the MPI Approved Maintenance Compounds (Non-dairy) Manual for a list of MPI approved maintenance compounds, available on the MPI website at: http://www.foodsafety.govt.nz/registers-lists/maintenance-compounds/.

(4) The operator may use an alternative maintenance compound (i.e. unapproved by MPI) provided the operator has assessed that the compound and its intended use will not adversely affect the safety and suitability of any petfood material, ingredient or product [AC Spec 3.14 (2)].

(5) The assessment undertaken by the operator should be documented.

(6) A list of maintenance compounds used and held on the premises should be kept and maintained up-to-date.

7.2.2 Labelling

(1) All containers of maintenance compounds held and used within the premises must be clearly labelled with the name of the maintenance compound it contains. For approved maintenance compounds, the name on the label must be as it appears in the MPI Approved Maintenance Compounds (Non-dairy) Manual or current MPI letter of approval [AC Spec 3.14 (3)].

The MPI Approved Maintenance Compounds (Non-dairy) Manual is available on the MPI website at: http://www.foodsafety.govt.nz/registers-lists/maintenance-compounds/.

Proper labelling should be applied to all types and sizes of chemical containers and dispensing equipment.

7.2.3 Storage

(1) Maintenance compounds should be:

a) stored in a designated area (e.g. shelf, cupboard or room); and
b) kept separate from petfood material, ingredients, products, and product contact packaging materials.

(2) Maintenance compounds should be kept in sealed containers when not in use.

7.2.4 Use of maintenance compounds

(1) All maintenance compounds should be used according to the directions of the manufacturer and, if applicable, any conditions of the MPI approval, by or under the supervision of suitably skilled persons.

(2) Directions for use and, if necessary, material safety data sheets, should be kept on-site and be available to users (e.g. given on the label, posted on the wall or provided in product information data sheets).

(3) Petfood material, ingredients, products and exposed packaging should be removed from the area or kept protected (e.g. covered) prior to the use of any maintenance compound that may result in their contamination.

(4) Equipment and other product contact surfaces should be cleaned by thorough washing after exposure to any maintenance compound, except for no-rinse-type chemicals that have been approved for that purpose.

(5) All containers or utensils used for measuring, mixing or transferring maintenance compounds should be:

a) clearly identified (e.g. labelled as 'For Chemicals Only'); and
b) only used for the identified purpose.

7.2.5 Disposal of chemical containers

(1) Empty chemical containers should be disposed of:

a) in a manner that will not contaminate any product or product contact surfaces; and
b) in accordance with manufacturer's instructions.

(2) Empty chemical containers should not be re-used for any other purpose within the premises.

7.2.6 Chemical contamination

(1) When chemical contamination occurs, the following actions should be taken:

a) dispose of all affected petfood material or product accordingly;
b) clean affected product contact surfaces and when appropriate, sanitise prior to reuse; and
c) exclude the use of affected packaging materials that cannot be effectively cleaned and sanitised for packing of any product.

7.3 Records

(1) Records of the following must be kept:

a) list of chemicals used and held in the premises;
b) any chemical information sheets provided by the supplier, including instructions for handling and use;
c) employee training records; and
d) monitoring and corrective action records [RMP Spec 20 (2)].

Part 8: Cleaning and Sanitation

8.1 Scope

(1) This Part discusses the requirements and procedures for cleaning and sanitation to ensure that all areas within the premises, facilities and equipment are maintained in a hygienic condition.

8.2 Requirements and Procedures

8.2.1 Documented cleaning programme

(1) The operator must develop and implement a written cleaning programme for:

a) processing areas;
b) storage areas;
c) freezers and chillers;
d) equipment;
e) amenities; and
f) external areas of the premises [AP Reg 11].

(2) The cleaning programme should include the following information:

a) areas/equipment to be cleaned;
b) procedures for all cleaning and sanitising operations, including the cleaning method, frequency of cleaning and sequence of cleaning;
c) detergents/sanitisers to be used, their concentration, application method, and contact time required;
d) the identity or position of the person(s) responsible for the cleaning activity;
e) methods and frequencies of monitoring and verification of the effectiveness of the cleaning and sanitation procedures; and
f) cleaning records forms or check sheets.

8.2.2 General cleaning procedures

(1) Cleaning should be carried out in a manner that prevents the contamination of:

a) petfood material;
b) ingredients and products;
c) packaging; and
d) previously cleaned areas, facilities and equipment.

(2) Workers should be adequately trained on the handling of cleaning chemicals and the implementation of the cleaning programme.

(3) The cleaning method should be appropriate to the type of surface to be cleaned, and the type and characteristics of the residual material or dirt to be cleaned off the surface.

Most processing areas will require a wet cleaning routine. Dry cleaning will be more appropriate for areas where dry materials are handled and stored (e.g. dry store room, dry ingredient weighing or batching areas). Other areas will require a combination of both methods. For example, the packing area should be kept dry during operations and should only be dry cleaned during processing, but may require wet cleaning occasionally.

(4) Cleaning compounds should be used in accordance with the procedures given in Part 7 Control of Maintenance Compounds.

8.2.3 Wet cleaning of processing areas and equipment

(1) Processing areas and equipment (except dry areas/equipment) should be wet cleaned using effective cleaning and sanitising procedures.

Cleaning should commence without delay after finishing the day's operation, because the more the dirt ages, the more difficult it is to remove from equipment surfaces.

Cleaning of facilities and equipment which are no longer in use should not be started if there:

- are still exposed products and packaging within the area; and
- is potential for exposed products and packaging to be contaminated from splashes and aerosols created during cleaning.

A basic cleaning and sanitising system usually includes the following steps:

- removal of gross contamination (e.g. removing scraps);
- rinsing the area with cold or warm water (≤ 60°C to prevent coagulation of protein, which makes it extremely difficult to remove);
- applying a detergent solution or foam and leaving it on all surfaces for the time specified by the manufacturer;
- scrubbing surfaces to loosen and remove dirt;
- rinsing with water, and draining;
- if scale has to be removed, an acid detergent is used at this stage, followed by rinsing and draining;
- applying a chemical sanitiser and leaving it on all surfaces for the time specified by the manufacturer;
- rinsing off the chemical sanitiser with water and draining (not needed if a no-rinse sanitiser is used); and
- allowing surfaces and equipment to dry.

(2) Petfood material, ingredients, products, packaging material and other materials that may be contaminated during cleaning should be:

a) removed from the area and stored in appropriate locations; or
b) protected by covers, before wet cleaning is started.

(3) Clean water should be used for wet cleaning of facilities and equipment.

(4) Floors and drains in wet processing areas should be cleaned daily. Cleaning water and steam should be contained within the immediate area that is being wet cleaned, and allowed to drain completely.

(5) Walls and doors should be cleaned daily by hosing or other effective means to remove any visible contamination.

More intensive cleaning (e.g. foaming and scrubbing) at regular frequency (e.g. weekly) should be done to remove any build-up of residues and microorganisms.

Stains: walls adjacent to and ceilings above thermal processing equipment can develop stains which cannot be removed by regular cleaning. Stains may make it difficult to assess the visual cleanliness of the surface. Other means of demonstrating the effectiveness of cleaning may be necessary (e.g. microbiological testing of surfaces).

Surfaces which become excessively stained should be replaced. Ways of effective containment or venting of heat or steam from thermal processing equipment should be considered to minimise staining of adjacent walls and ceilings.

(6) Ceilings and overhead structures in processing areas should be checked regularly and cleaned at an appropriate frequency.

Condensation on overhead structures directly above product is regarded as a critical defect (see 8.2.12 Pre-operational check for definition), and should be removed before processing can commence or continue.

(7) Product contact surfaces, including processing and conveying equipment, should be cleaned:

a) at least at the end of each production day, unless an alternative cleaning frequency has been validated by the operator;
b) whenever surfaces become contaminated or come into contact with waste; and
c) whenever necessary to prevent cross-contamination between products of different hygiene status (e.g. raw and cooked products).

Equipment and machinery that require disassembly for effective cleaning should:

- be disassembled in accordance with manufacturer's instructions; and
- ensure cleaning and sanitising of all parts and surfaces, including hard-to- reach areas where product residue can build up.

(8) When footbaths are used, they should be maintained properly with effective concentrations of sanitiser so that they do not become a source of contamination.

8.2.4 Dry cleaning of dry processing and storage areas

(1) Dry processing areas and stores should be kept dry, and be cleaned regularly by appropriate dry cleaning methods.

Dry cleaning methods include brushing, scraping, sweeping, vacuuming, and blowing with compressed air.

The cleaning method should minimise the creation of dust and air-borne contamination.

When vacuum cleaning systems are used, filters should be changed regularly and dust bags should be removed and replaced in a way that will not result in the contamination of any product or product contact surface.

(2) Products, dry ingredients, packaging and other materials should be stacked and stored in a tidy manner. Adequate space should be available to allow effective cleaning in storage areas.

(3) Spillage (e.g. dry ingredients) should be cleaned up immediately and disposed of appropriately.

8.2.5 Cleaning of chillers and blast freezers

(1) Chillers and freezers should be maintained in a tidy condition.

(2) Chillers and freezers should be emptied, and cleaned and sanitised regularly at a frequency specified in the cleaning programme.

8.2.6 Cleaning of air conditioning and refrigeration units

(1) Regular cleaning should be carried out for:

a) cleaning coils;
b) fans;
c) drip trays;
d) drainage pipes; and
e) vents of air conditioning units.

(2) Filters of the cold air ducting system should be cleaned or replaced regularly.

8.2.7 Cleaning of amenities

(1) Amenities should be cleaned at least daily and maintained in a hygienic condition throughout the day.

8.2.8 Maintenance and storage of cleaning equipment

(1) Cleaning implements and equipment should be maintained in a hygienic condition. They should not introduce any hazard or foreign object to any ingredient, product, packaging or product contact surface.

Porous and absorbent items (e.g. rags, wooden handled tools) should not be used in processing areas as they are difficult to clean and they harbour microorganisms. Steel wool should not be used for cleaning in processing areas. Cleaning implements and equipment should be sanitised daily (e.g. soaked in sanitiser solution), and maintained in a good state of repair.

(2) Different cleaning implements (e.g. brushes) should be used for product and non-product surfaces (they can be differentiated by colour-coding).

(3) Hoses should be stored off the ground on reels or racks when not in use.

(4) Cleaning equipment should be stored in a hygienic manner in designated facilities.

8.2.9 Removal of waste materials

(1) Waste must be:

a) collected in clearly identified waste containers;
b) kept under controlled conditions to ensure that it will not be mistakenly or fraudulently released as suitable for processing or fit for human consumption; and
c) be disposed of in a manner that ensures that it will not become a source of contamination to other petfood material or product [AC Spec (3.13)].

(2) Waste should not be allowed to accumulate in processing areas. If necessary, waste should be periodically removed from processing areas during the working day.

(3) Waste bins in processing areas that are taken to areas of lower hygienic status should be cleaned and sanitised before being returned to processing areas.

(4) Outside waste bins should be covered, maintained in a tidy condition, and collected regularly so that they do not attract pests and create objectionable odours.

8.2.10 External areas

(1) External areas within the RMP boundary, including gardens, lawns, old equipment yards, shipping containers, outside sheds, and waste collection units, must be maintained in a tidy condition to minimise potential sources of contaminants and harbourages for pests [AP Reg 11].

8.2.11 Cleaning inspection

(1) Cleaning checks or inspections should be undertaken on a regular basis, as indicated in the cleaning programme to:

a) ensure compliance to the cleaning programme; and
b) check the effectiveness of cleaning by assigned personnel.

Cleaning inspection is usually done at the end of each production day to check that the area, facilities and equipment have been cleaned to the standard required.

The general criteria for clean product contact surfaces and facilities are:

- no visible contamination;
- work surfaces should not feel greasy when rubbed with fingers;
- a clean, white tissue should not be discoloured when rubbed over the surface of cleaned stainless steel (this does not apply to galvanised iron or aluminium);
- objectionable smells should not be noticeable; and
- cleaned surfaces should not show signs of excessive water break when wetted.

Ideally, cleaning inspection and pre-operational check should be done as separate activities by different personnel. It is recognised that this may be impractical for small operations that have very few personnel, and for such cases, the two activities may be combined.

Occasional microbiological sampling and testing of facility and equipment surfaces may be useful for verifying the effectiveness of cleaning within the premises.

8.2.12 Pre-operational check

(1) Pre-operational checks of facilities and equipment should be conducted by a suitably skilled person to ensure that operations only begin after sanitation requirements have been met.

The person responsible for doing pre-operational checks should have good knowledge of the cleaning methods and the criteria for assessing cleanliness. He/she should be able to assess the potential effect of particular defects on product safety and determine appropriate corrective actions for any non-compliance.

Visual inspection of cleaned surfaces is the simplest and quickest way of assessing cleanliness (refer to the criteria given under clause 8.2.11 Cleaning inspection).

Defects observed during pre-operational checks should be categorised or ranked based on their potential effect on product contamination and product safety. This assists in the setting of appropriate corrective actions. It is common practice in the meat industry to categorise defects as:

- critical - a defect that will result in direct contamination of a product (e.g. dirty food contact surfaces; condensation from an overhead structure directly above exposed products or product contact surfaces);
- major - a defect that may result in direct or indirect contamination of a product (e.g. dirty / contaminated surfaces which are handled by workers which may lead to cross-contamination, e.g. residue build-up on door handles or equipment knobs; dirty surfaces that are in close proximity to a product contact surface); and
- minor - a defect which is unlikely to result in contamination of a product (e.g. dirty surfaces that are not near a product contact surface and are unlikely to come into contact with exposed product, product contact surfaces, packaging or workers, e.g. an isolated speck of product residue on a table leg, wall or drain).

Defect scores are allotted to each category, with the scores reflecting the severity of the defect, and a limit for total defect scores is established. The daily total defect scores achieved can then be tabulated or graphed so that trends and repetitive failures can easily be detected.

(2) Observations made during pre-operational inspection and corrective actions for any deficiencies identified should be documented in an appropriate check sheet or record form.

(3) If immediate corrective action is required (e.g. for critical and major defects), the corrected item should be rechecked before operation begins. The outcome of this recheck must also be included in the record.

(4) The operator should investigate and correct the causes of repetitive failures of the cleaning and sanitation programme.

8.3 Records

(1) Records of the following must be kept:

a) cleaning and pre-op records;
b) pre-operational check sheets;
c) list of cleaning chemicals;
d) any environmental test results, and
e) monitoring and corrective action records [RMP Spec 20 (2)].

Part 9: Pest Control

9.1 Scope

(1) This Part discusses the requirements and procedures for the effective control of pests which includes rodents, birds, insects, dogs and cats.

9.2 Requirements and Procedures

9.2.1 Pest control programme

(1) The operator must develop and implement a written pest control programme to minimise the exposure of petfood material, ingredients, products, packaging, equipment, and the processing environment to hazards associated with pests [AP Reg 11 (2) and (3)].

(2) The pest control programme should include the following information:

a) the person or agency responsible for the implementation of the programme;
b) procedures for the control of pests, and the monitoring and verification of pest control activities;
c) corrective action procedures that are to be applied in the event of loss of control; and
d) records to be kept.

The operator may employ a pest control person or agency to develop and implement a pest control system (e.g. set up traps, spraying programme) and monitor the premises. The contracted service should be clearly defined and reflect the activities of the site.

The operator is responsible for ensuring that the pest control person or agency is competent to perform the task, and complies with the relevant requirements of this programme.

9.2.2 Prevention of infestation and access of pests into buildings and facilities

(1) Premises, facilities, equipment and essential services must be designed, constructed, and maintained in a manner that prevents pest access [AP Reg 10].

(2) Holes, drains and other places where pests are likely to gain access should be sealed, or covered with screens or similar materials that prevent the entry of pests.

(3) External doors that open directly to processing areas and which are not screened should be kept closed at all times when not in use.

(4) Internal and external areas of the premises should be kept clean and tidy. The external environment should be checked regularly and kept free of any food source and breeding sites (e.g. long grass, bird's nest, food waste).

Areas that are likely to attract flies and other insects should be sprayed, as necessary.

(5) Dogs that are present on the premises should be under direct supervision or control of the owner, and should be prevented from entering processing and storage areas.

(6) Waste materials should be kept in covered pest-proof containers, and regularly collected and disposed of.

9.2.3 Use of pesticides

(1) Pest control chemicals (rodenticides and insecticides) should be handled, used and stored according to the procedures given in Part 7 Control of Maintenance Compounds.

(2) Pest control chemicals should be used by suitably skilled personnel, and in accordance with the directions of the manufacturer and, if applicable, any conditions of the MPI approval.

(3) Insecticides that have any residual activity or are dispensed as continuous aerosols should not be used in any processing or storage area in a manner that could cause contamination of products or product contact surfaces.

(4) Products and exposed packaging should be removed from the area or kept protected (e.g. covered) prior to the use of pest control chemicals that may contaminate them.

(5) Equipment and other product contact surfaces should be cleaned by thorough washing after exposure to any pest control chemical.

9.2.4 Use of pest traps

(1) Pest traps (including rodent boxes, bait stations and electric insect traps) should be located where they do not present a risk of contamination to any product. The location of pest traps should be identified on a site or building plan, or other suitable record.

(2) Bait stations should not be located inside any processing area. Rodenticides should be used only in enclosed bait boxes.

(3) Bait stations should be checked regularly for the following:

a) correct location as indicated in the plan or record, and presence of bait;
b) evidence of pest activity (e.g. nibbled bait, bait missing, droppings); and
c) boxes are in good working condition and identification is easily legible.

(4) Boxes should be cleaned and rebaited with an approved rodent bait, as necessary.

(5) Insect traps, including ultra-violet lamps, pheromone traps and any form of attractant device, should:

a) be constructed in a way that facilitates the capture and removal of insects (e.g. by providing a suitable drawer, tray or adhesive mat for catching and securing insects);
b) not cause any air-borne contamination; and
c) not be located where insects may fall on to product, packaging, or product contact surfaces.

(6) The frequency for monitoring of traps should be determined relative to the type of trap and the degree of pest activity noted. Increased monitoring and appropriate corrective actions should be implemented when increased rodent activity is observed.

9.2.5 Contamination

(1) When there is evidence of contamination from pests, the following corrective actions should be undertaken:

a) the affected product should be considered unfit for animal consumption;
b) the affected product contact surfaces should be cleaned and sanitised prior to reuse; and
c) affected packaging materials that cannot be effectively cleaned and sanitised should not be used for packing of any product.

9.3 Records

(1) Records of the following must be kept:

a) details of the contracted pest control person or agency, if applicable;
b) location of bait stations or other traps (e.g. site plan);
c) list of pest control chemicals used;
d) name, amount and point of use of any pest control chemicals used;
e) chemical handling training records; and
f) monitoring, corrective action and verification records [RMP Spec 20 (2)].

Part 10: Personnel Health and Hygienic Practices

10.1 Scope

(1) This Part discusses the requirements and procedures for ensuring that personnel are medically fit to perform their tasks, and hygienic practices are followed by all personnel. Personnel include all workers, contractors providing services, and visitors.

10.2 Requirements and Procedures

10.2.1 Health of personnel

(1) The operator must develop and implement written health procedures that ensure that a person (including any visitor or contractor) who is:

a) infected with, or a carrier of, an infectious disease in a communicable form as described in Section A, Part 1, of the First Schedule of the Health Act 1956 and that is likely to be transmitted through food or associated things; or

These include infections or diseases caused by *Salmonella* spp., *Shigella* spp., *E. coli* spp., *Campylobacter*, and the Hepatitis A virus.

b) suffering from acute respiratory infection; or
c) suffering from boils, sores, infected wounds, or any other condition that cannot be adequately protected from becoming a source of contamination;

does not work as a product handler or enter an area where the person may adversely affect the safety and suitability of any petfood material or product for animal consumption [AP Reg 13, AC Spec 3.15 (1)].

(2) The operator should ensure that all workers (including office staff), contractors and visitors are aware of, and comply with, the health procedures.

(3) The health procedures should include the following:

a) instructions to workers to inform their supervisor or manager if they are (or suspect that they are) suffering from diarrhoea, acute respiratory infection; or diagnosed with an illness as described om 10.2.1 (1);
b) actions to take so that medically unfit personnel do not work as product handlers or enter areas where the person may adversely affect the safety or suitability of any petfood material or product;
c) clearance requirements (e.g. submission of medical certificates) for workers resuming work after being diagnosed with an illness mentioned in clause 10.2.1 (1); and
d) procedures for treating injuries, wounds or cuts.

(4) Any injury, wound, or cut should be treated immediately and dressed with a secure waterproof dressing to prevent contamination of any ingredients, product, packaging or equipment. The dressing should be kept clean and properly secured to prevent it from becoming loose or falling off, and protected from becoming wet.

Brightly coloured or metallised wound dressings should be used as they are more easily detected in products if they become dislodged.

10.2.2 Hygienic practices

(1) The operator must develop and implement written hygienic practices and procedures for all personnel (including product handlers, cleaners, office workers, maintenance personnel, contractors and visitors), appropriate to their task and area of work [AP Reg 12].

(2) The operator must ensure that all personnel are adequately trained on the required hygienic practices and procedures. Refer to Part 11 Personnel Competencies and Training.

10.2.3 Protective clothing

(1) All personnel who enter any processing or storage areas must wear suitable, clean protective clothing and footwear [AP Reg 12 (a)].

(2) Protective clothing generally includes the following:

a) overall or coat, which may be of any colour, provided the presence of any contaminant, relative to the type of work, is clearly distinguishable;
b) gloves and sleeves;
c) water proof apron, as appropriate; and
d) waterproof footwear.

The use of hair restraint, for both head and facial hair, should be considered by the operator as appropriate to their product and customer requirements.

(3) Protective clothing should cover the potential product contact zone of personnel.

Covering of the potential food contact zone will, in the majority of cases, only require a coat that covers the body to below the knee.

(4) All protective clothing should be:

a) kept in good condition;
b) changed at least daily or more often if it becomes excessively contaminated; and
c) stored in a manner that protects it from contamination.

(5) Workers should not wear protective clothing outside the premises.

10.2.4 Personnel Movement

(1) The operator must implement appropriate hygiene routines for personnel when moving from areas or activities of a lower to a higher hygiene status (e.g. moving from raw meat handling areas to cooked petfood products, or from waste areas to processing areas) [AP Reg 12 (b)].

10.2.5 Hand washing

(1) All personnel should thoroughly wash hands and exposed portions of the arms with hand detergent and water, sanitise (when appropriate) and dry them:

a) before entering any processing or packing areas;
b) after any toilet activity;
c) after handling or coming into contact with waste or contaminated surfaces or material; and
d) when moving from areas or activities of lower to higher hygienic status (e.g. moving from raw to cooked areas).

10.2.6 Jewellery and other personal items

(1) Personnel in processing areas should not wear exposed jewellery that may come into direct or indirect contact with unprotected ingredients and products. Plain wedding bands (i.e. no stone) and medical

alerts may be worn provided they cannot be easily dislodged and they can be effectively cleaned in the same manner as hands.

(2) Workers should not take personal items (e.g. sweets, cigarettes, mobile phones and other electronic items) into processing or packing areas.

Certain supervisory or management staff (not product handlers) may be allowed to keep their mobile phones when entering processing areas provided the operator has documented procedures for managing their use.

10.2.7 Prohibited activities

(1) The following activities are not permitted inside processing or packing areas:

a) eating of any food;
b) smoking;
c) spitting; or
d) any other activity that may cause contamination of any product or product contact surface [AP Reg 12 (c)].

10.2.8 Visitors and contractors

(1) Visitors and contractors should report to the responsible person on arrival at the premises. They should be supervised by an assigned staff member while within the premises unless they have been inducted and are familiar with the required hygienic practices.

(2) It is the responsibility of the assigned staff member to ensure that the visitor or contractor follows hygienic practices and procedures.

Visitors and contractors who wish to enter a processing or packing area should sign a visitors' logbook on arrival.

10.3 Records

(1) Records of the following must be kept:

a) medical certificates;
b) register for injuries;
c) training records; and
d) visitors' logbook [RMP Spec 20 (2)].

Part 11: Personnel Competencies and Training

11.1 Scope

(1) This Part discusses competency and training requirements of personnel to ensure the effective performance of assigned tasks, compliance to hygienic practices and procedures, and production of safe and suitable petfood.

11.2 Requirements and Procedures

11.2.1 Identity and competencies of key RMP positions

(1) The operator must identify the following (either by position, designation or name) in their RMP:

a) the day-to-day manager or person responsible for the day-to-day running of the RMP;
b) the person(s) who authorises all or parts of the RMP document; and
c) personnel involved in process control, monitoring, corrective action, and operator verification activities [RMP Spec 15 (1)].

(2) The operator must document the skills or competencies needed by the persons identified in clause 10.2.1 Health of personnel to enable the effective operation of the RMP [RMP Spec 15 (2)].

These competencies may be documented in job descriptions.

- The day-to-day manager or person authorising all or part of the RMP should be familiar with the RMP, and have the following attributes:
  - good knowledge of product safety, and hygienic procedures and practices written in this Code;
  - good knowledge of regulatory requirements relevant to the development and implementation of RMPs, and petfood processing or manufacturing;
  - have technical knowledge and experience in the processing or manufacturing of food or petfood; and
  - effective organisational and communication skills.
- The person responsible for the development and review of the HACCP application within the RMP should have good understanding of the HACCP principles and how they are applied to the processing or manufacturing of petfood. Ideally, the person should have attained a recognised HACCP qualification, such as NZQA Unit Standard 28265.
- Workers involved in monitoring and corrective action activities, and operator verification should have the following competencies:
  - have appropriate level of knowledge and skill in implementing their assigned task; and
  - have a good understanding of, and be able to consistently comply with, hygienic practices and procedures.

11.2.2 Ante-mortem and post-mortem examiners

(1) Operators involved in slaughter activities must ensure that persons responsible for the ante-mortem or post-mortem examination of farmed mammals (including cattle, bobby calves, horses, hinnies, sheep, goats, deer and pigs) for processing into petfood meet specific qualifications. These qualifications are outlined in Schedule 2: Competency Specifications 'for ante-mortem and post-mortem examiners of mammals for petfood' [AC Spec 3.16 (1)(a)].

Note Schedule 2 of the AC Spec is reproduced in Appendix 2 of this document.

(2) Trainee ante-mortem and post-mortem examiners of farmed mammals for petfood may carry out ante-mortem or post-mortem examinations provided they are under the direct supervision of a person who meets the competency requirements of 10.2.2 (1) and who is accountable for the decisions that are made [AC Spec 3.17 (3)].

(3) The operator must obtain evidence that the post-mortem examination of killed wild rabbits, hares, wallabies, possums, goats and deer being processed for petfood is conducted by persons familiar with identifying normal tissue for these species [AC Spec 3.16 (1) (b)].

Evidence of familiarity with species should include the completion of the NZPFMA examination based on the booklet "Harvesting and Processing of Wild Rabbits, Hares, Wallabies, Possums, Goats and Deer for Petfood".

11.2.3 Approved suppliers

(4) Operators must assess the competency of suppliers of killed wild rabbits, hares, wallabies, possums, goats and deer, ensure that they have attained the qualifications outlined in Schedule 2 for approved suppliers, and are listed in the RMP as being an approved supplier [AC Spec 3.16 (1) (c) and 3.16 (3)].

Refer to Application to become an Approved Supplier - Petfood, available on the MPI website at: http://www.foodsafety.govt.nz/elibrary/industry/approved-supplier-application-wild-animals-2014.pdf.

11.2.4 Supervisors of thermal processing of low-acid canned products

(1) Operators involved in the canning of petfood must ensure that the person responsible for the supervision of thermal processing operations for low acid-canned products meets the requirements in Schedule 2 Competency specifications for supervisors of thermal processing of low-acid canned product [AC Spec 3.16 (1) (d)].

11.2.5 Skills maintenance

(1) The operator must ensure that the skills of those persons involved in process control and monitoring, corrective action, operator verification and those activities given in clauses 11.2.2 to 11.2.4, are maintained on an ongoing basis [AC Spec 3.17 (1)].

11.2.6 Training

(1) The operator should develop a training programme which includes the identification of skills and competencies required for key roles, training schedules (including refresher training) and training records of all personnel.

Training should be appropriate to the nature of the person's assigned task or activity and level of responsibility.

Training includes induction training, regular in-house meetings, on-the-job training and external training courses.

Basic training for all process workers should cover:

- health and personal hygiene;
- movement of personnel and materials;
- cleaning and sanitation;
- handling of chemicals; and
- hygienic handling of materials and products.

Workers should also be trained against written instructions or procedures for their specific tasks, including machine operation and monitoring of product and process parameters.

Specific training requirements, such as training in HACCP, monitoring procedures, and internal auditing, should also be identified.

(2) All personnel, including temporary workers, service contractors and administrative staff, should be appropriately trained before commencing work.

(3) The operator should provide induction training to all new workers and ensure that they are supervised until they are adequately trained to perform assigned tasks and procedures on their own.

Induction training should cover job or task descriptions, health requirements, and hygienic practices.

(4) The training programme should be reviewed at least annually to ensure that training of workers remains up-to-date and effective, and to identify requirements for new training or refresher training.

11.3 Records

(1) Records of all personnel competencies and training activities must be kept, including:

a) assessments and evidence of personnel competencies;
b) individual training records;
c) identity of any external training providers; and
d) any training materials (e.g. manuals or instructions) [RMP Spec 15 (3)].

Part 12: Calibration of Measuring Equipment

12.1 Scope

(1) This Part discusses the requirements for the calibration of measuring equipment that are used to carry out critical measurements. Measuring equipment include:

a) temperature measuring/recording devices;
b) timing devices;
c) scales;
d) metal detectors;
e) water activity meters;
f) pH meters;
g) flow meters; and
h) other instruments.

(2) It is recommended that calibration is also applied to equipment used in monitoring GOP parameters (e.g. refrigeration temperatures) and product parameters (e.g. product weight).

12.2 Requirements and Procedures

12.2.1 General requirements

(1) Measuring equipment (whether stand-alone or forming part of a piece of equipment) that is used to provide critical measurements must:

a) have the accuracy, precision, and conditions of use appropriate to the task performed;
b) be calibrated against a reference standard (shows traceability of calibration to a national or international standard of measurement, or (if no such standard exists) be calibrated on a basis that is documented in, or incorporated by reference into, the RMP; and
c) be uniquely identified (e.g. by using serial numbers, indelible tags or other permanent means of identification) to enable traceability of the calibrations and to identify calibration status [AP Reg 14 (1), AC Spec 3.18 (1)].

12.2.2 Calibration programme

(1) The operator must document a calibration programme that includes:

a) a list of measuring equipment, and their location and identification marks;
b) the calibration frequency for each measuring equipment; and
c) the calibration method/procedures for each measuring device, taking into consideration the stability of the device, the nature of the measurement, and the manufacturer's instructions [AC Spec 3.18 (2)].

The calibration programme should also:

- identify whether the measuring equipment is used for taking critical measurements or not;
- identify the person or agency who will perform the calibration;
- indicate the maximum error allowed before corrective action is taken (e.g. ± 1 g, ± 1°C);
- how the calibration date and any correction factor will be affixed to the measuring device; and
- the corrective action to be taken when the measuring device:
  - does not meet specification, including actions to be taken when a measuring device is damaged or provides inconsistent or inaccurate readings; and
  - the identification and disposition of any product produced when the device was out of calibration.

(2) Safeguards must be in place to prevent unauthorised adjustments to the calibration of the measuring device, including movement of the device when this may invalidate the calibration [AC Spec 3.18 (3)].

(3) Reference standards (e.g. reference thermometer or reference weights) should have a current calibration certificate before they can be used. The certificate should be issued by an accredited person or agency.

Aside from a calibration certificate or certificate of accuracy, newly purchased measuring devices should be provided with written calibration instructions, including methods and frequencies.

(4) Devices used for making critical measurements (i.e. for monitoring of critical limits), including reference thermometers, metal detectors and scales, need to be:

a) calibrated by an accredited agency; or
b) the equipment manufacturer must provide assurance or guarantee of the instrument's accuracy.

The reference thermometer should only be used for checking working thermometers.

(5) Any in-house routine check of measuring devices should be carried out against reference standards at regular and established frequencies by suitably skilled personnel. Refer to Table 2 Guidance on calibration methods and frequencies.

Table 2: Guidance on calibration methods and frequencies

Measuring device	Method	Frequency	Person / agency responsible
Standardised thermometer (reference thermometer)	Standardised against a national or international standard	Once every 1- 5 years	Accredited/ approved laboratory
Working thermometers	Calibrated against a reference thermometer	Annually	Accredited person or agency
	Ice point and/or boiling point method, as appropriate (Refer to methods in following box)	Those used daily for monitoring critical limits – weekly or fortnightly. Other working thermometers - monthly	Suitably skilled person
CATR	Calibrated against a reference thermometer	Annually	Accredited person or agency
Cooker probe and temperature recorder (e.g. data logger)	Calibrated against a reference thermometer	Data logger and probe - annually	Accredited person or agency
	Calibrated against a reference thermometer (in-house check)	Probe - monthly, if used to determine the final product temperature and the cooking schedule	Suitably skilled person
Weighing scales (ingredient and product scales, platform scales)	Check against test weights	Daily	Suitably skilled person
Weighing scales (e.g. final product scales)	Certify for accuracy as per the Weights and Measurements Act 1987	Annually	Accredited person or agency
Test weights	Standardised against a national standard	Annually	Accredited/ approved laboratory

Measuring device	Method	Frequency	Person / agency responsible
Water activity meter	Calibration against standard solutions; manufacturer's instructions	Before each day's use, or as recommended by manufacturer	Suitably skilled person
	Servicing and calibration	Annually	Instrument specialist
pH meter	Check against standard solutions; manufacturer's instructions	Before each day's use, or as recommended by manufacturer	Suitably skilled person
Metal detector	Test against metal test pieces	At least daily	Suitably skilled person
	Servicing and calibration	Annually	Instrument specialist

Ice point and boiling point calibration methods

Hot point calibration is used when monitoring temperatures higher than room temperature (e.g. cooking temperatures). A combination of the ice point and hot point methods is recommended for a more accurate calibration of thermometers used to monitor a wide range of temperatures.

- Ice point method:
  - use enough crushed ice in a container to allow immersion of most of the probe stem. Add just enough water to remove the air around the ice particles and to form a slush. Wait for the ice to appear clear;
  - stir the mixture (do not use the probe for mixing), tip off excess water, insert the probe and leave it for about 2 minutes. Ensure that the tip of the probe is in good contact with the slush ice at the centre of the container;
  - stir the mixture again and check the reading on the thermometer. Accept if the deviation from 0°C is within the declared limits of accuracy; and
  - if the deviation from 0°C is greater than the limit of accuracy, or greater than ± 1.0°C, adjust the thermometer accordingly or discard and replace the thermometer.
- Boiling point method:
  - place the probe in a container with boiling water for about 2-3 minutes until the thermometer reading stabilises. The probe should be at the centre of the container;
  - accept if the deviation from 100°C, or appropriate temperature according to elevation, is within the declared limits of accuracy; and
  - if the deviation from 100°C is greater than the limit of accuracy, or greater than ± 1.0°C, adjust the thermometer accordingly or discard and replace the thermometer.

12.3 Records

(1) Records of the following must be kept:

a) identification, location and calibration status of equipment;
b) calibration schedules;
c) certificates of accuracy or calibration; and
d) in-house calibration records [RMP Spec 20 (2)].

Part 13: Purchase, Handling and Storage of Raw Materials, Ingredients, and Packaging

13.1 Scope

(1) This Part discusses the requirements for the purchase, handling and storage of raw materials, ingredients, and packaging used in the processing or manufacture of petfood.

13.2 Requirements and Procedures

13.2.1 Sourcing requirements and specifications for raw materials, ingredients and packaging

(1) The operator should develop and implement written procedures for the sourcing and purchase of raw materials, ingredients, and packaging to ensure that regulatory requirements and any company specifications are met.

The purchasing procedures should cover the following:

- sourcing of ingredients from reputable (preferred) suppliers with suitable product traceability procedures;
- written raw material or ingredient specifications, which include any relevant regulatory requirements, agreed between the operator and the supplier; and
- provision of certificates of analysis or supplier guarantees by suppliers, when required.

(2) Animal material, including meat, poultry and seafood, used in the production of petfood must be sourced only from regulated sources [AP Spec 9.4 (1)].

Animal material needs to be acquired from a primary processor under the regulatory control of MPI, such as an abattoir operating under an RMP.

(3) The operator should source ingredients (e.g. additives, processing aids, vitamins, minerals, and other added nutrients) from reputable sources and ensure that they are suitable for use in petfood.

MPI maintains a list of substances that can be used as animal feed or petfood additives because they are generally recognised as safe (GRAS) when used for that purpose. Petfood manufacturers should confirm that additives used in their petfood are GRAS to ensure their products are exempt from registration under the Agricultural Compounds and Veterinary Medicines (Exemptions and Prohibited Substances) Regulations 2011.

(4) The composition and, where appropriate, the conditions of use of packaging must:

a) comply with the requirements specified in the current US Code of Federal Regulations, Title 21, Parts 170-199 (21 CFR 170 – 199), which includes coatings and linings of containers and cartons where these are the direct product contact surface; or
b) comply with the requirements specified in the current "Australian Standard for Plastic Materials for Food Contact Use, Australian Standard AS2070-1999"; or
c) be determined by the operator to be suitable for use, based on evidence provided by the packaging manufacturer and an analysis of hazards and other risk factors from the packaging [AC Spec 3.19 (1)].

(5) Where the packaging complies with the requirements of 13.2.1 (4) (a) or (b), the operator must be able state the specific regulation or standard that the packaging complies with [AC Spec 3.19 (2)].

Operators should obtain written guarantees from their supplier confirming that the packaging meets the relevant regulation or standard.

13.2.2 Receipt of incoming goods

(1) The operator should write and implement inspection procedures for incoming goods to ensure that:

a) they are fit for their intended purpose and comply with any company specifications, and
b) sufficient information is provided on labels and accompanying documentation for their proper identification, storage and use.

The written procedures should include the:

- checks to be undertaken on delivery (e.g. checks of documentation, temperature, packaging, labels);
- acceptance criteria;
- identity of person(s) responsible for checking incoming goods; and
- actions to be taken when raw materials and ingredients do not meet specifications.

Records need to be kept.

(2) Receipt of all deliveries of incoming goods should be recorded. Records should include:

a) reference to purchase orders or appropriate purchasing documentation;
b) supplier;
c) type of material;
d) date of receipt;
e) quantity received and identifiers that can be used for the purpose of traceability, such as batch number;
f) use-by date; and
g) packing date or date of manufacture.

Eligibility of animal material for export to particular overseas markets should also be checked.

(3) Chilled or frozen materials should meet minimum temperature requirements specified in the operator's RMP and should not show signs of temperature abuse (e.g. cartons badly stained with drip).

Chilled meat, poultry, fish and shellfish should be delivered at ≤ 7°C.

Frozen meat should be frozen hard with no signs of thawing.

(4) Packages or containers should be intact, clean and free of infestation.

(5) Raw materials and ingredients that do not meet specifications should be:

a) identified and isolated; and
b) their disposition decided on by a suitably skilled person.

13.2.3 Storage

(1) All process inputs, including raw materials, ingredients, and packaging must be handled and stored in a manner that minimises their potential contamination or deterioration [AC Spec 11.3].

(2) Raw materials, ingredients and packaging should be:

a) moved to storage as soon as possible after delivery;

b) held at appropriate temperatures to maintain their safety and suitability for their intended purpose;

Chilled meat should be maintained at ≤ 7°C, and frozen meat at ≤ -12ºC.

c) protected against contamination or damage during storage;
d) stored on racks, shelves or pallets to ensure no contact with the floor;
e) kept separate from maintenance compounds and other hazardous materials; and
f) properly labelled or identified.

All fixed and mobile bins, silos, tanks and bagged storage areas should be clearly identified. Records of the storage location of ingredient should be maintained.

(3) Any damage to the packaging of a petfood material, ingredient or product that may affect the safety or suitability of its contents must be

a) immediately rectified; or
b) when necessary, the affected petfood material, ingredient or product must be appropriately disposed of [AC Spec 3.19 (3)].

Refer to Part 16 Handling and Disposition of Non-complying Products, and Recall Procedures.

(4) A raw material or ingredient should be discarded when:

a) it is no longer safe (e.g. contaminated with rodent droppings, chemicals) or suitable for use (e.g. it has signs of spoilage, it is past its use-by date); or
b) important information needed for its safe use is lost (e.g. identity).

(5) Storage areas must be kept clean and tidy, and free from pests [AP Reg 11].

13.3 Records

(1) Records of the following must be kept:

a) list of suppliers;
b) raw material, ingredient and packaging specifications;
c) any supplier guarantees or certificates of analysis;
d) any supplier audit reports; and
e) incoming goods delivery documentation [RMP Spec 20 (2)].

Part 14: Identification and Labelling of Products

14.1 Scope

(1) This Part discusses the requirements for the identification and labelling of petfood materials and products.

14.2 Requirements and Procedures

14.2.1 General requirements

(1) The operator should develop and implement written procedures to ensure that:

a) labels are designed to meet regulatory requirements;
b) all information printed on labels or packaging are correct and accurate;
c) any claims on product labels are accurate and evidence is available to support the claims;
d) the correct label is applied to each product unit;
e) labels are stored in a manner that maintains them in good condition; and
f) damaged or obsolete labels are disposed of appropriately.

(2) All mandatory labelling information must be clear, legible, indelible, and use terms that are commonly used in the English language unless another language is approved by the Director-General in writing.

(3) An approval by the Director-General may only be given in relation to a specific one-off lot(s) or batch(es) of petfood material or product [AC Spec 4.2 (1) and (2)].

(4) Labelling or marking on any petfood material or product must not be misleading as to its intended purpose or nature [AC Spec 4.2 (3)].

(5) If the suitability of petfood material or product for its intended purpose changes from its original status, its new status must be reflected in all labelling and accompanying documentation. This must be carried out at the earliest opportunity, and must be prior to the release of the animal material or product from the premises [AC Spec 4.2 (4)].

14.2.2 Identification of petfood materials or products on operators' premises

(1) All petfood materials or products must be clearly identified that they are not intended for human consumption [AC Spec 4.3 (1)].

(2) Operators who process petfood materials or products and human consumption products in the same premises, must ensure that these two types of materials and products are kept separate from each other during handling, processing and packing until they are suitably packaged [AC Spec 4.3 (2) and (3)].

Whenever possible, the processing of products for human consumption should be physically separated from processing of petfood (i.e. different building or room) to:

- facilitate clear separation and identification; and
- prevent cross contamination.

Other separation methods may be applied by the operator based on an assessment, which considers the:

- potential for cross contamination and wrong identification of animal material and products; and
- practicality of the method for type and size of the operation.

For example, processing of human and animal consumption products using the same facilities may be separated by processing on different days.

Processing of human and animal consumption products at the same time within the same room or area, regardless of the distance between the two activities, should be avoided.

14.2.3 Transportation outers

(1) Labelling must be provided on all transportation outers of petfood material or product leaving the premises that clearly identifies:

a) the contents as not intended for human consumption;
b) the petfood material or product name or description;
c) storage directions where necessary to maintain the fitness for its intended purpose;
d) lot identification, where applicable; and
e) the name and address of the animal product operator [AC Spec 4.5].

14.2.4 Bulk transportation units

(1) Bulk transportation units used to transport unpackaged bulk petfood material or product must be labelled with the information specified in 14.2.3 Transportation outers, except when it is impractical to label the units. For such exceptional cases, the information must be provided in accompanying documentation [AC Spec 4.6].

(2) Petfood material or product in bulk transportation units dispatched from the premises must be:

a) contained in covered leak-proof bins or containers with clear labels indicating that the contents are not for human consumption; and
b) identified in an acceptable manner [AC Spec 4.7 (2)].

(3) Petfood material or product dispatched in accordance with clause 14.2.4 (2) must be denatured unless it is:

a) dispatched to a premises operating under an RMP and contained in tamper evident leak-proof bins or containers; or
b) dispatched for rendering and has been derived:

i) from fish or poultry being processed for human consumption;
ii) from a dual operator butcher, a homekill operation or a recreational service provider;
iii) directly from premises operating under the Food Act 1981 or Food Act 2014;
iv) from mammals and birds that have died in the field and is transported directly to the rendering operation;
v) from the processing of hides or skins; or

c) minimal risk material derived from fish [AC Spec 4.7 (3)].

(4) Operators who dispatch bulk petfood material or product in bulk transportation units from their premises must have fully documented systems of identification and security for that petfood material or product [AC Spec 4.7 (4)].

14.2.5 Petfood packaged for retail sale

Petfood packaged for retail sale must be labelled in accordance with the requirements of the Agricultural Compounds and Veterinary Medicines (ACVM) Regulation 2011 regulations 12 and 13. For further information on the ACVM requirements refer to the MPI website at http://www.mpi.govt.nz/ or email the ACVM Programmes & Appraisals Team at approvals@mpi.govt.nz.

The NZPFMA Labelling Guide gives detailed information on what a food label needs to include. Operators should contact the Association directly for a copy of the guide.

14.3 Records

(1) Records of the following must be kept:

a) label checklists; and
b) copies of labels [RMP Spec 20 (2)].

Part 15: Traceability and Inventory Control

15.1 Scope

(1) This Part discusses the requirements and procedures for the traceability and inventory control of petfood materials, ingredients and products.

15.2 Requirements and Procedures

(1) The operator must document and implement a traceability system that:

a) allows for the identification of all raw materials, ingredients and products throughout the entire production chain (i.e. from reception of incoming materials, through processing or manufacturing, to dispatch of products);
b) enables the movement of raw materials and ingredients to be traced from the supplier; and
c) enables the next person or company that any product is transferred to for further processing, packing, storage, distribution or sale to be traced [AP Reg 18(10), AC Spec 5.3 (1)].

(2) The operator must document and implement procedures for inventory control [AC Spec 5.2 (3)].

(3) All outgoing products must be clearly labelled and accompanied by appropriate documentation to ensure traceability of the batch [AC Spec 4.5 and 5.3 (1)].

15.3 Records

(1) Records of the following information must be kept:

a) the name and address of the suppliers of raw materials, ingredients, and packaging;
b) details about the supplied item, including the batch number, quantity and delivery date;
c) the supplier status of any approved suppliers;
d) production records indicating the type, formulation and quantity of the finished products manufactured, production or manufacturing date and batch number, and any rework or repacking activities; and
e) the name and address of the person or company to which the batch of products are delivered to [AC Spec 5.3 (1)].

MPI has developed a tracking system template to assist further petfood processors to meet these regulatory requirements. This template may also be useful to some RMP operators, particularly those who have less complex operations (e.g. businesses producing small volumes of a limited range of products for local distribution).

(2) Inventory records (i.e. stock records) must be maintained for all raw materials and ingredients, finished products, returned products and any non-complying products [AC Spec 5.2 (3)].

Part 16: Handling and Disposition of Non-complying Products, and Recall Procedures

16.1 Scope

(1) This Part discusses the requirements and procedures for the handling and disposition of non-complying products, including the recall of products from distribution or sale.

(2) A non-complying product is any product that:

a) does not meet a regulatory requirement (e.g. animal material eligibility, process or product criteria);
b) does not meet a limit or criteria defined by the operator in the RMP; or
c) has not been processed in accordance with procedures written in the RMP.

16.2 Requirements and Procedures

16.2.1 Non-complying products

(1) The operator should document procedures for the identification, handling, storage, and disposition of any non-complying products. The procedures should facilitate the traceability and inventory of any non-complying products.

(2) Non-complying products should be handled and stored in a manner that prevents:

a) contamination and deterioration of other products; and
b) contamination of the storage environment.

(3) Non-complying products should be:

a) clearly identified;
b) separated from other products; and
c) held within the premises until disposition is determined by a suitably skilled person or, in certain cases, by MPI.

Non-complying products may be separated from other products by holding them in a separate room or cage, or by wrapping the products with plastic.

(4) The disposition of any non-complying product should be determined by a suitably skilled person considering various factors, such as:

a) product safety and suitability;
b) the amount of product affected, whether the products have been released for distribution or not;
c) whether the products can be reprocessed; and
d) any instructions from MPI or the RMP verifier.

Appropriate actions may include one or a combination of the following: • restricted release when the operator is able to manage the problem appropriately; • regrading to an alternative use when the product conforms to the alternative requirements (e.g. for rendering); • reworking; • reprocessing to ensure that the product conforms to the requirements; • destruction of the product; or • recall.

(5) The RMP operator must notify the recognised RMP verifying agency in writing, without unnecessary delay, when there is any significant concern about the fitness for intended purpose of any of their products [RMP Spec 13 (3a)].

Notification in writing may be done by sending an email to the RMP verifier.

16.2.2 Recall

(1) The operator must document recall procedures, including:

a) the criteria for deciding when a recall will be initiated; and
b) how retrieval and disposition of the relevant product will be managed [RMP Spec 14 (1)].

(2) The operator must document a system for notifying MPI and the recognised RMP verifier, as soon as possible, when product is recalled from trade, distribution or from consumers because it is not or may not be suitable for processing or fit for its intended purpose [RMP Spec 14 (2)].

Refer to MPI's Recall Guidance Material for guidance on recall procedures, available at: http://www.foodsafety.govt.nz/elibrary/industry/recall-guidance-material-template/.

16.3 Records

(1) Records of the following must be kept:

a) list of non-complying products;
b) records of assessment and disposition of non-complying products;
c) records of recall activities;
d) inventory records; and
e) any correspondence with the verifier or auditor, or MPI [RMP Spec 20 (2)].

Part 17: Dispatch of Petfood Materials and Products

17.1 Scope

(1) This Part discusses the requirements for the dispatch of petfood materials and products from the processing or manufacturing premises.

17.2 Requirements and Procedures

(1) The petfood operator must write and implement procedures for checking of outgoing products before they are dispatched, to ensure that they are:

a) fit for their intended purpose and comply with any product specifications;
b) properly packaged and protected from potential contamination;
c) properly identified and labelled; and
d) sufficient information is provided on accompanying documentation for their effective identification, storage and use [AC Spec 5.3 (1)].

(2) The dispatch procedures must ensure effective inventory control and traceability of all petfood [AC Spec 5.2 (3) and 5.3 (10].

(3) The petfood operator should ensure that chilled or frozen petfood materials or products are at the preservation temperatures indicated in the RMP before dispatch occurs.

The preservation temperature for chilled meat is ≤ 7°C and for frozen meat it is ≤ -12°C. Refer to IS 9 for further details.

If temperature control during transport is achieved by an alternative method (e.g. bulk bins of offal packed with ice), the operator should:

- be able to demonstrate the effectiveness of the alternative method; and
- the procedures for the alternative method should be written in their RMP.

(4) The petfood operator should ensure that any transport company they use for transporting their products complies with the requirements in Part 18 Transport of Petfood Materials and Products.

Ideally, petfood operators should have preferred supplier arrangements or contracts with their transport company.

(5) The suitability of transportation units, containers and compartments should be checked by the petfood operator before loading of products.

This may include checks of:

- the cleanliness of the transportation unit;
- whether the refrigeration unit is running; and
- compatibility with other products being transported in the same transportation unit or compartment.

(6) Products should be protected from damage by rain or other adverse weather condition during dispatch and loading into transportation units.

17.3 Records

(1) Records of the following must be kept:

a) product clearance records;
b) consignment notes;
c) inventory records;
d) preferred supplier arrangements or contracts; and
e) delivery records [RMP Spec 20 (2)].

Part 18: Transport of Petfood Materials and Products

18.1 Scope

(1) This Part discusses the requirements for the transport of petfood materials and products.

(2) These requirements apply to operators involved in the transportation of:

a) animal material from petfood primary processors (i.e. slaughter and dressing operations) to secondary processors, such as petfood manufacturers and further petfood processors; and
b) animal material and petfood products between petfood RMP operators.

(3) These requirements do not apply to transport operators transporting live animals to a primary processor.

18.2 Requirements and procedures

18.2.1 Design and construction of transportation units

(1) Transportation units and loading equipment must be designed, constructed, equipped and operated to maintain the safety and suitability of any petfood material or product [AC Spec 12.2 (1) and (2)].

(2) Transportation units, compartments, containers and equipment should be:

a) constructed of material such that all exposed internal surfaces:

i) are durable;
ii) smooth, impervious and corrosion resistant;
iii) non-toxic, inert to the food and to the detergents and sanitising agents under normal operating conditions; and
iv) allow visible contamination to be easily detected;

b) constructed to enable effective and repeated cleaning;
c) constructed to exclude:

i) entry of any animals including dogs, cats, birds, rodents and insects;
ii) harbouring of vermin; and
iii) environmental contaminants including dust and rain.

(3) Refrigeration units fitted in transportation units must be designed, constructed and equipped to ensure that the specified product temperatures are maintained throughout transportation [AC Spec 12.2 (3)].

(4) Temperature measuring devices must be calibrated and located to measure the internal temperature of the transportation unit at the warmest point [AC Spec 12.2 (4)].

Refer to Part 12 Calibration of Measuring Equipment.

18.2.2 Hygiene and maintenance

(1) The transportation unit and loading equipment must be kept clean and maintained in good working condition [AC Spec 12.3 (1)].

(2) Records of cleaning and maintenance activities should be kept.

(3) The transport operator must ensure that transportation units are adequately clean before being used for transporting petfood materials or products after transporting the following:

a) goods other than petfood material or product; or
b) animal material or product that is not suitable for processing into petfood [AC Spec 12.4 (2)].

(4) Hygienic practices must be followed by persons involved in the transportation of petfood material or product to ensure that contamination and deterioration of petfood material or product is minimised [AC Spec 12.3 (2)].

(5) Persons involved in the handling and transportation of petfood materials or products should be trained on:

a) hygienic handling practices; and
b) the transport requirements appropriate to the materials and products.

(6) The transport operator must have a written policy and procedures for ensuring that exposed petfood material or product is not handled by any person with any condition or illness that could adversely affect the safety or suitability of any petfood [AC Spec 12.3 (3)].

18.2.3 Operation

(1) Petfood materials or products must not be transported together with any other animal material or product which is:

a) not suitable for processing into petfood;
b) together with goods other than animal material or product; or
c) together with any other thing that may be a source of contamination.

(2) The exception to subclause (1) is when the petfood material or product is adequately:

a) separated from the source of contamination; and
b) protected in a manner that is reasonably capable of preventing cross-contamination [AC Spec 12.4 (1) and(3)].

(3) Petfood materials or products must be maintained at their preservation temperatures during transportation. Records of the maintenance of the preservation temperature during transportation, must be available for verification to ensure that the safety and suitability of petfood materials and products are maintained [AC Spec 12.4 (4)].

The preservation temperatures for chilled meat is ≤ 7°C and for frozen meat it is ≤ -12°C. Refer to IS 9 for further details, available on the MPI website at: http://www.foodsafety.govt.nz/industry/sectors/meat-ostrich-emu-game/meatman/is9/.

(4) Determination of the temperature of any petfood material or product and the taking of any samples must be carried out in such a manner that minimises contamination of petfood material or product [AC Spec 12.4 (5)].

(5) The transport operator must have a documented contingency plan to deal with any failure to maintain preservation temperatures during transportation that may affect the safety or suitability of any petfood material or product, including:

a) immediate notification of the person who has responsibility for the petfood material or product; and
b) actions to prevent recurrence [AC Spec 12.4 (6)].

(6) The transport operator must ensure that persons transporting petfood material or product are aware of the relevant requirements and are adequately trained [AC Spec 12.4 (7)].

18.3 Records

(1) Records of the following must be kept:

a) delivery records;
b) records of cleaning and maintenance of transportation units;
c) refrigeration records; and
d) training records [RMP Spec 20 (2)].

Part 19: Operator Verification

19.1 Scope

(1) This Part discusses the requirements for operator verification to ensure compliance to the RMP and confirm its effectiveness.

19.2 Requirements and procedures

(1) The operator must develop a written operator verification programme, which includes:

a) the verification activities to be performed, and their frequencies;
b) any actions to be taken when all or part of the RMP is not effective; and
c) any recording and reporting requirements [RMP Spec 16 (1)].

Operator verification includes activities such as:

- internal audits;
- reviews of the HACCP plan; and
- other activities undertaken to confirm:
  - the effectiveness of hygiene and sanitation programmes (e.g. environmental testing);
  - achievement of regulatory and operator defined limits (e.g. product testing); and
  - compliance to specifications (e.g. ingredient testing) and validated processes.

The verification programme should include verification procedures (who, what, when, where, how), including corrective actions to be taken when there is a non-compliance.

19.2.1 Internal audits and reviews

(1) Internal audits should be undertaken by a suitably skilled person at a frequency sufficient to:

a) ensure ongoing compliance with documented RMP procedures; and
b) enable prompt identification and correction of any problem.

The person responsible for undertaking internal audits should have:

- auditing skills;
- a good understanding of the operations, processes and supporting systems covered by the RMP;
- be independent from the procedures being audited; and
- a good understanding of relevant regulatory requirements.

(2) The internal audit schedule should ensure that each RMP programme is audited at least annually, or two yearly for lower priority systems. The operator should increase the frequency of audits when repetitive non-compliances occur or the programme is found ineffective.

The frequency for internal audits of the different programmes comprising the RMP will depend on factors such as:

- the importance of the particular programme on product safety and hygienic operations;
- the frequency of non-compliances;
- the effectiveness of the programme;
- skills and training of personnel implementing the particular programme; and
- the cost of doing the audits.

Certain GOP programmes are expected to be internally audited at least annually, such as:

- process control;
- cleaning and sanitation;
- repairs and maintenance;
- operator verification;
- inventory and traceability;
- personnel training; and
- calibration of measuring devices.

(3) A review of relevant parts of the RMP should be undertaken when:

a) major changes to the product, process or premises are made to ensure that RMP documents describe current procedures and remain effective; or
b) problems are suspected as evidenced by process failures, repetitive non-compliances, negative trends or unacceptable external verification audits.

(4) The operator must keep records of observations made during any internal audit, and any corrective actions taken [RMP Spec 20(2)].

Internal audits should consist of:

- a review of written procedures;
- review of records;
- reality checks;
- confirmation that deficiencies or non-compliances identified from the last audit have been rectified; and
- identification of appropriate corrective actions.

Written procedures should be reviewed to ensure that they are up-to-date with current legislation and standards, and that they reflect actual practice.

Records should be reviewed for:

- completeness and accuracy of required information;
- appropriateness of corrective actions taken;
- any trends, new hazards, recurring problems; and
- compliance with documented control procedures.

The person performing the audit should sign the records or indicate in some other way that they have been subject to an internal audit.

Reality checks should include observations of:

- workers' performance and compliance to hygienic practices and process control procedures;

- compliance to established process parameters such as processing times and temperatures; and
- the hygienic status of the premises' internal and external environment, facilities and equipment.

All deficiencies found at previous audits should be followed up using the non-compliance system.

(5) The internal auditor should confirm that corrective actions identified in the audit report have been under taken in a timely and effective manner.

19.2.2 Ingredient and Product Testing

(1) When appropriate and necessary, product testing should be done to verify compliance to relevant regulatory limits or operator-defined limits written in the RMP.

The operator should document the product testing programme, which may also include any testing of raw materials and ingredients. The programme should include information on:

- products or ingredients to be tested;
- frequency of testing;
- number of samples;
- tests to be done; and
- the identity of the suitably skilled person or laboratory that will perform the tests.

Corrective actions to be taken when requirements are not met should also be documented.

(2) Samples should be representative of the particular batch or lot of product or ingredient being tested.

(3) Samples of products should be hygienically collected by a person who has appropriate training and/or experience in hygienic sampling techniques. Samples should be held and transported under conditions which will not affect the particular parameter that the ingredient or product is being tested for.

(4) Any in-house testing for chemical and physical parameters (e.g. moisture content, water activity, pH) should be done using standard methods by a person who has appropriate training and/or experience in the particular test.

Any water testing should be done by an IANZ (International Accreditation New Zealand) accredited laboratory to ISO/IEC 17025 with the required tests in the laboratory's scope of accreditation.

(5) All results of product tests must be kept [RMP Spec 20 (2)].

19.3 Records

(1) Records of the following must be kept:

a) internal audit reports;
b) RMP review records;
c) laboratory test results; and
d) corrective action and other verification records [RMP Spec 20 (2)].

Appendix 1 - Schedule 1 – Specification for operator supply of clean water

cl 1.2, definition of "clean water"

Initial Assessment of Water Supply Status

(1) Animal product operators supplying clean water solely for the use of the animal product operator, within a premises or place, must assess all of the applicable water sources to demonstrate they do not result in affecting the fitness for purpose of animal material or product. Animal product operators supplying water for the above purpose must keep a copy of the completed assessment as part of the risk management programme.

Reassessment of Water Supply Status

(1) The clean water supply must be reassessed:

a) every five years;
b) whenever a new source of water is used in the plant; and
c) within a month of there being a change to the environment on or around the water source that may affect the water quality.

Ongoing Water Monitoring

(1) Clean water must be subject to ongoing monitoring according to the following requirements:

a) clean water must meet the criteria at the point of use according to the testing frequency set out in Table 1 Testing requirements;
b) microbiological testing must be performed by or under the supervision of a recognised signatory of a LAS laboratory, or a ISO/IEC 17025 accredited laboratory with the required tests in the laboratory's scope of accreditation; and
c) the animal product operator must ensure that the training of water samplers is undertaken by a laboratory referred to in clause (b).

Table 1 -Testing requirements

Clean water Quality Testing programme for a private/own supply		
Measurement	**Criteria**	**Test Frequency**
Faecal coliforms	Must not be detected in any 100 ml sample	6 monthly
Turbidity	Must not exceed 5 NTU	6 monthly
Chlorine (when chlorinating)	Not less than 0.2 ppm (mg/L) free available chlorine with a minimum of 20 minute contact time	Daily
pH (when chlorinated)	6.6 – 8	6 monthly

Appendix 2 - Schedule 2 - Competency specifications

Ante-mortem and post-mortem examiners of mammals for petfood

(1) The competency specification referred to in clause 3.16 for ante-mortem and post-mortem examiners of mammals for petfood includes one of the qualifications listed below. The qualifications held may be species specific:

a) National Certificate in Meat Inspection Services, Registered by the New Zealand Qualifications Authority (NZQA); or
b) Certificate of Meat Inspection, issued by the Director, Meat Division, MAF; or
c) Certificate of Competency for meat inspection issued by MAF Quality Management; or
d) Qualification in Meat Inspection issued by the Australian Quarantine and Inspection Service (AQIS); or
e) Registration as a veterinarian under the Veterinarians Act 1994; or
f) National Certificate in Meat Processing - Petfood (Safety); or
g) National Certificate in Animal Product Examination Services (Petfood) with strands in Ante-mortem Examination, and Post-mortem Examination; or
h) any alternative qualification that the Director-General recognises as equivalent to any of the qualifications specified in clauses (a) - (g) above.

(2) For the qualifications listed in subclause (1), the examiner must be qualified for the ante-mortem or post-mortem examination being undertaken.

(3) For the National Certificate in Meat Inspection Services described in subclause (1) (a), an ante-mortem examiner must hold the Optional Advanced Meat Inspection Service Strand of that Certificate for the same species as the post-mortem qualification.

(4) Any person performing ante-mortem or post-mortem examinations must have, and be able to demonstrate knowledge of all specifications and other legislation and regulatory requirements relevant to ante-mortem or post-mortem examinations.

Supervisors of thermal processing of low-acid canned products

(1) The competency specification referred to in clause 3.16 includes any of the following qualifications:

a) Principles of Thermal Process Control, Acidification and Container Closure Evaluation, Massey University;
b) Retort Supervisors Course, DWC Pty Ltd, Australia;
c) NZ Retort Supervisors and Process Control School, Food Processing Specialists Pty Ltd, Australia; or
d) Any alternative qualification that the Director-General recognises as equivalent to any of the qualifications specified in clauses (a) - (c) above.

Qualified cannery persons for thermal processing

(1) The competency specification referred to in clause 3.16 includes any of the following qualifications:

a) Qualified Cannery Persons (Thermal Processing) Course, University of Western Sydney (Hawkesbury) Australia;
b) Approved Persons Course for the Thermal Processing of Low-Acid Foods, Food Science Australia, Werribee, Australia;
c) Introduction to the Fundamentals of Thermal Process Evaluation, Massey University, Palmerston North, New Zealand; or
d) Any alternative qualification that the Director-General recognises as equivalent to any of the qualifications specified in clauses (a) - (c) above.

Approved suppliers

(1) Approved suppliers of animal product to an animal product operator, referred to in clause 7.11 (2), must:

a) have passed the examination, the "Harvesting Wild Animals for Pet Food", which is set out in the training booklet issued by the New Zealand Petfood Manufacturers Association and approved in writing by the Director-General; and

b) have access to, a demonstrable understanding of, and an ability to comply with, the current version of the "Code of Practice for Petfood Processing, Part 2.2: Harvesting and Processing of Wild Rabbits and Hares", which is incorporated by reference into this Notice under clause 1.1, and available at http://www.foodsafety.govt.nz/elibrary/industry/processing-code-practice-petfood/

Appendix 3 - Schedule 3 - Approved inks

cl 1.2, 4.4 (2) (b), 4.4 (2) (c)

Denaturing inks

(1) Inks for denaturing animal material or product must be prepared from the following dyes:

a) Brilliant Green, colour index number (CI) 42040;
b) A green dye, colour index number (CI) 42053, variously named Fast Green FCF or FD & C No.3 Green;
c) Green S, colour index number (CI) 44090; or
d) Green vegetable dyes.

Petfood carcass stains

(2) Inks for marking petfood must be prepared from the following:

a) A black dye, colour index number (CI) 28440, variously named Food Black, Brilliant Black, Permicol Black or Hexacol Black PN;
b) Charcoal; or
c) any of the solvents and diluents listed in subclause (2).

(3) Inks for marking petfood may contain any of the following solvents and diluents:

a) Ethanol;
b) Ethyl acetate;
c) Edible grades of hardened vegetable fat;
d) Glycerol in its mono, di and tri-acetic acid esters;
e) Hydrogenated castor oil, Sett HR1;
f) Isopropyl alcohol; or
g) Propylene glycol.

(4) The labelling of these inks must contain a list of all constituents.