



Tracking System Template for Further Petfood Processors

17 October 2014

Title

Guidance Document: Tracking System Template for Further Petfood Processors

About this document

This document has been developed by the Ministry for Primary Industries (MPI), for the further (petfood) processor.

This document provides guidance on further petfood processing general requirements, listing with MPI and the documented tracking system. Compliance with these will assist further petfood operators to meet the requirements of the Animal Products Act 1999, particularly the Animal Products Specifications for Products Intended for Animal Consumption Notice issued 9 October 2014.

Related requirements

This guide relates to:

- a) Animal Products Act 1999.
- b) Animal Products Regulations 2000.
- c) Animal Products (Exemptions and Inclusions) Order 2000.
- d) Animal Product Fees, Charges and Levies Regulations 2007.
- e) Animal Products (Specifications for Products Intended for Animal Consumption) Notice 2014.

Document history

Previous Version Date	Current Version Date	Section Changed	Change(s) Description
October 2009	9 October 2014	Listing as a further petfood processor details	As a result of the new Animal Products Specifications for Products Intended for Animal Consumption issued 9 October 2014 this guide has been re-written to reflect these changes. This document has also been updated with relevant MPI information

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Contents	Page
1 Purpose	4
2 Background	4
3 Definitions	4
4 General Requirements	5
4.1 Introduction	5
4.2 Typical categories of further (petfood) processors	5
4.3 Tracking system	6
4.4 Reviews and verification	6
5 Operator responsibilities	8
5.1 Operations approved for further (petfood) processing	8
5.2 Operator responsibilities	8
5.3 Competency of persons supervising further petfood processing operations	8
6 Requirements for listing	9
7 Requirements for suppliers	10
8 Guidelines for completing the Tracking System Template	11
8.1 General Instructions	11
8.2 Components of the tracking system	11
Appendices	13
Appendix I Legislation	13

1 Purpose

This document provides guidance on further petfood processing general requirements, listing with MPI and the documented tracking system. Compliance with these will assist further petfood operators to meet the requirements of the Animal Products Act 1999, particularly the Animal Products Specifications for Products Intended for Animal Consumption Notice issued 9 October 2014.

2 Background

The requirements relating to 'further (petfood) processors' were introduced by an amendment issued in 2009, to the original Animal Products (Specifications for Products Intended for Animal Consumption) Notice 2006. This notice amplified the requirements for the petfood processor under the Animal Products Act 1999. The notice included the requirement for listing with MPI, procuring from a regulated source and having a documented tracking system.

A recent review of the notice and the systems for further petfood processors showed that a renewal listing system was required to ensure information was kept current. Maintaining a current list would provide the necessary information to rapidly trace and locate processors should an adverse event occur. The list is also used for MPI 'slice of life' audits intended to assess the performance of the sector.

As part of the review process, the Approvals and Appointments Team in MPI will take over the responsibility for managing the listing process from the Animal Products Team. This has provided the opportunity to also instigate the provision of charging for listing, which has been available in the Animal Product Fees, Charges and Levies Regulations 2007.

3 Definitions

In this document, unless the context otherwise requires:

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 processing of petfood:

- f) where the raw meat or animal material or product:
 - i) has been rendered; or
 - ii) is acquired in a ready-for-sale state and has been subject to primary processing in accordance with a registered risk management programme by an earlier processor
- a) under a risk management programme

(which reflects the activity described in clause 7(5) of the Animal Products (Exemptions and Inclusions) Order 2000) and **further (petfood) processor** has a corresponding meaning

regulated source means a source of regulated animal products of regulated animal products and includes processors who have a Risk Management Programme (RMP), operate under the Food Act or other further (petfood) processors

4 General Requirements

4.1 Introduction

This document applies to the further (petfood) processor.

A 'further (petfood) processor' is defined in clause 1.2 Definitions, of the Animal Products Specifications for Products Intended for Animal Consumption Notice issued 9 October 2014. A 'further (petfood) processor' means an operator who processes (other than transports or stores) 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). They are often called a secondary processor. Excluded are processors who do not necessarily handle raw meat such as the manufacture of biscuits or treats.

As a further petfood processor, you are required to meet a number of legal requirements under the Animal Products Act 1999 (APA). These requirements are outlined in this guidance document.

In summary the three significant requirements that you need to meet are:

- (1) listing with MPI;
- (2) procuring animal material for further (petfood) processing only from regulated sources; and
- (3) having a documented tracking system that demonstrates compliance with the requirement to only procure from regulated sources.

A regulated source includes a primary processing operation such as an abattoir who has a registered risk management programme (RMP) for human or animal consumption.

Excluded from the requirements for processing of petfood:

- a) are those under a RMP, which covers all processing of that animal material or product; or
- b) where the raw meat or animal material or product:
 - i) has already been rendered;
 - ii) is only acquired in a ready-for-sale state (and which has been subject to primary processing under a registered RMP by an earlier processor).

Further or secondary processors of petfood may be operating under a registered RMP because they are required to (because they export and require official assurances), or have elected to.

Primary processing, which includes the slaughter and dressing of mammals and birds, needs to occur under a registered RMP. The subsequent manufacture of ready-for-sale product can be undertaken by either a processor who is operating under a registered RMP or further (petfood) processor. Typical categories of further (petfood) processors

4.2 Typical categories of further (petfood) processors

There are a number of general categories of further (petfood) processing. These include:

- processing by size reduction (e.g. dicing, mincing, milling and grinding) and/or packing;
- undertaking processes other than size reduction and/or packing such as: boning, drying, heat treatment (e.g. cooking, baking, dog roll manufacture);
- retail sale of animal product; and
- wholesaling animal material or animal product.

The result is that processors tend to fall into three broad groups. These are:

- retailers who receive animal product, process it by size reduction (e.g. dicing, mincing) and/or packing, then sell the resulting product through their retail premises;
- processors who receive animal material or product, process it by size reduction (e.g. dicing, mincing) and/or packing, and then wholesale the resulting retail ready product(s) to supermarkets, pet shops etc.; and
- processors who receive animal material or product, process it by processes other than size reduction such as boning, drying, heat treatment (e.g. cooking, baking, dog roll manufacture), and then wholesale the resulting retail ready product(s) to supermarkets, pet shops etc.

4.3 Tracking system

To help you meet the requirements a tracking system template (and guidance) was issued by MPI and is located at the following webpage: [Further \(petfood\) processors documented tracking system](#).

This template has been written specifically to assist retailers who receive animal product, process it by size reduction and/or packing, and then sell the resulting product through their retail premises. If you do not fall into this broad grouping, you may still use this template. In this case, you may find that the complexity of your operation means that the example record forms are too simple for your operation. If this is the case, you will need to use your own existing record forms or develop your own.

Use of the MPI developed template tracking system is not a requirement therefore you can still develop your own documented system as long as it meets the requirements.

4.4 Reviews and verification

All 'further (petfood) processors' will be subject to checks by MPI to ensure that they are complying with the requirements outlined in the 'Requirements' sections of this code of practice chapter.

'Slice of life' reviews of certain 'further (petfood) processors'

If you only:

- process by size reduction (e.g. dicing, mincing, milling and grinding) and/or packing; and
- only sell the resulting animal product by retail;

then you will only be subject to a 'slice of life' review by the Systems Audit Group (SAG) of MPI. You will not be charged any part of the cost of these reviews.

A 'slice of life' review is intended to provide an indication of the performance of a particular sector rather than individual processors. As a result, a number of processors would be visited during a review of this group of 'further (petfood) processors'. Any issues identified at an individual processor would still need to be rectified.

If a 'slice of life' review shows the performance of this category of 'further (petfood) processors' is unacceptable, MPI may introduce a routine verification programme for this category.

Verification of the remaining 'further (petfood) processors'

If your operation is more extensive than that described above and includes either:

- undertaking processes other than size reduction and/or packing such as: boning, drying, heat treatment (e.g. cooking, baking, dog roll manufacture); and/or

- wholesaling animal material or animal product;

then you will be subject to routine verification by the MPI Verification Services (VS).

This verification will be in accordance with the Verification Statement of Policy 2005 and subsequent amendments including the Amendment to Verification Statement of Policy 2009. This verification is performance based and commences at an initial frequency of yearly which is also the maximum possible duration between audits. If the outcome of an audit is unacceptable the frequency of audits will increase, with the first step being down to 6 monthly.

The Verification Statement of Policy is available on the MPI website at: [Verification Statement of Policy 2005](#).

You will be charged for these verification audits. The charge will reflect the verifier's time relating to the verification including preparation, on-site visit and writing up the result of the verification. A cost will also be incurred to cover the verifier's travel costs. The overall cost will depend on the complexity and size of the operation. VS charges can be obtained from your nearest VS office.

5 Operator responsibilities

5.1 Operations approved for further (petfood) processing

Operations approved for further (petfood) processing are those registered with MPI under the APA that include processing by size reduction (e.g. dicing, mincing, milling and grinding) and/or packing; and only sell the resulting animal product by retail.

5.2 Operator responsibilities

It is the responsibility of the operator to ensure that all requirements notified under this Code of Practice are complied with. Where parts of this Code of Practice are carried out by persons not under the direct management control of the operator e.g. a supplier, then the operator must ensure that the further processing programme's integrity is assured through active management and verification of activities.

Operators in all cases need to ensure that intended suppliers are capable of meeting, and fully understand the requirements and expectations of the programme prior to supply being agreed. In all cases, it is recommended that individual operators establish commercial contracts with individual suppliers to formalise operator expectations of future supply.

5.3 Competency of persons supervising further petfood processing operations

Operators should ensure that further petfood processing operations are conducted under the direct supervision of a person competent in the requirements of the programme.

For the purpose of this section a person is deemed competent if they have a clear understanding of this part of the Tracking System Template.

6 Requirements for listing

Persons/petfood operators intending to become providers of further processed petfood need to be listed by MPI. This has been a requirement since 1 October 2009.

The petfood operator needs to become familiar with all the information contained within this code of practice chapter.

The applicant needs to:

- fill out the form, Application Form [AP61 Further \(Petfood\) Processors Listing](#); and
- any application fee prescribed in the application form.

After the initial listing, all further (petfood) processors need to re-list when any of the application information provided changes:

- their business name or trading name (if different); or
- their business address or physical address/es (if different) where further (petfood) processing occurs; or
- the general categories of processing operations, as described on the listing form AP61.

Every two years the applicant needs to re-list. MPI will remind the applicant when the listing is due.

MPI publishes the listing on its website as the Further (Petfood) Processors Listed with the Ministry for Primary Industries.

7 Requirements for suppliers

All petfood operators must maintain a list of suppliers that supply regulated products to that individual petfood operation.

A regulated source is a source of regulated animal products and includes processors who are:

- operating under a registered risk management programme (RMP); or
- operating under the Food Act 1981 regime, under an approved food safety programme (FSP) or the Food Hygiene Regulations 1974 (or Food Act 2014); or
- other further (petfood) processors.

The list of suppliers needs to be maintained, and reviewed whenever the suitability of individual suppliers is in doubt or when there has been any breach of the programme requirements.

It is expected that individual petfood operators will inform suppliers of the operator's expectations and requirements of this programme during contractual negotiations.

8 Guidelines for completing the Tracking System Template

8.1 General Instructions

The Tracking System template must be completed by a person who has full knowledge of the whole operation covered by the tracking system. The person completing the template should:

- a) read each section of this guidance before completing the corresponding section of the template;
- b) provide the required information;
- c) ensure that all information provided is legible; and
- d) ensure that everything written down accurately reflects or applies to their operation and that they will be able to comply.

It is very important that you complete the template accurately as this information will be verified by the recognised verifier.

8.2 Components of the tracking system

Section 1: Further (petfood) processor name, business address and contact details

- (1) **Full legal name:** If your business is a company, give its full legal name which must match the details given at the Companies Office exactly.
If your business is a partnership or a sole trader operation, give the name(s) of the business owner(s).
- (2) **Trading Name:** Give the name that you trade under (i.e. the name that usually used in company letterheads) which may be different to the legal name given in 1.1.
- (3) **Physical address:** Give the street address of your business.
- (4) **Postal address:** Give the address where you want any correspondence sent to (e.g. a P.O. Box number).
- (5) **Phone / Fax / Email:** Give the contact details for your business.

Section 2: Person Responsible for this Tracking System

This is the person responsible for the implementation of the tracking system and for ensuring that it is kept up to date. They are the contact person for MPI and the verifying agency when dealing with matters related to the tracking system.

Give the name or position or designation, and contact details (phone no., fax no., email address) of the person responsible for this tracking system. For larger operations it is recommended that the position or designation be given instead of the name of this person to avoid the need for updating the tracking system when the person is replaced. You may also wish to identify a deputy.

Section 3: General processing categories

Indicate the processes or activities that are covered under your operation by ticking the relevant boxes.

Cross out and/or write "NA" for the activity that is not applicable to your operation.

Section 4: Document list and responsibilities

Column 1: Document

This gives the list of all the documents that form part of your tracking system including the programmes given in the Attachments of the tracking system.

Column 2: Location (section/ page no.)

Indicate where each document listed in column 1 can be found within the tracking system (e.g. section and/or page number). For example, if you have a separate manual for your own written procedures, give the section or page number where the particular procedure can be found in the manual.

Column 3: Version No. or Date Issued

For each document, indicate the version number. This is usually the date when the document was issued.

Column 4: Person responsible for implementation

Give the name or position of the person responsible for the implementation of the attachment. For small operations, the same person is likely to be responsible for the overall system and the attachment. For larger operations the person with overall responsibility may delegate responsibility for the attachment to another person.

Section 5: Confirmation

Tick the two boxes to confirm that you agree to the statements given.

Signature: The operator or the person responsible for the tracking system must sign and date the completed template.

Attachment A: Traceability and inventory control

Do not remove anything from Attachment A. If you wish to add your own procedures directly into the Attachments, you must clearly identify the added section in the actual document in a manner that can easily be seen by the verifier.

Appendices

Appendix I Legislation

The abbreviations used for legislation cited in this section are:

- a) AP Reg – the Animal Product Regulations 2000;
- b) AP (E&I) Order – Animal Products (Exemptions and Inclusions) Order 2000;
- c) AC Spec – the Animal Products (Specifications for Products Intended for Animal Consumption) Notice issued 9 October 2014.

AP Reg 18 [Identification system requirements]

- (1) All operators of risk management programmes, all exporters, and all other categories of person required by specifications to do so, must have a tracking system that—
 - a) allows for the identification of animal material and animal product; and
 - b) enables the movement of the animal material or animal product to be traced—
 - i) where required by specifications, from the origin, through the supplier and the operator's business premises to the next recipient of the animal material or product; or
 - ii) where specifications do not require tracing from origin, from the supplier and the operator's business premises to the next recipient of the animal material or product.
- (2) The Director-General may, by specifications, require persons other than operators of risk management programmes and exporters to maintain a tracking system.
- (3) Before making specifications for the purposes of subclause (2), the Director-General must be satisfied of at least 1 of the matters referred to in regulation 21.

AP (E&I) Order clause 7 [Agricultural compounds and veterinary medicines covered by Agricultural Compounds and Veterinary Medicines Act 1997]

- (1) Parts 2 to 4 of the Act do not apply to the secondary processing of animal products or the processing of dairy material if the products or material are, or are being processed to become or form part of, an agricultural compound or veterinary medicine that is subject to the Agricultural Compounds and Veterinary Medicines Act 1997, except as provided in subclauses (3) to (5).
- (2) The exemption in this clause includes the secondary processing of animal products or the processing of dairy material if the products or material are, or are intended to become or form part of,—
 - a) a substance or compound that, under regulations made under section 75(1)(a) of the Agricultural Compounds and Veterinary Medicines Act 1997, may be imported, manufactured, sold, or used as an agricultural compound without registration under that Act; or
 - b) a substance or compound that, under regulations made under section 75(1)(b) of that Act must be notified to the Director-General before importation, manufacture, sale, or use as an agricultural compound.
- (3) The exemption in this clause does not obviate the need for compliance with any applicable requirements of Parts 2 to 4 of the Act if the agricultural compound or veterinary medicine (including any petfood within this description) is intended for export in circumstances that would require an official assurance to be issued, and the official assurance may only be issued on the basis of compliance with those requirements.
- (4) Exemption in this clause does not obviate the need for a risk management programme in respect of rendering operations or blood-drying operations that require a risk management programme under clause 20.

- (5) The exemption in this clause does not obviate the need to comply with any applicable requirements of Parts 2 to 4 of the Act in relation to petfood that is raw meat or other animal material or animal product that results from the death of the source animal unless—
- a) the raw meat or animal material or animal product has been rendered; or
 - b) the raw meat or animal material or animal product—
 - i) is acquired in a ready-for-sale state; and
 - ii) has been subject to primary processing in accordance with a registered risk management programme by an earlier processor.

AC Spec 1.2 Definitions

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 processing of petfood:

- a) where the raw meat or animal material or product:
 - i) has been rendered; or
 - ii) is acquired in a ready-for-sale state and has been subject to primary processing in accordance with a registered risk management programme by an earlier processor; or
- b) under a risk management programme;

(which reflects the activity described in clause 7(5) of the Order) and further (petfood) processor has a corresponding meaning.

AC Specs Part 9: Further processing of petfood

9.1 Interpretation

In this Part, “regulated source” means a source of regulated animal products and includes further (petfood) processors who are subject to this Part

9.2 Purpose

The purpose of this Part is to set out the conditions under which further (petfood) processors excluded from the need to comply with Parts 2 to 4 of the Act by clause 7 of the Animal Products (Exemptions and Inclusions) Order 2000 must carry out their further (petfood) processing operations in order to ensure that their operations meet ‘sufficient safeguards’ for the purposes of section 9 (2) (b) of the Act.

9.3 Application of this Part

This Part applies to further (petfood) processors, and such persons must comply with the applicable provisions of this Part

9.4 Requirement to procure only from regulated sources

- (1) A further (petfood) processor must procure animal material for further (petfood) processing only from regulated sources.
- (2) A further (petfood) processor must have a documented tracking system that demonstrates compliance with the requirement in subclause (1). This system must allow for the identification and traceability of animal material or product from the supplier, on to the further (petfood) processor’s business premises and then to the next recipient of the animal material or product. This is in accordance with the requirements of regulation 18 of the Animal Products Regulations 2000.
- (3) Without limitation, the system in place under subclause (2) must be capable of generating:

- a) records of the name and address of all regulated sources from which the further (petfood) processor has procured animal material;
 - b) records of all animal material procured from regulated sources, including a description of the animal material, and the quantity and date of each procurement; and
 - c) records that enable petfood product produced by the further (petfood) processor to be traced back to the procured animal material or product.
- (4) The system in place under subclause (2) must be:
- a) accessible to the recognised verifier, the recognised verifying agency and animal product officers;
 - b) retained by the further (petfood) processor for a period of at least four years including after cessation of operations under the Act; and
 - c) retrievable within two working days of any request by a person referred to in subclause (4) (a).

9.5 Further (petfood) processors to be listed

- (1) Further (petfood) processors must be listed with the Director-General.
- (2) The purpose of this list is:
- a) to enable the Director-General to record and monitor further (petfood) processors of petfood who are exempt from compliance with Parts 2 to 4 of the Act by the Animal Products (Exemptions and Inclusions) Order 2000. This is to ensure that their activities comply with the conditions of the exemption as set out in this Part;
 - b) to enable members of the public to know which further (petfood) processors are subject to this notice, and who is responsible for various functions related to processing under this scheme; and
 - c) To facilitate the compliance, audit, and other supporting and administrative functions of MPI under the Act.
- (3) The Director-General must:
- a) keep the list open for public inspection, without fee, during ordinary office hours at the head office of MPI and at such other places as the Director-General determines; and
 - b) supply to any person copies of all or part of the list on request and payment of a reasonable charge for the production of the copies.
- (4) The list may be kept in such manner as the Director-General thinks fit.
- (5) The information to be shown in this list is:
- a) current business name and (if different) trading name of the processor, in respect of their further (petfood) processing operation;
 - b) current business address and (if different) physical address/es at which the further (petfood) processing operations are carried out; and
 - c) a general description of the nature of the further (petfood) processing operations.

9.6 Application for listing

- (1) An application for listing must be made in writing to the Director-General, in the form and manner approved by the Director-General and containing the information as set out in clause 9.5 and be accompanied by:
- a) any additional information that is necessary to enable the listing process to achieve the purpose of clause 9.5 before determining whether or not to list the processor; and
 - b) the fee prescribed in regulations made under the Act (if any).
- (2) If the information or material is not supplied within three months of the date of request, or within such further time as the Director-General allows, the application for listing lapses.

9.7 Listing of further (petfood) processors

- (1) On receipt of a properly made application accompanied by the prescribed fee (if any), the Director-General will list the applicant as a further (petfood) processor including the information provided under clause 9.5 (5) (a) - (c).
- (2) The Director-General may decline to list an applicant if he or she considers that:
 - a) there has in the past, been a serious or repeated failure by the applicant to comply with the requirements specified in clause 9.4; or
 - b) there are grounds for considering that the applicant is likely in the future to fail to comply with the requirements specified in clause 9.4.
- (3) Listing is valid for a period of two years from the date of listing after which period, processors must renew their listing as set out in clause 9.8.
- (4) The Director-General must, as soon as practicable after listing a processor, advise the processor, in writing, of the listing and the expiry date of the listing.
- (5) After the initial listing, all further (petfood) processors must promptly inform MPI in the event of a change to any of their details, as referred to in clause 9.5 (5), in writing.

9.8 Renewal of listing

- (6) An application for renewal of listing of a further (petfood) processor must be made by the processor and received by the Director-General at least one month before the expiry of the processor's current listing.
- (7) If the Director-General fails to determine the application for renewal before the date the current listing expires, the processor will remain listed under this scheme until the date the Director-General notifies the processor of his or her determination on the application.

9.9 Delisting

- (1) The Director-General may remove a further (petfood) processor from the list if:
 - a) the listed further (petfood) processor so requests;
 - b) the Director-General is satisfied that the criteria referred to in clause 9.7 (2) applies, or the person no longer operates as a further (petfood) processor; or
 - c) any failure to pay the listing fee (if any) by the due date has persisted for more than 30 days.
- (2) Before delisting a further (petfood) processor on any of the grounds referred to in subclause (1) (b) and (c), the Director-General must—
 - a) notify the further (petfood) processor in writing of his or her intention; and
 - b) give the further (petfood) processor a reasonable opportunity, within the time specified in the written notice, to explain why he/she should not be delisted, or pay the unpaid fee.
- (3) The delisting of a further (petfood) processor under this section does not affect the right of a person to make a further application for listing under clause 9.6.