Ruminant Protein Assurance Programme for Tallow

The Ruminant Protein Assurance Programme for Tallow, which has been developed by the Ministry for Primary Industries in consultation with the New Zealand Renderers Group of the Meat Industry Association, is aimed at guiding rendering premises to meet the requirements under the Biosecurity (Ruminant Protein) Regulations 1999. This programme also provides assurance to overseas competent authorities that New Zealand's rendering industry meet the OIE requirements for ruminant protein in tallow.

Rendering premises operators are required to implement the chosen options by **16th March 2015.** The option chosen and the reference to the sampling procedure must be documented in the premises' Risk Management Programmes. This is considered a minor amendment to the RMP.

Other operators, such as tallow storage facilities, are not required to implement the sampling and testing programme detailed below. However, when tallow is blended and destined for human or animal consumption in New Zealand and the labelling/documentation for the blend components does not show that the insoluble impurities is $\leq$0.15% then testing may occur on a lot basis before shipping the product unlabelled/unidentified.

Tallow with insoluble impurities >0.15 % w/w is deemed to be ruminant protein under the Ruminant Protein Regulations and needs to be labelled/identified accordingly.

The assurance programme recognises that tallow is used in feed as well as for non-feed purposes.

Option 1: Insoluble Impurities Sampling and Testing Programme

The programme consists of an initial sampling of five consecutive load-outs, followed by one random sample at monthly intervals. If the level of insoluble impurities in a random sample is >0.15% w/w, the sampling and testing programme must start again with sampling of five consecutive load-outs to verify insoluble impurities in tallow is not greater than 0.15% w/w.

Initial Testing

Initial tests for insoluble impurities in tallow must be taken from a minimum of five consecutive load-outs. [*Details of tallow sample collection and test methodology given below*.]

All tallow must be labelled/identified as per Option 2 until five consecutive load-out samples have insoluble impurities results of ≤0.15% w/w. After which, the tallow can be sold without the label/identifier until the next random sampling.

> **Guidance**: The operator should consider retaining samples of tallow, including duplicates of samples sent for testing.

Random Samples

Test one random load-out sample every month.

The procedure of how the random sampling is intended to be carried out must be documented in the premises' RMP.

The batch from which the random sample has been drawn need not be labelled/identified as per Option 2 until the test result is known:

- If the insoluble impurity result of the random sample is >0.15% w/w then:
  i) Forward the result to downstream buyers by traceable means and also advise them to label/identify that batch and all subsequent batches sold after it as per Option 2.
  ii) Immediately re-start the cycle as described in the section on Initial Testing.
- If the test result for the random sample is ≤0.15% w/w then test another random sample next month and the cycle continues. The tallow need not be labelled/identified as per Option 2.

Plant Change or Plant Upgrade

Following periods of plant change, or plant upgrade or plant shutdown (e.g. between seasons), when insoluble impurities testing has not been carried out on a regular basis the operator must undertake steps as described in the section on Initial Testing after the change, upgrade or shutdown.

For the purposes of this requirement a plant is considered to be in shutdown when it does not operate for a period of a fortnight.

Record Keeping [Clause 15 of the Ruminant Protein Regulations]

Test results and relevant records to whom, how much and when the batches were sold must be retained at processing premises for a period of two years minimum.

The results must be available for inspection within five working days of a request being made by the Director-General of MPI or by an inspector or authorised person.

The results must be kept in a manner and format from which they can be readily retrieved and made available for inspection.

Tallow Sample Collection

The tallow samples must be taken at load-out.

The tallow sample must be a minimum of 750mL made up from equal-sized sub-samples, taken from at least the start, middle and end of the load out. The size of the composite sample may be more than the minimum 750mL so long as the chosen volume is collected consistently and the sampling procedure documented in the operator's RMP.

Test Methodology

The testing for insoluble impurities must be done by an IANZ (International Accreditation New Zealand) accredited laboratory using either the AOCS Ca 3a – 46 method or the method described in MIRINZ 831, or an internationally accepted method.

Tallow Production Process Review

If an insoluble impurities result of >0.15% w/w is obtained in the sampling and testing programme then the operator must conduct an immediate review of the production process focusing on potential reasons for the higher level of insoluble impurities in the tallow, and document the results of the review.

Guidance: The review should include:

- raw material, processing and product handling procedures;
- process control procedures;
- cleaning and sanitising programmes;
- design and construction.

Option 2: For Tallow Not Subject to an Insoluble Impurities Sampling and Testing Programme

For tallow not subject to an Insoluble Impurities Sampling and Testing Programme, label the tallow as either:

a. Per Clause 13 of the Ruminant Protein Regulations: "**Notice: Do not feed to sheep, cattle, deer, goats, buffaloes or other ruminant animals. This product contains or may contain ruminant protein**".

or

b. "**Prior to processing into feed for ruminant animals, the product must be tested to ensure the insoluble impurities do not exceed 0.15% w/w.**" Include this identifier on all consignment notes and as a Transfer Control Declaration on Eligibility Documents (but not on the export certificate).

Guidance: The label as per "a" above should be chosen when the insoluble impurities is known to be, or likely to be, >0.15% w/w, and the tallow is known to be destined for animal consumption in New Zealand.