Ministry for Primary Industries
Manatū Ahu Matua

Guidance Document

Further Processing

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Title

Guidance Document: Further Processing

About this document

The Guidance Document for Further Processing has been developed to assist secondary processors of non-dairy animal products to meet the requirements of the Animal Products Act 1999 (APA), and to make food that is fit for its intended purpose. It provides guidance on key process operations carried out by further processors, such as heat treatment, canning (commercial sterilisation), drying, acidification and high pressure processing. The focus of this document is on the development and validation of process steps used to control hazards, and operating those steps.

Related Requirements

- Animal Products Regulations 2000
- Animal Products (Risk Management Programme Specifications) Notice 2008
- Animal Products (Requirements for Risk Management Programme Outlines) 2008
- Animal Products Notice: Specifications for Products Intended for Human Consumption, issued 2016
- Australia New Zealand Food Standards Code (FSC)

Document history

Version	Version Date	Section Changed	Change(s) Description
1	August 2011		
2	May 2018	Parts 1 & 2 combined to produce Chapter 1.	New format and branding. General content update.

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CHAPTER 1: Overview of Guidance Document

1 Purpose and Scope

Further processing is a term used to describe processing operations such as heat treatment, canning and high pressure processing. Further processing operations are also referred to as secondary processing under the Animal Products Act 1999 (APA).

This Guidance Document has been developed to assist further processors of non-dairy animal products (such as meat and seafood) to meet the requirements of the APA. It has been developed by MPI with input from people with expertise in the various processing operations. As this Guidance Document is process operations based, model HACCP plans are not provided. The sector specific Codes of Practice, such as those for Processed Meat and Seafood, contain model HACCP plans that can be referred to when developing your own HACCP plans.

This Guide covers New Zealand domestic requirements under the APA. Export requirements have not been addressed in this guide. If you are intending to export, you need to be aware of and meet any export requirements relevant to your product and intended market.

1.1 Who should read this Guidance Document?

This Guidance Document should be read by:

- further processors of animal products including red meat, poultry, seafood and eggs products;
- regulators;
- recognised evaluators;
- recognised verifiers;
- consultants assisting with the development and validation of further processing operations.

1.2 Contents of the Guidance Document

This Further Processing Guidance Document is divided into two Chapters:

Chapter 1: Overview

This Chapter provides an overview of the Guidance Document and highlights the requirements for further processors under the APA. It explains the purpose, scope and application of the guide, and the APA legislative framework which underpins the requirements.

This Chapter also provides information for you to consider as you decide which regulatory regime (the APA or Food Act 2014) to operate under. High level guidance on developing a risk management programme (RMP), and links to documents published by MPI that may be useful during the development, validation and operation of your RMP are provided.

Table 1 identifies the legislation under the APA and the Australia New Zealand Food Standards Code (FSC) that is directly applicable to the processing operations covered in Chapter 2. The table has been included to give you greater awareness of the legal requirements that you need to comply with.

Chapter 2: Specific Processing Operation Good Operating Practices (GOP)

Chapter 2 is broken down into Parts, each of which addresses a specific processing operation. The Parts provide guidance on the practices relevant to the operation covered. It sets out the issues that you should consider when developing, validating and operating that type of process.

The Parts in this Chapter are being revised. Each Part will be consulted on separately as this happens. Chapter 2 will also continue to be expanded upon as new Parts are developed.

Each Part in Chapter 2 contains:

- Procedures to assist with compliance with the regulatory requirements; and
- Additional information (shown in boxes).

Mandatory requirements are identified by citing the legal reference in square brackets. You must comply with mandatory requirements and should follow the procedures for compliance, unless alternative practices have been included in your registered RMP. The additional information is given to assist with understanding.

2 Which Regulatory Regime Applies?

As a further processor of animal products you may operate under either:

- an RMP under the APA; or
- a Food Control Plan (FCP) or National Programme under the Food Act 2014.

The key considerations when deciding which regime to operate under are:

- whether the product is to be exported, and if so, is an official assurance needed (if yes, a RMP will be required); or
- are other activities being carried out (such a primary processing) which must occur under an RMP, and so the further processing would just be an extension to those operations (in which case a RMP maybe the best option).

If neither of these factors apply, it is likely that you will operate under the Food Act 2014.

2.1 The Animal Products Act (APA) regime

The APA provides New Zealand's legal framework for the processing of animal products. It establishes a risk management system that requires all animal products traded and used to be "fit for intended purpose". The APA sets out the duties of operators and the requirements for RMPs, Regulated Control Schemes, and exporter controls. Figure 1 illustrates the framework of the APA.

You must comply with the legal requirements of the APA and your registered RMP, adequately resource the RMP operations (including having competent staff), and operate within the capacity and capability of your premises, facilities and equipment.

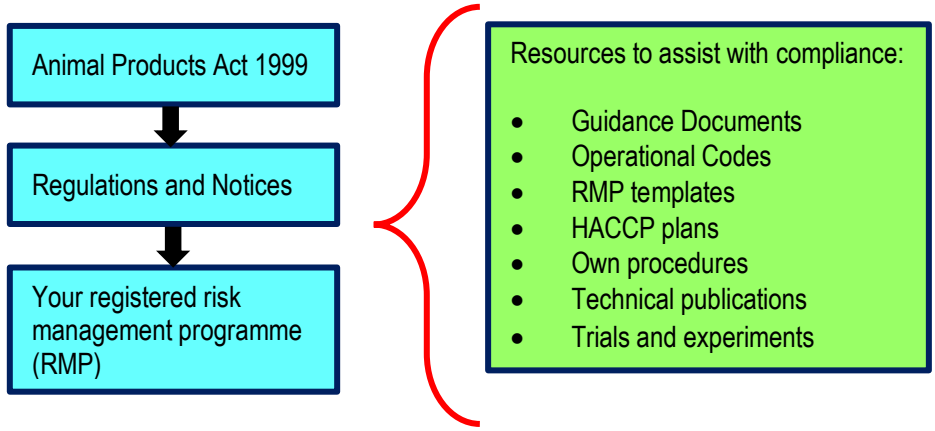

Figure 1: APA Framework

2.1.1 Risk Management Programmes

An RMP is a documented programme designed to identify and manage hazards and other risk factors when processing animal materials and animal products to ensure that it is fit for its intended purpose. The risk factors to be considered when developing an RMP are:

- risks from hazards to human and animal health (e.g. things that could make people or animals sick);
- risks from false or misleading labelling; and
- risks to the wholesomeness of animal material or product (e.g. things that are unexpected or unwanted in the product).

A registered RMP is "legally binding" so it must be developed and implemented in accordance with relevant New Zealand legislation. It must be specific to the processes, products and premises to which it applies. Export requirements including overseas market access requirements (OMARs) and commercial quality issues are not required to be part of the RMP.

The Risk Management Programme Manual provides comprehensive information about how to develop, register and operate an RMP.

2.1.2 Exporter controls under the APA

If you are going to export your animal product, you must meet the requirements of the APA and any additional market access requirements of foreign governments. Exporters must also be registered with MPI.

As an exporter, you need to be aware of the requirements and ensure that your documented systems include the necessary procedures and records to demonstrate compliance with the following documents:

- Animal Products Notice: Official Assurances Specifications for Animal Material and Animal Products;
- Any additional export Notices;
- relevant Overseas Market Access Requirements (OMARs).

Export requirements are not included in this Guidance Document.

For more detail on what's involved in exporting, go to the MPI website.

2.1.3 Recognition and duties under the APA

Under the APA, MPI recognises agencies and persons to carry evaluation and external verification of RMPs on its behalf. People or agencies are recognised if they meet specified requirements. MPI maintains a public register of all recognised agencies and persons. This is available on the MPI registers and lists. You can select a recognised evaluator and verifying agency from this list when it is time to have your RMP evaluated and verified. The relevant lists are:

Animal Products Recognised people – Evaluators;

Animal Products Recognised people – Verifiers;

For some process operations, the recognised evaluator or verifier will need to have mandatory competencies. For example if he or she is evaluating or verifying commercial sterilisation operations. If the recognised person does not have the required competency, a technical expert maybe used.

Sections 106 and 107 of the APA imposes duties on recognised persons and agencies.

2.2 Food Act 2014

The Food Act 2014 is a risk-based and outcome-focused approach to managing food safety. Food businesses that are higher risk from a food safety standpoint operate under more stringent food safety requirements and checks than lower-risk food businesses.

If you are interested in operating under the Food Act 2014, see the MPI website for detailed information about the requirements.

3 Australia New Zealand Food Standards Code (FSC)

The FSC sets out the standards relating to labelling, composition and contaminants of food sold, processed or handled for sale in Australia or New Zealand, or imported into Australia or New Zealand. The FSC is developed by Food Standards Australia New Zealand (FSANZ).

The FSC applies regardless of whether you operate under an RMP, FCP or a National Programme.

You can access the Food Standards Code here.

4 Applicable Regulatory Requirements

The legislation relevant to the further processing operations addressed in this Guide are listed in Table 1. The legalisation cited is specific to each processing operation. Legislative requirements that is more generic in nature such as the requirements for design and construction, personnel health, hygiene, and waste management have not been included. To see these other requirements refer to the list of related requirements linked from page 1 of this Guidance Document.

(1) The legislation cited in Table 1 is limited to the requirements in the:

a) Animal Products Regulations 2000; and
b) Animal Products Notice: Specifications for Products Intended for Human Consumption 2016 (HC Spec).

(2) Requirements in the FSC, Food Act 2014, and export requirements have not been included.

(3) Operators must ensure that they comply with all legislation applicable to their business.

Table 1: Selected Regulatory Requirements under the APA[1]

Processing operations in Chapter 2	Animal Products Regulations 2000	Animal Products Notice: Specifications for Products Intended for Human Consumption										
	Regulation number	Clause number										
	5, 6, 7, 8, 9, 12, 14, 16, 18, 19	2.11-2.14	5.2	5.3	6.2	7.2	9.2	Eggs 13.41-13.43	14.7-14.9	14.10	Chilled ready-to-eat animal product 15.1-15.5	Sched 3.3 & 4
1. Heat treatment	✓	✓		✓	✓	✓	✓	✓	✓		✓	
2. Commercial sterilisation	✓	✓	✓	✓	✓	✓	✓		✓	✓		✓
3. Concentration and drying	✓	✓		✓	✓	✓	✓	✓	✓			
4. Hurdle technology	✓	✓		✓	✓	✓	✓	✓	✓		✓	
5. Smoking	✓	✓		✓	✓	✓	✓	✓	✓		✓	
6. Acidification	✓	✓		✓	✓	✓	✓	✓	✓		✓	
7. High Pressure Processing	✓	✓		✓	✓	✓	✓	✓	✓			

5 Other Legislation

(1) You should not rely on this Guidance Document for the legal requirements that are imposed under other legislation.

(2) Examples of other legislation that may be relevant to your operation are:

a) Food Act 2014;
b) Commerce Act 1986;
c) Consumer Guarantees Act 1993;
d) Fair Trading Act 1986;
e) Hazardous Substances and New Organisms Act 1996;
f) Weight and Measures Act 1987

[1] The citations were current at the time of publication. You should check for any amendments when developing updating your RMP.

6 Other Sources of Information

The MPI website contains a lot of information to assist you as you develop and operate your RMP. The following sections provide links to information that are particularly relevant to the activities addressed in this Guidance Document.

6.1 MPI food science

This page contains links to a wide range of technical publications produced by or on behalf of MPI. You can use this information to help support your decisions, for example about the chemical or biological hazards that are reasonably likely to occur in your product or process, and appropriate controls that could be applied.

6.2 Hazard data sheets

This page contains links to a series of hazard data sheets for microbiological pathogens and chemicals. The pathogen data sheets can be used to help understand the characteristics of the micro-organisms that need to be controlled by a process, their sources, growth parameters and examples of processing guidelines.

The chemical information sheets provide information about the safety of chemicals in food. They describe the compounds, their sources, potential health effects and estimate the likelihood of dietary exposure to the chemicals.

6.3 Food risk profiles

This page contains links to the food risk profiles for specific food/hazard combinations, for example shiga-toxin producing *E. coli* in red meat and meat products, or *Listeria monocytogenes* in processed ready-to-eat meats. These risk profiles provide comprehensive information that identify the hazards that need to be controlled in your process and their significance to public health.

6.4 Hazard database

The Hazard Database is a searchable database that provides information on food safety hazards that are reasonably likely to occur in New Zealand foods and ingredients. The search results list the hazard(s) associated with the food, the source of the hazard, the regulatory limit (if applicable) as well as actions you can take to control the hazard.

6.5 How to determine the shelf life of food

This Guidance Document is designed to help you to determine the shelf life of your products and to apply appropriate date marking. It provides useful information to assist in preparing and handling foods for retail sale.

6.6 Control of *Listeria monocytogenes* in ready-to-eat foods

Part 15 of the HC Spec requires certain operators processing certain chilled ready-to eat animal products to have systems in place to manage *Listeria monocytogenes.* The microbiological limits for *Listeria monocytogenes* in ready-to-eat products are in standard 1.6.1 of the FSC.

MPI has developed a range of *Listeria* resources to help you understand what the issue is, the risks when Listeria is not managed effectively, why it receives so much attention, and to assist with the development and implementation of appropriate controls for your operation. These resources include:

- a series of simple fact sheets;
- training resources;
- a sampling video; and
- a detailed Guidance Document, which is made up of the following Parts:
  - Part 1: *Listeria* management and glossary;
  - Part 2: Good operating practices;
  - Part 3: Monitoring activities;
  - Part 4: Corrective actions.