



TECHNICAL DIRECTIVE 00/041

Control of Brands, Seals and Legend Bearing Packaging Materials in Export Establishments

		Priority	Normal
From:	Phil Ward, Programme Manager (Generic)	File:	
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1	References
1.1	TD 98/78, TD 99/165, Manual 15
2	Background
2.1	<p>Product brands, carton seals and legend bearing packaging materials have been controlled in a variety of ways in export establishments depending on the markets to which the establishments are listed.</p> <p>The one common factor has been that MAF VA staff (formerly MQM) have held the key(s) to secure areas and have physically unlocked the secure areas or released special security keys (e.g. Oz keys) to nominated company personnel who have released the items to the relevant departments during MAF presence at the establishment.</p>
2.2	<p>Technical Directive 98/78 permitted devolution of the MAF responsibility to MQM inspectors (now ASURE NZ). However this devolution of responsibility has not occurred in practice to any significant extent. TD 99/165 allocates responsibility of slaughter brands to ASURE NZ.</p>
2.3	<p>Manual 15 contains the current requirements for the supply, control and security of these materials. The requirements of this manual apply except for those variations given in this technical directive.</p> <p>MR 153 requires that brands and stamps be securely locked away to the satisfaction of the inspector.</p>
3	Procedure
3.1	Brands
	<p>Brands are applied to carcasses after inspection and may be applied to cuts/pieces in some cases.</p> <p>Brands shall be controlled by MAF VA or ASURE NZ in accordance with TD 99/165, but may be secured and released in accordance with conditions specified in this technical</p>

	directive.
3.1.1	<p><i>Licensee Responsibility</i></p> <p>The licensee shall have documented procedures describing brand security, approved by the Technical Supervisor. The procedures shall specify:</p> <ul style="list-style-type: none"> • the secure location • the responsible senior persons • the procedure followed when brands are released • the procedure followed when brands are secured • identification and inventory • company internal reconciliation • corrective actions • verification • records <p>Brands for use on carcasses in the slaughterhouse shall not be released for use unless MAF VA or ASURE NZ staff are present on the establishment.</p> <p>Brands for use in boning and or cutting operations may be released for use without MAF VA or ASURE NZ presence.</p>
3.1.2	<p><i>MAF VA Responsibility</i></p> <p>MAF VA shall retain possession of any unissued brands.</p> <p>MAF VA shall maintain an inventory of all brands issued to the licensee and shall verify the company programme on a weekly basis. ASSURE NZ will advise MAF VA of any non-compliance by the licensee with security of slaughter brands.</p> <p>All brands shall be uniquely identified, with the identification etched or stamped onto a readily visible part of the brand.</p>
3.1.3	<p><i>Response to Non-conformances</i></p> <p>Non-conformance to the approved programme must produce an immediate response.</p> <p>MAF VA shall carry out an immediate investigation to ascertain why the non- conformance occurred and whether any opportunity existed for misuse of the brand(s).</p> <p>Where the investigation shows reasonable grounds for believing that the misuse of the brand(s) may have occurred, certification of all product branded since the previous acceptable verification shall be withdrawn.</p> <p>Where certification is withdrawn details of the incident and the findings of the investigation shall be reported to the MAFVA Team Leader who shall notify his Director.</p> <p>Certification may only be reinstated by the Director Animal Products, MAF Food Assurance Authority.</p> <p>Where an investigation shows that misuse has not occurred corrective action shall be taken according to the licensees approved plan.</p> <p>All investigations shall be recorded.</p>
3.2	<p><i>Carton Seals</i></p> <p>Further processing operations, whether stand-alone PH or ME/DSP, are regarded as having part-time (intermittent) inspection cover (refer TD99/49).</p>

3.2.1	Licensee Responsibility
	<p>The licensee shall have documented procedures describing carton seal security, approved by the Technical Supervisor.</p> <p>The procedures shall include the keeping of records that show daily seal use against production.</p>
3.2.2	MAF VA Responsibility
	<p>Bulk supplies of seals will be kept under MAF VA security.</p> <p>At each visit to the premises (daily for EU-listed premises) sufficient seals will be issued to the licensee to cover the anticipated production for the period until the next visit.</p> <p>MAFVA shall conduct reconciliation audits commencing at the frequency of once per week, with a ceiling of once per month.</p>
3.2.3	Response to Non-conformance
	As per 3.1.3 with 'brands' substituted for 'seals'
3.3	Wrapping Materials and Labels Bearing the Pre-Printed Reduced Size Legend
	Reduced sized inspection legends shall be controlled according to Manual 15, Section 4.3.
	<p>Section 4.3.1 shall be replaced by:-</p> <p>4.3.1 Materials showing pre-printed legends shall be held under company security to the satisfaction of MAF VA. A designated company supervisor is to hold the key and is to ensure that the facilities are secured when not under direct supervision of the company.</p> <p>Add 4.3.2</p> <p>4.3.2 The company shall provide a procedure describing the security of legend bearing materials which has the formal approval of the Technical Supervisor.</p>
	The licensee shall maintain an inventory including movements in and out of the facility. MAF VA shall verify this inventory according to PBV principles with a four-weekly ceiling.
	Response to Non-conformances
	As per 3.1.3 with 'brands' substituted for 'reduced size inspection legends'.
4	Implementation
	Immediate