Guidelines for Risk Management Programme Template – Inshore Vessels Fish Filleting

Filleting of fish onboard inshore fishing vessels for sale on NZ market

Based on information available to the New Zealand Food Safety Authority (NZFSA), we believe that some inshore fishing vessel operators are filleting fish on board their vessels for sale on the New Zealand market.

Requirements of the Animal Products Act

The Animal Products (Definition of Primary Processor) Notice 2000 classifies the filleting of finfish at sea as primary processing. The Animal Products Act 1999 requires all primary processors of seafood products intended for human or animal consumption to operate under a registered Risk Management Programme (RMP). An RMP is a documented programme that identifies and manages hazards and other risk factors associated with primary processing of fish.

Operating under an RMP will help you to produce fish that is fit for its intended purpose. An RMP must cover the following risk factors:

- risks from hazards to human and animal health;

- risks from false or misleading labelling; and

- risks to the wholesomeness of animal material or product.

If you wish to fillet fish on board your vessel and sell the filleted fish on the New Zealand market, you must operate under a registered RMP.

RMP Template for Inshore Vessels – Fish Filleting

To help you set up and operate under an RMP, the Seafood Standards Council and NZFSA have developed a Risk Management Programme Template for Inshore Vessels – Fish Filleting.

This RMP template applies to onboard filleting of fish **only if the filleted product is sold on the New Zealand market**. You cannot export filleted fish produced under this RMP.

Completing the RMP template

We have pre-written as much of the RMP template as possible, but vessel operators (skippers) must complete the remaining sections to make sure that the RMP gives a true picture of their operations.

To complete the RMP template you should:

> a.   read through the template to get an overview of requirements;
>
> b.   provide the required information by:
>
> > • entering information into the empty boxes or blank lines
> >
> > • ticking the appropriate answers or statements, e.g. [√]
> >
> > • making sure that information provided is easy to read;
>
> c.   check that the completed RMP template accurately reflects your operation and that you will be able to comply with it.

Application Form - AP4 Risk Management Programme Form

To register your RMP you must also fill out an application form (see linked form AP4 and general guidelines for filling out the form).

Extra notes on the AP4 Application form

Section 7 - Processing Capabilities asks you to complete the form AP49: Principle Categories of Processing. We have provided a copy of this form for you.

Section 8 - Responsible Persons / Organisations asks for the name of your recognised evaluator. You should write "Not Applicable" in this box.

NZFSA does not require evaluation for an RMP that is fully based on an approved template because we know that the requirements and procedures in the template are valid and will meet regulatory requirements.

Section 8 also asks you to write the name of your recognised verification agency. To find out who this will be, you should write or email to -

Dave Metcalfe
NZFSA Verification Agency
PO Box 2835
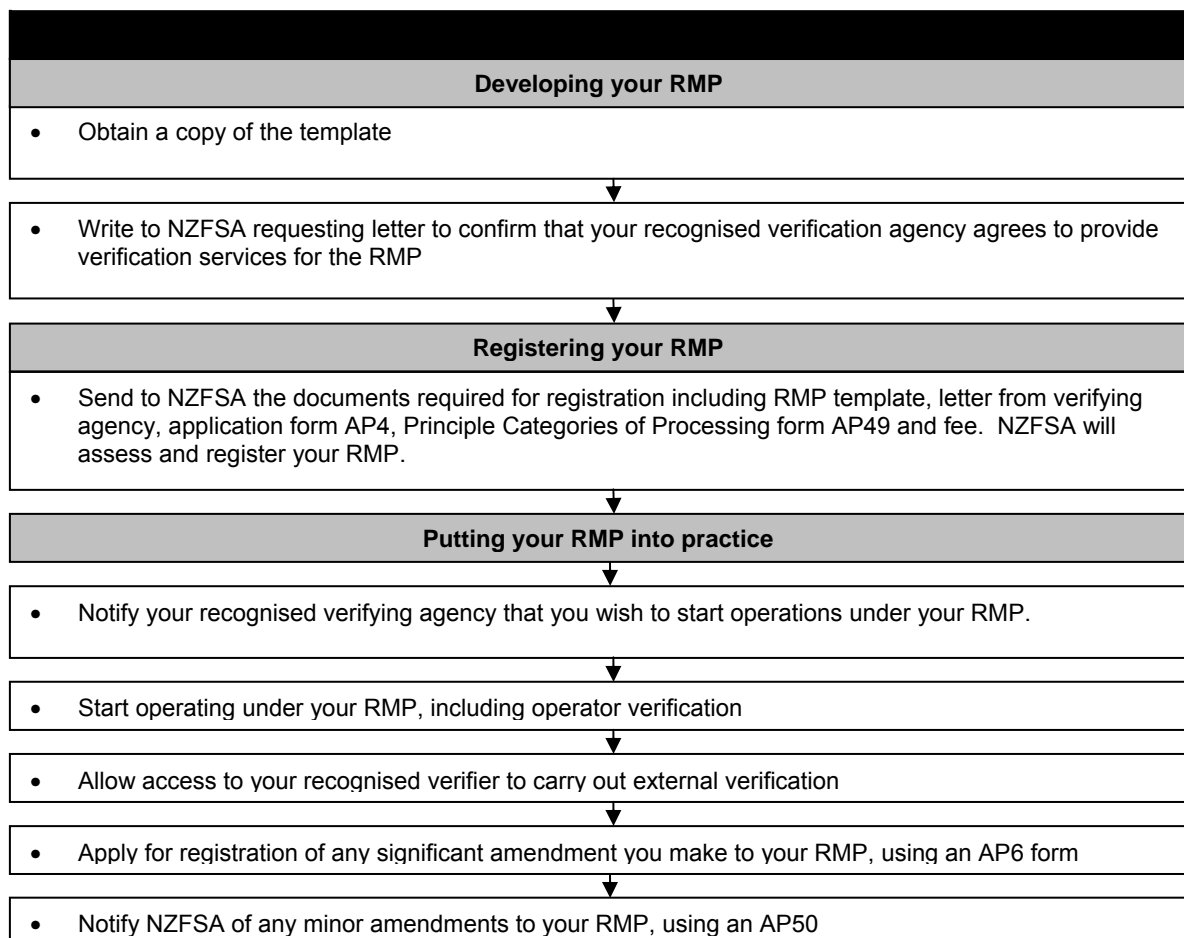Wellington

Email: david.metcalfe@nzfsa.govt.nz

Phone: 04 894 4219

NZFSA will reply with a letter giving the name of your recognised verification agency and confirming that this agency will verify your RMP. You must attach a copy of the NZFSA letter to your RMP template.

Section 11 - Minimum Documentation Requirements attached:

As explained for Section 8, you do not need an evaluator's report for your template RMP. In Section 11 tick the box next to the last statement "an NZFSA approved Risk Management Programme Template" and cross out the other 3 statements.

Summary of the steps for developing, registering and putting your RMP into practice

Developing your RMP
• Obtain a copy of the template

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• Write to NZFSA requesting letter to confirm that your recognised verification agency agrees to provide verification services for the RMP

▼

Registering your RMP
• Send to NZFSA the documents required for registration including RMP template, letter from verifying agency, application form AP4, Principle Categories of Processing form AP49 and fee. NZFSA will assess and register your RMP.

▼

Putting your RMP into practice

▼

• Notify your recognised verifying agency that you wish to start operations under your RMP.

▼

• Start operating under your RMP, including operator verification

▼

• Allow access to your recognised verifier to carry out external verification

▼

• Apply for registration of any significant amendment you make to your RMP, using an AP6 form

▼

• Notify NZFSA of any minor amendments to your RMP, using an AP50

What you must send to NZFSA when you apply for RMP registration

- Completed copy of the Risk Management Programme Template for Inshore Vessels – Fish Filleting

- Copy of a letter of confirming that your recognised verification agency is willing to provide verification services for your RMP

- Completed application form - AP4 Risk Management Programme Form

- Completed Principle Categories of Processing form AP49

- Application fee as prescribed in the Application Form AP4

Send all these documents, plus the fee, to:

New Zealand Food Safety Authority

Approvals & ACVM Group

PO Box 2835

Wellington 6140

When you should apply for RMP registration

If you wish to fillet fish on board your fishing vessel and sell the filleted fish on the New Zealand Market, you must apply for registration of an RMP by 31 August 2009.

Other sources of information

You can find information specific to fishing vessels and seafood products on the Animal Products website of the NZFSA.

The Animal Products website also provides general information about the Animal Products Act 1999 and RMPs.

The new Seafood Standards Council's website also provides useful information.

Contacts

Seafood Standards Council:

Questions about the content of the RMP template:

Cathy Webb
Seafood Standards Council
Private Bag 24 901
Wellington
Phone (office): 04 385 4005
Email: cathy.webb@seafood.co.nz

NZFSA:

Technical questions about RMP applications:

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Approvals & ACVM Group
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P O Box 2835
Wellington
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Administration questions about RMP applications:

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