Ministry for Primary Industries
Manatū Ahu Matua

Operational Code

Petfood Processing

13 February 2018

Issued by the Ministry for Primary Industries

New Zealand Government

TITLE

Operational Code: Petfood Processing

COMMENCEMENT

This Operational Code is effective from 13 February 2018

REPLACEMENT

This Operational Code: Petfood Processing amalgamates and replaces:

- Operational Code: Petfood Processing: Chapter 1 Overview, issued 2 June 2016
- Operational Code: Petfood Processing: Chapter 2 Good Operating Practice, issued 2 June 2016
- Operational Code: Petfood Processing: Chapter 3 Supply, Slaughter and Dressing of Farmed Animals, issued 21 December 2016
- Operational Code: Petfood Processing: Chapter 4 Harvesting and Processing of Wild Animals, issued 28 April 2017
- Operational Code: Petfood Processing: Chapter 5 Further Processing and Manufacturing of Petfood, issued 29 August 2017.

This revised version also reflects the changes made to the Animal Products Notice: Specifications for Products Intended for Animal Consumption issued 27 April 2017. Other general updates have also been made.

ISSUING BODY

This Operational Code is issued by the Ministry for Primary Industries.

Dated at Wellington, 13 February 2018

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Introduction

(1) This introduction is not part of the Operational Code, but is intended to indicate its general effect.

(2) The Petfood Processing Operational Code (Code) assists petfood processors and manufacturers to:

a) comply with the requirements of the Animal Products Act 1999 (APA) and relevant subordinate legislation; and
b) produce petfood that is safe and suitable for animal consumption.

(3) Petfood, as defined in the APA and used in this Code, means food intended to be fed to domesticated cats and dogs (including companion dogs, farm dogs and other work dogs) that is made of animal material or animal product. The requirements in this Code only apply to petfood that is intended to be sold or traded.

(4) The Code has been developed by the Ministry for Primary Industries (MPI), in consultation with the New Zealand Petfood Manufacturers Association (NZPFMA) to:

a) assist petfood operators meet the requirements of the APA;
b) produce petfood that is safe and suitable for its intended purpose; and
c) prevent petfood material and product from entering the human food chain.

Purpose

(1) This Code has been developed to provide guidance for meeting the requirements for the development, registration and implementation of a risk management programme (RMP).

(2) This Code has been developed for petfood processors and manufacturers operating an RMP. MPI recommends that 'further (petfood) processors' follow relevant procedures (e.g. Chapter 2: Good Operating Practice) given in this Code, although they are not required to document and implement an RMP.

Background

(1) This Code applies to all business operators involved in the primary and secondary processing of petfood and the transport of animal material or product for processing to petfood (refer to Part 3.2: APA Requirements for descriptions of these operations).

(2) This Code focuses on managing risks to animal and human health from food safety hazards (biological, chemical and physical) in petfood.

(3) The following operations are excluded from the scope of this Code:

a) processing of petfood that is principally of dairy origin;
b) rendering of animal material (this is covered by the MPI Rendering Code of Practice); and
c) activities solely covered by the Agricultural Compounds and Veterinary Medicines Act (refer to Part 3.1: APA and ACVM for clarification of these activities).

(4) This Code has been developed based on New Zealand standards and requirements only. Export requirements are not covered in this Code.

(5) An RMP Operator Resource Toolkit has been developed with example forms and procedures to assist operator in developing or improving their RMP.

Who should read this Operational Code?

(1) This Operational Code should be read by:

a) petfood RMP operators;
b) further (petfood) processors;
c) suppliers of animal material for processing into petfood;

d) transport operators;
e) evaluators;
f) regulators; and
g) verifiers.

Why is this important?

(1) Petfood operators are expected to develop and implement their RMPs in accordance with this Code. This will:

a) ensure that the operator complies with acceptable industry practices and procedures;
b) ensure that they meet relevant regulatory requirements; and
c) simplify and reduce the cost of developing and evaluating their RMPs.

(2) This Code clarifies MPI's expectations on how relevant petfood regulatory requirements may be met. This will assist petfood processors and manufacturers and RMP verifiers to have a consistent understanding of the requirements and their applications.

(3) This Code is intended to be a guide on how to meet legislative requirements. If an RMP operator incorporates the whole or part(s) of the Code into their RMP, then the incorporated part(s) of the Code becomes mandatory (i.e. is no longer a guide) and legally enforceable.

(4) Petfood operators may use alternative approaches, provided all relevant regulatory requirements are met. Those who wish to use an alternative approach should refer to the Risk Management Programme (RMP) Manual for guidance.

Main legislation

(1) Below is a summary of the legislation under the APA that is most applicable to petfood processing. Web links for documents were current at the date of issue of this Code (note this is not an exhaustive list). These may become out of date. To access all current legislation go to the MPI website: https://www.mpi.govt.nz/law-and-policy/requirements/animal-products-act-notices/

(2) It is the responsibility of the operator to be aware of and comply with all applicable current legislation:

a) Animal Products Act 1999 (APA);
b) Animal Products Regulations 2000;
c) Animal Products Notice: Specifications for Products Intended for Animal Consumption signed 27th April 2017 (AC Spec);
d) Agricultural Compounds and Veterinary Medicines Act 1997 (ACVM);
e) Agricultural Compounds and Veterinary Medicines (Exemptions and Prohibited Substances) Regulations 2011; and
f) Weights and Measures Act 1987.

(3) Information specific to petfood is available on the MPI website: Pet food, inedibles, animal feed and supplements.

Do you want to export?

(1) The Code covers the New Zealand standards and requirements only. Export requirements are not covered in this Code.

(2) Exporters of petfood must ensure that they meet all export requirements, including any Overseas Market Access Requirements (OMARs) relevant to their product and intended market.

(3) If you are wanting to export petfood, you are responsible for:

a) ensuring you meet relevant NZ standards (e.g. ACVM and APA);
b) complying with Official Assurances Specifications (OAS) for Animal Material and Animal Products (29 March 2017);

c) complying with the importing country's legislation and eligibility requirements (Overseas Market Access Requirements); and
d) registering as an exporter.

(4) Further information can be found on the MPI website: https://www.mpi.govt.nz/exporting/animals/pet-food/.

(5) If you have questions about exporting petfood, email info@mpi.govt.nz.

CHAPTER 1: OVERVIEW

Part 1: Structure of the Code

1.1 General

(1) The Operational Code: Petfood Processing is recognised by MPI to be valid and appropriate as a Code for petfood processing operations under the APA. This recognition provides petfood operators a means of satisfying the requirements of an RMP for petfood processing, with respect to section 12 (3A) of the APA. This states that an RMP may be based, in whole or in part, on a code of practice that is recognised by MPI as valid and appropriate to the type of business for which it is intended to apply.

(2) This Code covers the 5 Chapters:

Chapter 1: Overview

Provides for an overview of the whole Code. It explains the layout of the Code and the legislative framework which underpins the requirements for product safety and suitability.

Chapter 2: Good Operating Practice

Provides guidance on Good Operating Practices (GOP) covering hygiene and sanitation, documentation and record keeping, traceability, operator verification, and other quality assurance programmes.

Chapter 3: Supply, Slaughter and Dressing of Farmed Animals

Provides guidance on the requirements for:

a) the supply of farmed animals for slaughter intended for processing into petfood;
b) slaughter and dressing of farmed animals; and
c) post-slaughter processing of animal material.

Chapter 4: Harvesting, Refrigeration and Processing of Wild Animals

Provides guidance on ensuring harvested wild animals are fit for processing into petfood.

Chapter 5: Further Processing and Manufacturing of Petfood

Provides guidance on the manufacturing of petfood such as:

a) prepared raw petfood;
b) cooked, refrigerated petfood;
c) shelf stable petfood; and
d) dried pet chews.

1.2 Layout of Parts

(1) The Parts within this Code are generally laid out with the following subheadings:

Scope

This describes the purpose and scope of application.

Requirements and procedures

This section discusses the regulatory and industry agreed requirements and the control measures or procedures for meeting these requirements.

A regulatory requirement is identified by having a citation, at the end of the relevant sentence or clause, of the specific legislation from which the particular requirement is derived from. The word "**must**" is also used indicating its mandatory status. For example:

"All inputs, including raw materials, ingredients, additives and packaging must be handled, processed, and stored in a manner that minimises any potential contamination or deterioration [AP Reg 9]".

In many cases, the mandatory requirements have been paraphrased. Operators should refer to the cited legislation for the actual wording of the legal requirement.

The abbreviations used for legislation cited are:

a) **APA** - the Animal Products Act 1999
b) **AP Reg** - the Animal Products Regulations 2000
c) **AC Spec** - the Animal Products Notice: Specifications for Products Intended for Animal Consumption
d) **RMP Spec** - the Animal Products (Risk Management Programme Specifications) Notice 2008
e) **ACVM** – Agricultural Compounds and Veterinary Medicines Act 1997

Industry agreed requirements or recommended procedures are accepted or industry agreed means of achieving or complying with regulatory requirements. To differentiate them from regulatory requirements, the word "**should**" is used rather than "**must**".

MPI expects RMP operators to comply with the recommended procedures ("**should**") that are applicable to their product and process unless they have proposed an alternative process, procedure or parameter that will achieve the same outcome. The operator should be able to demonstrate the validity and effectiveness of any proposed alternative. Any alternative process, procedure or parameter should be documented in their RMP.

Guidance

Guidance
Guidance material is presented in a box. It elaborates on relevant requirements ("**must**") or recommended procedures ("**should**") and provides explanatory information and options or examples for achieving a particular outcome or requirement.

Records

This gives the list of records that should be kept by the RMP operator to demonstrate compliance to requirements and procedures.

Part 2: Definitions

(1) In this Code, unless the context otherwise requires:

AAFCO means the Association of American Feed Control Officials

amenities means toilets, wash rooms, locker rooms, change rooms, lunch rooms and cafeterias

APA means Animal Products Act 1999

animal material means any live or dead animal, or any tissue or other material taken or derived from an animal

animal product, or **product** means any animal material that has been processed (other than simply transported or stored in such a way as not to involve any alteration to its nature) for the purpose, or ultimate purpose, of consumption or other use by humans or animals

approved maintenance compound means any maintenance compound that is approved by MPI or listed in specifications made under the Animal Products Act 1999

animal product operator means an operator who processes animal material or product for animal consumption under a risk management programme, and **operator** when used in this document has a corresponding meaning

approved ink means an ink or stain that is approved for use for a specific purpose (and listed in Schedule 3 of the Animal Products Notice: Specifications for Products Intended for Animal Consumption) (reproduced here as Appendix 3)

approved supplier means a person who is assessed by an animal product operator under clause 3.16 (3) as competent in accordance with clause 7.11 of the Animal Products Notice: Specifications for Products Intended for Animal Consumption to supply killed wild rabbits, hares, wallabies, possums, goats or deer. In relation to the supply of wild animals, the approved supplier is the person responsible for harvesting wild animals (i.e. the hunter). A person solely engaged in facilitating the transfer of wild animals, such as a transport operator or purchasing agent, is not considered a supplier

batch or **lot** means a homogenous quantity of relevant product manufactured during a discrete period of time, typically not exceeding 24 hours, as part of one continuous process

buffer zone means the area of land surrounding a poisoned area that is within the defined buffer zone distance for the specific wild animal species and type of poison used (see Figure 2: Poisoned Area and Buffer Zones). Buffer zone distances are determined based on information about the roaming distances of different species of wild animals and are measured as a straight line on a horizontal plane, or as the crow flies

calibration means the procedure used for the comparison of a measuring instrument with a standard, under specific conditions, and adjustment of the instrument, if necessary

caution period is the period of time following an area of land's exposure to poison within which hunting is not acceptable

clean (verb) means to remove visible contaminants from any surface

clean sea water means sea water that is free of excessive turbidity, colour, offensive odour and any contaminants

clean water means

a) in relation to water supplied by an independent supplier (including a public or private supplier), water of a standard administered by the independent supplier under the Health Act 1956 and any regulations made under that Act; or
b) in relation to water supplied by the animal product operator solely for the use of the animal product operator (such as bore water, rain water or surface water), water that complies with the

requirements in Schedule 1 of the Animal Products Notice: Specifications for Products Intended for Animal Consumption (reproduced here as Appendix 1)

Code, unless specifically stated otherwise, means the Petfood Processing Operational Code

complete and balanced petfood means a food that is nutritionally complete and balanced and meets the minimum recommended nutritional requirements for cats or dogs as defined by AAFCO, FEDIAF or other internationally recognised standards or guidelines

contaminant means any biological agent, chemical agent, foreign matter or other substance not intentionally added to petfood which may compromise product safety or suitability

control measure means any action and activity that can be used to prevent or eliminate a product safety hazard or reduce it to an acceptable level

cooked product means product that has undergone a cooking step

cooking means the application of heat to a product to destroy vegetative pathogens that may pose a hazard to animal health

corrective action means any action to be taken when the results of monitoring a process step or control measure indicate a loss of control

Critical Control Point (CCP) means a step at which control can be applied and is essential to prevent or eliminate a product safety hazard or reduce it to an acceptable level

critical limit means a criterion which separates acceptability from unacceptability at a CCP

critical measurement means a parameter identified as critical in any specification or a critical limit for a CCP in an RMP

Department of Conservation Pesticide Summary means the regularly updated lists of animal pest operations using vertebrate toxic agents that occur on lands managed or administered by the Department of Conservation (DOC). These are published on the DOC website or available from DOC offices

deer means an animal of the family Cervidae including:

a) the red deer (*Cervus elaphus*);
b) sika deer (*Cervus nippon*);
c) fallow deer (*Dama dama*);
d) white-tailed deer (*Odocoilius virginianus*); and
e) wapiti (*Cervus canadensis*)

direct supervision in relation to any function, operation or activity means supervising any function, operation or activity while in sufficiently close physical proximity to ensure that any relevant specifications are met

equipment includes:

a) the whole or any part of any utensil, machine, fitting, device, instrument, stamp, apparatus, table, or article, that is used or available for use in or for preparing, marking, processing, packing, storing, carrying, or handling of any product, ingredient, additive or processing aid; and
b) any utensil or machine used or capable of being used in the cleaning of any equipment or facilities

essential services includes the provision of gases, lighting, ventilation, water and waste management

facilities includes amenities, storage areas and processing areas

farmed animals include farmed mammals and farmed birds

farmed birds include farmed ratites (e.g. ostriches, emus) and farmed poultry (e.g. chicken, ducks, turkeys)

FEDIAF means the European Pet Food Industry Federation

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

b) where processing is undertaken under a risk management programme

generally fit and healthy means that an animal displays signs or behaviour of being reasonably bright and alert and does not display signs or behaviour of being moribund or infected with disease that would exclude it from being fit for purpose for processing for animal consumption. For a more detailed description of what is "generally fit and healthy" refer to Appendix 4: Ante-mortem Assessment of Farmed Mammals for Slaughter.

goat means an animal of the subfamily Caprinae (of the family Bovidae) including:

a) domestic goat (*Capra aegagrus hirus*);
b) thar (*Hemitragus jemlahuis*); and
c) chamois (Rubicara rubicara)

Good Operating Practice (GOP) means the documented procedures relating to practices that are required to ensure products are fit for their intended purpose (may also be referred to as Good Manufacturing Practice, GMP)

GPS (Global Positioning System) is a system for determining position on the Earth's surface

GPS data in relation to hunting, means electronically generated data that includes:

a) the date of hunting;
b) the waypoints; and
c) in the case of ground hunting trips - the GPS co-ordinates in NZTM2000 and time at both the commencement and completion of hunting

HACCP means the Hazard Analysis and Critical Control Point system adopted by the Codex Alimentarius Commission

harvest means to take a wild animal for purposes of trade

hazard means a biological, chemical or physical agent in, or condition of, food with the potential to cause an adverse health effect

ingredient means any substance, including a food or additive, used in the manufacture or preparation of petfood and is present, whether in a modified form or not, in the final food

kill location means the location where the animal finally comes to rest immediately after being shot

label includes any wording, tag, brand, symbol, picture, or other descriptive matter written, printed, stencilled, marked, embossed, impressed on, appearing on, attached to, or enclosed within any product

lethality means a measure of the ability of a process to destroy a particular pathogen

listed means currently appearing on a list of approved suppliers maintained by an operator

low-acid product means:

a) any petfood, where any component has a pH value greater than 4.6 after heat processing, and a water activity greater than 0.85; but
b) does not include petfood that is required to be stored under refrigeration

maintenance compound means any substance:

a) used for maintaining, repairing, servicing, cleaning, or sanitising equipment or surfaces that may be the source of, or result in, contamination of animal material, animal product or associated things;
b) used for treating water; or
c) used for pest control

manufactured petfood means a petfood, where meat either singly or in combination with other ingredients, has undergone a method of processing other than boning, slicing, dicing, mincing, mixing, forming, chilling or freezing

maximum permissible level (MPL) means the maximum permissible level at which a substance may be present in animal material or animal product as specified in the Animal Products Notice: Contaminant Specifications

maximum residue limit (MRL) means, in relation to a residue, the maximum permissible level of that residue as specified in the Food Notice: Maximum Residue Levels for Agricultural Compounds

medium risk material means animal material or product that is:

a) derived from slaughtered or killed animals that are suspected to be diseased;
b) derived from animals slaughtered and killed for specific disease eradication purposes;
c) derived from mammals and birds that have died in the field;
d) derived from homekill or recreational catch;
e) derived from animal material or product from any animal containing residues of agricultural compounds or veterinary medicines, toxic substances or natural substances (including shellfish affected by marine biotoxins), which may result in harm to the consumer. The exception is where any particular residue or toxic substance can be processed or treated so that they can be reduced to a level that is unlikely to result in harm to the consumer;
f) derived from animal material or product which is not fit for animal consumption without further processing or treatment; or
g) any minimal risk raw material that has come into contact with any medium risk raw material

minimal risk raw material means any animal material or product that is not high or medium risk raw material and which does not result in any direct or indirect harm to animals upon consumption

minimise means to have taken all practical steps to substantially reduce the potential hazard of concern, consistent with what is technologically feasible

monitor means the act of conducting a planned sequence of observations or measurements of control parameters to assess whether a process step or control measure is under control

non-complying product means any product that:

a) does not meet a regulatory requirement (e.g. animal material eligibility, process or product criteria);
b) does not meet a limit or criteria defined by the operator in the RMP; or
c) has not been processed in accordance with procedures written in the RMP

NZPFMA means New Zealand Petfood Manufacturers Association

on-farm slaughter means the slaughter of a farmed animal on the animal supplier's farm, but excludes the slaughter of any farmed animal undertaken by a mobile slaughter operator. On-farm slaughter covers the stunning or shooting, sticking and bleeding of a farmed animal

operator in relation to an animal product business, means the owner or other person in control of the business, including the person in charge of export approved premises, or his or her manager or agent

operator-defined limit means a measurable limit or criterion established by an operator that defines a petfood's safety and suitability, considering its intended purpose and use

operator verification means the application of methods, procedures, tests and other checks by an RMP operator to confirm the on-going:

a) compliance of the RMP with the legislative requirements; and
b) compliance of the operations with the RMP; and
c) applicability of the RMP to the operation and forms part of confirmation as described in section 17(3)(f) of the Act.

packaging means any material that is intended to protect and that comes into immediate contact with the product, and includes:

a) rigid materials such as cartons and containers where the product is filled directly into the carton and container; and
b) any other material contained with, in, or attached to, the product (such as labels, heat sensors, oxygen scavengers)

pasteurisation means the application of heat, or any treatment or combination of treatments, to petfood to reduce the most resistant microorganism(s) of animal or human health concern to a level that is not likely to present a risk to the health of pets (by direct consumption of petfood) or their human handlers, under normal conditions of distribution and storage of the petfood

pathogen means a microorganism that causes illness

pest means any unwanted animal that:

a) may affect plants, animal or primary produce;
b) is an entity declared to be a pest by Order in Council; and
c) does not include any human being or any living organism affecting only human beings or any living organism declared not to be a pest by Order in Council

pet means cat or dog

petfood means animal product intended for consumption by pets

petfood material means animal material, such as meat, poultry, fish and shellfish, used in the processing or manufacture of petfood

petfood manufacturer means a business operator involved in the production of processed petfood

place or premises includes any building, conveyance, craft, fishing vessel, or structure; and includes any land, water, or other area where animals or animal material are produced or may be present

possum means an animal of the species *Trichosurus velpecula*

poison means, in relation to vertebrates, a vertebrate toxic agent that is registered under the ACVM Act for use against vertebrate animals

poison use statement means a statement that describes the poison use status of an area of land signed by a responsible person in respect of that land and which is in the form Landowner / Manager Poison Use Statement - Petfood

primary processor means a person who, for reward (other than as an employee) or for purposes of trade:

a) slaughters and/or dresses animals or birds; or
b) dresses animals or birds that are killed wild animals or are killed as if they were wild animals; but does not include hunters

process control means all conditions and measures applied during the production process that are necessary to produce a safe and suitable petfood

processing areas (rooms) includes all areas where ingredients and products are prepared (thawed, cut, weighed, pre-mixed, injected, cured, massaged, tumbled, emulsified, filled), processed (cooked, cooled, dried, baked, sliced) and packed

protected means sufficiently wrapped, packaged or enclosed to prevent the introduction of contaminants

protective clothing means special outer wear garments intended to preclude the contamination of product; and includes head coverings and footwear

rabbit means an animal of the species *Oryctolaques cuniculus*

raw petfood means a petfood, where animal material (meat, offal, bone) either singly or in combination with other ingredients has not undergone a processing step or treatment beyond boning, slicing, dicing, mincing, mixed, forming, chilling or freezing

regulatory limit means a measurable limit or criterion set in legislation that defines a petfood's safety or suitability, considering its intended purpose and use

rework:

a) when used as a noun, means product which has been partially or fully processed and is incorporated and reprocessed into another batch of product; and
b) when used as a verb, means to incorporate rework into another batch of product

risk management programme (RMP) means a programme designed to identify, control, manage and eliminate or minimise hazards and other risk factors in relation to the production and processing of animal material and products in order that the resulting animal product is fit for intended purpose [APA 4 Interpretation]

sanitise means the application of a chemical or physical agent with the intention of reducing microbial contamination to a level that will avoid the creation of a hazard

shelf life means the period of time, established under intended conditions of distribution, storage, retail and use, that the petfood will remain safe and suitable

shelf-stable means the condition achieved at which petfood in its manufactured state can be stored and handled under non-refrigerated conditions without microbial deterioration

spoilage microorganisms means microorganisms that cause deterioration of petfood resulting in a loss in its quality

suitably skilled person means a person who in the opinion of the operator is skilled in a particular activity or task through training, experience or qualifications

supplier means the owner or person in charge of animals who supplies these animals to the animal product operator and includes a sales yard operator. This does not include a person solely engaged in facilitating the transfer of animals such as a transport firm or purchasing agent

supplier statement, in respect of wild animals, means the Wild Animal Material Supplier Statement – Petfood, which is signed by a supplier to confirm that relevant requirements of the AC Spec have been met

Tb vector-free means an area where the risk of Tb infection is considered low

tempering means in the case of frozen product, the elevation of the temperature to any point that is lower than the freezing point of the product (meat begins to freeze at about -2°C)

thawing means the elevation of the temperature of frozen product to temperatures that are higher than the freezing point of the product

topographical map means a map to a standard 1:50,000 scale

transportation outer means a package that:

a) encases any packaged or unpackaged animal material or animal product for the purpose of transportation and distribution; and
b) is either removed before the animal product is used or offered for retail sale, or is not taken away by the consumer of the product

but does not include a transportation unit

transportation unit includes vehicles, aircraft, railway wagons, ships, shipping containers, bulk bins, bulk tanks, trailers and any other form of transport used in the transport of animal material or product

validation means obtaining evidence that a process, control measure or combination of control measures, if properly implemented, is capable of consistently achieving a specified outcome, such as a regulatory limit, operator-defined limit, or other process or GOP criteria

verification means the application of methods, procedures, tests and other checks to confirm compliance to the documented RMP and relevant regulatory requirements

wallaby means an animal of the family *Macropodidae* including:

a) bennett's wallaby (*Macropus rufogrisea*);
b) tammar wallaby (aka Dama wallaby) (*Macropus eugenii*); and
c) parma wallaby (*Macropus parma*)

waste includes, without limitation, all solids, liquids and gases that the operator intends to dispose of as being unwanted and that may become a source of contamination or attract pests

water activity (a_w) means a measure of the water in the food which is available for microbial growth. It is the ratio of the water vapour pressure of the food (p) to that of pure water (p_o) at the same temperature, $a_w = p/p_o$

waypoint means the time and GPS co-ordinates or topographical map grid reference points in NZTM2000 of the kill or capture location

waypoint identifier means the identification that is applied to the waypoint and the animal carcass so as to link the waypoint to the carcass

whole flock health scheme in relation to a flock of farmed birds, means a documented programme implemented by poultry operators to ensure that any hazards associated with the birds that are likely to affect human health are identified and managed in an appropriate manner. The whole flock health scheme includes:

a) measures for disease control or eradication;
b) activities to ensure that agricultural compounds and veterinary medicines are used according to any general or specific conditions of use; and
c) measures for feed management

wild animal means a kind of animal that lives in the wild and is, immediately before its taking or capture, not owned by any person. This includes a game estate animal that is hunted and supplied for petfood processing

wild animal depot means a storage installation where petfood material is collected and held prior to transfer to a primary processor.

wild bird in the context of this Code means a ground-living bird including:

a) wild turkey (Meleagris gallopavo);
b) peacock, peafowl (*Pavo cristatus*)
c) quail (*Synoicus ypsilophorus*)
d) pheasant (*Phasianus colchicus*); and
e) guinea fowl (*Numida meleagris*)

young calf means

a) it is up to 14 days of age; and
b) it has been separated from its mother

a young calf is commonly referred to as "bobby calf"

(2) References in this Code to clauses, appendices and parts are references to clauses, appendices and parts of this Code unless otherwise stated.

(3) Any term or expression used in this Code that is defined in the Act or Regulations made under the Act and used, but not defined, in this Code has the same meaning as in the Act or Regulations.

Part 3: New Zealand legislation applicable to petfood

3.1 APA and ACVM

(1) Product safety and suitability aspects of petfood production in New Zealand are primarily legislated under the APA and the ACVM.

(2) Table 1 Applicable Legislation for Activities Undertaken by Petfood Businesses summarises the various activities generally undertaken by New Zealand petfood businesses and the legislation that apply to each of them. The APA requirements for primary and secondary processing of petfood are further explained in Part 3.2: APA Requirements.

Table 1: Applicable legislation for activities undertaken by petfood businesses

Process/activity	Requirements that apply	
	APA	ACVM
Importation of any petfood		√
Primary processing of animal product for animal consumption (e.g. slaughter and dressing)	√ An RMP is required	√
Preparation or manufacturing of food for pets that do not contain any animal product (e.g. plant-based food)		√
Secondary processing (i.e. preparation or manufacturing) of any petfood for export requiring official assurance	√ An RMP is required	√
Secondary processing defined as "further (petfood) processing" in the AC Spec	√ MPI listing and implementation of a tracking system are required	√
Secondary processing of petfood that does not involve any processing of products for export requiring official certification or any "further (petfood) processing"		√
Secondary processing by petfood operators that are not legally required to operate under an RMP, but voluntarily choose to do so for commercial reasons	√ An RMP is required	√
Processing of petfood that is principally of dairy origin (if no dairy processing or export assurance requiring an RMP occurs at the premises)		√
Domestic sale of all petfood		√
Transport of animal material during primary processing. Transport of animal material or product from primary processors to secondary processors and between secondary processors	√	

(3) The main pieces of legislation under the APA that apply to animal product operators involved in the processing and manufacture of petfood are the:

a) Animal Product Regulations 2000;
b) Animal Products Notice: Specifications for Products Intended for Animal Consumption; and
c) Animal Products (Risk Management Programme Specifications) Notice 2008.

(4) The main legislation under the ACVM that covers the requirements for the importation, manufacture and sale of petfood in New Zealand is the Agricultural Compounds and Veterinary Medicines (Exemptions and Prohibited Substances) Regulations 2011.

(5) The Agricultural Compounds and Veterinary Medicines (Exemptions and Prohibited Substances) Regulations 2011 requires the registration of manufactured petfood that has a therapeutic claim. Manufactured petfood that is marketed purely to provide nourishment to an animal does not require registration, however, it still needs to meet particular regulations related to the product's fitness for purpose, documented system for manufacturing, labelling and recording keeping.

For further information on the ACVM requirements refer to the MPI website or contact the MPI ACVM Programmes & Appraisals Team: ACVM-info@mpi.govt.nz.

3.2 APA requirements

3.2.1 Primary processing

(1) Primary processing of petfood includes the following activities or processes:

a) supply and presentation of animals for slaughter;
b) slaughter and dressing of farmed animals; and
c) harvesting, refrigeration and dressing of wild animals.

(2) All business operators involved in primary processing of petfood (i.e. primary processors) must operate under an RMP [APA 13 (1)(a)].

3.2.2 Secondary processing

(1) Secondary processing includes all processing that occur after the carcass has passed post-mortem examination. These include:

a) cutting and boning of carcasses and cuts;
b) further processing and manufacturing of petfood;
c) packing;
d) refrigeration; and
e) storage.

(2) Animal material for all secondary processing of petfood must be procured only from regulated sources. Regulated sources are registered or listed businesses that operate under regulatory control of MPI, such as:

a) abattoirs, slaughter plants and seafood processing premises that operate an RMP under the APA;
b) further petfood processors that implement a tracking system under the APA;
c) retail butchers registered under the Food Act 2014; and
d) petfood manufacturers that have a documented system for manufacturing under the ACVM.

(3) To ensure that animal materials for processing of petfood are procured only from regulated sources, while at the same time providing flexibility to petfood operators, legislation allows for several regulatory scenarios under which petfood operators may operate, depending on the nature of their operation and the type of petfood they produce. These scenarios and their corresponding regulatory requirements are summarised in Table 2: Secondary Processors: Regulatory Scenarios and Applications.

Table 2: Secondary processors: regulatory scenarios and applications

	Regulatory scenarios	Application	APA requirements
1	Secondary processors that **must** operate under an RMP.	Processors or manufacturers of any type of petfood for export that requires an official assurance (i.e. export certification).	These secondary processors must develop, register and implement an RMP according to the RMP Spec and AC Spec. In addition to meeting New Zealand standards, exporters must also meet relevant export requirements and Overseas Market Access Requirements (OMARs). Refer to MPI's Exporting webpage for more details.
2	Secondary processors involved in "further petfood processing", as defined in the AC Spec, that **must** implement a documented tracking system.	Processors or manufacturers involved in the processing of petfood that is: • made from or contain any **raw** animal material (e.g. raw meat, offal, poultry or fish) and • is for domestic sale only; or • is for export but official certification is not required. Examples: • a manufacturer that produces raw petfood (e.g. diced meat and offal) or processed petfood (e.g. cooked dog rolls) for domestic sale only. • a manufacturer of processed petfood for export to a country that does not require official certification from MPI for petfood consignments.	These further petfood processors must: • be listed with MPI; and • implement a documented tracking system that shows that all animal material used in petfood processing are procured from regulated sources. Refer to the following for more details: • Tracking System Template for Further Petfood Processors (PDF) • Tracking System Template for Further Petfood Processors (DOC) • Guidance Document: Tracking System Template for Further Petfood Processor Note that further petfood processors are exempt from having a documented tracking system if they voluntarily choose to operate under an RMP, since procedures for the procurement of raw materials and product traceability are required parts of an RMP.
3	Secondary processors of petfood that are not covered by scenario (1) or (2), i.e. they are not required to implement an RMP or tracking system.	Manufacturers involved in the processing of petfood that is:	These manufacturers must comply with the requirements of the ACVM Regulations 2011.

	Regulatory scenarios	Application	APA requirements
		• made of rendered or manufactured animal product; or • made of raw meat, poultry or fish bought in a ready-for-sale form from a regulated source (e.g. meat bought from a retail butcher or supermarket) and • is for domestic sale only; or • is for export but official certification is not required. Examples: • a manufacturer of dog biscuits and dry petfood.	They are not required to implement a tracking system under the APA. The businesses they procure their materials from are required to source animal material from regulated sources as part of the regulatory programme (e.g. RMP or Food Control Plan) they operate under.
4	Secondary processors that fall under scenario (2) or (3) and are not required to operate under an RMP, but voluntarily choose to do so.	Examples: • a further petfood processor that chooses to operate under an RMP for commercial reasons (e.g. customer requirement). • a manufacturer of dry petfood for domestic sale that chooses to operate under an RMP.	These secondary processors must develop, register and implement an RMP according to the RMP Spec.

3.2.3 RMP Requirements

(1) Petfood manufacturers that require an RMP must develop and document an RMP that is specific to their own products, processes and premises. The MPI RMP Manual provides comprehensive information on the development, registration and implementation of an RMP.

(2) The whole or parts of the Code may be incorporated in a manufacturer's RMP (e.g. by copying or referencing the relevant part). Since the RMP is a legally binding document, any part of the Code incorporated in an RMP becomes mandatory (i.e. is no longer a guide) for the operator.

(3) The processes covered by the RMP must be developed based on the application of the HACCP principles set out by the Codex Alimentarius.

(4) The following must be documented in a petfood RMP:

a) any regulatory limit and/or operator-defined limit applicable to the product or process covered by the RMP;
b) processing procedures, including product and process parameters for all key steps of the process;
c) procedures for monitoring and verifying compliance to established processing procedures and parameters, particularly critical limits at identified critical control points; and
d) corrective actions for any non-compliances to or deviation from any regulatory limit or operator-defined limit, procedures, and product and process parameters [RMP Spec 7, 8 and 11].

3.3 Animal Welfare Act 1999

(1) Owners or people in charge of live animals must comply with the Animal Welfare Act 1999, its Regulations and relevant codes of welfare.

(2) Animal welfare requirements are not specifically covered in this Code, however, when appropriate, guidance (in boxes) on certain animal welfare requirements may be included to remind operators of their responsibilities under the Animal Welfare Act.

(3) Petfood operators in charge of the handling of live animals should not rely on this Code to provide adequate information on animal welfare requirements. They should refer to Codes of Welfare available on MPI's animal welfare webpage for guidance.

3.4 Other Legislation

(1) Petfood operators should not rely on this Code for information on legal requirements under other legislation. Operators are responsible for ensuring that they are familiar and comply with all other legislation relevant to their business.

(2) Other legislation that are likely to be relevant to petfood operators include, but are not limited to, the following Acts and their associated regulations and specifications:

a) Biosecurity Act 1993;
b) Commerce Act 1986;
c) Consumer Guarantees Act 1993;
d) Fair Trading Act 1986;
e) Hazardous Substances and New Organisms Act 1996;
f) Health and Safety at Work Act 2015;
g) Resource Management Act 1991; and
h) Weight and Measures Act 1987.

3.5 Resources for developing an RMP

(1) MPI has developed various resources to assist you when developing your RMP:

a) Risk Management Programme (RMP) Manual;
b) What is Validation? provides information on validation concepts;
c) Red Meat Code of Practice;
d) Rendering Code of Practice;
e) Poultry Code of Practice (whilst developed to meet the Animal Products Notice: Specifications for Products Intended for Human Consumption 2016, it may still be useful);
f) Standardisation of Hazard Analysis and Critical Control Point (HACCP);
g) MPI Hazard database has searchable information on food safety hazards that is reasonably likely to occur in New Zealand, including applicable regulatory limits and actions operators can take to control the hazards.

CHAPTER 2: GOOD OPERATING PRACTICE

Part 4: General

4.1 Application

(1) Chapter 2 discusses the relevant Good Operating Practices (GOP) requirements under the APA and its subordinate legislation, particularly the Animal Products Notice: Specifications for Products Intended for Animal Consumption and how they can be practically met by petfood RMP operators.

(2) Chapter 2 provides guidance covering hygiene and sanitation and quality assurance. It has been developed mainly for petfood processors and manufacturers operating a RMP. It is also recommended for 'further (petfood) processors' although they are not required to implement an RMP.

(3) Chapter 2 applies to all petfood operators involved in all types of petfood operations, including:

a) slaughter and dressing of farmed mammals and birds;
b) harvesting, refrigeration and processing of wild animals; and
c) post-slaughter and manufacturing of petfood.

Part 5: General requirements

5.1 Document control and record keeping

5.1.1 Scope

(1) This Part discusses the requirements for the control of RMP documents and record keeping.

5.1.2 Document control

(1) The operator must implement procedures to control documents and records and ensure that the RMP is up-to-date and reflects actual operations [RMP Spec 19 (2)].

(2) Operators must document the following in their RMP:

a) processing procedures, and product and process parameters;
b) procedures for monitoring and verifying compliance to established processing procedures and parameters - in particular, critical limits at identified critical control points; and
c) corrective actions for any non-compliance or deviation to any regulatory limit or operator-defined limit, procedures, and product and process parameters [RMP Spec 8 and 11].

(3) Every document that forms part of the RMP must be:

a) legible;
b) dated or marked to identify its version;
c) authorised (signed) prior to use, either directly or within the document control system, by:

i) the operator; or
ii) the day-to-day manager of the programme; or
iii) a person nominated to do so in the programme's document control system; and

d) available in a readily accessible form, when required, to any person with responsibilities under the programme [RMP Spec 19 (1)].

(4) Operators should include the following in each of their documented GOP programmes:

a) purpose and scope;
b) authorities and responsibilities;
c) procedures (covering control measures, monitoring, corrective action and operator verification);
d) records; and
e) references to other relevant documents as applicable.

(5) The operator should keep a register of all current RMP documents showing the document titles, and their current versions and/or dates of issue.

(6) Details of all amendments to the RMP, including significant and minor amendments, must be recorded in an amendment register [RMP Spec 19 (2)(a) and (b)].

Guidance

The amendment register may be presented in a table with the following column headings:

- document name or reference;
- details of amendment;
- reason for amendment;
- date of change; and
- approved by.

In addition to completing the amendment register, amendments should also be identified in the document itself (e.g. by use of *italics*, highlighting the amended text, etc.).

RMP operators should refer to Parts 3.3 and 3.19 of the RMP Manual for more detailed information regarding amendment requirements. Go to the MPI website and search on "RMP Manual".

(7) All amended RMP documents or parts must be authorised (and registered in the case of a significant amendment to an RMP) prior to issue and use [RMP Spec 19 (2)(c)].

(8) All amended RMP documents or parts must be replaced with the current versions at all distribution points, without unnecessary delay [RMP Spec 19 (2)(d)].

5.1.3 Record keeping

(1) The operator must produce records demonstrating that the requirements of relevant animal product regulations, notices and the registered RMP are being met [AC Spec 5.2 (1)].

(2) The operator must ensure that all records are:

a) legible;
b) stored for 4 years or for the shelf-life of the product to which the records relate (whichever is longer); and
c) stored in a manner which protects the records from damage, deterioration or loss [RMP Spec 20 (1)(a) and (b)].

(3) Records relating to the RMP's monitoring, corrective action and operator verification activities must include:

a) the date and, where appropriate, the time of the activity or observation;
b) a description of the results of the activity or observation; and
c) the identity of the person(s) who performed the activity [RMP Spec 20 (2)].

Guidance
The requirements given in clause 5.1.3 (3) apply to both paper and electronic records.

Dates and times should be recorded in a way appropriate to the activity being monitored. For example the monitoring of certain critical process time and/or temperatures may require the recording of the exact date and time when the observation is made. Monitoring a more general time period may be acceptable (e.g. shift) for the observation of certain GOP programmes such as for checking compliance with protective clothing requirements.

(4) Records should accurately reflect any observations taken and remain readable throughout their entire storage period.

Guidance
Consideration should be given to:
- the durability of paper on which records are kept (e.g. pen does not write well on wet paper); and
- its suitability for storage (e.g. thermal papers can fade over time).

Pencil is not suitable for recording information because it is easy to erase or alter.

Any alterations made to records should be made alongside the original entry and initialled by the person amending the record.

The use of white out (e.g. Twink™) or similar materials for correcting record entries is not acceptable to auditors and verifiers as it is not possible to see the original entry.

5.1.4 Accessibility and retention of RMP documents and records

(1) The operator must retain 1 copy of all obsolete RMP documents and records for 4 years:

a) in a manner that protects the documents from damage, deterioration or loss; and
b) prevents confusion with current documents [RMP Spec 19 (3), AC Spec 5.2 (2)(b)].

(2) The operator should have an effective backup system for maintaining electronic RMP documents and records.

(3) The operator must ensure that:

a) RMP documents;
b) all reference materials relating to the RMP; and
c) any archived documents are accessible or can be retrieved and made available within two working days of any request to:

i) recognised persons;
ii) animal product officers (or food safety officers);
iii) the Director-General; and
iv) persons authorised by the Director-General [RMP Spec 19 (4), RMP Spec 20 (1)(c) and 20 (3), AC Spec 5.2 (2)(a) and (c)].

5.1.5 Records

(1) Records of the following must be kept:

a) list of all documents that make up the RMP;
b) amendment register; and
c) GOP and process control records, including monitoring, corrective action and verification records [RMP Spec 20 (2)].

5.2 Personnel health and hygiene

5.2.1 Scope

(1) This Part discusses the requirements and procedures for ensuring that personnel are medically fit to perform their tasks and hygienic practices are followed by all personnel. Personnel include all workers, contractors providing services, and visitors.

5.2.2 Health of personnel

(1) The operator must develop and implement written health procedures that ensure that a person (including any visitor or contractor) who is:

a) infected with, or a carrier of, an infectious disease in a communicable form as described in Section A, Part 1, of the First Schedule of the Health Act 1956 and that is likely to be transmitted through food or associated things;

Guidance
These include infections or diseases caused by *Salmonella* spp., *Shigella* spp., *E. coli*., *Campylobacter* and the Hepatitis A virus.

b) suffering from acute respiratory infection; or
c) suffering from boils, sores, infected wounds, or any other condition that cannot be adequately protected from becoming a source of contamination;

does not work as a product handler or enter an area where the person may adversely affect the safety and suitability of any petfood material or product [AP Reg 13, AC Spec 3.15 (1)].

(2) The operator should ensure that all workers (including office staff), contractors and visitors are aware of, and comply with, the health procedures.

(3) The health procedures should include the following:

a) instructions to workers to inform their supervisor or manager if they are (or suspect that they are) suffering from diarrhoea, acute respiratory infection or diagnosed with an illness as described in clause 5.2.2 (1);
b) actions to take so that medically unfit personnel do not work as product handlers or enter areas where the person may adversely affect the safety or suitability of any petfood material or product;
c) clearance requirements (e.g. submission of medical certificates) for workers resuming work after being diagnosed with an illness mentioned in clause 5.2.2 (1); and
d) procedures for treating injuries, wounds or cuts.

(4) Any injury, wound or cut should be treated immediately and dressed with a secure waterproof dressing to prevent contamination of any ingredients, product, packaging or equipment. The dressing should be kept clean and properly secured to prevent it from becoming loose or falling off and protected from becoming wet.

Guidance
Brightly coloured wound dressings should be used as they are more easily detected in products if they become dislodged.

5.2.3 Hygienic practices

(1) All inputs, including raw materials, ingredients, additives and packaging must be handled, processed, and stored in a manner that minimises any potential contamination or deterioration [AP Reg 9].

(2) The operator may process animal material or product for human consumption and animal consumption in the same facilities provided the operator has effective procedures in place to:

a) maintain separation of product intended for human consumption from that intended for animal consumption; and
b) prevent cross-contamination or substitution between them [AC Spec 3.3 (7) and (8)].

(3) The operator must develop and implement written hygienic practices and procedures for all personnel (including product handlers, cleaners, office workers, maintenance personnel, contractors and visitors), appropriate to their task and area of work [AP Reg 12].

(4) Operators must establish and carry out procedures to:

a) ensure appropriate and adequate maintenance, cleaning, and sanitation of premises, facilities, essential services and equipment;
b) manage waste;
c) control pests; and
d) implement effective personnel hygiene practices [AP Reg 11].

(5) The operator must ensure that all personnel are adequately trained on the required hygienic practices and procedures. Refer to Part 5.3: Personnel Competencies and Training.

5.2.4 Protective clothing

(1) All personnel who enter any processing or storage areas must wear suitable, clean protective clothing and footwear [AP Reg 12 (a)].

(2) Protective clothing generally includes the following:

a) overall or coat, which may be of any colour, provided the presence of any contaminant, relative to the type of work, is clearly distinguishable;
b) gloves and sleeves;
c) waterproof apron, as appropriate; and
d) waterproof footwear.

Guidance
The operator should consider whether it is necessary to use hair restraints, for both head and facial hair, considering their product and customer requirements.

(3) Protective clothing should cover the potential product contact zone of personnel.

Guidance
Covering of the potential product contact zone will, in the majority of cases, only require a coat that covers the body to below the knee.

(4) Protective clothing should be:

a) kept in good condition;
b) changed at least daily or more often if it becomes excessively contaminated; and
c) stored in a manner that protects it from contamination.

(5) Workers should not wear protective clothing outside the premises.

5.2.5 Personnel movement

(1) The operator must implement appropriate hygiene routines for personnel when moving from areas or activities of a lower to a higher hygiene status (e.g. moving from raw meat handling areas to cooked petfood products, or from waste areas to processing areas) [AP Reg 12 (b)].

5.2.6 Hand washing

(1) All personnel should thoroughly wash hands and exposed portions of the arms with hand detergent and water and dry them:

a) before entering any processing or packing areas;
b) after any toilet activity;
c) after handling or coming into contact with waste or contaminated surfaces or material; and
d) when moving from areas or activities of lower to higher hygienic status (e.g. moving from raw to cooked areas).

5.2.7 Jewellery and other personal items

(1) Personnel who enter processing areas should not wear exposed jewellery that may come into direct or indirect contact with unprotected ingredients and products. Plain wedding bands (i.e. no stone) and medical alerts may be worn provided they cannot be easily dislodged and they can be effectively cleaned in the same manner as hands.

(2) Workers should not take personal items (e.g. sweets, cigarettes, mobile phones and other electronic items) into processing or packing areas.

Guidance
Some supervisory or management staff (not product handlers) may be allowed to keep their mobile phones when entering processing areas provided the operator has documented procedures for managing their use.

5.2.8 Prohibited activities

(1) The following activities are not permitted inside processing or packing areas:

a) eating of any food;
b) smoking;
c) spitting; or

d) any other activity that may cause contamination of any product or product contact surface [AP Reg 12 (c)].

5.2.9 Visitors and contractors

(1) Visitors and contractors should be supervised by an assigned staff member while within the premises unless they have been inducted and are familiar with the required hygienic practices.

(2) It is the responsibility of the assigned staff member to ensure that the visitor or contractor follows hygienic practices and procedures.

Guidance
Visitors and contractors who wish to enter a processing or packing area should sign a visitors' logbook on arrival.

5.2.10 Records

(1) Records of the following must be kept:

a) medical certificates;
b) register for injuries;
c) staff training records; and
d) visitors' logbook [RMP Spec 20 (2)].

5.3 Personnel competencies and training

5.3.1 Scope

(1) This Part discusses competency and training requirements of personnel to ensure:

a) effective performance of assigned tasks;
b) compliance to hygienic practices and procedures; and
c) production of safe and suitable petfood.

5.3.2 Identity and competencies of key RMP positions

(1) The operator must identify the following (either by position, designation or name) in their RMP:

a) the day-to-day manager or person responsible for the day-to-day running of the RMP;
b) the person(s) who authorises all or parts of the RMP document; and
c) personnel involved in process control, monitoring, corrective action and operator verification activities [RMP Spec 15 (1)].

(2) The operator must document the skills or competencies needed by the persons or positions identified in clause 5.3.2 (1) to enable the effective operation of the RMP [RMP Spec 15 (2)].

Guidance
These competencies may be documented in job descriptions.

- The day-to-day manager or person authorising all or part of the RMP should be familiar with the RMP, and have the following knowledge and skills:
  - good knowledge of product safety, and hygienic procedures and practices written in this Code;
  - good knowledge of regulatory requirements relevant to the development and implementation of RMPs, and petfood processing or manufacturing;
  - have technical knowledge and experience in the processing or manufacturing of food or petfood; and
  - effective organisational and communication skills.

- The person responsible for the development and review of the HACCP application within the RMP should have good understanding of the HACCP principles and how they are applied to the processing or manufacturing of petfood. Ideally, the person should have a recognised HACCP qualification, such as NZQA Unit Standard 28265.
- Workers involved in monitoring and corrective action activities and operator verification should have the following competencies:
  - have appropriate level of knowledge and skill in implementing their assigned task; and
  - have a good understanding of, and be able to consistently comply with, hygienic practices and procedures.

5.3.3 Ante-mortem and post-mortem examiners

(1) Operators involved in slaughter activities must ensure that persons responsible for ante-mortem or post-mortem examination of farmed mammals (including cattle, bobby calves, horses, hinnies, sheep, goats, deer and pigs) for processing into petfood meet the qualifications outlined in Appendix 2 - Schedule 2 Competency Specifications.

(2) Trainee ante-mortem and post-mortem examiners of farmed mammals for processing into petfood may carry out ante-mortem or post-mortem examinations provided they are under the direct supervision of a person who meets the competency requirements of clause 5.3.3 (1) and who is accountable for the decisions that are made [AC Spec 3.17 (3)].

(3) The operator must obtain evidence that the post-mortem examination of killed wild rabbits, hares, wallabies, possums, goats and deer for processing into petfood is conducted by persons familiar with identifying normal tissue for these species [AC Spec 3.16 (1)(b)].

Guidance

Evidence of familiarity with species should include the completion of the NZPFMA examination based on the booklet “Harvesting Wild Animals for Petfood”.

Competency requirements for ante-mortem and post-mortem examiners for poultry intended for animal consumption can be found in the Animal Products (Specifications for the Ante-mortem And Post-mortem Examination of Poultry Intended for Human or Animal Consumption) Notice 2005.

5.3.4 Approved suppliers

(1) Operators must:

a) assess the competency of suppliers of killed wild rabbits, hares, wallabies, possums, goats and deer; and
b) ensure that they have attained the qualifications for approved suppliers outlined in Appendix 2 - Schedule 2 Competency Specifications and are listed in the RMP as being an approved supplier [AC Spec 3.16 (1)(c) and 3.16 (3)].

(2) Approved suppliers are deemed competent if they have:

a) a clear understanding of this Code; and
b) the *Harvesting Wild Animals for Petfood* training booklet issued by the NZPFMA; and
c) have passed the *Examination for Harvesting Wild Animals for Petfood* set by the NZPFMA.

Guidance

Current copies of the NZPFMA training booklet and examination can be obtained from NZPFMA even if not a member of the association. You can contact NZPFMA here: http://www.petfoodnz.co.nz/.

The approved supplier applicant should complete the MPI form "Application to become an Approved Supplier- Petfood", go to the MPI website and search on "approved supplier petfood".

5.3.5 Supervisors of thermal processing of low-acid canned products

(1) Operators involved in the canning of petfood must ensure that the person responsible for the supervision of thermal processing operations for low acid-canned products meets the competency requirements in Appendix 2 - Schedule 2 Competency Specifications.

5.3.6 Skills maintenance

(1) The operator must ensure that the skills of those persons involved in process control and monitoring, corrective action, operator verification and those activities given in clauses 5.3.2 to 5.3.4, are maintained on an ongoing basis [AC Spec 3.17 (1)].

5.3.7 Training

(1) The operator should develop a training programme which includes the identification of skills and competencies required for key roles, training schedules (including refresher training) and training records of all personnel.

Guidance
Any training provided should be appropriate to the nature of the person's assigned task or activity and level of responsibility. This may include induction training, regular in-house meetings, on-the-job training and external training courses.

Basic training for all process workers should cover:
- health and personal hygiene;
- movement of personnel and materials;
- cleaning and sanitation;
- handling of chemicals; and
- hygienic handling of materials and products.

Workers should also be trained against written instructions or procedures for their specific tasks, including machine operation and monitoring of product and process parameters.

Training on specific areas, such as in HACCP, monitoring procedures, and internal auditing, should also be identified by the operator.

(2) All personnel, including temporary workers, service contractors and administrative staff, should be appropriately trained before commencing work.

(3) The operator should provide induction training to all new workers and ensure that they are supervised until they are adequately trained to perform assigned tasks and procedures on their own.

Guidance
Induction training should cover job or task descriptions, health requirements and hygienic practices.

(4) The training programme should be reviewed at least annually to ensure that training of workers remains up-to-date and effective and to identify any need for new training or refresher training.

5.3.8 Records

(1) Records of all personnel competencies and training activities must be kept, including:

a) assessments and evidence of personnel competencies;

b) individual training records;
c) identity of any external training providers; and
d) any training materials (e.g. manuals or instructions) [RMP Spec 15 (3)].

5.4 Operator verification

5.4.1 Scope

(1) This Part discusses the requirements for operator verification to confirm compliance to the RMP and its effectiveness.

5.4.2 Requirements and procedures

(1) The operator must develop a written verification programme, which includes:

a) the verification activities to be performed and their frequencies;
b) procedures or methods used;
c) any actions to be taken when all or part of the RMP is not effective; and
d) any recording and reporting requirements [RMP Spec 16 (1)].

Guidance

Operator verification includes activities such as:

- internal audits;
- reviews of the HACCP plan; and
- any other activity undertaken to confirm:
  - the effectiveness of hygiene and sanitation programmes (e.g. environmental testing);
  - achievement of regulatory or operator defined limits (e.g. product testing); and
  - compliance to specifications (e.g. ingredient testing) and validated processes.

5.4.3 Internal audits and reviews

(1) Internal audits should be undertaken by a suitably skilled person at a frequency sufficient to:

a) ensure ongoing compliance with documented RMP procedures; and
b) enable prompt identification and correction of any problem.

Guidance

The person responsible for undertaking internal audits should have:

- auditing skills;
- a good understanding of the operations, processes and supporting systems covered by the RMP;
- be independent from the procedures being audited; and
- good understanding of relevant regulatory requirements.

The frequency for internal audits of the different RMP programmes should be determined by the operator considering various factors such as:

- the importance of the particular programme on product safety and hygienic operations;
- the frequency of non-compliances;
- the effectiveness of the programme;
- skills and training of personnel implementing the particular programme; and
- the cost of doing the audits.

Certain GOP programmes are expected to be internally audited at least annually, such as:

- process control;

- cleaning and sanitation;
- repairs and maintenance;
- operator verification;
  - inventory and traceability;
  - personnel training; and
  - calibration of measuring equipment.

The operator should increase the frequency of audits when repetitive non-compliances occur or the programme is found ineffective.

(2) The operator must keep records of observations made during any internal audit and any corrective actions taken [RMP Spec 20(2)].

Guidance

Internal audits should consist of:

- a review of written procedures;
- review of records;
- reality checks;
- confirmation that deficiencies or non-compliances identified from the last audit have been rectified; and
- identification of appropriate corrective actions.

Written procedures should be reviewed to ensure that they are up-to-date with current legislation and standards and that they reflect actual practice.

Records should be reviewed for:

- completeness and accuracy of required information;
- appropriateness of corrective actions taken;
- any trends, new hazards, recurring problems; and
- compliance with documented control procedures.

The person performing the audit should sign the records or indicate in some other way that they have been subject to an internal audit.

Reality checks should include observations of:

- workers' performance and compliance to hygienic practices and process control procedures;
- compliance to established process parameters such as processing times and temperatures; and
- the hygienic status of the premises' internal and external environment, facilities and equipment.

All deficiencies found at previous audits should be followed up using the non-compliance system.

(3) A review of relevant parts of the RMP should be undertaken when:

a) a major change is made to a product, process or the premises; or
b) when there are indications (e.g. process failures, repetitive non-compliances, negative trends or unacceptable external verification audits) that certain programmes or procedures are ineffective.

5.4.4 Ingredient and product testing

(1) When appropriate and necessary, product testing should be done to verify compliance to relevant regulatory limits or operator-defined limits written in the RMP.

Guidance

The operator should document the product testing programme, which may also include any testing of raw materials and ingredients. The programme should include information on:

- products or ingredients to be tested;
- frequency of testing;
- number of samples;
- tests to be done; and
- the identity of the suitably skilled person or laboratory that will perform the tests.

Corrective actions to be taken when requirements are not met should also be documented. Refer to Part 29.7 Verification of Compliance to Specifications for more details.

(2) Samples should be representative of the particular batch or lot of product or ingredient being tested.

(3) Samples of products should be hygienically collected by a person who has appropriate training and/or experience in hygienic sampling techniques.

(4) Samples should be held and transported under conditions which will not affect the particular parameter that the ingredient or product is being tested for.

(5) Any in-house testing for chemical and physical parameters (e.g. moisture content, water activity, pH) should be done using standard methods by a person who has appropriate training and/or experience in the particular test.

Guidance

Any water testing should be done by an IANZ (International Accreditation New Zealand) accredited laboratory to ISO/IEC 17025 with the required tests in the laboratory's scope of accreditation.

5.4.5 Records

(1) Records of the following must be kept:

a) internal audit reports;
b) RMP HACCP review records;
c) laboratory test results; and
d) corrective action and other verification records [RMP Spec 20 (2)].

5.5 Monitoring and corrective actions

(1) Compliance to requirements and procedures should be regularly checked by the responsible person at a frequency that will ensure consistent and ongoing effectiveness of the programme.

(2) Corrective actions for any non-compliance should include an assessment to determine the cause and extent of the non-compliance, and address:

a) immediate restoration of control;
b) identification and disposition of any affected petfood material or product; and
c) prevention of recurrence of the problem.

(3) The root cause(s) of the problem should be identified and addressed by the corrective actions.

(4) Corrective actions should be undertaken in an effective and timely manner.

(5) A register for internal audit corrective actions, including follow-up checks, should be maintained.

Part 6: Design, construction and maintenance of buildings, facilities and equipment

6.1 Scope

(1) This Part discusses the requirements and procedures for:

a) ensuring that all buildings, facilities and equipment are designed, constructed and maintained in a manner that prevents or minimises contamination of petfood materials; and
b) products, packaging, equipment and the processing environment.

(2) The regulatory requirements and general principles given in this Part applies to all types of petfood operations including:

a) slaughter and dressing of farmed mammals and birds;
b) harvesting, refrigeration and processing of wild animals; and
c) post-slaughter and manufacturing of petfood.

Additional requirements for slaughter and dressing facilities and specific requirements for wild animal depots are discussed in Part 7: Design and Construction – Additional or Specific Requirements for Primary Processing Facilities.

(3) The requirements of the Building Act 2004 are not covered in this document. Operators must comply with this and any other relevant legislation (refer to Chapter 1: Overview).

6.2 Requirements and procedures

6.2.1 General requirements (applies to all types of petfood operations)

(1) The operator must ensure that the premises, facilities, equipment and essential services are designed, located and constructed in a manner:

a) that facilitates safe and hygienic processing; and
b) prevents contamination of any petfood material, ingredient or product [AP Reg 10].

(2) Facilities, equipment and internal structures, that may affect the hygienic processing or safety and suitability of any petfood material or product, must be of sanitary design [AC Spec 3.2 (2)].

(3) Cleaning and sanitation facilities, and equipment, must be provided to ensure that the hygiene of personnel, equipment, vehicles, conveyances, premises or places can be maintained so that the processing of petfood is not adversely affected [AC Spec 3.3 (5)].

6.2.2 External areas

(1) Transport access ways and areas between and around buildings should be constructed and maintained to:

a) allow effective drainage; and
b) minimise contamination of the processing environment from dust and other contaminants.

Guidance
Transport access ways and areas surrounding buildings should be sealed. There should be adequate space around buildings and other structures within the premises to allow for effective:

- cleaning;
- building maintenance; and
- pest control.

6.2.3 Design and layout of buildings and facilities

(1) Facilities used for processing of petfood material or products must be physically separated from facilities used for processing products for human consumption. These facilities must only be used for the processing of animal material [AC Spec 3.3 (7)], except when clause 6.2.3 (2) applies.

(2) Despite clause 6.2.3 (1), the operator may process animal material or product for human consumption and animal consumption in the same facilities when the operator has effective procedures in place to:

a) maintain separation between human and animal consumption products; and
b) prevent cross-contamination or substitution between them [AC Spec 3.3 (8)].

(3) Adequate facilities should be available for the:

a) hygienic performance of all operations;
b) storage of raw materials, ingredients, products, packaging and equipment;
c) storage and distribution of water, as appropriate;
d) cleaning and sanitation of facilities and equipment;
e) performance of personnel hygiene activities;
f) provision of essential services; and
g) drainage and disposal of wastes.

(4) Buildings, including internal structures such as floors, ceilings and walls, should be designed and constructed in a manner that:

a) minimises contamination of the product from pests and environmental contaminants; and
b) facilitates cleaning and maintenance.

(5) Adequate space in processing areas should be provided to allow:

a) the hygienic performance of all operations;
b) proper movement of personnel; and
c) effective cleaning and inspection.

(6) The design and layout of processing facilities and equipment should facilitate appropriate segregation and prevent cross-contamination between:

a) unprocessed and processed materials and products; and
b) products for human and animal consumption.

Guidance

Segregation should take into account:

- product flow;
- nature of materials;
- types of equipment;
- personnel movement;
- waste management;
- airflow; and
- provision of services.

6.2.4 Floors, walls, and ceilings

(1) Floors, walls, ceilings and other exposed internal surfaces in processing areas should be:

a) impervious and non-absorbent when surfaces are exposed to moisture (i.e. moisture from products, cleaning chemicals, water);
b) easily cleaned and sanitised;
c) durable and capable of withstanding repeated exposure to normal cleaning and sanitising; and

d) in the case of materials lining the walls, floors and ceilings, be of a colour that does not disguise contaminants (having regard to the lighting arrangements and the type of process carried out on the premises) [AC Spec 3.2 (1)].

Guidance
Commonly used acceptable materials for floors are sealed concrete, floor tiles, and vinyl. Concrete or mortar floors which incorporate an approved latex or synthetic resin finish have better than ordinary resistance to meat, fats and acids.

Insulated panels are the ideal materials for walls in processing areas. Laminates and melamine face sheeting are also suitable construction materials. Porous surfaces such as cement or plaster are not acceptable unless they are sealed to render them impervious to moisture.

The floor/wall junctions and corners should be coved in areas where wet operations or cleaning occur.

Hollow coving should be avoided to prevent debris from accumulating and pest harbourage.

Floor joints and wall joints should be finished flush with the surface, and be sealed to prevent the entry of water, pests and contaminants.

Floors should allow effective drainage of water (i.e. no water pooling). Ideally they should be sloped so that water will run off to floor drains. Careful consideration should be given to the siting of machinery. Suitable drainage should be provided so that any discharge or overspill from processing goes directly into a drain rather than on the floor.

(2) Objects attached to walls and ceilings, such as:

a) pipes;
b) cables;
c) overhead cranes;
d) light fixtures; and
e) fans and hoses;

should be accessible for cleaning and located where they do not become a source of contaminants (e.g. dust, dirt, rust particles, and peeling paint falling onto products or processing equipment).

(3) Product lines, service lines, and ducting that pass through walls, ceilings or floors should be sealed to prevent:

a) water seepage; and
b) harbourage and entry of pests.

6.2.5 Doors and windows

(1) Doors should be installed where their opening and closing from external surroundings or other areas of lower hygiene status (e.g. waste area) will not result in contamination of:

a) petfood material and products; and
b) processing equipment and the processing environment.

Guidance
Doors in areas where processing and/or packing is carried out should not open directly to the outside environment.

(2) Doors and windows should be properly sealed to prevent water seepage, and harbourage and entry of pests.

(3) When plastic strips are used in doorways, they should be maintained in a clean and good working condition.

(4) Glass windows should not be used where glass could contaminate product if a window breaks.

> **Guidance**
> The use of safety glass is an acceptable alternative.

6.2.6 Drainage

(1) The design and construction of the drainage system should prevent:

a) odours, pests, other objectionable material and storm water from entering the premises; and
b) contamination of products, packaging and equipment from aerosols and splashes from drains.

(2) Drains should be of sufficient capacity (i.e. size and fall) to ensure liquid and solid waste is contained and rapidly removed to minimise the spread of waste across floors.

> **Guidance**
> Screens or grating should be installed to prevent large pieces of solid material from entering the drains.

6.2.7 Lighting

(1) Facilities should have adequate natural and/or artificial lighting of sufficient intensity and quality to enable satisfactory performance of all operations, checks, and inspections [AC Spec 3.4 (1)]. Refer to Table 3: Recommended Lighting Intensities.

Table 3: Recommended lighting intensities

Facility	Intensity (lux)	Measured at (location)
Processing rooms	500	Working plane
Areas where product is inspected and prepared to inspection standards	750	Working plane
Laboratories	750	Bench
Stores with constant operation	300	Floor aisles
Staff rooms, changing rooms, lavatories	150	Floor

(2) Lights and light fixtures over product, exposed packaging materials or equipment should be of a safety type or protected to prevent contamination in the event of breakage.

6.2.8 Ventilation

(1) Adequate ventilation and air flow should be maintained in storage areas and the processing environment to:

a) prevent product deterioration;
b) remove excessive heat, steam and condensation; and
c) minimise the entry of odours, dust, vapours or smoke.

6.2.9 Water and steam

(1) An adequate supply, volume and pressure of clean water and appropriate facilities for storage, distribution and temperature control should be available for hygienic operations.

Guidance
When hot water is used for the sterilisation of processing equipment and other product contact surfaces, it should be at least 82°C at the point of use.

(2) Steam used in direct or indirect contact with product or product contact surfaces should be produced from clean water.

6.2.10 Process gases and product contact air

(1) Gases used for processing that come into direct contact with petfood material or product must not cause contamination of any product [AC Spec 3.10 (1)].

(2) Compressed air generated on-site for the purpose of processing and that comes in direct contact with any product, must be clean and filtered [AC Spec 3.11 (1)].

Guidance
Product contact air includes:
- air used for cooling, drying, conveying, mixing and stirring; and
- compressed air that comes in contact with product or product contact surfaces.

Equipment using pressurised air in direct product contact should be fitted with a filter located as near to the use outlet as is feasible. The choice of filter will depend on the nature of the product and process, and the size, nature and concentration of the particulate matter to be removed.

Filters should be readily removable for replacement or cleaning.

6.2.11 Temperature controlled processing rooms

(1) Temperature controlled processing rooms and equipment must be operated within their design capability and capacity, and must consistently deliver any temperature specified in legislation or in the RMP [AC Spec 3.3 (3)].

Guidance
In the meat industry, it is common practice for processing areas to be maintained at +12°C or cooler, except when:
- conditions are sufficient to maintain the temperature of the meat and/or mix at +7°C or cooler; and/or
- processing areas are used for thermal processing or where a higher temperature is either not detrimental to product safety or is required for its manufacture.

6.2.12 Refrigeration facilities

(1) Refrigeration facilities (chillers, freezers, thawing rooms) should have the:

a) capability to reduce product temperatures to the required temperature within the prescribed time or maintain product temperatures at or below the required temperature; and
b) capacity appropriate for the volume of products likely to be processed or held in the refrigeration facility any one time.

6.2.13 Waste facilities

(1) Equipment and storage areas that are used to store or contain waste must be clearly identified and not be a source of contamination to any product [AC Spec 3.13 (1)].

6.2.14 Processing equipment

(1) All equipment that come into contact with any product should be designed, constructed, installed and operated in a manner that:

a) ensures the effective performance of the intended task;
b) ensures effective cleaning and sanitation;
c) facilitates effective process control and monitoring; and
d) do not cause contamination of the product.

(2) Equipment must be:

a) durable;
b) resistant to chipping, cracking, flaking, delamination and abrasion;
c) able to withstand exposure to heat, water and all products expected to be processed under normal operating conditions;
d) designed to minimise build-up of food material and other residues; and
e) corrosion resistant [AC Spec 3.2 (1)].

(3) The following materials should not be used in any equipment or product contact surface:

a) toxic metals such as cadmium, lead and their alloys;
b) metals whose contact with liquid or other material may create harmful chemical or electrolytic action;
c) porous materials such as sponge rubber, stone slabs, linoleum, leather and fabrics (excluding strainers/filters); and
d) wood.

Guidance

Stainless steel (300 series or better) is the preferred material for equipment that comes into contact with meat products.

Aluminium is not recommended. It can:

- warp;
- be susceptible to the effects of both oxidation and certain types of corrosion, especially from alkaline cleaning chemicals; and
- be susceptible to pitting and scratching

Galvanised metal is not recommended for product contact surfaces as the zinc coating:

- wears off to expose the base iron sheet, which corrodes; and
- is soluble in acidic food, and in acid and alkali detergents.

Galvanised iron cages and trolleys may be used provided they do not come in direct contact with any exposed product.

Wood is not a suitable material for product contact surfaces because its porous nature allows products to penetrate the surface, and once impregnated it cannot be cleaned effectively. Residual product in the wood provides a nutrient source for microorganisms.

New equipment which will be used in direct contact with meat products should be provided with a letter of guarantee from the supplier certifying its acceptability for food use.

Effective cleaning of equipment, machinery, storage racks and shelving is enhanced if they are a:

- sufficient height off the floor; and
- sufficient distance from walls and other equipment.

(4) Containers used for holding petfood material, ingredients and products should be clearly identified and differentiated (e.g. by labels or colour coding) from those used for containing waste, cleaning materials and other purposes.

6.2.15 Monitoring equipment

(1) Monitoring equipment (e.g. thermometers, relative humidity gauges) should have the capability and accuracy appropriate for the:

a) product, process, facility or equipment it is fitted to; and
b) measurement being taken.

(2) Monitoring equipment should be installed where it:

a) can be easily read;
b) is able to take accurate readings of the relevant parameter (e.g. warmest temperature of the refrigeration equipment or facility and the coldest temperature of the cooking equipment); and
c) is adequately protected from physical and chemical damage.

(3) Measuring equipment that is used to carry out a critical measurement must be calibrated [AP Reg 14].

Guidance
Refer to Part 12: Calibration of Measuring Equipment.

6.2.16 Cleaning facilities and equipment

(1) Cleaning and sanitation facilities and equipment, must be provided to ensure that personnel hygiene, hygienic condition of equipment, vehicles, conveyances, premises or places can be maintained [AC Spec 3.3 (5)].

(2) Cleaning equipment should be maintained in a hygienic and good working condition.

(3) Cleaning equipment that comes into contact with petfood material, ingredients, products and packaging should be:

a) clearly identified and differentiated (e.g. by labels or colour coding); and
b) stored separately from those used for other purposes (e.g. cleaning of floors and drains).

6.2.17 Employee amenities

(1) There should be employee amenities that provides sufficient space and facilities for employees to:

a) consume food;
b) change clothes;
c) store personal belongings; and
d) attend to personal hygiene.

(2) Employee amenities should not open directly into any processing area.

(3) Lockers for storing employees' clothing and personal belongings should be provided.

(4) There should be adequate free space to for allow easy cleaning of lockers and their surrounding area.

(5) All opening windows or vents of amenities should be adequately screened against pests.

(6) Toilet vents should be sited far enough from ventilation intakes of processing and storage areas to prevent cross-contamination of these areas.

6.2.18 Washing and sanitising units

(1) Hand washing units should be:

a) sufficient in number to allow for effective hygiene;

b) non-hand operable (e.g. foot, knee or automatic);
c) located in areas that are readily accessible to all persons working in or entering a processing area; and
d) provided with warm potable water and approved soap.

(2) Disposable paper towels or other hand drying facilities that do not contaminate washed hands or the surrounding area should be provided.

(3) Facilities for washing waterproof protective clothing (e.g. boots, aprons, gloves, etc.) should be provided in a readily accessible location.

6.3 Requirements and procedures – repairs and maintenance

(1) The operator must document and implement a repairs and maintenance programme to ensure that the premises, facilities and equipment are maintained in good working and hygienic condition [AP Reg 11 (1)].

Guidance

The repairs and maintenance programme should include the following information:

- identity of the responsible person;
- procedures for routine or programmed maintenance (i.e. preventive maintenance), including monitoring activities and their frequencies;
- procedures for facilities and equipment breakdowns;
- corrective actions;
- procedures for inspection of any completed repairs or maintenance work; and
- records to be kept.

For small operations with simple processes a documented system may consist of a checklist or register for repairs and maintenance. The register should include the following information:

- the item, equipment or facility that requires fixing;
- the date the problem was identified and by whom;
- the solution to the problem (may include short term or temporary fix and/or long term or permanent fix);
- target dates for undertaking and completing the work; and
- the identity of the person responsible for ensuring the work is done.

Target dates for undertaking and completing repairs and maintenance work should be based primarily on the problem's potential impact on product safety, such as:

- likelihood and severity of contamination exposed products;
- product contact surfaces; and
- the processing environment.

Other considerations that the operator may take into account are:

- potential impact on product quality or operating efficiency;
- potential impact on occupational safety; and
- cost, disruption to operations, or size and complexity of the work required.

(2) Repairs and maintenance work should be undertaken in a manner that minimises contamination of petfood material, ingredients, products, packaging, equipment and the processing environment.

(3) Prior to any alteration, repair or maintenance work on buildings, facilities or equipment, a suitably skilled person should:

a) assess its potential for contaminating ingredients, products, packaging, equipment and the processing environment; and

b) put in place appropriate controls to minimise exposure to contamination.

(4) Major alterations on the premises and facilities, and routine or programmed maintenance of equipment that may affect hygienic operations should not be done during processing.

(5) All maintenance personnel must comply with the requirements for personnel hygiene appropriate to the area they are operating in, including access restrictions, hygienic practices and protective clothing requirements.

(6) Chemicals used during repairs and maintenance must be used in accordance with any specified conditions of their approval and the manufacturer's instructions. RMP operators may only use approved maintenance compounds when carrying out repairs and maintenance activities.

Guidance
Refer to Part 14: Control of Maintenance Compounds.

(7) Tools used for repairs and maintenance should not come in contact with, or cause the contamination of any ingredient, product or packaging material.

(8) After completion of any repair or maintenance work and prior to starting processing, the responsible person should check that:

a) the facility or equipment has been repaired to a satisfactory working condition;
b) all maintenance tools and pieces of equipment (e.g. nuts, bolts, etc.) are removed from the area to prevent contamination of products; and
c) the affected processing area and equipment are cleaned and sanitised, as needed.

6.3.1 Records

(1) Records of the following must be kept:

a) building layout and floor plans;
b) any engineering designs and specifications;
c) any equipment diagrams and specifications;
d) repairs and maintenance worksheets or registers; and
e) monitoring and corrective action records [RMP Spec 20 (2)].

Part 7: Design and construction – additional or specific requirements for primary processing facilities

7.1 Scope

(1) This Part discusses the additional or specific requirements for the design and construction of primary processing facilities.

(2) RMP operators involved in the slaughter and dressing of farmed mammals and birds for processing into petfood should meet the specific requirements given in this Part that are applicable to their operation. Other relevant requirements in Part 6: Design, Construction and Maintenance of Buildings, Facilities and Equipment for all petfood operations should also be met.

7.2 Requirements and procedures

7.2.1 Animal holding facilities

(1) Appropriate animal holding facilities must be provided where animals are held prior to slaughter. These must be operated within their design and capacity [AC Spec 3.3 (1)].

(2) Animal holding facilities should be designed, constructed, and located to:

a) ensure compliance with animal welfare requirements;
b) effectively contain animals;
c) facilitate ante-mortem examination;
d) allow normal mobility and an easy flow of animals from holding facilities to the slaughter facilities
e) allow effective cleaning; and
f) minimise any adverse effects on the hygienic slaughter and dressing of animals and the processing, packing, storing and transport of petfood material.

(3) Animal holding facilities and unloading areas (e.g. pens, races, receiving areas, etc.) must comply with animal welfare requirements under the Animal Welfare Act 1999.

> **Guidance**
> Refer to the Animal Welfare (Commercial Slaughter) Code of Welfare 2016 for animal welfare requirements, go to the MPI website and search on “commercial slaughter code”.

(4) The outer perimeter of animal pens and races leading to the slaughter floor should be curbed to a height sufficient to contain liquid waste.

(5) The pen and race floors should be constructed of impervious material and allow water, and liquid waste to drain into a drainage system.

(6) Facilities should be provided for washing animals to remove contamination from the hide or the skin, when necessary.

7.2.2 Ante-mortem and post-mortem facilities

(1) Appropriate facilities for ante-mortem and post-mortem examination of animals and birds must be provided, as needed [AC Spec 3.3 (2)].

(2) The site selected for ante-mortem examination should allow for animals to be effectively contained and viewed for examination purposes.

(3) Adequate space and facilities should be provided for post-mortem examination to enable all parts of the animals to be examined effectively.

(4) Sufficient natural or artificial lighting must be provided to enable effective ante-mortem and post-mortem examination [AC Spec 3.4 (1)]. Refer to Part 6.2.7: Lighting.

7.2.3 Slaughter and dressing facilities

(1) Slaughter and dressing facilities should be designed and constructed to:

a) ensure hygienic slaughter and dressing;
b) facilitate hygienic product flows;
c) allow effective cleaning;
d) ensure compliance with animal welfare requirements; and
e) facilitate post-mortem examination.

(2) Animal restraining and stunning equipment must comply with the requirements of the Animal Welfare (Commercial Slaughter) Code of Welfare 2016.

Guidance
Refer to the Animal Welfare (Commercial Slaughter) Code of Welfare 2016 for animal welfare requirements, go to the MPI website and search on "commercial slaughter code".

(3) Adequate facilities should be provided to ensure correlation of each carcass to its parts.

(4) Slaughter floors should have hand washing facilities and, where required, knife sterilisers that are readily accessible.

(5) Where a moving chain system is used, chain stopping devices should be provided to facilitate hygienic processing and carcass examination, and ensure safe operations.

(6) Slaughter floors should have processing rails or other carcass elevating devices of a height sufficient to ensure there is adequate carcass clearance over operational equipment and non-product contact structures.

(7) Where carcass washing is carried out during processing, carcass wash areas should be constructed to confine wash water to that area and direct it to the drainage system.

(8) Slaughter floors should have facilities for retaining carcasses or carcass parts that require further inspection or treatment.

(9) Adequate facilities should be provided for secure holding and disposal of condemned material.

(10) Facilities and equipment used for condemned materials should be properly identified.

7.2.4 Mobile slaughter premises

(1) The premises' location, design and construction should prevent contamination and comply with regulatory requirements by providing:

a) a hygienic environment for the holding, slaughter and dressing of animals; and
b) hygienic processing, packing, storing and transport of petfood materials and products.

(2) Premises should be located, designed, constructed, equipped and serviced to provide a standard of operation equivalent in outcome to that required for fixed-location premises, in accordance with the applicable sections of:

a) Part 6: Design, Construction and Maintenance of Buildings, Facilities and Equipment; and
b) Part 7: Design and Construction - Additional or Specific Requirements for Primary Processing Facilities.

7.3 Records

(1) Records of the following must be kept:

a) building layout and floor plans;
b) any engineering designs and specifications;
c) any equipment diagrams and specifications;
d) repairs and maintenance worksheets or registers; and
e) monitoring, corrective action and verification records [RMP Spec 20 (2)].

Part 8: Water

8.1 Scope

(1) This Part discusses the requirements for water for different applications and uses in a petfood operation.

8.2 Requirements and procedures

8.2.1 Water (all types and sources) that comes into contact with petfood material or products

(1) Water (including ice and steam) that comes into direct or indirect contact with petfood material or products must be clean water or clean seawater (i.e. on fishing vessels) at the point of use [AC Spec 3.5 (1)].

8.2.2 Water management – applies to all petfood operations regardless of the type or source of water

(1) An adequate supply of clean water (or clean sea water, as appropriate) should be available for:

a) processing of products;
b) cleaning;
c) personnel hygiene activities; and
d) any other activity where water comes into direct or indirect contact with any petfood material or product.

(2) The water reticulation system within the premises must be designed, installed and operated in a manner that prevents:

a) cross connections between clean water and water of a lower standard;
b) stagnant water (i.e. no dead ends and unused pipes); and
c) back flow that may cause contamination of the clean water supply [AC Spec 3.8 (2)].

(3) Water pipes, storage tanks and other parts of the reticulation system must be maintained in good condition [AC Spec 3.8 (2)].

> **Guidance**
> It is recommended that the operator periodically checks the condition of the reticulation system and records of these checks should be kept.

(4) The reticulation system should be flushed to ensure that stagnant water, rust, scale or other material is flushed out of the system when:

a) water is not used for an extended period; or
b) repairs to the system have been made.

(5) When additional treatment is applied by the operator to make the water suitable for its intended use, the operator must include the following information in the RMP:

a) information about the additional treatment (including type of treatment, operating parameters, procedures for control, monitoring/testing and acceptable limits);
b) a water sampling and testing programme for monitoring the effectiveness of the specific water treatment applied; and
c) corrective action procedures for instances when the water source is found to be unsatisfactory based on the results of any test done [AC Spec 3.8 (2)].

Guidance
The operator should obtain information from the supplier of the particular treatment method or equipment regarding the control and monitoring procedures (e.g. the types and frequency of water testing necessary to confirm the effectiveness of the treatment). This ensures the treatment's effectiveness and prevents it from adversely affecting the safety or quality of the water (e.g. clogging of filters).

8.2.3 Clean water supplied by an independent supplier (without additional treatment)

(1) Water supplied by a local authority or council (i.e. town supply) or other independent supplier that meets the standards for drinking water under the Health Act 1956, is considered as clean water.

(2) When the operator is advised by the supplier that the water supplied is not fit for human consumption, the operator must cease all operations that involves the unfit water. Operations must remain ceased until the problem is rectified and clean water is available again [AC Spec 3.9 (2)(a)].

(3) Despite clause 8.2.3 (2), the operator may continue operations provided the operator is able to show that:

a) the RMP specifically provides a means for ensuring that water is still suitable for its intended use (e.g. the operator applies a chlorination or filtration step); or
b) an assessment of water quality has been undertaken by the operator and the results indicate that the water is safe and suitable for its intended use [AC Spec 3.9 (2) and (3)].

(4) A record of the assessment carried out under clause 8.2.3 (3) must be kept.

8.2.4 Clean water supplied by the operator for their own use

(1) Operators supplying clean water solely for their use, within a premises or place, must assess all of their water sources (e.g. bore water, rain water, river water) and be able to demonstrate that the supplied water is suitable for use in the processing of petfood material or product.

(2) The operator must keep a copy of the completed assessment as part of the RMP [AC Spec Schedule 1].

(3) The clean water supply must be reassessed:

a) every 5 years;
b) whenever a new source of water is used in the plant; and
c) within a month of there being a change to the environment around the water source that may affect the water quality [AC Spec Schedule 1].

(4) Clean water must be subject to ongoing monitoring according to the following requirements:

a) clean water must meet the criteria at the point of use according to the testing frequency, set out in 'Table 4: Water Testing Requirements for Water Supplied by the Operator for Their Own Use';
b) microbiological testing must be performed by an ISO/IEC 17025 accredited laboratory with the required tests in the laboratory's scope of accreditation; and
c) the operator must ensure that the training of water samplers is undertaken by a laboratory referred to in clause 8.2.4 (4)(b) [AC Spec Schedule 1].

Table 4: Water testing requirements for water supplied by the operator for their own use

Measurement	Criteria	Test frequency
Faecal coliforms	Must not be detected in any 100 ml sample	6 monthly
Turbidity	Must not exceed 5 NTU	6 monthly
Chlorine (when chlorinating)	Not less than 0.2 ppm (mg/L) free available chlorine with a minimum of 20 minutes contact time	Daily
pH (when chlorinated)	6.6 to 8	6 monthly

(5) When the ongoing monitoring of water quality shows that any of the criteria in Table 4: Water Testing Requirements for Water Supplied by the Operator for their Own Use is not met, the operator must cease all operations where water comes into direct or indirect contact with petfood material or product until the problem is rectified and clean water is available again [AC Spec 3.9(2)(c)].

(6) Despite clause 8.2.4 (4), the operator may continue operations provided the operator is able to show that it meets the conditions given in clause 8.2.2 (2) [AC Spec 3.9 (2) and (3)].

8.2.5 Clean seawater used on fishing vessels

(1) When seawater is used on fishing vessels, it must only be taken from places that are of a sufficient distance offshore to ensure that water quality is not at risk from any source of pollution [AC Spec 3.7 (1)].

(2) Any water treatment equipment used for clean seawater (including desalination plants) must be installed, maintained and operated in accordance with the equipment manufacturer's instructions [AC Spec 3.7 (2)].

8.3 Records

(1) Records of the following must be kept:

a) water assessment records;
b) any checks of the reticulation system;
c) any water testing results; and
d) monitoring, corrective action and verification records [RMP Spec 20 (2)].

Part 9: Cleaning and sanitation

9.1 Scope

(1) This Part discusses the requirements and procedures for cleaning and sanitation to ensure that all areas within the premises, facilities and equipment are maintained in a hygienic condition.

9.2 Requirements and procedures

9.2.1 Documented cleaning programme

(1) The operator must develop and implement a written cleaning programme for:

a) processing areas;
b) storage areas;
c) freezers and chillers;
d) equipment;
e) amenities; and
f) external areas of the premises [AP Reg 11].

(2) The cleaning programme should include the following information:

a) areas/equipment to be cleaned;
b) procedures for all cleaning and sanitising operations, including the cleaning method, frequency of cleaning and sequence of cleaning;
c) detergents/sanitisers to be used, their concentration, application method, and contact time required;
d) the identity or position of the person(s) responsible for the cleaning activity;
e) methods and frequencies of monitoring and verification of the effectiveness of the cleaning and sanitation procedures; and
f) cleaning records forms or check sheets.

9.2.2 General cleaning procedures

(1) Cleaning should be carried out in a manner that prevents the contamination of:

a) petfood material;
b) ingredients and products;
c) packaging; and
d) previously cleaned areas, facilities and equipment.

(2) Workers should be adequately trained on the handling of cleaning chemicals and the implementation of the cleaning programme.

(3) The cleaning method should be appropriate to the type of surface to be cleaned and the type and characteristics of the residual material or dirt to be cleaned off the surface.

Guidance
Most processing areas will require a wet cleaning routine.

Dry cleaning will be more appropriate for areas where dry materials are handled and stored (e.g. dry store room, dry ingredient weighing or batching areas, etc.).

Other areas will require a combination of both methods. For example, the packing area should be kept dry during operations and should only be dry cleaned during processing, but may require wet cleaning occasionally.

(4) Cleaning compounds should be used in accordance with the procedures given in Part 14: Control of Maintenance Compounds.

9.2.3 Wet cleaning of processing areas and equipment

(1) Processing areas and equipment (except dry areas/equipment) should be wet cleaned using effective cleaning and sanitising procedures.

Guidance

Cleaning should commence without delay after finishing the day's operation, because the more the dirt ages, the more difficult it is to remove from equipment surfaces.

Cleaning of facilities and equipment which are no longer in use should not be started if there:

- are still exposed products and packaging within the area; and
- is potential for exposed products and packaging to be contaminated from splashes and aerosols created during cleaning.

A basic cleaning and sanitising system usually involves the following steps:

- removal of gross contamination (e.g. removing scraps);
- rinsing the area with cold or warm water (60°C or cooler to prevent coagulation of protein, which makes it extremely difficult to remove);
- applying a detergent solution or foam and leaving it on all surfaces for the time specified by the manufacturer;
- scrubbing surfaces to loosen and remove dirt;
- rinsing with water and draining;
- if scale has to be removed, an acid detergent is used at this stage, followed by rinsing and draining;
- applying a chemical sanitiser and leaving it on all surfaces for the time specified by the manufacturer;
- rinsing off the chemical sanitiser with water and draining (not needed if a no-rinse sanitiser is used); and
- allowing surfaces and equipment to dry.

(2) Petfood material, ingredients, products, packaging material and other materials that may be contaminated during cleaning should be:

a) removed from the area and stored in appropriate locations; or
b) protected by covers, before wet cleaning is started.

(3) Clean water should be used for wet cleaning of facilities and equipment.

(4) Floors and drains in wet processing areas should be cleaned daily. Cleaning water and steam should be contained within the immediate area that is being wet cleaned and allowed to drain completely.

(5) Walls and doors should be cleaned daily by hosing or other effective means to remove any visible contamination. More intensive cleaning (e.g. foaming and scrubbing) at regular frequency (e.g. weekly) may be needed to remove any build-up of residues and microorganisms.

(6) Ceilings and overhead structures in processing areas should be checked regularly and cleaned at an appropriate frequency.

(7) Processing equipment should be disassembled (if necessary for thorough cleaning) and cleaned:

a) at least at the end of each production day, unless an alternative cleaning frequency has been validated by the operator;
b) whenever surfaces become contaminated or come into contact with waste; and
c) whenever necessary to prevent cross-contamination between products of different hygiene status (e.g. raw and cooked products).

(8) When footbaths are used, they should be maintained properly with effective concentrations of sanitiser so that they do not become a source of contamination.

9.2.4 Dry cleaning of dry processing and storage areas

(1) Dry processing areas and stores should be kept dry and tidy, and be cleaned regularly by appropriate dry cleaning methods.

> **Guidance**
> Dry cleaning methods include brushing, scraping, sweeping, vacuuming, and blowing with compressed air.
>
> The cleaning method should minimise the creation of dust and air-borne contamination.
>
> When vacuum cleaning systems are used, filters should be changed regularly and dust bags should be removed and replaced in a way that will not result in the contamination of any product or product contact surface.

(2) Products, dry ingredients, packaging and other materials should be stacked and stored in a tidy manner.

(3) Adequate space should be available to allow effective cleaning in storage areas.

9.2.5 Cleaning of chillers and blast freezers

(1) Chillers and freezers should be maintained in a tidy condition. They should be emptied and cleaned regularly at a frequency specified in the cleaning programme.

9.2.6 Cleaning of air conditioning and refrigeration units

(1) Air conditioning and refrigeration units should be regularly cleaned and the filters replaced when necessary.

9.2.7 Cleaning of amenities

(1) Amenities should be cleaned at least daily and maintained in a hygienic condition throughout the day.

9.2.8 Maintenance and storage of cleaning equipment

(1) Cleaning implements and equipment should be maintained in a hygienic condition. They should not introduce any hazard or foreign object to any ingredient, product, packaging or product contact surface.

> **Guidance**
> Porous and absorbent items (e.g. rags, wooden handled tools) should not be used in processing areas as they are difficult to clean and they harbour microorganisms.
>
> Steel wool should not be used for cleaning in processing areas.
>
> Cleaning implements and equipment should be sanitised daily (e.g. soaked in sanitiser solution) and maintained in a good state of repair.

(2) Different cleaning implements (e.g. brushes) should be used for product and non-product contact surfaces (they can be differentiated by colour-coding).

(3) Hoses should be stored off the ground, on reels or racks, when not in use.

(4) Cleaning equipment should be stored in a hygienic manner in designated facilities.

9.2.9 Removal of waste materials

(1) Waste must be:

a) collected in clearly identified waste containers;
b) kept under controlled conditions to ensure that it will not be mistakenly or fraudulently released as suitable for processing or fit for human consumption; and
c) be disposed of in a manner that ensures that it will not become a source of contamination to other petfood material or product [AC Spec 3.13].

(2) Waste should not be allowed to accumulate in processing areas. If necessary, waste should be periodically removed from processing areas during the working day.

(3) Waste bins in processing areas that are taken to areas of lower hygienic status should be cleaned and sanitised before being returned to processing areas.

(4) Outside waste bins should be covered, maintained in a tidy condition, and collected regularly so that they do not attract pests and create objectionable odours.

9.2.10 External areas

(1) External areas within the RMP boundary, including gardens, lawns, old equipment yards, shipping containers, outside sheds and waste collection units, must be maintained in a tidy condition to minimise potential sources of contaminants and harbourages for pests [AP Reg 11].

9.2.11 Cleaning inspection

(1) Cleaning checks or inspections should be undertaken on a regular basis, as indicated in the cleaning programme to:

a) ensure compliance to the cleaning programme; and
b) check the effectiveness of cleaning by assigned personnel.

Guidance
Cleaning inspection is usually done at the end of each production day to check that the area, facilities and equipment have been cleaned to the standard required.

The general criteria for clean product contact surfaces and facilities are:
- no visible contamination;
- work surfaces should not feel greasy when rubbed with fingers;
- a clean, white tissue should not be discoloured when rubbed over the surface of cleaned stainless steel (this does not apply to galvanised iron or aluminium);
- objectionable smells should not be noticeable; and
- cleaned surfaces should not show signs of excessive water break when wetted.

Ideally, cleaning inspection and pre-operational checks should be done as separate activities by different personnel. It is recognised that this may be impractical for small operations that have very few personnel, and for such cases, the two activities may be combined.

Occasional microbiological sampling and testing of facility and equipment surfaces may be useful for verifying the effectiveness of cleaning within the premises.

9.2.12 Pre-operational checks

(1) Pre-operational checks of facilities and equipment should be conducted by a suitably skilled person to ensure that operations only begin after sanitation requirements have been met.

Guidance

The person responsible for doing pre-operational checks should have good knowledge of the cleaning methods and the criteria for assessing cleanliness. He/she should be able to assess the potential effect of particular defects on product safety and determine appropriate corrective actions for any non-compliance.

Visual inspection of cleaned surfaces is the simplest and quickest way of assessing cleanliness (refer to the criteria given under Part 9.2.11 Cleaning Inspection).

Defects observed during pre-operational checks should be categorised or ranked based on their potential effect on product contamination and product safety. This assists in the setting of appropriate corrective actions. It is common practice in the meat industry to categorise defects as:

- critical - a defect that will result in direct contamination of a product (e.g. dirty food contact surfaces; condensation from an overhead structure directly above exposed products or product contact surfaces, etc.);
- major - a defect that may result in direct or indirect contamination of a product (e.g. dirty/contaminated surfaces which are handled by workers which may lead to cross-contamination, residue build-up on door handles or equipment knobs; dirty surfaces that are in close proximity to a product contact surface, etc.); and
- minor - a defect which is unlikely to result in contamination of a product (e.g. dirty surfaces that are not near a product contact surface and are unlikely to come into contact with exposed product, product contact surfaces, packaging or workers, an isolated speck of product residue on a table leg, wall or drain, etc.).

Defect scores are allotted to each category, with the scores reflecting the severity of the defect and a limit for total defect scores is established. The daily total defect scores achieved can then be tabulated or graphed so that trends and repetitive failures can easily be detected.

(2) Observations made during pre-operational inspection and corrective actions for any deficiencies identified should be documented in an appropriate check sheet or record form.

(3) If immediate corrective action is required (e.g. for critical and major defects), the corrected item should be rechecked before operation begins. The outcome of this recheck must also be included in the record.

(4) The operator should investigate and correct the causes of repetitive failures of the cleaning and sanitation programme.

9.3 Records

(1) Records of the following must be kept:

a) cleaning and pre-operational records;
b) pre-operational check sheets;
c) list of cleaning chemicals;
d) any environmental test results, and
e) monitoring and corrective action records [RMP Spec 20 (2)].

Part 10: Purchase, handling and storage of raw materials, ingredients, and packaging

10.1 Scope

(1) This Part discusses the requirements for the purchase, handling and storage of raw materials, ingredients and packaging used in the processing or manufacture of petfood.

10.2 Requirements and procedures

10.2.1 Sourcing requirements and specifications for raw materials, ingredients and packaging

(1) The operator should develop and implement written procedures for the sourcing and purchase of raw materials, ingredients and packaging to ensure that regulatory requirements and any company specifications are met.

> **Guidance**
> The purchasing procedures should cover the following:
> - sourcing of ingredients from reputable (preferred) suppliers with reliable product traceability procedures;
> - having written specifications for raw materials and ingredients, which include any relevant regulatory requirements, agreed between the operator and the supplier; and
> - the provision of certificates of analysis or supplier guarantees by suppliers, when required.

(2) Animal material, including meat, poultry and seafood, used in the production of petfood must be sourced only from regulated sources [AC Spec 9.4 (1)].

> **Guidance**
> Animal material must be procured from a primary processor under the regulatory control of MPI, such as an abattoir operating under an RMP.

(3) The operator should source ingredients (e.g. additives, processing aids, etc.) from reputable sources and ensure that they are suitable for use in petfood.

> **Guidance**
> MPI maintains a list of substances that are Generally Recognised As Safe (GRAS) as animal feed or petfood additives when used for that purpose. Petfood manufacturers should confirm that additives used in their petfood are GRAS to ensure their products are exempt from registration under the Agricultural Compounds and Veterinary Medicines (Exemptions and Prohibited Substances) Regulations 2011 or go to the MPI website and search on "agricultural compounds regs".

(4) The composition and, where appropriate, the conditions of use of packaging must:

a) comply with the requirements specified in the current US Code of Federal Regulations, Title 21, Parts 170-199 (21 CFR 170 – 199), which includes coatings and linings of containers and cartons where these are the direct product contact surface; or
b) comply with the requirements specified in the current "Australian Standard for Plastic Materials for Food Contact Use, Australian Standard AS2070-1999"; or
c) be determined by the operator to be suitable for use, based on evidence provided by the packaging manufacturer and an analysis of hazards and other risk factors from the packaging [AC Spec 3.19 (1)].

(5) Where the packaging complies with the requirements of clause 10.2.1 (4)(a) or (b), the operator must state the relevant regulation or standard that the packaging complies within their RMP [AC Spec 3.19 (2)].

Guidance
The operator should obtain a written guarantee from their supplier confirming that the packaging meets the relevant regulation or standard.

10.2.2 Receipt of incoming goods

(1) The operator should write and implement inspection procedures for incoming goods to ensure that:

a) they are fit for their intended purpose and comply with any company specifications, and
b) sufficient information is provided on labels and accompanying documentation for their proper identification, storage and use.

Guidance
The written procedures should include the:
- checks to be undertaken on delivery (e.g. checks of documentation, temperature, packaging, labels, etc.);
- acceptance criteria;
- identity of person(s) responsible for checking incoming goods; and
- actions to be taken when raw materials and ingredients do not meet specifications.

(2) Records of all deliveries of incoming goods should be kept. They should include the following information:

a) reference to purchase orders or appropriate purchasing documentation;
b) identity of supplier;
c) type of material;
d) date of receipt;
e) quantity received and identifiers that can be used for the purpose of traceability, such as batch number;
f) use-by date; and
g) packing date or date of manufacture.

Guidance
Eligibility of animal material for export to particular overseas markets should also be checked against the relevant Overseas Market Access Requirements (OMARs).

(3) Secondary processors (petfood manufacturers or further 'petfood' processors) who receive from primary processors any petfood material that requires refrigeration or cooling to maintain its safety and quality should:

a) specify in their RMP the criteria for accepting the refrigerated or cooled product, such as the product's preservation temperature, alternative temperature or cooling conditions, and any product quality criteria, and
b) ensure that all deliveries of the petfood material are checked against these criteria.

Guidance
The generally accepted preservation temperature for chilled meat is +7°C or cooler and for frozen meat it is -12°C or cooler. Meat and poultry are usually dispatched and transported from slaughter and dressing facilities at these temperatures.

A chilled or cooled petfood material may be transported to and received at petfood processing premises at +7°C or warmer provided that:

- continuous cooling occurs during holding and transport of the petfood material (i.e. product temperature should not go up);
- the cooling procedures and transport conditions are documented in the RMP of the operator either supplying or receiving the petfood material; and
- the operator is able to demonstrate the effectiveness of any alternative cooling method and conditions in maintaining the safety and quality of the petfood material, considering its intended use.

An example of an alternative cooling method is the continuous cooling of offal by packing them in bulk bins with ice and transporting them in this state. In this case, the following should be written in the RMP:

- the cooling procedures (e.g. method of packing in bins, proportion of ice to product, maximum period for holding);
- transport conditions (e.g. delivery time); and
- the criteria for accepting the product (e.g. product temperature, amount of ice left in the bin, signs of spoilage or quality deterioration, etc).

Frozen petfood materials may be transported to and received at petfood processing premises at -12°C or cooler provided that they remain in the frozen state (i.e. frozen hard) with no signs of tempering or thawing.

Note that the conditions for cooling and transport of carcasses of animals killed on-farm and carcasses of wild animals are covered in Chapter 4 Harvesting and Processing of Wild Animals.

(4) Packages or containers of incoming goods should be intact, clean and free of infestation.

(5) Raw materials and ingredients that do not meet specifications should be:

a) identified and isolated; and
b) their disposition decided by a suitably skilled person.

10.2.3 Handling and storage

(1) All process inputs, including raw materials, ingredients, and packaging must be handled and stored in a manner that minimises their potential contamination or deterioration [AC Spec 11.3].

(2) Raw materials, ingredients and packaging should be:

a) moved to appropriate storage rooms as soon as possible after delivery;
b) held at appropriate temperatures to maintain their safety and suitability for their intended purpose;
c) protected against contamination or damage during storage;
d) stored on racks, shelves or pallets to ensure no contact with the floor;
e) kept separate from maintenance compounds and other hazardous materials; and
f) properly labelled or identified.

Guidance

Chilled meat should be maintained at +7°C or cooler and frozen meat at -12°C or cooler.

All fixed and mobile bins, silos, tanks and bagged storage areas should be clearly identified.

Records of the storage location of ingredients should be maintained.

(3) If the packaging material of any raw material or ingredient is damaged, the operator must:

a) check and ensure that the contents have not been contaminated or deteriorated;
b) rectify the problem (e.g. repack or repair the damage), if appropriate; and
c) dispose of any affected raw material or ingredient that is no longer suitable for processing [AC Spec 3.19 (3)].

Guidance
Refer to Part 16: Handling and Disposition of Non-complying Products and Recall Procedures.

(4) Any stored raw material or ingredient should be discarded when:

a) it is no longer safe (e.g. contaminated with rodent droppings, chemicals, etc.) or suitable for use (e.g. it has signs of spoilage, it is past its use-by date, etc.); or
b) important information needed for its safe use is lost (e.g. identity).

(5) Storage areas must be kept clean and tidy, and free from pests [AP Reg 11].

10.3 Records

(1) Records of the following must be kept:

a) list of suppliers;
b) raw material, ingredient and packaging specifications;
c) any supplier guarantees or certificates of analysis;
d) any supplier audit reports; and
e) incoming goods delivery documentation [RMP Spec 20 (2)].

Part 11: Traceability and inventory control

11.1 Scope

(1) This Part discusses the requirements and procedures for the traceability and inventory control of petfood materials, ingredients and products.

11.2 Requirements and procedures

(1) The operator must document and implement a traceability system that:

a) allows for the identification of all raw materials, ingredients and products throughout the entire production chain (i.e. from reception of incoming materials, through processing or manufacturing, to dispatch of products, etc.);
b) enables the movement of raw materials and ingredients to be traced from the supplier; and
c) enables the next person or company that any product is transferred to for further processing, packing, storage, distribution or sale to be traced [AP Reg 18 (10), AC Spec 5.3 (1)].

(2) The operator must document and implement procedures for inventory control [AC Spec 5.2 (3)].

(3) All outgoing products must be clearly labelled and accompanied by appropriate documentation to ensure traceability of the batch [AC Spec 4.5 and 5.3 (1)].

11.3 Records

(1) Records of the following information must be kept:

a) the name and address of suppliers of raw materials, ingredients and packaging;
b) details about the supplied item, including the batch number, quantity and delivery date;
c) the supplier status of any approved suppliers;
d) production records indicating the type, formulation and quantity of the finished products manufactured, the production or manufacturing dates and batch numbers, the use of any reworked products, and any repacking done; and
e) the name and address of the person or company to which the batch of products are delivered to [AC Spec 5.3 (1)].

Guidance
MPI has developed a tracking system template to assist further petfood processors to meet these regulatory requirements. Refer to the following for more details:

- Tracking System Template for Further Petfood Processors (PDF)
- Tracking System Template for Further Petfood Processors (DOC)
- Guidance Document: Tracking System Template for Further Petfood Processor

This template may also be useful to some RMP operators, particularly those who have less complex operations (e.g. businesses producing small volumes of a limited range of products for local distribution).

(2) Inventory records (i.e. stock records) must be maintained for all raw materials and ingredients, finished products, returned products and any non-complying products [AC Spec 5.2 (3)].

Part 12: Calibration of measuring equipment

12.1 Scope

(1) This Part discusses the requirements for the calibration of measuring equipment that are used to carry out critical measurements.

(2) Critical measurements means a parameter identified as critical in any specification or a critical limit for a critical control point (CCP) in an RMP (as defined in Part 2: Definitions).

(3) Measuring equipment include:

a) temperature measuring/recording devices;
b) timing devices;
c) scales;
d) metal detectors;
e) water activity meters;
f) pH meters;
g) flow meters; and
h) other instruments.

(4) It is recommended that calibration is also applied to equipment used in monitoring GOP parameters (e.g. refrigeration temperatures) and product parameters (e.g. product weight).

12.2 Requirements and procedures

12.2.1 General requirements

(1) Measuring equipment (whether stand-alone or forming part of a piece of equipment) that is used to provide critical measurements must:

a) have the accuracy, precision and conditions of use appropriate to the task performed;
b) be calibrated against a reference standard (shows traceability of calibration to a national or international standard of measurement) or (if no such standard exists) be calibrated on a basis that is documented in, or incorporated by reference into, the RMP; and
c) be uniquely identified (e.g. by using serial numbers, indelible tags or other permanent means of identification) to enable traceability of the calibrations and to identify the calibration status [AP Reg 14 (1), AC Spec 3.18 (1)].

12.2.2 Calibration programme

(1) The operator must document a calibration programme that includes:

a) a list of measuring equipment used in processing and their location and identification marks;
b) the calibration frequency for each measuring equipment; and
c) the calibration method/procedures for each measuring device, taking into consideration the stability of the device, the nature of the measurement, and the manufacturer's instructions [AC Spec 3.18 (2)].

Guidance

The calibration programme should also:

- identify whether the measuring equipment is used for taking critical measurements or not;
- identify the person or agency who will perform the calibration;
- indicate the maximum error allowed before corrective action is taken (e.g. ± 1 g, ± 1°C);
- indicate how the calibration date and any correction factor will be affixed to the measuring device; and

- include the corrective actions to be taken when a measuring device:
  - is damaged or provides inconsistent or inaccurate readings; and
  - identification and disposition of any product produced when the device was out of order.

(2) Safeguards must be in place to prevent unauthorised adjustments to the calibration of measuring equipment, including movement when this may invalidate its calibration [AC Spec 3.18 (3)].

(3) Reference standards (e.g. reference thermometer or reference weights) should have a current calibration certificate before they can be used. The certificate should be issued by an accredited person or agency.

Guidance

Aside from a calibration certificate or certificate of accuracy, newly purchased measuring devices should be provided with written calibration instructions, including methods and frequencies.

(4) Equipment used for making critical measurements (i.e. for monitoring critical limits), including reference thermometers, metal detectors and scales, should be:

a) calibrated by an accredited agency; or
b) the equipment manufacturer must provide assurance or guarantee of the instrument's accuracy.

Guidance

The reference thermometer should only be used for checking working thermometers.

(5) Any in-house routine check of measuring equipment should be carried out against reference standards at regular and established frequencies by suitably skilled personnel. Refer to the table *Calibration Frequencies for Various Critical Measuring Equipment* under *Section L. Calibration Methods and Frequencies* in the RMP Operator Resource Toolkit.

Guidance

Ice point and boiling point calibration methods

Hot point calibration is used when monitoring temperatures higher than room temperature (e.g. cooking temperatures). A combination of the ice point and hot point methods is recommended for a more accurate calibration of thermometers used to monitor a wide range of temperatures.

- Ice point method:
  - use enough crushed ice in a container to allow immersion of most of the probe stem. Add just enough water to remove the air around the ice particles and to form a slush. Wait for the ice to appear clear;
  - stir the mixture (do not use the probe for mixing), tip off excess water, insert the probe and leave it for about 2 minutes. Ensure that the tip of the probe is in good contact with the slush ice at the centre of the container;
  - stir the mixture again and check the reading on the thermometer. Accept if the deviation from 0°C is within the declared limits of accuracy; and
  - if the deviation from 0°C is greater than the limit of accuracy, or greater than ± 1.0°C, adjust the thermometer accordingly or discard and replace the thermometer.
- Boiling point method:
  - place the probe in a container with boiling water for about 2-3 minutes until the thermometer reading stabilises. The probe should be at the centre of the container;
  - accept if the deviation from 100°C, or appropriate temperature according to elevation, is within the declared limits of accuracy; and
  - if the deviation from 100°C is greater than the limit of accuracy, or greater than ± 1.0°C, adjust the thermometer accordingly or discard and replace the thermometer.

12.3 Records

(1) Records of the following must be kept:

a) identification, location and calibration status of equipment;
b) calibration schedules;
c) certificates of accuracy or calibration; and
d) in-house calibration records [RMP Spec 20 (2)].

Part 13: Identification and labelling of products

13.1 Scope

(1) This Part discusses the requirements for the identification and labelling of petfood materials and products.

13.2 Requirements and procedures

13.2.1 General requirements

(2) The operator must document and implement a traceability system that:

a) allows for the identification of all raw materials, ingredients and products, from reception through production to finished products; and
b) enables the movement of raw materials and ingredients to be traced from the supplier, and to the next person or company that any product is transferred to for further processing, packing, storage, distribution or sale [AP Reg 18 (10), AC Spec 5.3 (1)].

(1) The operator should develop and implement written procedures to ensure that:

a) labels are designed to meet regulatory requirements;
b) all information printed on labels or packaging are correct and accurate;
c) any claims on product labels are accurate and evidence is available to support the claims;
d) the correct label is applied to each product unit;
e) labels are stored in a manner that maintains them in good condition; and
f) damaged or obsolete labels are disposed of appropriately.

(2) All mandatory labelling information must be clear, legible, indelible, and use terms that are commonly used in the English language unless another language is approved by the Director-General in writing.

(3) An approval by the Director-General may only be given in relation to a specific one-off lot(s) or batch(es) of petfood material or product [AC Spec 4.2 (1) and (2)].

(4) Labelling or marking on any petfood material or product must not be misleading as to its intended purpose or nature [AC Spec 4.2 (3)].

(5) If the suitability of petfood material or product for its intended purpose changes from its original status, its new status must be reflected in all labelling and accompanying documentation. This must be carried out at the earliest opportunity, and must be prior to the release of the animal material or product from the premises [AC Spec 4.2 (4)].

13.2.2 Identification and separation of petfood materials or products

(1) All petfood materials or products must be clearly identified that they are not intended for human consumption [AC Spec 4.3 (1)].

> **Guidance**
> Petfood retail packs identified by e.g. ‘dog food’ is acceptable as ‘not being for human consumption’.

(2) Operators who process petfood materials or products and human consumption products in the same premises must ensure that these two types of materials and products are kept separate from each other during handling, processing and packing until they are suitably packaged [AC Spec 4.3 (2) and (3)].

Guidance

Separation

Whenever possible, the processing of products for human consumption should be physically separated from processing of petfood (i.e. different building or room) to:

- facilitate clear separation and identification of products; and
- prevent cross-contamination.

Separation between processing of human and animal consumption products using the same facilities may be separated by processing on different days.

Processing of human consumption products and petfood may also be achieved by time separation (e.g. processing on different days) provided the operator can demonstrate the effectiveness of controls in place (e.g. cleaning; procedures for identifying and separating materials, products and packaging, etc.) to prevent cross contamination between the two activities and mis-identification of products.
Processing of human consumption products and petfood the same time within the same room or area, regardless of the distance between the two activities, should be avoided.

Downgraded product

Where by-products or animal material/product is downgraded from human consumption for petfood, the constituents:

- should not contain any chemical or physical agent that is harmful to the species of concern;
- should not be formulated with any ration or material that contains chemicals or residues that will harm the intended species; and
- should comply with any requirement relating to the formulation or composition of petfood e.g. appropriate labelling, feeding instructions, etc.

For further information, visit the MPI website: Pet food, inedibles, animal feeds, and supplements.

13.2.3 Transportation outers

(1) All transportation outers of petfood material or product leaving the premises must have a label that clearly indicates:

a) not intended for human consumption;
b) the name or description of the petfood material or product;
c) storage directions where necessary to maintain the product's safety and suitability;
d) lot identification, where applicable; and
e) the name and address of the petfood operator [AC Spec 4.5].

13.2.4 Bulk transportation units

(1) Bulk transportation units used to transport unpackaged bulk petfood material or product must be labelled with the information specified in clause 13.3.3, except when it is impractical to label the units. For such exceptional cases, the information must be provided in accompanying documentation [AC Spec 4.6].

(2) Petfood material or product in bulk transportation units dispatched from the premises must be:

a) contained in covered leak-proof bins / containers with clear labels indicating that the contents are not for human consumption; and
b) identified in an acceptable manner [AC Spec 4.7 (2)].

(3) Petfood material or product dispatched in accordance with clause 13.3.4 (2) must be denatured unless it is:

a) dispatched to a premises operating under an RMP and contained in tamper evident leak-proof bins / containers;
b) dispatched for rendering and has been derived:

i) from fish or poultry being processed for human consumption;
ii) from a dual operator butcher, a homekill operation or a recreational service provider;
iii) directly from premises operating under the Food Act 2014;
iv) from animals and birds that have died in the field and are transported directly to the rendering operation;
v) from the processing of hides or skins; or

c) minimum risk material derived from fish [AC Spec 4.7 (3)].

(4) Operators who dispatch bulk petfood material or product in bulk transportation units from their premises must have fully documented systems of identification and security for that petfood material or product [AC Spec 4.7 (4)].

13.2.5 Petfood packaged for retail sale

Guidance

Petfood packaged for retail sale must be labelled in accordance with the requirements of the ACVM (Exemptions and Prohibited Substances) Regulations 2011 regulations 12 and 13 or email the ACVM Programmes & Appraisals Team at ACVM-info@mpi.govt.nz.

The NZPFMA *Labelling Guide* gives detailed information on how to meet the relevant labelling requirements, as well as providing best practice examples. Operators should contact the Association directly for a copy of the guide.

13.3 Records

(1) Records of the following must be kept:

a) label checklists; and
b) copies of labels [RMP Spec 20 (2)].

Part 14: Control of maintenance compounds

14.1 Scope

(1) This Part discusses the requirements and procedures for the storage, handling, and use of maintenance compounds. Maintenance compounds refers to substances used for cleaning, sanitising, pest control, and repairs and maintenance of equipment and facilities.

14.2 Requirements and procedures

14.2.1 General requirements

(1) The operator should develop written procedures for the handling, storage and use of maintenance compounds.

(2) Maintenance compounds must be stored, handled, and used in a manner that minimises contamination of ingredients, products, packaging, equipment, and the processing environment [AP Reg 11 (3)].

(3) Only approved maintenance compounds may be used during processing operations or in the maintenance of processing areas, facilities and equipment, except when clause 14.2.1 (4) applies [AC Spec 3.14 (1)].

> **Guidance**
> Refer to the MPI Approved Maintenance Compounds (Non-Dairy) Manual. For a list of MPI approved maintenance compounds, go to the MPI website and search for "approved maintenance compound".

(4) The operator may use an alternative maintenance compound (i.e. unapproved by MPI) provided the operator has assessed that the compound and its intended use will not adversely affect the safety and suitability of any petfood material, ingredient or product [AC Spec 3.14 (2)].

(5) The assessment undertaken by the operator should be recorded.

(6) A list of maintenance compounds used and held on the premises should be kept and maintained up-to-date.

14.2.2 Labelling

(1) All containers of maintenance compounds held and used within the premises must be clearly labelled with the name of the maintenance compound it contains. For approved maintenance compounds, the name on the label must be as it appears in the MPI Approved Maintenance Compounds (Non-Dairy) Manual or current MPI letter of approval [AC Spec 3.14 (3)].

> **Guidance**
> Proper labelling should be applied to all types and sizes of chemical containers and dispensing equipment.

14.2.3 Storage

(1) Maintenance compounds should be:

a) stored in a designated area (e.g. shelf, cupboard, room, etc.); and
b) kept separate from petfood material, ingredients, products and product contact packaging materials; and
c) kept in sealed containers when not in use.

14.2.4 Use of maintenance compounds

(1) All maintenance compounds should be used according to the directions of the manufacturer and, if applicable, any conditions of the MPI approval, by or under the supervision of suitably skilled persons.

(2) Directions for use and, if necessary, material safety data sheets, should be kept on-site and be available to users (e.g. given on the label, posted on the wall, provided in product information data sheets, etc.).

(3) Petfood material, ingredients, products and exposed packaging should be removed from the area or kept protected (e.g. covered) prior to the use of any maintenance compound that may result in their contamination.

(4) Equipment and other product contact surfaces should be cleaned by thorough washing after exposure to any maintenance compound, except for no-rinse-type chemicals that have been approved for that purpose.

(5) All containers or utensils used for measuring, mixing or transferring maintenance compounds should be:

a) clearly identified (e.g. labelled as 'For Chemicals Only'); and
b) only used for the identified purpose.

14.2.5 Disposal of chemical containers

(1) Empty chemical containers should be disposed of:

a) in a manner that will not contaminate any product or product contact surfaces; and
b) in accordance with manufacturer's instructions.

(2) Empty chemical containers should not be re-used for any other purpose within the premises.

14.2.6 Chemical contamination

(1) When chemical contamination occurs, the operator should take the following actions:

a) dispose of all contaminated petfood material or product;
b) clean affected product contact surfaces and when appropriate, sanitise prior to reuse; and
c) dispose of contaminated packaging materials that cannot be effectively cleaned.

14.3 Records

(1) Records of the following must be kept:

a) list of chemicals used and held in the premises;
b) any chemical information sheets provided by the supplier, including instructions for handling and use;
c) employee training records; and
d) monitoring and corrective action records [RMP Spec 20 (2)].

Part 15: Pest control

15.1 Scope

(1) This Part discusses the requirements and procedures for the effective control of pests which includes rodents, birds, insects, dogs and cats.

15.2 Requirements and procedures

15.2.1 Pest control programme

(1) The operator must develop and implement a written pest control programme to minimise the exposure of petfood material, ingredients, products, packaging, equipment and the processing environment to hazards associated with pests [AP Reg 11 (2) and (3)].

(2) The pest control programme should include the following information:

a) the person or agency responsible for the implementation of the programme;
b) procedures for the control of pests, and the monitoring and verification of pest control activities;
c) corrective action procedures that are to be applied in the event of loss of control; and
d) records to be kept.

Guidance
The operator may employ a pest control person or agency to develop and implement a pest control system (e.g. set up traps, spraying programme, etc.) and monitor the premises. The contracted services should be clearly defined and be appropriate to the premises, considering its operation, activities of the site, location and surroundings.

The operator is responsible for ensuring that the pest control person or agency is competent to perform the task and complies with the relevant requirements of this programme.

15.2.2 Prevention of infestation and access of pests into buildings and facilities

(1) Premises, facilities, equipment and essential services must be designed, constructed and maintained in a manner that prevents pest access [AP Reg 10].

(2) Holes, drains and other places where pests are likely to gain access should be sealed, or covered with screens or similar materials that prevent the entry of pests.

(3) External doors that open directly to processing areas and are not screened should be kept closed at all times when not in use.

(4) Internal and external areas of the premises should be kept clean and tidy. The external environment should be checked regularly and kept free of any food source and breeding sites (e.g. long grass, bird's nest, food waste, etc.).

Guidance
Areas that are likely to attract flies and other insects should be sprayed, as necessary.

(5) Dogs that are present on the premises should be under direct supervision or control of the owner, and should be prevented from entering processing and storage areas.

(6) Waste materials should be kept in covered pest-proof containers, and regularly collected and disposed of.

15.2.3 Use of pesticides

(1) Pest control chemicals (rodenticides and insecticides) should be handled, used and stored according to the procedures given in Part 14: Control of Maintenance Compounds.

(2) Pest control chemicals should be used by suitably skilled personnel, in accordance with the directions of the manufacturer and, if applicable, any conditions of the MPI approval.

(3) Insecticides that have any residual activity or are dispensed as continuous aerosols should not be used in any processing or storage area in a manner that could cause contamination of products or product contact surfaces.

(4) Products and exposed packaging should be removed from the area or kept protected (e.g. covered) prior to the use of pest control chemicals that may contaminate them.

(5) Equipment and other product contact surfaces should be cleaned by thorough washing after exposure to any pest control chemical.

15.2.4 Use of pest traps

(1) Pest traps (including rodent boxes, bait stations and electric insect traps) should be located where they do not present a risk of contamination to any product. The location of pest traps should be identified on a site or building plan, or other suitable record.

(2) Bait stations should not be located inside any processing area. Rodenticides should be used only in enclosed bait boxes.

(3) Bait stations should be checked regularly for the following:

a) correct location as indicated in the plan or record, and presence of bait;
b) evidence of pest activity (e.g. nibbled bait, bait missing, droppings); and
c) boxes are in good working condition and with legible identification.

(4) Boxes should be cleaned and rebaited with an approved rodent bait, as necessary.

(5) Insect traps, including ultra-violet lamps, pheromone traps and any form of attractant device, should:

a) be constructed in a way that facilitates the capture and removal of insects (e.g. by providing a suitable drawer, tray or adhesive mat for catching and securing insects, etc.);
b) not cause any air-borne contamination; and
c) not be located where insects may fall on to product, packaging or product contact surfaces.

(6) The frequency for monitoring of traps should be determined relative to the type of trap and the degree of pest activity observed. Increased monitoring and appropriate corrective actions should be implemented when increased rodent activity is observed.

15.2.5 Contamination

(1) When there is evidence of contamination from pests, the following corrective actions should be undertaken any affected:

a) product should be considered unfit for animal consumption and disposed of accordingly;
b) product contact surfaces should be cleaned and sanitised prior to reuse; and
c) packaging materials that cannot be effectively cleaned and sanitised should not be used for packing of any product.

15.3 Records

(1) Records of the following must be kept:

a) details of the contracted pest control person or agency, if applicable;
b) location of bait stations or other traps (e.g. site plan);

c) list of pest control chemicals used;
d) name, amount and point of use of any pest control chemicals used;
e) chemical handling training records; and
f) monitoring, corrective action and verification records [RMP Spec 20 (2)].

Part 16: Handling and disposition of non-complying products and recall procedures

16.1 Scope

(1) This Part discusses the requirements and procedures for the handling and disposition of non-complying products, including the recall of products from distribution or sale.

16.2 Requirements and procedures

16.2.1 Non-complying products

(1) The operator should document procedures for the identification, handling, storage, and disposition of any non-complying products. The procedures should facilitate the traceability and inventory of any non-complying products.

(2) Non-complying products should be handled and stored in a manner that prevents:

a) contamination and deterioration of other products; and
b) contamination of the storage environment.

(3) Non-complying products should be:

a) clearly identified;
b) separated from other products; and
c) held within the premises until disposition is determined by a suitably skilled person or, in certain cases, by MPI.

Guidance

Non-complying products may be separated from other products by holding them in a separate room or cage, or by wrapping the products with plastic.

(4) The disposition of any non-complying product should be determined by a suitably skilled person considering various factors, such as:

a) product safety and suitability;
b) the amount of product affected;
c) whether the products have been released for distribution or not;
d) whether the products can be re-processed; and
e) any instructions from MPI or the RMP verifier.

Guidance

The disposition of any non-conforming products may involve one or a combination of the following actions, depending on the nature and extent of the problem:

- restricted release of products;
- regrading of products for an alternative use (e.g. for down grading or rendering);
- reworking;
- reprocessing to ensure that the product conforms to the requirements;
- destruction of the product; and
- withdrawal or recall of products which have been distributed for sale.

(5) The RMP operator must notify the recognised RMP verifying agency, without unnecessary delay, when there is any significant concern about the safety or suitability of any of their products [RMP Spec 13 (3)(a)].

Guidance

The operator should notify the verifier as soon as possible and follow-up with a notification in writing (may be done by sending an email).

16.2.2 Recall

(1) The operator must document recall procedures, including:

a) the criteria for deciding when a recall will be initiated; and
b) how retrieval and disposition of the relevant product will be managed [RMP Spec 14 (1)].

(2) The operator must document a system for notifying MPI and the recognised RMP verifier, as soon as possible, when product is recalled from trade, distribution or from consumers because it is not or may not be suitable for processing or fit for its intended purpose [RMP Spec 14 (2)].

Guidance

Refer to MPI's Recall Guidance Material for guidance on recall procedures, or go to the MPI website and search on 'recall'.

16.3 Records

(1) Records of the following must be kept:

a) list of non-complying products;
b) records of assessment and disposition of non-complying products;
c) records of any recall activities;
d) inventory records; and
e) any correspondence with the verifier or auditor, or MPI [RMP Spec 20 (2)].

Part 17: Dispatch of petfood materials and products

17.1 Scope

(1) This Part discusses the requirements for the dispatch of petfood materials and products from the processing or manufacturing premises.

17.2 Requirements and procedures

(1) The petfood operator must write and implement procedures for dispatch of outgoing products, to ensure that:

a) products are properly packaged, identified and labelled;
b) the correct product items and quantity are dispatched;
c) transport conditions are appropriate for the products;
d) consignment details necessary for inventory control and traceability of the products are recorded; and
e) any documentation accompanying a consignment has adequate and correct information for proper identification, storage and use of the products [AC Spec 5.3 (1)].

(2) The operator should ensure that petfood materials and products that require refrigeration or cooling to maintain their safety and quality meet:

a) their preservation temperatures, or
b) alternative product temperatures or cooling conditions specified in the RMP, prior to their dispatch.

Guidance
Refer to clause 10.2.2 (3) for additional guidance on acceptable preservation temperature for chilled and frozen meat.

An example of an alternative cooling method is the continuous cooling of offal by packing them in bulk bins with ice and transporting them in this state. In this case, the following should be written in the RMP:

- the cooling procedures (e.g. method of packing in bins, proportion of ice to product, maximum period for holding);
- transport conditions (e.g. delivery time); and
- the criteria for accepting the product (e.g. product temperature, amount of ice left in the bin, signs of spoilage or quality deterioration, etc.).

Frozen petfood materials may be transported to and received at petfood processing premises at -12°C or cooler provided that they remain in the frozen state (i.e. frozen hard) with no signs of tempering or thawing.

Note that the conditions for cooling and transport of carcasses of animals killed on-farm and carcasses of wild animals are covered in Chapter 4: Harvesting and Processing of Wild Animals.

(3) The petfood operator should ensure that any transport company they use for transporting their products complies with the requirements in Part 18 Transport of Petfood Materials and Products.

Guidance
Ideally, petfood operators should have preferred supplier arrangements or contracts with their transport company.

(4) The suitability of transportation units, containers and compartments should be checked by the petfood operator before loading of products.

> **Guidance**
> This may include checking:
> - the cleanliness of the transportation unit;
> - whether the refrigeration unit is running; and
> - the compatibility between the petfood and other products being transported in the same transportation unit or compartment.

(5) Products should be protected from damage by rain or other adverse weather condition during dispatch and loading into transportation units.

17.3 Records

(1) Records of the following must be kept:

a) product release records;
b) consignment notes;
c) inventory records;
d) preferred supplier arrangements or contracts; and
e) delivery records [RMP Spec 20 (2)].

Part 18: Transport of petfood materials and products

18.1 Scope

(1) This Part discusses the requirements for the transport of petfood materials and products.

(2) These requirements apply to operators involved in the transportation of:

a) animal material from petfood primary processors (e.g. slaughter and dressing operations) to secondary processors, such as petfood manufacturers and further petfood processors; and
b) animal material and petfood products between secondary petfood operators.

(3) These requirements do not apply to transport operators transporting live animals to a primary processor.

18.2 Requirements and procedures

18.2.1 Design and construction of transportation units

(1) Transportation units and loading equipment must be designed, constructed, equipped and operated to maintain the safety and suitability of any petfood material or product [AC Spec 12.2 (1) and (2)].

(2) Refrigeration units fitted in transportation units must be designed, constructed and equipped to ensure that the specified product temperatures are maintained throughout transportation [AC Spec 12.2 (3)].

(3) Temperature measuring devices must be calibrated and located to measure the internal temperature of the transportation unit at the warmest point [AC Spec 12.2 (4)].

Guidance
Refer to Part 12: Calibration of Measuring Equipment.

18.2.2 Hygiene and maintenance

(1) Transportation units and loading equipment must be kept clean and maintained in good working condition [AC Spec 12.3 (1)].

(2) The transport operator must ensure that transportation units to be used for transporting petfood materials or products are adequately clean after transporting the following:

a) goods other than petfood material or product; or
b) animal material or product that is not suitable for processing into petfood [AC Spec 12.4 (2)].

(3) Records of cleaning and maintenance activities should be kept.

(4) The transport operator must ensure that:

a) hygienic handling practices are followed by persons involved in the transportation of petfood material or product to minimise the contamination and deterioration of any petfood material or product ; and
b) any exposed petfood material or product (e.g. carcasses) is not handled by any person with any condition or illness that could adversely affect the safety or suitability of any petfood [AC Spec 12.3 (2) and (3)].

18.2.3 Operation

(1) Petfood materials or products must not be transported together with any other animal material or product which:

a) is not suitable for processing into petfood; or

b) may be a source of contamination.

(2) The exception to clause 18.2.3 (1) is when the petfood material or product is adequately:

a) separated from the source of contamination; and
b) protected in a manner that is reasonably capable of preventing cross-contamination [AC Spec 12.4 (1) and(3)].

(3) Petfood materials or products must be maintained at their preservation temperatures, or alternative temperature or cooling condition specified in the RMP during transportation (refer to clause 17.2 (3)) [AC Spec 12.4 (4)].

(4) Records demonstrating the maintenance of the specified temperature or condition during transportation must be kept [AC Spec 12.4 (4)].

(5) Determination of the temperature of any petfood material or product and the taking of any samples must be carried out in such a manner that minimises contamination of petfood material or product [AC Spec 12.4 (5)].

(6) The transport operator must have a documented contingency plan to deal with any failure to maintain preservation temperatures during transportation that may affect the safety or suitability of any petfood material or product, including:

a) immediate notification of the person who has responsibility for the petfood material or product; and
b) actions to prevent recurrence [AC Spec 12.4 (6)].

(7) The transport operator must ensure that persons transporting petfood material or product are aware of the relevant requirements and are adequately trained [AC Spec 12.4 (7)].

18.3 Records

(1) Records of the following must be kept:

a) delivery records;
b) records of cleaning and maintenance of transportation units;
c) refrigeration records; and
d) training records [RMP Spec 20 (2)].

CHAPTER 3: SUPPLY, SLAUGHTER AND DRESSING OF FARMED ANIMALS

Part 19: General

19.1 Application

(1) Chapter 3 discusses the requirements for primary processing of petfood under the APA and its subordinate legislation, particularly the Animal Products Notice: Specifications for Products Intended for Animal Consumption and how they can be practically met by petfood RMP operators.

(2) This Chapter also includes industry agreed procedures for the handling and processing of young calves, where appropriate. These procedures are based on the *Young Calf Processors Agreement (14 June 2016)*, the agreement between the 3 stand-alone slaughter operators of young calves for petfood. Only those agreed procedures that go beyond the requirements of the Animal Welfare Act 1999, relevant codes of welfare and animal welfare regulations issued under this Act are included in the Operational Code.

(3) Where appropriate, this Chapter also provides information on relevant industry agreed procedures for meeting some of the requirements under the Animal Welfare Act 1999, its regulations and codes.

(4) Animal suppliers, transport operators and slaughter operators must not rely on this Chapter for complete information regarding their obligations under the Animal Welfare Act 1999, its regulations and codes.

Part 20: Supply and transport of live farmed animals (excluding young calves) for slaughter

20.1 Scope

(1) This Part discusses the requirements for the supply of live farmed animals (excluding young calves) supplied directly to primary processors for:

a) slaughter and dressing in permanently located primary processing premises (e.g. abattoir);
b) slaughter and dressing in mobile slaughter premises; or
c) on-farm slaughter (also previously referred to as on-farm killing).

(2) This Part also discusses the transport of live farmed animals (excluding young calves) from the farm to an abattoir or slaughter premises.

(3) The requirements for the supply of live young calves for slaughter are discussed in Part 21: Supply and Transport of Live Young Calves for Slaughter.

20.2 Supply of live farmed animals (excluding young calves)

(1) The requirements in this section apply to suppliers of all farmed animals (excluding young calves) for slaughter that are intended to be used for processing or manufacture of petfood.

(2) All farmed animals must be alive and generally fit and healthy at the time of presentation for slaughter at a primary processing premises or for on-farm slaughter [AC Spec 7.3 (9) and (10)]. Guidance on the assessment of farmed mammals presented for slaughter is included in Appendix 4: Ante-mortem Assessment of Farmed Mammals for Slaughter.

(3) All farmed mammals presented for slaughter must be identified to enable trace back of the animals to their supplier statement. Cattle and deer must be identified in accordance with the National Animal Identification and Tracing (NAIT) scheme (refer to the NAIT Act and regulations).

(4) All poultry intended for slaughter must be produced under a "whole flock health scheme" [AC Spec 7.8 (1)].

(5) A farmed animal must not be presented as a farmed animal for slaughter, if the supplier is aware, or has reason to believe, that:

a) the animal may have been exposed to any unapproved veterinary medicine, poison or environmental contaminant;
b) material derived from the animal (e.g. meat, offal) may contain residual levels of a chemical that may be harmful to animals on consumption;
c) the animal has been used in experiments, trials or research, unless the supplier meets the requirements given in Part 20.4: Supply of Farmed Animals that have been used in Experiments, Trials or Research and has obtained the appropriate approval from MPI; or
d) the supplier does not have a correctly completed supplier statement or Animal Status Declaration (ASD) from the previous owner stating that the animals have not been treated with, or exposed to an unapproved veterinary medicine, and the animal was:

i) not born on the supplier's property; or
ii) not been farmed by the supplier in the last 60 days.

e) the animal is within the withholding period for buparvaquone (BPQ) (refer to the Animal Products Notice: Specifications for Animals Treated with Buparvaquone 2014) [AC Spec 7.3].

(6) The supplier of any farmed animals, that have been purchased more than 60 days prior to the date of the supplier statement must:

a) declare in the supplier statement whether any of the animals are within a meat withholding period for any veterinary medicine administered by the supplier or previous owner; and
b) provide details about the treatment [AC Spec 7.3 (2), (3), (4) and (8)].

20.3 Supplier statements for farmed animals (excluding young calves)

(1) A supplier of farmed animals for slaughter must provide the slaughter operator a correctly completed supplier statement using the appropriate MPI approved form, as listed in Table 5: Supplier Statements for Farmed Animals, at the time the animals are presented for slaughter [AC Spec 7.5 (2)]. Alternatively an Animal Status Declaration (ASD) may be used.

(2) A back-to-back Supplier Statement and Ante-mortem Examination form is available that combines the two forms for practical use on-farm. The Notes for the Farmed Mammal Supplier Statement - Petfood Combined Form is available to assist completing the Supplier Statement side of the form.

Table 5: Supplier statements for farmed animals

Farmed animal	Supplier statement form
Cattle (excluding young calves), deer, sheep (including lambs), goats, alpacas, llamas, horses	Farmed Animal Supplier Statement - Petfood Ante-mortem Examination Declaration - Petfood Combined Form Notes for the Farmed Mammal Supplier Statement - Petfood Combined Form
Pigs	Farmed Animal Supplier Statement - Petfood Combined Supplier Statement and Ante-mortem Examination form Notes for the Farmed Mammal Supplier Statement - Petfood Combined Form
Ostriches and emus	There is no MPI approved form specifically for ratites. Suppliers of ratites should use the Farmed Animal Supplier Statement - Petfood.
Poultry	There is no MPI approved form for poultry. Refer to clause 20.3 (3) below.

(3) In relation to clause 20.3 (1), a supplier statement is not required for poultry that is supplied by a poultry operator who is identified as a "specified supplier" in the petfood slaughter operator's supplier guarantee programme [AC Spec 7.5 (4)].

> **Guidance**
> An MPI approved supplier statement has not been developed for poultry because all poultry suppliers currently supply farmed birds in accordance with a supplier guarantee programme. MPI can develop a supplier statement if needed.
>
> A supplier guarantee programme is a programme documented in a slaughter operator's RMP that establishes that poultry supplied by specific suppliers identified in the programme have been produced under a whole flock health scheme (refer to clause 20.2 (4)). It requires poultry suppliers to annually provide information equivalent those in farmed animal supplier statements (refer to the Animal Products Notice: Specifications for Products Intended for Human Consumption).

(4) The supplier must complete the statement to the best of his/her knowledge, and with reference to any supplier statements provided by previous persons in control of the animals [AC Spec 7.5 (5)].

(5) The supplier may deliver the supplier statement to the processor by electronic transmission [AC Spec 7.5 (6)]. This should be agreed with the recipient.

(6) The supplier must keep the following records for a period of 1 year after supplying the animals for slaughter:

a) a copy of any supplier statements;
b) any records and other information used to complete any supplier statements; and

c) any manufacturers' declarations relating to the composition of animal feeds fed to farmed ruminants [AC Spec 7.5 (7)].

(7) The records listed in clause 20.3 (5) must be kept in a readily accessible form, and made available for audit or verification on request by a person authorised by MPI [AC Spec 7.5 (8)].

20.4 Supply of farmed animals that have been used in experiments, trials or research

(1) The supplier of any farmed animals that have been used in an experiment, trial or research, must obtain approval from MPI prior to the presentation of any of these animals to a slaughter operator [AC Spec 7.2(2)].

(2) Prior approval must be obtained where any of the following apply:

a) unregistered veterinary medicines or agricultural compounds;
b) registered veterinary medicines or agricultural compounds outside the conditions of their registration or exemption under the ACVM; or
c) genetic modification [AC Spec 7.2 (2)].

(3) In relation to clause 20.4 (1), the MPI approval may be subject to conditions and may be granted on a category or class basis [AC Spec 7.2 (2)].

Guidance
Suppliers of animals to be used in experiments, trials or research using veterinary medicines or agricultural compounds should apply to MPI for approval using the Drug Trial Approval - Petfood form before undertaking any experiment, trial or research. The completed form should be sent to the Animal Products team at animal.products@mpi.govt.nz.

If the application is successful MPI will issue:
(a) a formal letter of approval, including any specified conditions (e.g. 3 working days notification, trial or research timeframes); or
(b) an exemption (refer to clause 20.4 (5)).

(4) The supplier of any farmed animals that have been used in an experiment, trial or research must:

a) notify the slaughter operator in writing at least 3 working days before presenting the animals for slaughter; and
b) on presentation of animals, provide the slaughter operator with a copy of the MPI approval and a completed supplier statement to the effect that all relevant conditions of the approval have been complied with [AC Spec 7.2 (3)].

(5) MPI may issue an exemption from the requirements given in clauses 20.4 (2) and (3) above for certain classes or descriptions of animals, when MPI is satisfied the risk to animal health is negligible [AC Spec 7.2 (4)].

(6) Animal product derived from animals that have been used in experiments, trials or research are not eligible for export (refer to Part 22.9: Eligibility for Export).

20.5 Transport of live farmed animals

(1) Suppliers and transport operators must ensure that live farmed animals are handled and transported in a manner that ensures that they remain generally fit and healthy at the time of presentation for slaughter [AC Spec 7.3 (9) and (10)].

Guidance

Animal suppliers and transport operators must meet their obligations under the Animal Welfare Act 1999, relevant codes of welfare and animal welfare regulations issued under this Act.

Part 21: Supply and transport of live young calves for slaughter

21.1 Scope

(1) This Part discusses the requirements for the supply of live young calves supplied directly to primary processors for:

a) slaughter and dressing in permanently located primary processing premises (e.g. abattoir);
b) slaughter and dressing in mobile slaughter premises; or
c) on-farm slaughter (also previously referred to as on-farm killing).

(2) This Part also discusses the transport of live young calves from the farm to an abattoir or slaughter premises.

(3) This Part also includes the *Young Calf Processors Agreement* procedures that are not already covered under the Animal Welfare Act 1999, relevant codes of welfare and animal welfare regulations issued under this Act.

21.2 Supply of live young calves

(1) All young calves must be alive and generally fit and healthy at the time of presentation for slaughter at a primary processing premises or for on-farm slaughter [AC Spec 7.3 (9) and (10)]. Guidance on the assessment of farmed mammals presented for slaughter is included in Appendix 4: Ante-mortem Assessment of Farmed Mammals for Slaughter.

(2) A young calf must not be presented for slaughter, if the supplier is aware, or has reason to believe, that:

a) the young calf may have been exposed to any unapproved veterinary medicine, poison or environmental contaminant; or
b) any animal material derived from the young calf may contain residual levels of any chemical that may be harmful to animals on consumption [AC Spec 7.3 (2) and (8)]; or
c) the young calf was born to a cow that had been treated with Buparvaquone (BPQ) (refer to the Animal Products Notice: Specifications for Animals Treated with Buparvaquone 2014).

21.3 Supplier information on young calves

(1) Suppliers of young calves for slaughter should provide the slaughter operator information about the animals supplied, including:

a) whether any of the animals have been exposed to or treated with any veterinary medicine and remain within a withholding period; and
b) whether any of the animals have been fed ruminant protein.

Guidance
The petfood industry uses an NZPFMA form to record seasonal information required in clause 21.3 (1) and other information relating to animal welfare requirements. A record may cover a whole season or part of a season, as appropriate to the supplier's operation. This form can be obtained from NZPFMA: http://www.petfoodnz.co.nz/. MPI encourages the use of this form.

21.4 Transport of live young calves

(1) Suppliers and transport operators must ensure that live young calves are handled and transported in a manner that ensures they remain generally fit and healthy at the time of presentation for slaughter [AC Spec 7.3 (9) and (10)].

(2) Animal suppliers and transport operators must meet their obligations under the Animal Welfare Act 1999, relevant codes of welfare and animal welfare regulations issued under this Act.

Guidance

Refer to the Animal Welfare (Calves) Regulations 2016 for animal welfare requirements.

Young calves should be assessed and confirmed as being fit for transport by the supplier before being placed in a designated place or area, which is not readily visible from the roadside, for collection by the transport operator.

Part 22: Slaughter and dressing

22.1 Scope

(1) This Part discusses the requirements for slaughter and dressing of farmed animals for petfood.

22.2 RMP requirements

(1) Operators involved in the slaughter and dressing of farmed animals must operate under a registered RMP [APA 13].

(2) Slaughter and dressing operators must have written procedures included in their RMP for the following activities, as applicable to their operation:

a) receiving of live farmed animals presented for slaughter, including procedures to deal with situations where the supplier statement does not confirm the status of the animal as suitable for petfood processing;
b) receiving of carcasses, carcass parts or offal of farmed animals that have been slaughtered on-farm or in mobile premises;
c) slaughter and dressing, including hygienic techniques and practices at key processing steps;
d) slaughter of animals for humane reasons [AC Spec 7.6];
e) handling and disposal of animal material determined at ante-mortem examination as medium or high risk raw material;
f) identification of, and separation between, export eligible and non-export eligible animal material or animal; and
g) post-slaughter processing [AC Spec 7.6 (1) and 8.2 (5)].

(3) Slaughter operators must have a documented tracking system to identify and trace animal material or product from the supplier, operator's premises and then to the next recipient [AC Spec 5.3 (1)].

(4) Slaughter and dressing operators must comply with all relevant requirements discussed in Chapter 2: Good Operating Practice.

(5) Operators involved in the slaughter of young calves should provide slaughter summaries weekly to their MPI primary verifier during the calving season, by completing the Young Calf Collection Run Sheet [Young Calf Processors Agreement].

(6) Slaughter operators should take part in the MPI On-Farm Verification programme [Young Calf Processors Agreement].

22.3 Receiving of live farmed animals and checking of supplier statements

(1) The slaughter operator must ensure that correctly completed supplier statements are provided for the following farmed mammals at the time an animal or group of animals is presented for slaughter (refer to Part 20.3: Supplier Statements for Farmed Animals for the list of supplier statements):

a) cattle (excluding young calves), deer, sheep (including lambs), goats, alpacas, llamas, horses, ostriches, emus;
b) pigs; and
c) poultry [AC Spec 7.5 (2) and 8.2 (1)].

(2) The slaughter operator should ensure that information listed in clause 21.3 (1) is provided by suppliers of young calves for slaughter.

(3) The slaughter operator must not accept any farmed animal for processing if:

a) the supplier statement is absent or incomplete;
b) the slaughter operator is aware of, or has received information, that would give reasonable grounds to suspect that the information in a supplier statement cannot be relied on; or
c) the slaughter operator has been advised by the recognised verifier that the supplier has a status of "notified" or "listed" under any residue or contaminant control scheme or any disease surveillance suspect list [AC Spec 8.2 (1), (3) and (9)].

(4) In relation to clause 22.3 (3)(a), when the supplier statement is absent or incomplete, the slaughter operator of a permanently located slaughter premises may hold live farmed animals in order to give the supplier an opportunity to provide a completed or a replacement supplier statement [AC Spec 8.2 (8)].

(5) The slaughter operator must inform the recognised verifier within 1 working day if the situation described in clause 22.3 (3)(b) occurs [AC Spec 8.2 (4)].

(6) The slaughter operator must keep a copy of every:

a) Supplier Statement;
b) Landowner/manager Poison Use Statement – Petfood;
c) Ante-mortem Examination Declaration – Petfood; and
d) Department of Conservation Pesticide Summary

they receive from suppliers for a minimum of 4 years [AC Spec 8.2 (6)].

(7) Operators of permanently located slaughter premises (e.g. abattoir) should comply with the following industry agreed requirements [Young Calf Processors Agreement]:

a) all areas where any young calf is received and held prior to slaughter (i.e. the lairage) should be under CCTV surveillance; and
b) CCTV footage covering a consignment of young calves should to be retained and be available for 1 month from the time the consignment is received at the slaughter premises.

22.4 Ante-mortem examination

(1) All farmed animals to be processed for petfood must be subjected to and pass an ante-mortem examination by an official assessor or an ante-mortem petfood examiner before being processed [AC Spec 8.3 (1)].

(2) Ante-mortem examination must occur within 2 hours prior to slaughter [AC Spec 8.3 (2)].

(3) All animals must be assessed to be generally fit and healthy at the time of ante-mortem examination [AC Spec 8.3 (3)]. Guidance is included in Appendix 4: Ante-mortem Assessment of Farmed Mammals for Slaughter.

Guidance

Ante-mortem examination requirements for poultry intended for animal consumption can be found in the Animal Products (Specifications for the Ante-mortem And Post-mortem Examination of Poultry Intended for Human or Animal Consumption) Notice 2005.

(4) The ante-mortem petfood examiner must complete and sign an Ante-mortem Examination Declaration – Petfood form prior to the slaughter of each animal or group of animals [AC Spec 8.3 (4) to (6)].

(5) A back-to-back Ante-mortem Examination Declaration - Petfood Combined Form is available that combines the two forms for practical use on-farm (the Notes for Combined Supplier Statement and Ante-Mortem Examination form is available to assist completing the Supplier Statement side of the form).

(6) Any animal material or product that is determined as unsuitable for processing into petfood by the ante-mortem petfood examiner must be designated by the slaughter operator as medium risk raw material (provided it has not been classed as high risk raw material by MPI). Records showing the

inventory of these animal materials and products and how they are disposed of must be maintained by the slaughter operator [AC Spec 8.4 (1)].

22.5 Slaughter

(1) The slaughter of animals (i.e. stunning, sticking and bleeding) must be carried out without unnecessary delay after the animals are presented for slaughter, and in a way that minimises contamination of the carcass [AC Spec 8.5 (1)].

(2) The following principles should be adhered to:

a) animals should be rendered instantaneously unconscious and insensible to pain prior to being slaughtered or killed;
b) the period of insensibility should continue until death supervenes; and
c) bleeding should be carried out promptly and skilfully.

Guidance

Young calves should be stunned using a captive bolt for the safety of personnel and other animals. An effective back-up system (e.g. another captive bolt, gun) should be readily available in case of equipment failure.

Where an animal is killed by shooting with a gun, solid bullets should be used instead of frangible bullets to minimise the potential for contamination of the product with bullet fragments.

Wherever possible, on-farm slaughter should be carried out in a designated place or area that is not readily visible from the roadside. However animals that have already gone down may be slaughtered in-situ and not be moved to a designated area.

Operators must meet their obligations under the Animal Welfare Act 1999, relevant codes of welfare and animal welfare regulations issued under this Act.

(3) Carcasses of animals that are slaughtered on-farm should not be skinned or washed on-farm. This does not apply to animals slaughtered and dressed in mobile slaughter premises.

22.6 Transport of on-farm slaughtered animals

(1) The slaughter operator must ensure that on-farm slaughtered animals are:

a) handled and transported to a slaughter and dressing premises in such a manner that minimises deterioration and contamination of the carcasses, e.g. by covered or sided vehicles;
b) delivered to the slaughter and dressing premises within 6 hours of slaughter;
c) not transported with any material that is not suitable for processing for petfood; and
d) not transported with any material intended for processing for human consumption [AC Spec 7.7 (1)].

(2) The slaughter operator must ensure that slaughtered animals ineligible for export processing, as described in Part 22.9: Eligibility for Export are clearly identified and physically separated from export eligible animal material to prevent them from entering the export chain [AC Spec 12.4 (1)].

(3) Slaughtered animals must not be transported in the same vehicle (truck and/or trailer) with any live animals unless they are physically separated [AC Spec 12.4 (1) and (3)].

22.7 Dressing

(1) Dressing of carcasses must be carried out without unnecessary delay and in a hygienic manner that minimises the transfer, proliferation, and redistribution of contaminants on and between animal material or product [AC Spec 8.6 (1) (g) and (h)].

(2) Hygienic dressing techniques should be applied to prevent or minimise contamination of the carcass from:

a) contaminated parts of the animals such as the hide, pelt or hair; the gastro-intestinal tract; the integument, hooves, trotters, or feet of the same or another carcass;
b) contaminated equipment, such as uncleaned knives, viscera tables, buggies and equipment used for suspending carcasses, offal or other parts;
c) contaminated surfaces, such as the floor or drains; and
d) wastes and other contaminated material.

Guidance

Hygienic dressing techniques

- knives should be cleaned after each use on a carcass, and disinfected regularly;
- all equipment should be cleaned and disinfected when contaminated;
- carcasses should be physically separated from each other during de-hiding, de-pelting and evisceration, so that cross contamination is minimised;
- evisceration should be performed in a manner that prevents puncture of the gastro-intestinal tract, gall bladder, uterus and bladder;
- care should be taken to prevent leakage onto the carcass when removing the gut set; and
- scraps and trimmings that are not suitable for processing into petfood should be put in designated containers or chutes and disposed of appropriately.

(3) Where multiple dressing operations are carried out on the same carcass by the same operator, the operations posing the least risk of contamination should be performed first.

(4) Offal and other animal material for petfood must be collected in a hygienic manner [AC Spec 8.6 (1) (h)].

(5) Tissues derived from the thyroid gland or from the surrounding throat structures (larynx) should not be saved and used for petfood.

(6) All parts of an animal must remain 'positively identifiable' (traceable) to the carcass during dressing until the completion of the full post-mortem examination (refer to Part 22.8: Post-mortem Examination). An exception to this can only be made when batch examination procedures are in use, or when tissues have been adequately controlled as condemned or medium risk material.

(7) Carcasses and animal products that have not passed post-mortem examination must be physically separated from those that have passed post-mortem examination [AC Spec 8.6 (1)(e)].

22.8 Post-mortem examination

(1) The slaughter operator must ensure that:

a) all animal material to be processed for petfood is subjected to post-mortem examination by an official assessor or post-mortem petfood examiner;
b) tissue is examined in accordance with the post-mortem examination procedures in Domestic Petfood Farmed Mammal - Post-Mortem Disposition Tables;
c) product dispositions are made in accordance with Domestic Petfood Farmed Mammal - Post-Mortem Disposition Table; and
d) procedures for lot or batch post-mortem examination procedures are fully documented in the operators RMP where these procedures are used for post-mortem examination of animal

products derived from a common source and included in a single supplier statement [AC Spec 8.7 (1)].

Guidance

Post-mortem examination requirements for poultry intended for animal consumption can be found in the Animal Products (Specifications for the Ante-mortem And Post-mortem Examination of Poultry Intended for Human or Animal Consumption) Notice 2005.

(2) The slaughter operator must inform the recognised verifier within 1 working day of any animal carcass or animal material suspected by the post-mortem petfood examiner to be infected with:

a) tuberculosis;
b) *Taenia saginata, T. solium*; or
c) true hydatids [AC Spec 8.7 (2)].

(3) In relation to clause 22.8 (2), the slaughter operator must identify and retain the carcass or animal material suspected of being infected until such time as instructions are received from the recognised verifier regarding their final disposition [AC Spec 8.7 (3)].

(4) Any carcass or animal material found to be unsuitable for petfood processing must be immediately identified as such by the slaughter operator from suitable animal material [AC Spec 8.7 (4)].

(5) The slaughter operator must ensure that all animal material or products are handled and disposed of in accordance with the instructions of the post-mortem petfood examiner [AC Spec 8.7 (5)].

(6) Any carcass or animal material that is found unsuitable (suspect) for petfood by the post-mortem petfood examiner must be deemed medium risk raw material (provided it has not been classed as high risk raw material by MPI) [AC Spec 8.7 (6)].

22.9 Eligibility for export

(1) The suitability of animal material or animal product for export is subject to the applicable Overseas Market Access Requirements (OMARs).

22.9.1 Farmed animals ineligible for export processing

(1) Farmed animals are ineligible for export processing when:

a) it has been treated with or exposed to a registered agricultural compound and is within the withholding period stated on the label for that species, or animals of that type; or
b) it has been treated with or exposed to a registered agricultural compound in a manner that differs from its conditions of registration, unless:

i) 91 days have elapsed since the treatment of farmed ruminants (such as cattle, deer, sheep and goats); or
ii) 63 days have elapsed since the treatment of farmed monogastrics (such as pigs, horses, birds and rabbits) [AC Spec 7.4].

c) it is a healthy animal slaughtered on-farm. Refer to Appendix 4: Ante-mortem Assessment of Farmed Mammals.

Part 23: Post-slaughter processing

23.1 Scope

(1) This Part discusses the requirements for post-slaughter processing (i.e. operations after post-mortem examination such as cooling, cutting and boning).

23.2 Cooling of carcasses and offal

(1) The cooling of carcasses, carcass parts and offal must be undertaken without unnecessary delay and in a manner that minimises microbial growth and deterioration of the animal material or product [AC Spec 8.8 (1)].

(2) The cooling procedures and parameters must be written in the RMP [RMP Spec 20 (2)].

> **Guidance**
> Animal material should be continuously cooled until the required preservation temperature is reached. The generally accepted preservation temperature for chilled meat is +7˚C or cooler and for frozen meat it is -12˚C or cooler. It should be demonstrated that the chilling regime does not have a deleterious effect on product safety and suitability.
>
> Refer to clause 10.2.2 (3) for guidance on cooling of offal using ice.

(3) The cooling parameters must be monitored and records kept [RMP Spec 20 (2)].

23.3 Cutting and boning

(1) Carcasses intended for boning and cutting should be processed without unnecessary delay. The rate of processing should be managed so that processing delays and stock-piling of meat do not occur.

(2) Hygienic boning and cutting techniques should be applied to minimise contamination, and the redistribution and growth of microorganisms on meat cuts.

(3) After boning or cutting, meat should be refrigerated without delay unless they are to be used immediately in the manufacture of petfood.

23.4 Packing and labelling

(1) Packaging materials used for containing or packing petfood meat should conform with the requirements discussed in clause 10.2.1 (4).

(2) All products must be identified and labelled in accordance with the requirements and procedures discussed in Part 13: Identification and Labelling of Products.

23.5 Storage

(1) All products must be handled and stored in a manner that minimises their contamination or deterioration [AC Spec 11.3].

(2) Products should be:

a) moved to storage as soon as possible after packing;

b) held at appropriate temperatures to maintain their safety and suitability for their intended purpose (refer to Part 10.2.3: Handling and Storage for further guidance);
c) protected against contamination or damage;
d) stored on racks, shelves or pallets to ensure no contact with the floor;
e) kept separate from maintenance compounds and other hazardous materials; and
f) properly labelled or identified.

(3) If the packaging material of any product is damaged, the operator must:

a) check and ensure that the contents have not deteriorated or become contaminated;
b) rectify the problem (e.g. repack the product or repair the packaging); and
c) dispose of any affected raw material or ingredient that is no longer suitable for processing [AC Spec 3.19 (3)].

23.6 Dispatch

(1) All products should be dispatched from the slaughter premises in accordance with the requirements and procedures discussed in Part 17: Dispatch of Petfood Materials and Products.

(2) The transport of carcasses and other animal material from farmed animals slaughtered in mobile premises (for example to a further (petfood) processor) should comply with the requirements given in Part 18: Transport of Petfood Materials and Products.

CHAPTER 4: HARVESTING AND PROCESSING OF WILD ANIMALS

Part 24: General

24.1 Application

(1) Chapter 4 discusses the relevant requirements for the harvesting, supply and primary processing of killed wild animals under the APA and its subordinate legislation, particularly the Animal Products Notice: Specifications for Products Intended for Animal Consumption and how they can be practically met by petfood RMP operators.

24.2 Scope

(1) The typical steps of these processes are shown in Figure 1: Typical Process for the Harvesting and Primary Processing of Wild Animals for Petfood.

(2) Wild animals can include hunted game estate animals. Wild animals includes (but is not limited to):

a) rabbits and hares;
b) wallabies;
c) possums;
d) wild birds;
e) pigs;
f) goats; and
g) deer.

(3) The harvesting and primary processing of wild animals must be covered by the primary processor's RMP. Harvesting must be specifically included under the scope of the documented RMP and the RMP registration must show harvesting as a process category.

(4) Only species of wild animals indicated in the scope of the documented RMP of the primary processor may be supplied by an approved supplier to the primary processor. The addition of another species in the RMP may require a significant amendment of the RMP. The RMP operator should seek advice from the company's RMP verifier prior to making changes in their operation.

(5) The RMP operator (primary processor) must comply with all relevant requirements given in Chapter 2: Good Operating Practice.

24.3 Petfood safety hazards associated with wild animals harvested from the field

(1) The requirements and procedures discussed in this Chapter are focused on managing microbiological and chemical contaminants (poisons) on or in wild animals to ensure that petfood derived from these materials are safe and suitable.

(2) Only persons that have undergone a supplier approval process are permitted to supply killed wild animals to petfood primary processors [AC Spec 7.11 (1)].

Guidance

The control of poisons in wild animals is of major importance because of the potential exposure of these animals to poisons that may occur in the areas they are harvested from. Some wild animals

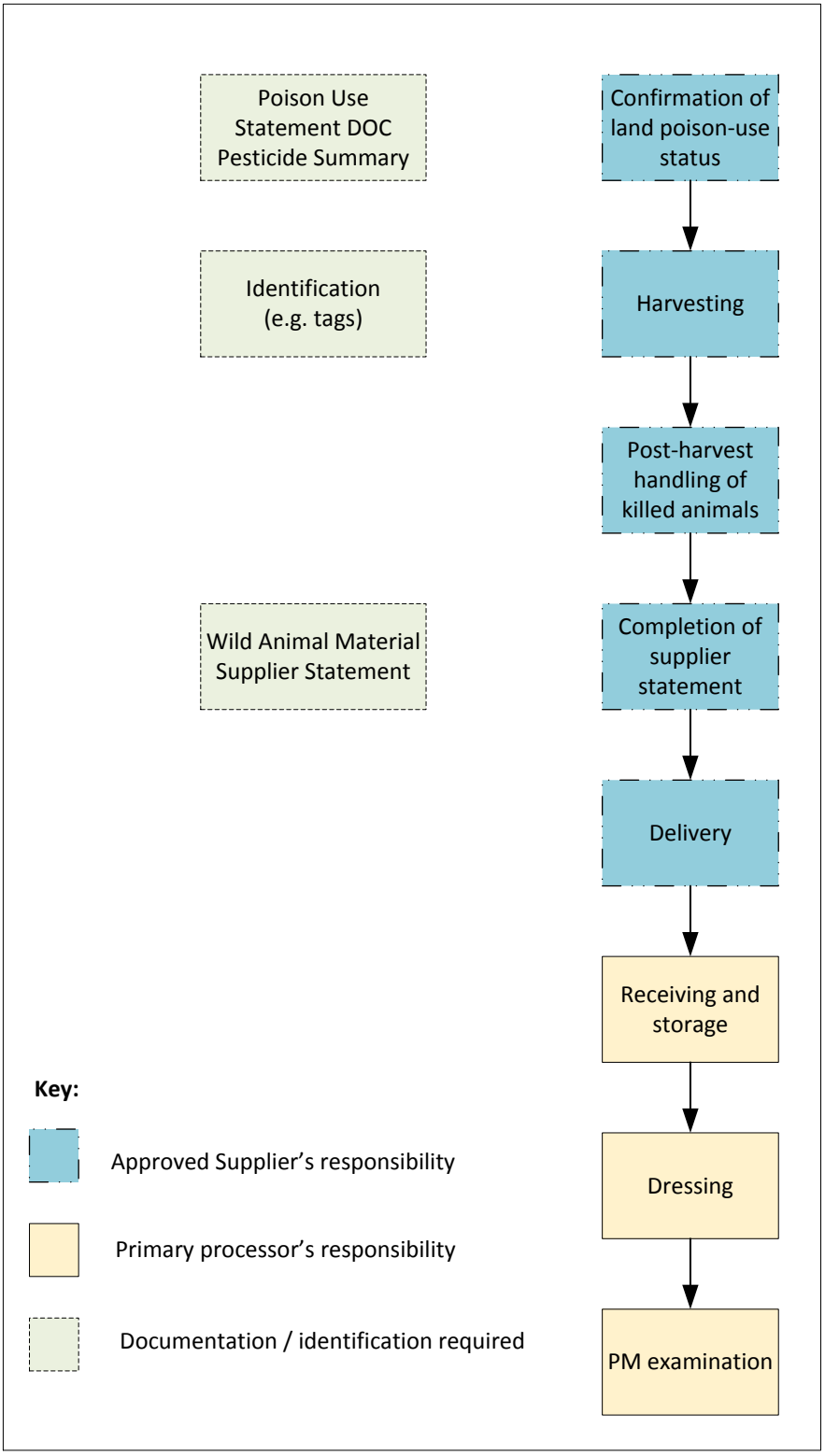
defined as pests may be target species for pest control activities. Other wild animals may forage the same areas where poisons have been laid and so may also ingest poisons.

The NZPFMA *Harvesting Wild Animals for Petfood Training Booklet* discusses in more detail the poisons that are of concern in wild animals. The control of poisons in wild animals harvested for petfood relies heavily on suppliers having the knowledge of, and skills on, proper harvesting procedures and techniques and their commitment to comply with requirements.

24.4 Use of animal material fit for human consumption for petfood processing

(1) Carcasses, meat and offal derived from wild animals that have been harvested, handled and processed in compliance with Part 11 Supply of Animal Material of the Animal Products Notice: Specifications for Products Intended for Human Consumption (i.e. the animal material is suitable for processing to food for human consumption) may be supplied to petfood operators for processing into petfood [AC Spec 7.9 (1)].

Figure 1: Typical process for the harvesting and primary processing of wild animals for petfood



Part 25: Harvesting and supply of killed wild animals

25.1 Scope

(1) This Part discusses the requirements for the supply of killed wild animals for petfood processing, including the requirements for:

a) the approved suppliers of wild animals;
b) facilities for handling and storage of killed wild animals;
c) the harvesting (i.e. capture, killing and/or recovery) of wild animals from the field;
d) the confirmation of the poison status of the land from which wild animals are harvested from; and
e) the preparation, handling and delivery of killed wild animals for primary processing.

(2) In this Part, unless specifically stated otherwise, the term "wild animals" collectively refers to all field-harvested wild animals, including rabbits, hares, wallabies, possums, goats, deer and wild (ground-living) birds. This list is not exhaustive. Wild animals may also include game estate animals that are hunted and supplied for petfood processing.

(3) This Part applies to all approved suppliers of wild animals for primary processing.

25.2 Approved supplier

(1) A supplier (harvester or hunter) of any killed wild animal for petfood processing must be approved and listed as an approved supplier by the primary processor to whom he/she intends to supply wild animal material to, in accordance with the requirements of this Part [AC Spec 7.11 (1)].

> **Guidance**
> The legal status of an approved supplier is attained and maintained through the RMP of the petfood primary processor that has him/her listed as an approved supplier. If a supplier supplies killed wild animals to several petfood processors, the supplier must be approved by each of the processors that he/she supplies wild animal material to.

(2) To become an approved supplier of killed wild animals, the prospective supplier must:

a) obtain copies of current versions of the following documents from the petfood primary processor that he/she intends to supply wild animal material to:
   i) Chapter 4: Harvesting and Processing of Wild Animals; and
   ii) the NZPMA *Harvesting Wild Animals for Petfood Training Booklet*.
b) study the above documents and be able to demonstrate his/her understanding of the requirements;
c) sit and pass the NZPFMA *Examination for Harvesting Wild Animals for Petfood* under the supervision of the primary processor;
d) complete the MPI form "Application to Become an Approved Supplier - Petfood" and then submit it to the primary processor for signing, together with personal identification, such as a driver's license or firearms license [AC Spec 7.11 (2) and (3)]; and
e) be listed as an approved supplier under the primary processor's RMP.

(3) An approved supplier must ensure they meet the requirements of Part 25: Harvesting and Supply of Killed Wild Animals.

(4) A person's 'approved supplier' status remains valid only for 2 years. A supplier must re-apply for renewal of his/her approved supplier listing and be re-approved by the petfood primary processor in order to continue to supply wild animals to the processor [AC Spec 7.11 (4)].

25.3 Facilities for handling and storage of wild animals

(1) Buildings and facilities used by an approved supplier for the handling, preparation, refrigeration or storage should be designed and constructed to facilitate hygienic operations in a way that:

a) minimises the entrance, harbourage or accumulation of pest contaminants; and
b) facilitates hygienic practices.

(2) The building should be located on a freely draining site with firm and reasonably dust-free ground, away from stock and other animals.

(3) All equipment used in contact with any wild animal material or product should be constructed of materials that are:

a) durable;
b) non-toxic;
c) free from defects that may affect the suitability of the animal material for petfood processing; and
d) can be readily cleaned and sanitised.

(4) The following should be available:

a) facilities for the suspension of carcasses, such as rails in order to avoid contact between animal material and walls, floors, ceilings or other structures;
b) a refrigeration unit (e.g. chiller, refrigerator, box freezer, etc.) with a calibrated temperature gauge and with sufficient capacity to achieve the required product temperature within the specified time. Refer to Part 12: Calibration of Measuring Equipment for more guidance;
c) a supply of clean water in sufficient volume for hygienic operations;
d) suitable cleaning equipment for the effective cleaning of the building and its facilities and equipment; and
e) facilities for the collection and disposal of waste materials and containment and drainage of waste water.

Guidance
Clean water means water that is free of excessive turbidity, colour, offensive odour and pollutants, such as human or animal waste and toxic chemicals.

Only approved maintenance compounds may be used for cleaning. Refer to the MPI Approved Maintenance Compounds (Non-dairy) Register for a list of MPI approved maintenance compounds.

(5) Where a toilet is provided, it should be located and constructed so it will not adversely affect the hygienic operation of the facility.

25.3.1 Wild animal depots

(1) Wild animal depots should be designed and constructed to facilitate the hygienic chilling and holding of the carcasses of harvested wild animals.

(2) The depot should be located on a readily drained site with firm and reasonably dust-free ground, away from stock and other animals.

(3) Buildings and facilities should be constructed to minimise the entrance, harbourage, or accumulation of pest and contaminants.

(4) All equipment used in contact with product should be constructed of materials that are durable, non-toxic and can be easily cleaned and sanitised.

(5) Adequate facilities should be provided for the suspension of carcasses to avoid contact with walls, floors, ceilings or other structures, fittings and equipment.

(6) The depot should have a refrigeration facility capable of achieving the required product temperature within the specified time, considering the refrigeration unit's maximum capacity.

(7) The internal temperature of carcasses of wild animals must be reduced to +7°C or cooler within 24 hours of killing. If carcasses are to be frozen, the internal temperature should be continuously reduced to -12°C or cooler [AC Spec 7.19].

> **Guidance**
> A refrigerator or box freezer may be considered a refrigeration facility.

(8) The refrigeration facility should have a calibrated temperature gauge for monitoring refrigeration temperature.

> **Guidance**
> Temperature gauges should be calibrated annually and a record of the calibration should be kept.

(9) A supply of suitable water, with appropriate facilities for its storage and distribution, should be provided in sufficient volume and pressure for the hygienic operation of the depot.

> **Guidance**
> Suitable water means water that is free of excessive turbidity, colour, offensive odour and pollutants, such as human or animal waste and toxic chemicals.

(10) Suitable cleaning equipment should be available for the effective cleaning of the depot and its facilities and equipment.

> **Guidance**
> Only approved maintenance compounds may be used for cleaning. Refer to the MPI Approved Maintenance Compounds (Non-Dairy) Manual for a list of MPI approved maintenance compounds, go to the MPI website and search on "approved maintenance compounds".

(11) Adequate facilities should be provided for the collection and disposal of waste materials. All waste water should be adequately contained and ducted to a drain.

(12) Where a toilet facility is provided, it should be located and constructed so as not to adversely affect the hygienic operation of the depot.

25.4 Requirements for the harvesting of wild animals

(1) The harvesting (includes hunting, trapping, killing and/or recovery) of any wild animal for petfood processing must be undertaken by, or under the direct supervision of, an approved supplier [AC Spec 7.11 (1)].

> **Guidance**
> Approved suppliers may involve other people, for example helicopter pilots or other hunters, in the hunting operation. Where this occurs, the approved supplier must directly supervise the activities being undertaken, as it is the supplier's responsibility to sign the supplier statements confirming the legal requirements have been met.

(2) An approved supplier must not present any wild animal material for primary processing that:

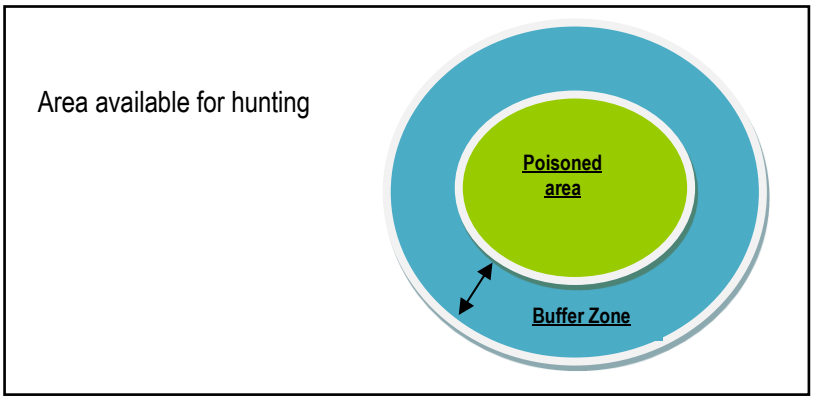
a) the approved supplier has reason to believe would exceed any MRL or MPL; or
b) has been harvested from a poisoned area or its buffer zone within the applicable caution period for the poisons used, as given in Table 6 Poison Groups, Caution Periods and Buffer Zone Distances for Wild Animals.

Table 6: Poison groups, caution periods and buffer zone distances for wild animals [AC Spec 7.12]

Poison Group		0	1	2	3	4
Poison		• Cholecalciferol • Hydrogen cyanide • Phosphorus • Potassium cyanide • Sodium cyanide	• Zinc phosphide • Para-aminopropiophenone • Sodium nitrite • Any other poison not covered in groups 2 to 4 (except cyanide or cholecalciferol)	• Diphacinone • Pindone	• Coumatetralyl • Sodium monofluoroacetate (1080)	• Brodifacoum • Bromadiolone • Difenacoum • Difethialone • Flocoumafen
Caution Period (All species)		None	1 month	2 months	4 months	3 years
Buffer Zone	Rabbits	0	200 m	200 m	200 m	200 m
	Hares, thar, wallabies, possum	0	1 km	1 km	1 km	1 km
	Goats (excluding thar), deer	0	2 km	2 km	2 km	2 km
	Wild birds	0	2 km	2 km	2 km	2 km
	Pigs and other species	0	2 km	2 km	2 km	5 km

Guidance

Figure 2: Poisoned area and buffer zones



Poisoning use status of the land

Poisoning activities are carried out on certain land areas to control pests. The approved supplier should check the status of the land prior to a hunt to ensure that the land from which wild animals will be taken from has an acceptable poison use status. The supplier must also ensure that the animals are:

(a) not killed within a certain distance of a poisoned area ('buffer zone'); and

(b) not hunted for a period of time after poisons have been laid ('caution periods').

Poisons of concern
The poisons of concern in wild animals are classified into 5 groups based on their likely persistence time in animals. These poisons are discussed in more detail in the NZPFMA *Harvesting Wild Animals for Petfood Training Booklet*.

Only the active substances (for example brodifacoum) are listed in Table 6: Poison Groups, Caution Periods and Buffer Zone Distances for Wild Animals. These active substances are incorporated into a range of trade name products which the approved supplier may be more familiar with (for example Pestoff rodent bait, Talon rat, mouse killer, Final All-weather blox). The supplier should have knowledge of the active substances in the various trade name products to ensure that the appropriate buffer zones and caution periods are applied. To assist with this, a list of trade name products and their active substance (current at the time of writing) is given in the Appendix of the NZPFMA *Harvesting Wild Animals for Petfood Training Booklet*.

Approved suppliers should regularly review product registrations and be aware of the currently registered poisons at the time of the hunt or harvest. The Agricultural Compounds and Veterinary Medicines database – Database of Registered Trade Name Products and Active Ingredients provides an up-to-date list of registered products, their trade names and active ingredients.

Buffer zone
A buffer zone is the area of land surrounding a poisoned area that is within the defined buffer zone distance for the specific wild animal species and type of poison used (Figure 2: Poisoned Area and Buffer Zones). Buffer zone distances are:
(a) determined based on information about the roaming distances of different species of wild animals; and
(b) are measured as a straight line on a horizontal plane, or as the crow flies.

The buffer zone distances given in Table 6: Poison Groups, Caution Periods and Buffer Zone Distances for Wild Animals may be extended by government or local authority, regional council, poisoning operator, land owner or hunter) when circumstances occur that may affect the roaming distances of animal species within an area, such as a change in migration patterns of animals.

Caution period
The caution period is the amount of time a poisoned area and its buffer zone remains unacceptable for hunting, from the time the poison is applied on the land. The caution periods are determined based on the poisons' persistence times in sub-lethally exposed animals. The caution periods for each poison group are listed in Table 6 Poison Groups, Caution Periods and Buffer Zone Distances for Wild Animals.

An approved supplier must ensure that the hunted animals are not taken from within a poisoned area or its buffer zone until the caution period has passed. For example if pindone has been applied to an area of land, a supplier must wait for 2 months from the time of application before animals can be hunted on that land or its buffer zone. If 1080 has been used, 4 months must have elapsed before a supplier can hunt animals on that land or its buffer zone.

(3) Despite clause 25.4 (2), an approved supplier may present for primary processing, any wild animal, except pigs, harvested from any privately owned land if:

a) all poisons used on the land were from poison groups 1, 2 or 3 of Table 6: Poison Groups, Caution Periods and Buffer Zone Distances for Wild Animals and were:

i) used solely in bait stations that were correctly situated so that the poisons were inaccessible to the animal;
ii) used solely in, or adjacent to, buildings (farm, residence or immediate surrounds) that could not be accessed by the animal; or

iii) inaccessible to the animal due to impassable geographical features (such as rivers, sea, cliffs or steep ravines); and

b) the responsible person completing the poison use statement believes that any poison used was not, or was not likely to have been, accessed by the applicable animal [AC Spec 7.12 (2)].

Guidance
To clarify, the above exceptions do not apply to:
- pigs;
- poisons in group 4; or
- any wild animal harvested from land administered by the Department of Conservation (DOC).

(4) In the case of possums and deer, the approved supplier must ensure that any possum or deer presented for primary processing was taken from an area declared Tb vector-free by TBfree New Zealand [AC Spec 7.12 (6)].

Guidance
Tb vector-free areas
The harvesting of wild possums and deer for petfood may only occur from areas declared Tb vector-free by TBfree New Zealand. TBfree New Zealand is a joint government-industry body charged with the mission to eradicate bovine tuberculosis.

Areas where Tb is found in wildlife are called Tb vector risk areas. Areas where Tb is not found in wildlife are called Tb vector-free areas.

Approved suppliers should keep up-to-date with current Tb vector-free areas by regularly reviewing the Tb vector free area map available on the TBfree New Zealand website: http://www.tbfree.org.nz/risk-based-assessment-of-new-zealand-2.aspx.

25.5 Poison use statements

(1) When presenting wild animals for primary processing, the approved supplier must provide the petfood primary processor with:

a) a correctly completed Landowner / Manager Poison Use Statement - Petfood, for killed wild animals that have had access to privately owned land; or
b) a Department of Conservation Pesticide Summary for killed wild animals that have had access to land wholly or partly administered by DOC [AC Spec 7.13 (1) (b)].

(2) The statement must be correctly completed and signed by the landowner, manager or that person's legal representative, whichever of those persons has or is likely to have the best knowledge of the poison-use-status of the land covered by the statement [AC Spec 7.13 (3)].

(3) The Landowner / Manager Poison Use Statement – Petfood, is valid for 3 months from the date of signing unless replaced earlier [AC Spec 7.13 (4)].

(4) Poison use statements should be kept by the approved supplier for 1 year from the date of signing.

Guidance
Completing the Landowner/Manager Poison Use Statement - Petfood
'Landowner/Manager Poison Use Statement - Petfood' are the statements used to inform the approved supplier and the processor about any poisons used on privately owned land or any other land not covered by a DOC Pesticide Summary.

The approved supplier is responsible for obtaining the completed statements from a responsible person. The responsible person is generally the land owner or manager of the land, or another person with the appropriate knowledge and authority to complete the statement.

When collecting a statement, the supplier should ensure that the responsible person understands the:
(a) content of the statement;
(b) poisons that it applies to;
(c) area of land covered by the statement; and
(d) timeframes that the statement covers.

Guidance for completing the statement properly is given on the back of the supplier statement to assist the responsible person.

DOC Pesticide Summaries
DOC Pesticide Summaries describe poisons used on land managed or administered by the DOC. The DOC Pesticide Summaries are valid for 4 months and cover the periods March to June, July to October and November to February. They are available from Department of Conservation offices and the Department of Conservation website using the key words "pesticide summary" or can be viewed at http://www.doc.govt.nz.

The pesticide summaries identify when and where poisons are laid and the poisons continue to be identified until the caution period has passed and the land is suitable for hunting.

25.6 Harvesting procedures

25.6.1 Condition of animal

(1) Wild animals for petfood processing must show no observable signs of illness or poor health immediately prior to being killed. If the approved supplier is unable to confirm this, then the wild animal material must not be presented for primary processing [AC Spec 7.16 (1) and (2)].

Guidance
Only healthy animals that have been killed by or under the direct supervision of an approved supplier are eligible for petfood processing. For example an animal that dies as a result of drowning while being hunted is not eligible for processing.

Suppliers should also be aware of the need to report any cases of rabbits showing signs of the rabbit calicivirus (RHDV) to Landcare Research.

25.6.2 Hunting method

(1) Hunting should be done by:

a) shooting with a non-fragmental ammunition (i.e. does not break up on impact);
b) humane live trapping; or
c) humane live netting.

Wild animals for primary processing must not be killed using poisons or other chemical substances [AC Spec 7.16 (4)].

Guidance

Wild animals, particularly small animals like rabbits, hares, wallabies and possums, should not be killed using a shotgun to reduce the likelihood of lead being present in the final product. Animals killed with a shotgun are also more difficult to process, often requiring extensive trimming.

For animal welfare requirements on the use of traps refer to leg hold traps and glue boards, or go to the MPI website and search on "traps".

25.6.3 Identification of killed wild animals and their harvesting location

(1) The approved supplier must ensure that the harvesting location for each animal or group of animals is clearly defined on the Wild Animal Material Supplier Statement – Petfood, using either a GPS or topographical map grid reference points [AC Spec 7.15].

(2) The approved supplier must:

a) identify killed wild animals individually or as groups of animals; and
b) ensure that they are clearly linked to the supplier statement applicable to the animal or group of animals [AC Spec 7.16 (3)].

Guidance
Small wild animals (e.g. hares, rabbits, wallabies, live possums etc.) are typically identified as a group. To be identified as a group, all animals in the group must be killed or captured:
(a) on the same date;
(b) in an area of land that have the same poisoning status and covered by a single Poison Use Statement or DOC Pesticide Summary; and
(c) by the same approved supplier.

Large wild animals, such as deer, should be individually tagged or identified. Whenever practical, they should be tagged or identified at the location where it comes to rest immediately after it is killed or is captured so that the accurate harvesting location waypoint can be recorded.

25.7 Hygienic practices

(1) Large wild animals, such as deer, pigs and goats, should be bled as soon as possible after killing.

Guidance
It is important that the major blood vessels in the neck are opened when bleeding animals. Inadequate or delayed bleeding may result in spoilage and/or darkening of the meat colouring, making it unsuitable for processing. Any pooling of blood in the chest cavity should be drained out when the pluck is freed.

(2) Killed wild animals should be eviscerated in the field or in a primary processing facility.

(3) When animals are eviscerated:

a) the animals must be eviscerated hygienically and without unnecessary delay;
b) evisceration must be limited to the removal of the stomach and intestines, using minimal excising cuts to remove the parts; and
c) the kidneys, heart, lungs and liver must not be removed and must remain attached to the carcass when presented to the primary processor to facilitate post-mortem examination [AC Spec 7.18 (2) to (4)].

(4) The heads of the animals may be removed in the field prior to delivery to the primary processor or in a primary processing facility.

(5) Wild animal carcasses must not be skinned or washed prior to delivery to the petfood primary processor to minimise potential contamination of the carcass [AC Spec 7.18 (1)].

(6) The carcasses of small wild animals, such as rabbits, hares and wallabies, must:

a) be placed under refrigeration within 4 hours of the animals being killed (if the ambient temperature is above 10ºC) or within 12 hours of the animals being killed (if the ambient temperature is at all times below 10 ºC);
b) have the internal temperature continuously reduced to less than +7ºC within 24 hours; and
c) be maintained at a temperature less than +7ºC storage so that they will not deteriorate [AC Spec 7.19].

(7) The carcasses of large animals, such as deer, should be placed under refrigeration within 10 hours of the animal being killed and be delivered to the primary processor within 24 hours of the animal being shot.

(8) For freezing carcasses, the process should be continuous and achieve an end point temperature of cooler than -12°C to ensure the raw material is kept frozen for delivery.

25.8 Transport and delivery of wild animal carcasses

(1) The approved supplier should ensure that wild animal carcasses are:

a) handled and transported to a primary processor in such a manner that minimises deterioration and contamination of the carcasses;
b) not contaminated by microbiological, chemical (e.g. agricultural chemicals, aviation gas, etc.) and physical hazards from the environment;

i) transport vehicle; and
ii) other materials kept in the same vehicle, particularly if the same vehicle is used for activities other than carcass delivery;

c) not transported in the same vehicle with any live animals or any material that is not suitable for processing to petfood, unless they are physically separated; and
d) not transported with any material intended for processing for human consumption.

Guidance
Carcasses are best transported in the hanging position to maintain cooling. Piling of carcass on top of one another should be avoided because this may inhibit cooling and increase the potential for contamination between carcasses. Refrigeration units should not be over-loaded.

(2) Chilled carcasses must be maintained at less than +7°C during transport and be delivered to the primary processor within 72 hours of killing [AC Spec 7.20 (1) (a)].

(3) Frozen carcasses must be maintained in a frozen solid state (-12°C or cooler) during transport and delivery to the primary processor [AC Spec 7.20 (1) (b)].

(4) The approved supplier must ensure that any consignment is accompanied by the following completed documentation when delivered to the primary processor:

a) Wild Animal Material Supplier Statement – Petfood;
b) Landowner / Manager Poison Use Statement - Petfood or the DOC Pesticide Summary.

(5) The supplier statement must be completed and signed by the approved supplier, linking the consignment to the supplier statement. The statement must not be signed by a person who is not approved, even if that person is under the direct supervision of an approved supplier [AC Spec 7.14 (3)].

25.9 Records

(1) Records of the statements and declarations must be kept [RMP Spec 20 (2)].

Part 26: Primary processing of killed wild animals

26.1 Scope

(1) This Part discusses the requirements for the primary processing of killed wild animals for petfood.

(2) Primary processing of killed wild animals for petfood covers all the steps and activities from receiving of the animal carcassess at the processing premises to post-mortem examination.

(3) This Part applies to all primary processors of killed wild animals for petfood.

26.2 RMP requirements

(1) Petfood primary processors involved in the harvesting and processing of wild animals for petfood must

a) operate under a registered RMP [APA 13]; and
b) comply with all relevant requirements given in Chapter 2: Good Operating Practice.

(2) The primary processor must include in their RMP written procedures covering the following:

a) the system for supplier approval and re-approval, including procedures for assessing the suppliers' ability to meet the requirements discussed in Part 25: Harvesting and Supply of Killed Wild Animals;
b) procedures for maintaining a current list of approved suppliers;
c) procedures for receiving of wild animal carcasses;
d) hygiene and sanitation procedures;
e) processing procedures; and
f) monitoring, verification and corrective action procedures [RMP Spec 11; AC Spec 7.11 (4)].

(3) The primary processor must also have written procedures to deal with situations where the supplier statement Landowner / Manager Poison Use Statement - Petfood or DOC Pesticide Summary, does not confirm the status of the animal material as suitable for processing [AC Spec 8.2(5)].

Guidance

Refer to Part 16: Handling and Disposition of Non-complying Products and Recall Procedures for guidance.

26.3 Receiving of killed wild animal carcasses

(1) Petfood primary processors must ensure that all killed wild animals have been hunted, killed and dressed as appropriate by, or under, the direct supervision of suppliers that they have approved [AC Spec 7.11 (1)].

(2) The primary processor must check all relevant documents accompanying a consignment and confirm that the following requirements have been met prior to accepting any wild animal carcasses for processing:

a) that the supplier is listed on their approved supplier list;
b) that the consignment is accompanied by correctly completed and accurate documentation:
    i) Wild Animal Material Supplier Statement – Petfood;
    ii) Landowner / Manager Poison Use Statement - Petfood or the DOC Pesticide Summary; and
c) that the wild animal materials are clearly identified (for example tagged) and linked to the accompanying documentation listed in clause 26.3 (2)(b).

(3) The primary processor must not accept animal material for processing if the operator is aware or suspect that the information in a supplier statement cannot be relied on [AC Spec 8.2 (3)].

(4) The primary processor must inform the recognised verifier within 1 working day if the situation described in clause 26.3 (3) occurs [AC Spec 8.2 (4)].

(5) Any animal material that is rejected by the primary processor as unsuitable for petfood processing should be clearly identified and separated from suitable animal material and disposed of appropriately. The processor should record the reason(s) for the rejection and any corrective action taken and retain all documentation for verification purposes.

(6) Following acceptance, the wild animal carcasses should be held under appropriate storage conditions to minimise microbial growth and deterioration of the carcasses [AC Spec 7.19].

Guidance
Chilled carcasses awaiting further processing should be held in a refrigeration unit running at +7°C or cooler.

Frozen carcasses should be kept in a freezer (-12°C or cooler), if they are not going to be immediately thawed.

26.4 Processing

26.4.1 Thawing of frozen killed wild animals

(1) Thawing of frozen carcasses should be done in a manner and under conditions that minimises contamination or deterioration of the carcasses.

(2) If thawing is done in water, clean water must be used for each thawing cycle.

(3) Thawing equipment, such as thawing tank or bins, must be emptied and cleaned after each thawing cycle (i.e. after thawing a batch of carcasses).

(4) Thawed carcasses should be processed without unnecessary delay, or they must be held under refrigeration while waiting to be further processed.

26.4.2 Dressing of wild animals for petfood

(1) Dressing of carcasses must be carried out without unnecessary delay and in a hygienic manner that minimises the transfer, proliferation, and redistribution of contaminants on the product [AC Spec 8.6 (1) (g) and (h)].

(2) Hygienic techniques should be applied during dressing to prevent or minimise contamination of the carcass from:

a) contaminated parts of the animals (i.e. the hide, pelt or hair; the gastro-intestinal tract; the integument, hooves, trotters, or feet of the same or another carcass);
b) contaminated equipment (such as uncleaned knives, viscera tables, buggies and equipment used for suspending carcasses, offal or other parts);
c) contaminated surfaces (such as the floor or drains); and
d) wastes and other contaminated material.

Guidance
Hygienic dressing techniques
- all animals should be dressed off the floor;
- knives should be cleaned after each use on a carcass, and disinfected regularly;
- all equipment should be cleaned and disinfected when contaminated;

- carcasses should be kept separated from each other during de-hiding, de-pelting and evisceration, so that cross contamination is minimised;
- evisceration should be performed in a manner that manages contamination of the carcass and the viscera set;
- scraps and trimmings that are not suitable for processing into petfood should be put in designated containers or chutes and disposed of appropriately; and
- care should to be taken when handling carcasses that have been thawed due to the increased risk of cross-contamination from thaw drip.

(3) Traceability between parts of the animal, or animals in case of batch processing, must be maintained until post-mortem examination is completed [AC Spec 5.3 (1)].

(4) Carcasses and animal products that have not passed post-mortem examination must be physically separated from those that have passed post-mortem examination [AC Spec 8.6 (1)(e)].

26.5 Post-mortem examination of wild animals for petfood

(1) All wild animal material must undergo post-mortem examination to ensure the material is suitable for processing into petfood [AP Reg 5]. Refer to Part 22.8: Post-mortem Examination for post-mortem procedures.

(2) Post-mortem examination should be conducted by a person:

a) familiar with the normal tissues of wild animals; and
b) able to identify abnormal tissues associated with animal diseases of concern.

Guidance
The person undertaking post-mortem examination should be qualified as a post-mortem examiner.

(3) Persons competent in wild animal post-mortem examination must be identified in the operator's staff training records.

(4) Any carcass or animal material that is found unsuitable (suspect) for petfood by the post-mortem petfood examiner must be deemed medium risk raw material (provided it has not been classed as high risk raw material by MPI) [AC Spec 8.7 (6)].

(5) The following post-mortem carcass examination judgements summarised in Table 7: Carcass Examination Judgements.

Table 7: Carcass examination judgements

Problem	Guidance
Deterioration	A carcass in a state suggestive of deterioration that could impact on the suitability of the material for petfood is to be condemned.
Contamination	All visible gross contamination are to be trimmed. A carcass with extensive contamination is to be totally condemned.
Objectionable odour	A carcass with a pronounced or objectionable odour suggestive of spoiling is to be condemned.
Wounds	All wounds are to be trimmed to remove potential contamination and visible tissue damage.
Carcass bullet entry wounds	The site of bullet entry wound is to be trimmed and the area palpated for bullet pieces. Carcasses contaminated with projectile pieces are to be condemned. Any material containing lead is not to be rendered.

Problem	Guidance
Bone fractures	Meat contaminated with bone pieces are to be removed by trimming when used for raw petfood but may be acceptable for further processing such as grinding.
Any other abnormality indicative of systemic disease e.g. infection or pus etc.	A carcass with any abnormality indicative of systemic disease is to be totally condemned.
Offal with evidence of any abnormality	All tissues to be disposed of as medium risk material.

26.6 Records

(1) Records of the following must be kept:

a) statements and declarations;
b) approved suppliers list;
c) assessments and evidence of personnel competencies; and
d) monitoring, corrective action and verification records [RMP Spec 20 (2); AC Spec 8.2 (6)].

CHAPTER 5: FURTHER PROCESSING AND MANUFACTURING OF PETFOOD

Part 27: General

27.1 Application

(1) Chapter 5 focuses on managing the following risks to animal and human health from petfood:

a) risk to animal health from consumption of petfood by pets;
b) risk to human health through direct or indirect infection of humans from handling and preparation of petfood; and
c) risk to animal health due to nutrient imbalances (i.e. inadequate or excessive levels that may be harmful).

(2) This Chapter applies to all petfood manufacturers operating under an RMP. Although 'further petfood processors' are not required to document and implement an RMP, MPI recommends that they also follow relevant procedures given in this chapter.

(3) The following are outside the scope of this Chapter:

a) risk to human health from human consumption of petfood; and
b) risk to human health through direct or indirect exposure of humans to infected pets and anything in the environment contaminated by infected pets.

27.2 Legislation applicable to petfood

(1) The APA and ACVM provide for several scenarios under which petfood operators may operate, depending on the nature of their operation and the type of petfood they produce. These scenarios and their corresponding regulatory requirements are summarised in Table 2: Secondary Processors: Regulatory Scenarios and Applications.

27.3 Types of petfood

(1) This Chapter covers the processing of raw petfood and the manufacture of complete and balanced petfood (wet, semi-moist and dry petfood), pet chews and pet treats.

(2) Examples of the different types of processed or manufactured petfood covered by this Chapter are summarised in Table 8: Types of Petfood.

(3) The following operations are excluded from the scope of this Code:

a) processing of petfood that is principally of dairy origin;
b) rendering of animal material (this is covered by the MPI Rendering Code of Practice); and
c) activities solely covered by the ACVM (refer to Table 2: Secondary Processors: Regulatory Scenarios and Applications).

Table 8: Types of petfood

Type	Description	Example
Raw petfood	• petfood that has not undergone any heat or preservation treatment (refer to definition) • prepared with or without added ingredients • stored chilled or frozen	• raw meat mince or chunks • raw offal • raw chicken neck • pelletised raw meat • raw meat patties
Canned petfood	• retorted or aseptically processed (low-acid) • packed in cans or pouches • shelf-stable at ambient conditions • typically has a moisture content of 60 to 75% or $a_w \geq 0.85$	• canned dog food • cat food in pouches
Heat treated refrigerated (wet) petfood	• pasteurised • stored chilled or frozen • typically has a moisture content of 60 to 75% or $a_w \geq 0.85$	• chilled dog rolls
Semi-moist petfood and treats	• heat treated • additional hurdle(s) is usually applied (e.g. a_w control, pH control, use of preservative) • may be shelf-stable at ambient conditions if mould growth is inhibited (e.g. by vacuum packaging and/or use of anti-fungal agent) • typically has a moisture content 25 to 35% or a_w of 0.60 to 0.80	• shelf-stable dog rolls • shelf-stable semi-moist meat and vegetable chunks • soft jerky
Dry petfood (kibbles) and treats	• extruded, dried and baked • shelf-stable at ambient conditions • typically has a moisture content of <10% or a_w of 0.25 to 0.50	• dog biscuits • kibble
Freeze-dried petfood and treats	• may or may not be heat treated prior to freeze-drying • shelf-stable at ambient conditions • typically has a moisture content of ≤10 % or $a_w \geq$ of 0.25 to 0.50	• freeze-dried meat chunks
Dried pet chews and treats	• heat treated and then dried (e.g. air-dried) • shelf-stable at ambient conditions • typically has a moisture content of <10% or a_w of 0.25 to 0.50	• hard jerky • dried bones, ears, hooves, liver • pet chews produced from processed hides

Part 28: Animal materials and products for use in petfood

28.1 Sourcing of animal materials

(1) Materials derived from mammals, birds and seafood that are used in petfood must be sourced only from regulated sources [AC Spec 9.4 (1)].

(2) Regulated sources are registered or listed businesses that operate under the regulatory control of MPI, such as:

a) abattoirs, slaughter plants, and meat, poultry or seafood processing premises that operate an RMP under the APA; and
b) retail butchers, seafood businesses and other food businesses registered under the Food Act 2014.

Guidance
Petfood manufacturers that use imported animal material (e.g. fish for petfood processing) can meet this requirement by ensuring that the imported animal material meets applicable biosecurity Import Health Standards.

28.2 Animal materials suitable for use in raw petfood

(1) Only the following minimal risk materials may be directly used in raw petfood:

a) materials derived from farmed mammals and birds slaughtered for animal consumption under an RMP and passed as suitable for petfood use, refer to Chapter 3: Supply, Slaughter and Dressing of Farmed Animals;
b) materials derived from farmed animals slaughtered for human consumption under an RMP and passed as fit for human consumption, but is not going to be used in this way for commercial reasons (e.g. edible offal deemed fit for human consumption but sold for petfood use);
c) materials derived from farmed animals slaughtered for human consumption under an RMP that passed ante-mortem examination but deemed unfit for human consumption at post-mortem examination, but deemed suitable for petfood;
d) materials derived from wild animals and passed as suitable for petfood use, in accordance with Chapter 4: Harvesting and Processing of Wild Animals;
e) materials derived from seafood that is fit for human consumption; and
f) processed non-meat animal products, such as processed egg, processed dairy and honey.

28.3 Animal materials suitable for use in manufactured petfood

(1) The following materials may be directly used in the production of manufactured petfood:

a) minimal risk materials listed in clause 29.2 (1);
b) rendered animal products (e.g. meat and bone meal) produced under a registered RMP;
c) processing food scraps and by-products, such as skins, boning room scraps, fish heads, gut or frames from products intended for human consumption which are derived from premises registered under the Food Act 2014; and
d) medium risk materials (listed in clause 29.3 (2)) that have been rendered [AC Spec 10.3 (1)]).

(2) In relation to clause 29.3 (1) (d), the following animal materials are considered as medium risk materials and must not be used directly in petfood. They must be rendered or treated using a method that delivers a similar outcome to rendering in terms of hazard reduction, before being used in petfood:

a) materials derived from slaughtered or killed animals that are suspected to be diseased;

b) materials derived from animals slaughtered and killed for specific disease eradication purposes;
c) materials derived from mammals and birds that have died in the field;
d) materials derived from homekill or recreational catch;
e) materials derived from any animal containing residues of agriculture compounds or veterinary medicines, toxic substances or natural substances (including shellfish affected by marine biotoxins) that may result in harm to pets, only if the rendering process or the treatment can reduce the particular residue or toxic substance to a level that is unlikely to result in harm to the pet;
f) materials from tuberculous (Tb) animals;
g) any minimal risk material that has come into contact with any medium risk raw material; and
h) any other animal material that is not fit for animal consumption without further processing or treatment [AC Spec 2.2. and 10.3].

(3) In relation to clause 29.3 (2) (f), materials from farmed tuberculous animals (including reactor animals), including offal and blood, may only be used directly in petfood that will be thermally treated at not less than 62.5 ºC for not less than 30 minutes or equivalent treatment to ensure destruction of the tuberculosis organism [AC Spec 11.6].

28.4 Animal materials prohibited for use in petfood

(1) The following materials must not be used in any type of petfood:

a) materials derived from animals that have been used in experiments, trials, or research, except where approval is granted by MPI (refer to Chapter 3: Supply, Slaughter and Dressing of Farmed Animals);
b) materials derived from pets, zoo animals, guinea pigs, rats and mice; and
c) any "high risk material", except where permitted by MPI in writing, including:

i) any material that MPI requires, by direction made under section 81 (2) of the APA, to be treated as high risk raw material;
ii) medium risk raw material or minimal risk raw material that has come into contact with any high risk raw material; or
iii) animal material or product that is derived from ruminants imported live into New Zealand [AC Spec 2.1 (1) and 6.2].

28.5 Animal materials eligible for use in petfood for export

(1) Petfood manufacturers must ensure that animal materials for use in petfood for export meet the eligibility requirements of the particular overseas market. Refer to MPI's website for guidance on exporting petfood and Overseas Market Access Requirements (OMARs).

Part 29: General product and processing requirements

29.1 Scope

(1) This Part discusses the general requirements applicable to all petfood processing and manufacturing operations.

29.2 Petfood safety and suitability outcomes

(1) Petfood manufacturers must ensure that petfood they produce does not contain:

a) hazards at levels that may directly or indirectly be harmful to pets and their human handlers; and
b) unwholesome or extraneous material that may make the petfood unsuitable for its intended purpose [AP Reg 6].

(2) Manufacturers must identify and document in their RMP any regulatory or operator-defined limits or other criteria relevant to the safety or suitability of petfood they produce.

Guidance
Regulatory and operator-defined limits define the safety and/or suitability outcomes for a particular petfood, considering its intended purpose and use. Generally, they are measurable process or product criteria that must be achieved during processing.

Regulatory limits are specified in legislation. When no regulatory limit is specified and when necessary to define the acceptability of the petfood, the operator is expected to establish their own limits for the types of petfood they produce.

When establishing operator-defined limits, the manufacturer should consider:
- the type and nature of the petfood (e.g. limits for raw petfood will be different from those for manufactured petfood);
- the hazard(s) reasonably likely to occur in the petfood;
- the potential risks to the pet through direct consumption of the petfood; and
- the risk to the pet owner or handler through direct or indirect contamination from handling, preparing or storing of petfood.

The manufacturer should also ensure that the defined limits are scientifically justifiable and appropriate to the petfood, considering:
- its intended use;
- the intended consumer and expected handling after leaving the RMP; and
- that they are consistently achievable under normal operating conditions.

Examples of operator-defined limits are:
- physico-chemical properties of a petfood (e.g. pH, moisture content, a_w etc.);
- maximum level of a hazard in a petfood (e.g. microbiological criteria, maximum levels of a physical or chemical hazard, etc.);
- process parameters (e.g. pasteurisation time and temperature, thermal process schedule for 12D reduction of *C. botulinum* in canned petfood, etc.); and
- maximum level of an additive in a petfood.

These regulatory and operator defined-limits may be achieved by applying control measures at a specific process step (e.g. at a CCP) or combination of steps, or by Good Operating Practice. The effectiveness of a process or RMP can be validated against these criteria. Refer to the RMP Manual for further discussion on regulatory and operator-defined limits.

29.3 Good operating practice

29.3.1 Hygiene and sanitation

(1) Petfood manufacturers must establish and carry out procedures to:

a) ensure appropriate and adequate maintenance, cleaning, and sanitation of premises, facilities, essential services and equipment;
b) manage waste;
c) control pests; and
d) implement effective personnel hygiene practices [AP Reg 11, AC Spec Part 3].

(2) Petfood manufacturers must comply with the requirements covering hygiene and sanitation of the premises, facilities and equipment given in Chapter 2: Good Operating Practice.

(3) Cleaning of food contact surfaces and equipment should be undertaken between processing of different types of product (e.g. dog food and cat food, "organic" petfood and normal petfood, products made of different species of meat, etc.) where necessary to maintain product safety and suitability and truth of labelling. Refer to Part 9: Cleaning and Sanitation for cleaning and sanitation procedures.

29.3.2 Control of contamination and deterioration

(1) All inputs, including raw materials, ingredients, additives and packaging must be handled, processed, and stored in a manner that minimises their potential contamination or deterioration [AP Reg 9].

(2) All process steps should be performed without unnecessary delay.

(3) Animal materials and products requiring refrigeration should be maintained at temperatures that will minimise microbiological growth in the product.

(4) There should be effective separation to prevent cross-contamination between different types of products (e.g. raw and heat treated products, dog and cat food, "organic" petfood and conventional petfood, etc.) where necessary to maintain product safety and suitability and truth in labelling.

(5) Procedures should be in-place to protect ingredients and product from contamination by physical hazards such as glass, metal or wood. Unprotected glass and glass implements should be excluded from processing and storage areas. Wooden implements should not be used where they may affect product safety.

(6) Where metal detectors are installed to control an identified hazard, procedures for the operation of metal detectors must be documented. The procedures must include the following:

a) testing or calibration of the metal detector sensitivity;
b) procedures for handling product rejected by the metal detector; and
c) procedures for re-checking product in the event that routine monitoring of a metal detector indicates the equipment has failed or is out of calibration [AC Spec 3.18 (1)].

(7) Petfood manufacturers must comply with relevant requirements given in Part 12: Calibration of Measuring Equipment.

29.3.3 Purchase, receipt and storage of raw materials, ingredients and packaging

(1) Petfood manufacturers must source animal material for use in petfood in accordance with the eligibility requirements given in Part 28: Animal Materials and Products for Use in Petfood.

29.3.4 Rework

(1) Materials for rework should be:

a) clearly identified;
b) kept separate from other products during storage; and

c) be handled and stored in a manner and under conditions that minimise contamination and growth of microorganisms.

(2) Product that cannot be identified by its original production batch or is deemed unsafe should not be reworked or used in production of petfood and be disposed of as waste.

(3) Formulations should be properly adjusted to account for the addition of any rework. Consider any potential effect of using rework on the safety, nutritional content, labelling, and shelf-life of the product.

(4) Procedures for tracing the batches of reworked materials and the batches of products they have been used in must be established and documented [RMP Spec 11].

Guidance
Manufacturers should establish a cut-off period for reworking products from one batch to the next to facilitate traceability and recall procedures and prevent selection of resistant strains of microorganisms in the product.

The manufacturer should periodically clear out all rework. For example, some manufacturers have a weekly cut-off for re-work, with material produced in a previous week not being reworked into the current week's production.

29.4 Product design and formulation

(1) All petfood products must be designed and formulated to produce petfood that is safe and meets the nutritional requirements of the intended pet consumer, considering its intended purpose and use [APA s5].

(2) Product formulations or recipes should be developed by a suitably skilled person who:

a) has technical knowledge and experience in developing petfood formulations;
b) is familiar with regulatory standards and requirements, including permitted levels of ingredients and additives;
c) a good understanding of nutritional requirements of pets, particularly when developing complete and balanced petfood; and
d) a good understanding of the effect of any change in the formulation on product characteristics, nutritional content, process parameters, labelling, shelf life, etc.

(3) The following should be taken into consideration when developing petfood:

a) the type and, if applicable, the life-stage of the pet the petfood is intended for;
b) the intended purpose and use of the petfood (i.e. whether it is intended to be a complete and balanced food or a treat);
c) the nutritional requirements of the pet;
d) how the petfood will be distributed through the supply chain, and handled, stored and used by the retailer and pet owner or handler;
e) the source and suitability of raw materials, ingredients and packaging;
f) the hazards associated with the raw materials and ingredients;
g) the manufacturing process;
h) any applicable regulatory or operator-defined limits, product or process criteria;
i) the shelf-stability and shelf-life of the petfood; and
j) for petfood for export, the eligibility of the animal material and petfood for the intended overseas market.

Guidance
MPI maintains a list of substances Generally Recognised As Safe (GRAS) for use as animal feed or petfood additives. Petfood manufacturers should confirm that additives used in their petfood are

GRAS to ensure their products are exempt from registration under the ACVM (Exemptions and Prohibited Substances) Regulations 2011.

(4) The manufacturer should have a system for managing activities and incidents that may impact on formulations and recipes, such as recipe changes, changes in suppliers of ingredients, use of different brands or alternative ingredients and use of rework materials.

(5) Records of petfood formulations should be kept.

(6) Shelf-life should be established, taking into account the petfood formulation, process, packaging and subsequent storage conditions. The manufacturer should be able to explain the basis for the established shelf-life and provide supporting records, if necessary.

Guidance
Shelf-life can be determined based on:
- scientific literature;
- industry guidelines;
- company's experience and historical records; and/or
- shelf-life trials.

29.4.1 Complete and balanced petfood

(1) A petfood that is intended to be a "whole diet" or "complete and balanced" food should meet the recommended nutritional requirements for cats or dogs as defined by the AAFCO Official Publication, the FEDIAF Nutritional Guidelines (July 2016) or other internationally accepted standard or guidelines. The operator should be able to provide evidence demonstrating compliance with the requirements.

(2) The petfood manufacturer should, where appropriate, undertake trials and carry out testing to verify if product formulation and manufacturing processes are capable of producing a nutritionally well balanced and safe petfood.

29.5 Process development and validation

(1) Manufacturing processes for each product or product group should be:

a) developed based on the application of HACCP and designed to consistently achieve any applicable regulatory and/or operator-defined limits;
b) documented in the RMP, including the procedures at key process steps and product and process parameters and criteria; and
c) validated by a suitably skilled person; and revalidated whenever there is a change to the process or product that could impact on the product's safety and stability.

Guidance
The following references give useful information on petfood safety hazards and HACCP:
- Annex II of the FEDIAF Guide to Good Practice for the Manufacture of Safe Pet Foods provides information on HACCP and its implementation and examples of CCPs for different types of petfood processes.
- Part 4 of the Processed Meats Code of Practice provides guidance on the HACCP approach and examples of HACCP plans for manufactured meat products.
- The Reference List of Contaminants and Residues in Petfood and Ingredients with Safety Risks published by the Pet Food Industry Association of Australia Inc. (PFIAA) provides information on contaminants and hazards that manufacturer's should take into consideration when developing their products and HACCP plans.

(2) Validation should cover the aspects of the process summarised in Table 10: Scope of Process Validation.

(3) Records of all aspects of the validation work must be kept [AP Reg 20 (2)].

Table 10: Scope of process validation

The manufacturer should be able to demonstrate that:	Examples of evidence
Operator defined limits, including process parameters at CCPs and product criteria, are appropriate to the product and its intended use and scientifically valid	• published scientific literature; • New Zealand or internationally recognised code of practice; • industry agreed criteria; • expert's opinion; or • reports of validation studies.
Process equipment, such as pasteurisers cookers or driers: • have the correct capability; • are correctly installed and set up; and • are fitted with calibrated measuring devices at the correct location (e.g. the slowest heating point of a cooler).	• commissioning reports; or • evidence of compliance to equipment manufacturer's instructions regarding installation and setup, such as an installation checklist. For simple equipment, such as small water cookers, actual demonstration of the equipment's operation by the petfood manufacturer may suffice.
Established process parameters, including critical limits at CCPs (e.g. heating parameters, drying parameters), and product criteria (e.g. a_w, microbiological criteria) are consistently met.	For existing businesses and processes - process monitoring data, historical records. For new businesses or new processes – results of validation trials (refer to RMP Manual).
Personnel responsible for control and monitoring at key operational steps (particularly CCPs) are adequately trained or have the correct competencies.	Training records.

Note: Refer to the RMP Manual, the Processed Meats Code of Practice, and guidance document What is Validation? for further discussions on validation.

29.6 Process control and monitoring

29.6.1 Monitoring

(1) The process must be operated in accordance with documented procedures.

(2) The process must be monitored and verified at a frequency necessary to ensure that the established process and product parameters are consistently met.

(3) Process control and monitoring of critical control points must be carried out and/or supervised by appropriately trained personnel.

(4) Calibrated instruments must be used for measuring critical process parameters. Refer to Part 12: Calibration of Measuring Equipment.

(5) Records of the process, including records of raw materials and ingredients, must be maintained for each production lot or batch. Refer to Part 5.1: Document Control and Record Keeping.

29.6.2 Non-compliance to processing procedures and parameters

(1) The manufacturer must take immediate action when any non-compliance occurs that results in the product or process not meeting the established process or product parameters, including any regulatory or operator-defined limits.

(2) Non-compliant products must be identified and segregated until their safety and disposition has been determined by a suitably skilled person (refer to Part 16: Handling and Disposition of Non-complying Products and Recall for procedures).

(3) A suitably skilled person must investigate any incidence of non-compliance or process failure, determine the cause of the failure and take appropriate corrective action.

(4) The corrective actions must address the:

a) restoration of control (e.g. stop processing until the assessment is completed and any necessary changes have been made to the product or process);
b) identification and disposition of affected product (including initiating a recall, if necessary); and
c) prevention of the recurrence of the problem.

(5) A record of the assessment and corrective actions taken must be kept [AP Reg 20 (2)].

29.7 Verification of compliance to specifications

(1) When appropriate and considered necessary, a programme should be in-place for verifying compliance of raw materials, ingredients and finished products to specifications, such as microbiological and chemical limits, nutritional specifications and shelf life.

(2) Inspection or testing protocols must be documented in the RMP, including:

a) sampling frequencies and methods;
b) procedures for handling of samples;
c) analytical tests or inspection methods; and
d) procedures for recording and reporting of results.

(3) Where the manufacturer undertakes (or sub-contracts) analyses critical to petfood safety, the testing laboratory must have, as a minimum, accreditation to the international standard ISO/IEC 17025 (by IANZ) with the required tests in the laboratory's scope of accreditation.

(4) Any in-house testing should be done using standard methods and by a person who has appropriate training and/or experience in the particular test.

Part 30: Preparation steps

30.1 Scope

(1) This Part discusses the steps typically undertaken during the production of raw petfood and the preparation of petfood material for processing.

30.2 Tempering and thawing

(1) Appropriate temperature control should be applied during the tempering or thawing of frozen meat to minimise the growth of pathogenic and spoilage microorganisms in the product.

(2) Procedures and time/temperature parameters for the tempering or thawing of frozen meat should be documented in the operator's RMP.

(3) Plastic liners that may be entrapped in meat blocks should be removed properly.

> **Guidance**
> The occurrence of entrapped plastic in the meat may be reduced by using thicker gauge liners which are less likely to tear and using coloured liners which are easier to see.

30.3 Cutting, boning and trimming

(1) Carcasses, sides and quarters should be checked for gross visible defects before they are cut and boned and any defects found should be removed in a hygienic manner. Visible defects include rail dust, grease, bruises, lesions, blood clots, clusters of hair, dirt or other extraneous material.

(2) Defective material and contaminated or deteriorated meat unsuitable for petfood processing should be immediately disposed of into identified waste bins or containers. Dropped meat may be used for processing provided contaminated areas are adequately trimmed prior to use.

(3) The operation should be managed so carcasses and cuts are maintained at a temperature that prevents microbial growth during cutting, boning, or trimming.

(4) Cuts and trimmings should not be allowed to accumulate without proper temperature control.

(5) Equipment used, such as knives, sharpening steels and mesh gloves, should be cleaned and sanitised, as necessary, to prevent contamination of products.

30.4 Size reduction (e.g. mincing, flaking, dicing)

(1) Procedures for preventing metal contamination from grinders and flakers, and corrective actions when metal contamination occurs should be established and documented.

> **Guidance**
> Grinders and flakers should be checked and maintained regularly to prevent metal contamination from equipment. Some companies also have procedures for preventing metal contamination from newly installed blades. For example, when a new or re-sharpened blade is installed, the first few kilograms of mince produced after installation is dumped to waste.

(2) Grinders, flakers and other equipment should be maintained in a hygienic condition during the production period.

30.5 Weighing

(1) Correct recipes or batch weighing instructions should be available to, and used by, the person responsible for weighing ingredients.

(2) The weighing and assembly of ingredients and additives should be carried out only by designated and trained personnel.

(3) Accurate scales and metering equipment with appropriate capability must be used for weighing ingredients. They should be calibrated or certified, as applicable, considering their use and the criticality of the measurement being taken. Refer to Part 12: Calibration of Measuring Equipment [AP Reg 14(1), AC Spec 3.18 (1)].

(4) Weighing procedures should facilitate the identification and traceability of all raw materials and ingredients used in batches of products. Batch records must be kept.

(5) Containers and utensils used for weighing should be dedicated for the purpose. They should be clean and not be a source of contamination.

(6) Pre-weighing and assembly of dry ingredients should be performed in a dry ingredient room, or in an area specifically designated for dry ingredient preparation and/or storage.

30.6 Mixing

(1) Mixing procedures should ensure a homogenous mixture, which is essential for nutritional balance and petfood safety.

(2) Packaging or containers of pre-weighed ingredients or premixes should be handled and disposed of properly so that they do not become a source of physical hazard or foreign matter (e.g. plastic bag, pieces of paper, string, etc.).

(3) When necessary for product safety, the temperature of the mixture should be controlled.

> **Guidance**
> Temperature control can be maintained by e.g. small batch sizes, water baths, temperature controlled rooms etc.

(4) The mixture should be used (e.g. filled into casings) without unnecessary delay, or it should be held under refrigeration while waiting to be further processed.

(5) The incorporation of rework into any product should be in accordance with the procedures given in Part 30.3.4 Rework.

(6) Procedures for preventing metal contamination from bowl choppers and mixers, and corrective actions when metal contamination occurs should be established and documented.

30.7 Filling

(1) The petfood preparation or mixture should be hygienically filled into containers (e.g. retail-ready containers, food grade casings, molds etc.).

(2) If a filling machine is used, it should be adjusted properly to achieve portioning accuracy and evacuation of air pockets from the product. Casings should be filled to the correct diameter.

> **Guidance**
> Under-filling and over-filling can affect the quality of the end product. Diameter size influences the rate of heating and drying.

(3) Procedures for preventing the mixing of products from one batch to the next should be established and documented.

(4) If metal clips are used for sealing casings or bags, procedures for preventing contamination from metal clips should be established and documented.

Part 31: Processing treatments

31.1 Scope

(1) This Part discusses the processing requirements for specific types of manufactured petfood.

(2) The contents of this Part have largely been based on the Australian Standard: Manufacturing and Marketing of Pet Food and the FEDIAF Guide to Good Practice for the Manufacture of Safe Pet Foods (Revision 12 March 2010).

31.2 Canned petfood

(1) Manufacturers producing thermally processed low-acid canned product must comply with the requirements of clause 14.10 of the Animal Products Notice: Specifications for Products Intended for Human Consumption 2016 (reproduced below):

14.10 Thermal processing of low-acid canned products

(1) Operators who thermally process low-acid canned products (including aseptic processing and packaging operations) must do so in accordance with the principles of the code or codes in either of:

a) the current edition:

i) of the Code of Hygienic Practice for Low Acid and Acidified Low-Acid Canned Foods, as published by the Codex Alimentarius Commission: (CAC/RCP 23-1979); and

ii) for aseptic processing and packaging operations, of the Code of Hygienic Practice for Aseptically Processed and Packaged Low-Acid Foods, as published by the Codex Alimentarius Commission: (CAC/RCP 40-1993); or

b) the current edition of the United States Food and Drug Administration requirements for Thermally Processed Low-acid Foods Packaged in Hermetically Sealed Containers, as contained in 21 CFR Part 113, and Acidified Foods as contained in 21 CFR, Part 114, as appropriate.

(2) Canned petfood should be subjected to a minimum heat treatment that delivers a lethality of F_0 3.

31.3 Heat treated refrigerated petfood

(1) Heat treated refrigerated petfood, such as dog rolls, should be pasteurised (i.e. cooked) followed by quick cooling to 5ºC or less.

(2) Cooking facilities, such as steam or water cookers and ovens should be properly installed and set up so they provide uniform temperature distribution throughout the unit and equipped with a calibrated measuring device located at the 'cold spot' of the cooker.

(3) Process control applied to heat treated petfood intended for refrigerated storage should include:

a) control of the size and weight of product dispensed into casings or primary packaging to ensure uniform cooking of products in each batch;
b) control and monitoring of heating conditions (e.g. time and temperature, loading configuration, etc.) to ensure that all products are exposed to the required pasteurisation temperature and time;
c) control of product transfer from filling to the heat treatment or from heat treatment to filling and cooling without delay and within a specified time; and
d) storage at 5ºC or less.

31.4 Shelf-stable semi-moist petfood and treats

(1) Semi-moist petfood, such as shelf-stable dog rolls and some types of soft jerky and treats, should be heated treated to a specified time-temperature, which in combination with the adjustment of pH or a_w by drying or addition of additives (e.g. preservatives, humectants, etc.), makes the product microbiologically safe and shelf-stable.

(2) The a_w should be specified taking into account the heat treatment, use of mould inhibitors, pH adjustment and type of packaging. The a_w in combination with mould inhibitors, packaging and storage temperature should be low enough to prevent the growth of microorganisms during storage.

Guidance
Water activity (a_w) can be determined using a calibrated a_w meter. Manufacturers who do not have access to such equipment can measure moisture content, but it is necessary to establish its correlation to a_w for each product.

Selection of samples for testing is important in drying operations as there may be large variation throughout a batch or run. The manufacturer should have good knowledge of their process to ensure that the wettest samples are selected for testing.

(3) Process control applied to semi-moist petfood and treats should include:

a) control of the size and weight of product dispensed into casings or primary packaging to ensure uniform cooking of products in each batch;
b) control and monitoring of heating conditions (e.g. time and temperature, loading configuration, etc.) to ensure that all products are exposed to the required heating temperature and time; and
c) control and monitoring of the use of additives, adjustment of pH, adjustment of a_w or other microbial control processes that are necessary to achieve the stated shelf-life.

31.5 Dried petfood (freeze-dried petfood, dried pet chews and treats)

(1) The drying process and any additional controls (where used) should make the dried petfood microbiologically safe and shelf-stable.

Guidance
Dried meat products are preserved primarily by the reduction of a_w, however, additional controls are normally applied during their commercial production, which contribute to the effectiveness of the process to inactivate or inhibit micro-organisms. Examples of these additional controls are:

- the use of salt and/or anti-microbial agents;
- application of smoke; and
- heating of the meat before drying.

(2) Dried pet chews and treats should be subjected to a heat treatment during processing sufficient to destroy pathogenic microorganisms including *Salmonella*. After treatment, every precaution should be taken to ensure that the product is not exposed to contamination.

(3) Dried petfood should be dried to a moisture content or a_w that will inhibit the growth of microorganisms during storage.

Guidance
At $a_w \leq 0.85$, the growth of all bacterial pathogens of concern is controlled. The growth of moulds and yeast can be prevented during storage by drying to $a_w < 0.80$ and vacuum packing, or by drying and maintaining a_w at ≤ 0.65.

(4) Process control applied to dried petfood should include:

a) control of product size and weight to ensure uniform drying;
b) if heating is applied, control and monitoring of heating conditions (e.g. time and temperature, loading configuration, etc.) to ensure that all products are exposed to the required heating temperature and time;
c) control of drying conditions (e.g. drying time and temperature, relative humidity, vacuum, etc.) to ensure that products are dried to a specified a_w and/or equivalent moisture content to produce a shelf-stable product; and
d) product cooling before packing.

31.6 Dry petfood (extruded or baked)

(1) Dry petfood, such as kibbles, for which the method of preservation is heating through an extrusion or baking process followed by drying should be heated for a specified time and internal temperature which in combination with drying, is sufficient to make the product microbiologically safe and shelf-stable.

(2) Following extrusion or baking, products should be dried to a a_w low enough to inhibit the growth of microorganisms, including moulds. Dry petfood typically has a moisture content of < 10% or a_w of 0.25 to 0.50.

(3) Process control applied to dry petfood should include:

a) control of product size and weight;
b) control of drying conditions (e.g. drying time and temperature, relative humidity, vacuum, etc.), to ensure that products are dried to a specified a_w and/or equivalent moisture content to produce a shelf-stable product; and
c) product cooling before packing.

Part 32: Packing and storage

32.1 Scope

(1) This Part discusses the requirements and procedures for post-process handling, packing and storage of petfood.

32.2 Packing and labelling

(1) The specifications, handling and storage of packaging materials must meet the requirements given in Part 10: Purchase, Handling and Storage of Raw Materials, Ingredients and Packing.

(2) Identification and labelling must meet the requirements given in Part 13: Identification and Labelling of Products.

> **Guidance**
> The NZPFMA *Labelling Guide* gives the detailed information on how to meet the relevant labelling requirements, as well as providing best practice examples. Manufacturers should contact the Association directly for a copy of the guide.

(3) Raw petfood should be packed in new packaging with effective seals to prevent leakage.

(4) Packaging materials should be dispensed in a manner that protects the materials and the product from contamination.

(5) Packaging machines should be set up correctly so that they produce effective seals where this is necessary for product safety. Packaging seal or closure integrity should be checked regularly. This may include visual or physical testing (e.g. complete seal, no cracking or wrinkling, maintenance of vacuum, etc.).

(6) Transport outers of petfood must be labelled with the following information:

a) the contents are not intended for human consumption;
b) the name or description of the product;
c) storage directions where necessary to maintain the safety and suitability of the product
d) lot identification, where applicable; and
e) the name and address of the petfood manufacturer [AC Spec 4.5].

(7) Refrigerated products must be transferred without delay to the chiller or freezer after packing.

32.3 Repacking

(1) Finished products that do not meet packaging specifications (e.g. coding, labels, etc.) may be repacked without receiving any additional treatment provided that the products:

a) have not been dispatched;
b) are not past their shelf-life; and
c) are of acceptable quality and have been handled properly.

(2) Repacking of product due to damaged packaging must be done in a manner that minimises contamination. Any product detrimentally affected as a result of the packaging damage must be considered as non-complying product.

(3) The label of repacked products must indicate the original production code and the shelf-life given must be based on the original date of production of the product.

32.4 Storage

(1) Chilled products should be maintained at +5ºC or cooler and frozen products at -12ºC or cooler.

(2) The chiller and freezer temperatures should be monitored regularly.

(3) Chillers should not be loaded beyond their capacity.

(4) Procedures should be in place for identifying and holding finished product awaiting test results for release.

(5) A first-in-first-out or plant specific rotation inventory control system should be maintained for finished products.

(6) Products with damaged packaging should be handled in a manner that will minimise:

a) the exposure or spillage of the product (e.g. products can be wrapped and sealed);
b) contamination or deterioration of the product; and
c) contamination of other products and the storage area.

32.5 Dispatch

(1) Products should be released in accordance with the procedures discussed in Part 17: Dispatch of Petfood Materials and Products.

Appendix 1: Schedule 1 - Specification for operator supply of clean water

Reproduced from the Animal Products Notice: Specifications for Products Intended for Animal Consumption signed 27th April 2017.

cl 1.2, definition of "clean water"

Initial Assessment of Water Supply Status

(1) Animal product operators supplying clean water solely for the use of the animal product operator, within a premises or place, must assess all of the applicable water sources to demonstrate they do not result in affecting the fitness for purpose of animal material or product. Animal product operators supplying water for the above purpose must keep a copy of the completed assessment as part of the risk management programme.

Reassessment of Water Supply Status

(1) The clean water supply must be reassessed:

a) every five years;
b) whenever a new source of water is used in the plant; and
c) within a month of there being a change to the environment on or around the water source that may affect the water quality.

Ongoing Water Monitoring

(1) Clean water must be subject to ongoing monitoring according to the following requirements:

a) clean water must meet the criteria at the point of use according to the testing frequency set out in Table 1 Testing requirements;
b) microbiological testing must be performed by or under the supervision of a recognised signatory of a LAS laboratory, or a ISO/IEC 17025 accredited laboratory with the required tests in the laboratory's scope of accreditation; and
c) the animal product operator must ensure that the training of water samplers is undertaken by a laboratory referred to in clause (b).

Table 1: Testing requirements

Clean water Quality Testing programme for a private/own supply		
Measurement	**Criteria**	**Test Frequency**
Faecal coliforms	Must not be detected in any 100 ml sample	6 monthly
Turbidity	Must not exceed 5 NTU	6 monthly
Chlorine (when chlorinating)	Not less than 0.2 ppm (mg/L) free available chlorine with a minimum of 20 minute contact time	Daily
pH (when chlorinated)	6.6 – 8	6 monthly

Appendix 2: Schedule 2 - Competency specifications

Reproduced from the Animal Products Notice: Specifications for Products Intended for Animal Consumption signed 27th April 2017.

Ante-mortem and post-mortem examiners of mammals for petfood

(1) The competency specification referred to in clause 3.16 for ante-mortem and post-mortem examiners of mammals for petfood includes one of the qualifications listed below. The qualifications held may be species specific:

a) National Certificate in Meat Inspection Services, Registered by the New Zealand Qualifications Authority (NZQA); or
b) Certificate of Meat Inspection, issued by the Director, Meat Division, MAF; or
c) Certificate of Competency for meat inspection issued by MAF Quality Management; or
d) Qualification in Meat Inspection issued by the Australian Quarantine and Inspection Service (AQIS); or
e) Registration as a veterinarian under the Veterinarians Act 1994; or
f) National Certificate in Meat Processing - Petfood (Safety); or
g) National Certificate in Animal Product Examination Services (Petfood) with strands in Ante-mortem Examination, and Post-mortem Examination; or
h) any alternative qualification that the Director-General recognises as equivalent to any of the qualifications specified in clauses (a) - (g) above.

(2) For the qualifications listed in clause (1), the examiner must be qualified for the ante-mortem or post-mortem examination being undertaken.

(3) For the National Certificate in Meat Inspection Services described in clause (1)(a), an ante-mortem examiner must hold the Optional Advanced Meat Inspection Service Strand of that Certificate for the same species as the post-mortem qualification.

(4) Any person performing ante-mortem or post-mortem examinations must have, and be able to demonstrate knowledge of all specifications and other legislation and regulatory requirements relevant to ante-mortem or post-mortem examinations.

Supervisors of thermal processing of low-acid canned products

(1) The competency specification referred to in clause 3.16 includes any of the following qualifications:

a) Principles of Thermal Process Control, Acidification and Container Closure Evaluation, Massey University;
b) Retort Supervisors Course, DWC Pty Ltd, Australia;
c) NZ Retort Supervisors and Process Control School, Food Processing Specialists Pty Ltd, Australia; or
d) Any alternative qualification that the Director-General recognises as equivalent to any of the qualifications specified in clauses (a) - (c) above.

Qualified cannery persons for thermal processing

(1) The competency specification referred to in clause 3.16 includes any of the following qualifications:

a) Qualified Cannery Persons (Thermal Processing) Course, University of Western Sydney (Hawkesbury) Australia;
b) Approved Persons Course for the Thermal Processing of Low-Acid Foods, Food Science Australia, Werribee, Australia;
c) Introduction to the Fundamentals of Thermal Process Evaluation, Massey University, Palmerston North, New Zealand; or
d) Any alternative qualification that the Director-General recognises as equivalent to any of the qualifications specified in clauses (a) - (c) above.

Appendix 3: Schedule 3 - Approved inks

Reproduced from the Animal Products Notice: Specifications for Products Intended for Animal Consumption signed 27th April 2017.

cl 1.2, 4.4 (2)(b), 4.4 (2)(c)

Denaturing inks

(1) Inks for denaturing animal material or product must be prepared from the following dyes:

a) Brilliant Green, colour index number (CI) 42040;
b) A green dye, colour index number (CI) 42053, variously named Fast Green FCF or FD & C No.3 Green;
c) Green S, colour index number (CI) 44090; or
d) Green vegetable dyes.

Petfood carcass stains

(1) Inks for marking petfood must be prepared from the following:

a) A black dye, colour index number (CI) 28440, variously named Food Black, Brilliant Black, Permicol Black or Hexacol Black PN;
b) Charcoal; or
c) any of the solvents and diluents listed in clause (2).

(2) Inks for marking petfood may contain any of the following solvents and diluents:

a) Ethanol;
b) Ethyl acetate;
c) Edible grades of hardened vegetable fat;
d) Glycerol in its mono, di and tri-acetic acid esters;
e) Hydrogenated castor oil, Sett HR1;
f) Isopropyl alcohol; or
g) Propylene glycol.

(3) The labelling of these inks must contain a list of all constituents.

Appendix 4: Ante-mortem assessment of farmed mammals

A. General

The following table provides the general guidance that apply to **all** slaughter operators of farmed mammals for petfood.

Table A: General guidance for on-farm slaughter of farmed mammals for petfood

No.	Topic	Requirements	
1.	On-farm slaughter of farmed mammals for petfood	Only primary processors who have documented procedures for this activity within their registered RMP.	
2.	Generally fit and healthy	To be eligible for on-farm slaughter, farmed mammals must be assessed as generally fit and healthy by a trained petfood examiner. The following provides general information regarding what is considered to be generally fit and healthy. It also provides information as to what would be considered not generally fit and healthy and therefore may not be suitable for petfood.	
		Generally fit and healthy	**Not generally fit and healthy** (and therefore not suitable for petfood)
		Animals should exhibit the following symptoms: • ears pricked and locating sound; • eyes bright and follow movement; • generally aware of surrounding environment; • able to stand and bear weight evenly on all limbs; • may move away on being approached; • bright and alert; or • normal behaviour. Normal temperatures at rest are: • 38.0˚C for horses; • 38.5˚C for cattle; and • 39.0˚C for calves, sheep, goats and pigs.	Animals exhibiting some or all of the following symptoms: • ears drooped, not moving; • eyes semi-closed, not following movement; • sitting or lying, with head drooped or on the ground; • not interested in surrounding environment; • diarrhea / scour; • abnormal behaviour; • increased breathing and panting; • laboured breathing without any obvious cause; • signs of excessive or unusual discharge from eyes, nose, mouth, vagina or rectum; • dull and depressed; or • abnormal temperature.

No.	Topic	Requirements
		These may vary by 0.5˚C up or down and vary during the day. For some of these animals, the stress of measuring the temperature is enough to cause it to rise.
4.	Animals acceptable for transport – fit and healthy horses or cattle (excluding calves)	Horses and cattle (excluding calves) must be capable of being transported under the Animal Welfare Act 1999 and relevant codes of welfare and animal welfare regulations issued under this Act. RMP operators must have specific written approval from MPI to carry out this activity. Application must be made in writing to MPI. The resulting animal product is not eligible for export.
3.	Timely action	The welfare of the animal is paramount. Decisions and interventions must be undertaken in a timely manner, so as to avoid unnecessary pain or distress of the farmed animal. The petfood processing operator should remind the owner that they have obligations under the Animal Welfare Act 1999 if they: • determined an animal is not suitable for petfood (e.g. during initial telephone call from the owner); or • is unable to attend to an animal in a timely manner. The animal must be treated (including veterinary treatment where appropriate) or destroyed humanely, if it is suffering unreasonable or unnecessary pain or distress.
4.	Ante-mortem examination – general	All farmed mammals must be subjected to, and pass, ante-mortem examination in accordance with clause 8.3 of the AC Spec.

B. On-farm slaughter for humane reasons

The following table provides the general guidance for the on-farm slaughter for humane reasons, of farmed mammals for petfood.

Table B1: Assessment for on-farm slaughter for humane reasons

No.	Topic	Requirements
1.	General requirements	Comply with **Table A: General Requirements for On-farm Slaughter of Farmed Mammals for Petfood**
2.	Ante-mortem examination – **additional requirements** for animals being slaughtered for humane reasons	When assessing the animal as being generally fit and healthy the ante-mortem examiner should consider whether the suspected condition will affect the animal's suitability for purpose. **Note**: • The resulting animal product is subject to post-mortem examination. The disposition will be affected by the extent of the defect or condition at this examination. • The animal must not be processed into petfood if after post-mortem examination: – an animal fails to meet the requirements relating to the suspected condition (e.g. too advanced); or – there is reason to suggest the animal is generally ill or suffering from any condition other than those provided for in these requirements.
3.	Specified conditions for slaughter on-farm for humane reasons	**Table B2: Specific Conditions for On-Farm Slaughter for Humane Reasons** - to be eligible for on-farm killing for humane reasons a farmed mammal must have one of the specified conditions described in Table B2: Specific Conditions for On-Farm Slaughter for Human Reasons below. **Note**: These specific conditions: • should be read in conjunction with the Petfood Examiner's Reference Manual – Ante-Mortem. This manual provides additional detail including ante-mortem signs; and • would prevent the humane transport of the animal for human consumption. **Note**: The Animal Welfare (Calves) Regulations (5) prohibit the use of blunt force to the head to kill (young) calves except in specific circumstances. A (young) calf must be in severe pain or distress and, as a result, require immediate humane destruction and there must be no reasonably practicable alternative to the use of blunt force available. Refer to the Animal Welfare regulations for full details of the requirements.

Table B2: Specified conditions for on-farm slaughter for humane reasons

Conditions	Species	General explanation	Requirements / supporting evidence
Traumatic injury e.g. • broken leg; • dislocated limbs; • mounting causing split pelvis; • fighting injuries.	All	An animal showing recent signs of injury through traumatic event (damage to nerves, bones or the musculo-skeletal system) to a localised region of the body. **Likely ante-mortem signs:** • haemorrhages or injuries, dislocation; • animal may be sitting, but not lying down; • reluctance to move; • lameness; or soft tissue injuries, bleeding, cuts.	**Where an animal is suffering pain and distress, it must be humanely killed as soon as possible. Where:** • the animal exhibits signs of lameness or pain when moving; or • there is clear evidence of fracture, dislocation or swelling of the joint. **Note**: in some cases of localised swelling, lameness or pain to the joint, it may not be possible to clearly differentiate between other causes of lameness e.g. infective arthritis. In these cases the animal may be killed on humane grounds and subject to (intensified) post-mortem examination procedures.
Emaciation	All	An animal that has lost condition, due to a lack of feed, so that it would be inhumane to transport it. This may be due to: • drought; • being snow bound (and potentially suffering from exposure); • starvation; or • nutritional deficiency. **Likely ante-mortem signs:** • animal is very thin; or • very weak, reluctant to move.	When the body condition score is below those defined in the codes of welfare urgent remedial action must be taken to either improve condition or humanely kill the animal. In the case of drought or snowbound event there is clear evidence that the general procurement area or farm is experiencing either of those events. **EXCLUSION:** Animals that have become emaciated through a disease. The disease should be assessed recognising that it has caused emaciation which may change the ante-mortem decision.
Any metabolic disease	All, especially dairy cattle	Cows which are down as a result of a metabolic condition such as milk fever and which have not responded to treatment.	These animals must be specifically assessed as fit for processing into petfood. When making this assessment consideration must be given to any previous history or treatment the animal may have had which would affect its suitability for petfood. This

Conditions	Species	General explanation	Requirements / supporting evidence
			includes any therapeutic treatment given and the diagnostic history of the animal. This assessment must either be undertaken by either: (a) an ante-mortem examiner; or (b) a **practising veterinary clinician** must provide, within the last 36 hours, the supplier with a Veterinary Certificate or Veterinary Practice Docket declaring that in their opinion the animal is fit for processing into petfood. This document must include the following information: i) the owner's name; ii) the cow's ear tag and herd identification number; iii) a statement that the cow shows no evidence of a septic or toxic condition; iv) the fact that the animal is not fit to be transported; v) time of examination; vi) veterinarian's signature and date; and vii) veterinary practice address. The supplier must provide to the petfood primary processor: • the Veterinary Certificate or Veterinary Practice Docket; and • the supplier statement.
Calving paralysis	Cattle, especially dairy	An animal that shows signs of full or partial paralysis of the hind legs.	• the animal exhibits signs of weakness or paralysis in one or both hind legs and is unable to stand; or • there is a temporal association of pregnancy and calving. **Note:** calving paralysis is caused by damage to the hind leg nerves associated with the calving process. In particular it occurs where the calf is large relative to the size of the pelvis.
Cancer eye (squamous cell carcinoma)	All	Cancer eye, where the size and location of the lesion(s) means, that it is likely to be injured during transport, or associated with mucopurulent discharge (secretion of fluid containing mucus and pus).	There are specific requirements describing those cancer eye lesions that are ineligible for transport. The Petfood Examiner's Reference Manual – Ante-Mortem is another option for those cancer eye cases that have advanced beyond the stage that

Conditions	Species	General explanation	Requirements / supporting evidence
			allows them to be acceptable for transport. However the Petfood Examiner's Reference Manual – Ante-Mortem is not to allow carte blanche acceptance of neglected cancer eye cases to be processed for petfood. **EXCLUSION**: Signs of gross osseus (bony) involvement or a significant systemic involvement would make any such animals ineligible for processing into petfood.
Ingrown horns	Horned animals	Such animals are likely to be injured during transport.	When the horns are placing pressure on the animal's head and contacting the skin or eye.
Prolapsed uteri (womb) or rectum	Pig, sheep, cattle, goats		Each prolapse should be examined to rule out any condition that may impact on the animal's suitability for processing into petfood e.g. evidence of gangrene. Determine what steps are needed to ensure hygienic processing.

C. Conditions not acceptable for petfood

The following table provides a list of conditions that are not acceptable for petfood. This is not an exhaustive list, so the ante-mortem examiner must always consider whether a condition will make it unacceptable for petfood.

Table C: Conditions not acceptable for petfood for ALL species

No.	Condition	Explanation
1.	General systemic illness, sick, or showing evidence of an infectious disease	As described as not generally fit and healthy in Table B1: Assessment for On-farm Slaughter for Humane Reasons. These animals should not be held for extended periods and instead should be humanely euthanised as soon as possible.
2.	Diarrhea (enteritis)	Bloody or gangrenous.
3.	Gangrene/Necrosis	Infection and break-down of tissues. Absorption of poisons from affected area can causes paralysis and death. Where the gangrene/necrosis is localized e.g. to the udder the affected tissue can be trimmed and the rest of the carcass acceptable for processing (no sign of systemic involvement from infection or toxin). **Ante-mortem signs of a generalised condition:** • characterised by strong offensive smell; • green/black tissue around infected area; • fever; • animal dull and depressed; • animal down; • may be an associated injury, like muscular or bone injuries, mastitis; • foul-smelling faeces, may be blood; or • animal will be obviously sick. **Note**: could be more than one animal affected, some may be dying or dead.
4.	Salmonellosis	**Ante-mortem signs of a generalised condition** (serious bacterial infection of the intestines): • foul-smelling faeces, may be blood; or • animal will be obviously sick. **Note**: could be more than one animal affected, some may be dying or dead.

No.	Condition	Explanation
5.	Septicaemia	**Ante-mortem signs of a generalised condition** (infection of the circulatory system): • will either be systematically ill or dying; • pin-head haemorrhages on mouth lining may be evident; or • often associated with a disease: enteritis, arthritis, mastitis, abscess.
6.	Toxaemia	**Ante-mortem signs of a generalised condition** (toxins circulating in the blood stream)**:** • will either be systematically ill or dying.