



Memorandum

To: Listed further (petfood) processors

Cc: Matthew Stone, Director Animal and Animal Products
Chris Mawson, Agency Technical Manager Verification Agency
Diane Carter, Manager Systems Audit

From: Judy Barker, Manager Animal Products

Date: 9 October 2014

Subject: **TRACKING SYSTEM TEMPLATE FOR FURTHER PETFOOD PROCESSORS**

Introduction

As a 'further (petfood) processor', as defined in the clause 1.2 Definitions of the Animal Products Specifications for Products Intended for Animal Consumption Notice issued on 9 October 2014, you are required to meet a number of legal requirements under the Animal Products Act 1999. These requirements are outlined in the attached guidance document. In summary the three significant requirements that you must meet are:

1. listing with MPI; and
2. procuring animal material for further (petfood) processing only from regulated sources; and
3. having a documented tracking system that demonstrates compliance with the requirement to only procure from regulated sources.

The new notice Animal Products Specifications for Products Intended for Animal Consumption Notice issued 9 October 2014 replaces the 2009 amendment that introduced the requirements relating to 'further (petfood) processors' and the original 2006 notice.

MPI is not being actively notified of a change in circumstances that impacts the listing of a further petfood processor. Others simply ceased trading or sold the business, so the list gradually became out of date. It became clear during the review that a renewal listing system was required to ensure information was kept current. Maintaining a current list would provide the necessary information to rapidly trace and locate processors should an adverse event occur. The list is also used for 'slice of life' audits intended to assess the performance of the sector.

As part of the review process the Approvals and Appointments Team in MPI will take over the responsibility for managing the listing process from the Animal Products Team. This has provided the opportunity to also instigate the provision of charging for listing. The requirement for only procuring animal material from regulated sources and maintaining a Tracking System is still in place.

Further Petfood processors have previously received a listing from MPI without being charged any fees, and without any assessment costs associated with that listing being recovered.

The listing changes that will be introduced include:

- re-applying for listing every two years; and
- the introduction of cost recovery fees.

Any fees will not apply for current listings until at least after the Fees, Charges and Levies Regulations are reviewed and gazetted, which is anticipated to be 1 July 2015. As this notice commences 9 October 2014, the re-application for listing every two years will not come into force until 9 October 2016 and hence any re-

application fees for currently listed further petfood processors will not apply until after that date. The application fees are detailed in the application form AP61 located at:
<http://www.foodsafety.govt.nz/industry/sectors/petfood-inedibles/documents/forms/>

Secondary processors operating under a registered RMP not affected by these changes.

A secondary processor of petfood, who is operating under a registered RMP that covers all petfood operations, is not a 'further (petfood) processor'.

RMP operators do not need to meet requirements that specifically apply to 'further (petfood) processors', namely Part 7A of the Animal Products (Specifications for Products Intended for Animal Consumption) Notice 2006. Secondary processors of petfood may be operating under a registered RMP because they are required to (because they export and require official assurances) or have elected to.

Tracking System Template

The Tracking System template (and accompanying guidance) originally issued by the New Zealand Food Safety Authority has been updated with minor changes. Electronic copies are available on the 'Petfood' subject page on the MPI Food Safety web site at: <http://www.foodsafety.govt.nz/elibrary/industry/further-food-processors-guidance/index.htm>

This template has specifically been written to assist retailers who receive animal product, process it by size reduction and/or packing, and then sell the resulting product through their retail premises. If you do not fall into this broad grouping you may still use this template. In this case you may find that the complexity of your operation means that the example record forms are too simple for your operation. If this is the case, you will need to use your own existing record forms or develop your own.

Use of the MPI developed tracking system is not a requirement therefore you can still develop your own system.

Verification and 'slice of life' reviews of 'further (petfood) processors'

All 'further (petfood) processors' will be subject to checks by MPI to ensure that they are complying with the requirements outlined in the attached guidance document.

'Slice of life' reviews of certain 'further (petfood) processors'

If you only:

- process by size reduction (e.g. dicing, mincing, milling and grinding) and/or packing; and
- only sell the resulting animal product by retail

then you will only be subject to a 'slice of life' review by the Systems Audit Team of MPI. You will not be charged any part of the cost of these reviews.

A 'slice of life' review is intended to provide an indication of the performance of a particular sector rather than individual processors. As a result a number of processors would be visited during a review of this group of 'further (petfood) processors'. Any issues identified at an individual processor would still need to be rectified.

If a 'slice of life' review shows the performance of this category of 'further (petfood) processors' is unacceptable MPI may introduce a routine verification programme for this category.

If your operation is more extensive than that described above and includes either:

- undertaking processes other than size reduction and/or packing such as: boning, drying, heat treatment (e.g. cooking, baking, dog roll manufacture); and/or
- wholesaling animal material or animal product

then you will be subject to routine verification by the MPI Verification Services.

This verification will be in accordance with the Verification Statement of Policy 2005 and subsequent amendments including the Amendment to Verification Statement of Policy 2009. This verification is performance based and commences at an initial frequency of yearly which is also the maximum possible duration between audits. If the outcome of an audit is unacceptable the frequency of audits will increase, with the first step being down to 6 monthly.


You will be charged for these verification audits. The charge will reflect the verifier's time relating to the verification, including preparation, on-site visit and writing up the result of the verification. A cost will also be incurred to cover the verifier's travel costs. The overall cost will depend on the complexity and size of the operation.

If you have any queries regarding the tracking system template and accompanying guidance please contact:

Janice Attrill
Specialist Adviser (Animal Products)
Regulation and Assurance Branch
Ministry for Primary Industries
PO Box 2526
Wellington 6140

Alternatively, queries can be emailed to: animal.products@mpi.govt.nz.

Yours faithfully



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