



Petfood Processing

Chapter 4 Harvesting and Processing of Wild Animals

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Draft for
Consultation

TITLE

Operational Code: Petfood Processing

COMMENCEMENT

This Operational Code is effective from [Effective Date]

REVOCATION

This replaces the Code of Practice for Petfood Processing Part 2.2: Harvesting and Processing of Wild Rabbits, Hares, Wallabies, Possums, Goats and Deer, 9 October 2014.

ISSUING BODY

This Operational Code is issued by the Animal Products Team, Regulation & Assurance Branch, MPI

Dated at Wellington this ... day of 2017

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Contents	Page
Introduction	3
Part 1: Definitions	5
Part 2: Application and Scope of this Chapter	9
2.1 General Requirements	9
2.2 Petfood Safety Hazards Associated with Wild Animals Harvested from the Field	9
2.3 Use of animal material fit for human consumption for petfood processing	10
Part 3: Harvesting and Supply of Killed Wild Animals	12
3.1 Scope	12
3.2 Approved Supplier	12
3.3 Facilities for Handling and Storage of Wild Animals	13
3.4 Requirements for the Harvesting of Wild Animals	14
3.5 Confirmation of the Poison-use-status of the Land	17
3.6 Harvesting Procedures	19
3.7 Hygienic Practices	20
3.8 Wild Animal Material Supplier Statement	21
3.9 Delivery of wild animal carcasses	21
3.10 Records	21
Part 4: Primary Processing of Killed Wild Animals	22
4.1 Scope	22
4.2 RMP Requirements	22
4.3 Receiving of Killed Wild Animals	22
4.4 Processing	23
4.5 Post-mortem Examination of Wild Animals for Petfood	24
4.6 Records	25

Introduction

- (1) Chapter 4 of the Petfood 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 of the Act; and
 - b) produce petfood that is safe and suitable for animal consumption.
- (2) It has been developed by the Ministry for Primary Industries (MPI), in consultation with the New Zealand Petfood Manufacturers Association (NZPFMA).
- (3) This introduction is not part of the Operational Code, but is intended to indicate its general effect.

Purpose

- (1) This chapter provides guidance on ensuring harvested wild animals are fit for processing into petfood. It has been developed mainly for petfood processors and manufacturers operating a risk management programme (RMP).

Scope and Application

- (1) This chapter discusses the relevant requirements for the harvesting, refrigeration and processing of wild animals under the APA and its subordinate legislation, particularly the Animal Products Notice: Specifications for Products Intended for Animal Consumption (signed on the 6th October 2014) and how they can be practically met by petfood RMP operators.
- (2) This document applies to all wild animal suppliers and RMP operators involved in harvesting, refrigeration and processing of wild animals into petfood.
- (3) Wild animals can include hunted game estate animals. Wild animals includes (but is not exhaustive):
 - rabbits and hares;
 - wallabies;
 - possums;
 - wild birds;
 - pigs;
 - goats; and
 - deer.
- (4) This Code has been developed based on New Zealand standards and requirements only. Export requirements are not covered in this Code. 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.
- (5) The development and revision of existing chapters is being undertaken in a staged manner and it is intended that the Code will combine all the chapters into one document towards the end of this process.

Who should read this Operational Code?

- (1) This Code should be read by:
 - a) petfood RMP operators;
 - b) suppliers of wild animal material for processing into petfood;
 - c) transport operators;
 - d) regulators; and
 - e) verifiers.

Why is this important?

- (1) This chapter clarifies MPI's expectations on how relevant petfood regulatory requirements may be met and the management of risks associated with wild animals being used in petfood. This will assist petfood processors and manufacturers and RMP verifiers to have a consistent understanding of the requirements and their applications.
- (2) A code is intended to be a guide on how to meet APA 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.
- (3) MPI and the NZPFMA are committed to ensuring that any field harvesting of wild animals is conducted in accordance with these industry agreed requirements.

Layout of this Chapter

- (1) Regulatory requirements, recommended procedures and guidance information are distinctly differentiated in this document.
- (2) 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:

APA - the Animal Products Act 1999

AP Reg - the Animal Products Regulations 2000

AC Spec - the Animal Products Notice: Specifications for Products Intended for Animal Consumption signed on the 6th October 2014

RMP Spec - the Animal Products (Risk Management Programme Specifications) Notice 2008

- (3) 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.

- (4) Guidance or supplementary information

Guidance

Guidance material is presented in a box. It provides explanatory information, options or examples for achieving a particular outcome or requirement.

Part 1: Definitions

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

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 Supplier means a person assessed by a petfood operator as competent in accordance with Clause 7.11 of the Animal Products (Specifications for Products Intended for Animal Consumption) Notice 2014

buffer zone means the distance between the boundaries of an area of land that is poisoned to the point where it is acceptable for the animals to be hunted. Buffer zone distances are measured as a straight line on a horizontal plane, or “as the crow flies” (see [Figure 2 Poisoned Area and Buffer Zones](#))

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

contaminant means any substance or thing which:

- a) is undesirable, potentially harmful, or unexpected in a particular product or process; and
- b) is or may be present in, or in contact with, animal material or animal product

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:

- the red deer (*Cervus elaphus*);
- sika deer (*Cervus nippon*);
- fallow deer (*Dama dama*);
- white-tailed deer (*Odocoileus virginianus*); and
- 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 the preparing, marking, processing, packing, storing, carrying, or handling of any animal material, animal 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

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

- domestic goat (*Capra aegagrus hirus*);

- Thar (*Hemitragus jemlahuis*); and
- Chamois (*Rubicara rubicara*)

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;
- c) in the case of ground hunting trips - the GPS coordinates in NZTM2000 and time at both the commencement and completion of hunting; and
- d) in the case of helicopter operations - the GPS co-ordinates in NZTM2000, altitude, and time, taken at a maximum of 10 second intervals for the duration of the flight during which the hunting occurred

hare means an animal of the species *Lepus europæus occidentalis*

harvest means to take a wild animal for purposes of trade

hazard means a biological, chemical, or physical agent that is:

- a) in or has the potential to be in animal material or product; or
- b) or has the potential to be a condition of animal material or product; and leads or could lead to an adverse health effect on humans or animals

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

listed means currently appearing on a list of Approved Suppliers maintained by a petfood operator.

List and **listing** have the corresponding meaning

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 (Contaminant Specifications) Notice 2008, as that notice may be modified or replaced under section 167 of the Act

maximum residue limit (MRL) means, in relation to a residue, the maximum permissible level of that residue as specified in the New Zealand (Maximum Residue Limits of Agricultural Compounds) Food Standards 2013, as that standard may be modified or replaced under section 11C of the Food Act 1981 (or the equivalent provision of the Food Act 2014 on commencement of that provision)

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, except:
 - i) 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

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

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 products intended for consumption by pets

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. **Poisoning** has the corresponding meaning

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

rabbit means an animal of the species *Oryctolagus cuniculus*

risk management programme (RMP) has the same meaning as the Act - 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

supplier statement means a statement which is signed by a supplier to confirm that certain requirements of those specifications have been met, and includes electronic supplier statements for farmed animals or wild animals

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

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

wallaby means an animal of the family Macropodidae including:

- Bennett's wallaby (*Macropus rufogrisea*);
- Tammar wallaby (aka Dama wallaby) (*Macropus eugenii*); and
- Parma wallaby (*Macropus parma*)

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

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

wild bird in the context of this Code means a ground-living bird which includes turkey, peacock, quail, pheasant, peafowl and guinea fowl

- (2) References in this Code to subclauses, clauses, appendices and parts are references to subclauses, 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, Regulations or Notice made under the Act and used, but not defined, in this Code has the same meaning as in the Act, Regulations or Notice

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Part 2: Application and Scope of this Chapter

2.1 General Requirements

- (1) Chapter 4 describes the requirements and procedures for the harvesting and primary processing of wild animals for petfood. The typical steps of these processes are shown in [Figure 1 Typical Process for the Harvesting and Primary Processing of Wild Animals for Petfood](#):
 - a) the steps in blue boxes are those undertaken by, and are the responsibility of, the approved supplier; and
 - b) the steps in cream boxes are undertaken by, and are the responsibility of, the petfood primary processor.
- (2) Approved suppliers and primary processors must comply with all regulatory requirements discussed in this Chapter that are relevant to their operation and responsibilities. MPI also expects them to comply with recommended procedures (indicated by the use of “should”), including industry-agreed procedures, unless they have an alternative process, procedure or parameter documented in their RMP which they can demonstrate will achieve the same outcomes.
- (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, of this Code.

2.2 Petfood Safety Hazards Associated with Wild Animals Harvested from the Field

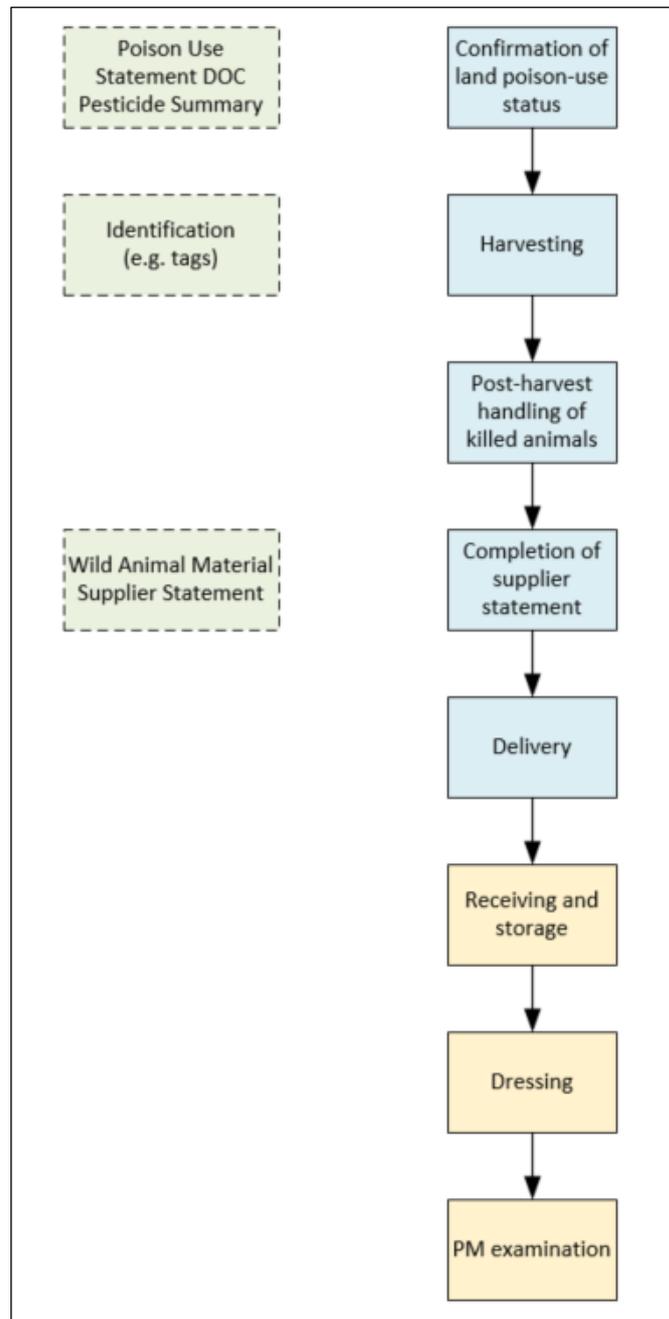
- (1) The requirements and procedures discussed in this Chapter are focused on managing microbiological and chemical contaminants (poisons) on or in wild animals to ensure that petfood derived from these materials are safe and suitable.
- (2) The control of poisons in wild animals is of major importance because of the potential exposure of these animals to poisons that may occur in the areas they were harvested from. Some of these wild animals are defined as pests and thus may be target species for pest control activities while other wild animals may forage the same areas where poisons have been laid and so may have ingested poisons.
- (3) The [NZPFMA Harvesting Wild Animals for Petfood Training Booklet](#) discusses in more detail the poisons that are of concern in wild animals.
- (4) The control of poisons in wild animals harvested for petfood relies heavily on harvesters having the knowledge of, and skills on, proper harvesting procedures and techniques, and their commitment to comply with requirements. This is why only persons that have undergone a supplier approval process are permitted to supply killed wild animals to petfood primary processors.

2.3 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)].

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Figure 1. Typical process for the harvesting and primary processing of wild animals for petfood

**Key:**

- Approved Supplier's responsibility
- Primary processor's responsibility
- Documentation / identification

Part 3: Harvesting and Supply of Killed Wild Animals

3.1 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 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.

3.2 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 petfood primary processor to whom he/she intends to supply wild animal material to, in accordance with the requirements of this section [AC Spec 7.11 (1)].

Guidance

An approved supplier may only supply killed wild animals to a petfood primary processor:

- (a) whose registered RMP specifically includes the harvesting of wild animals within its scope; and
- (b) who has him/her included in their approved supplier list.

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 of the Petfood Operational Code (i.e. this document); 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 petfood primary processor;
 - d) complete the MPI form “[Application to Become an Approved Supplier - Petfood](#)” and then submit it to the petfood primary processor for signing, together with personal identification, such as a driver’s license or firearms license [AC Spec 7.11 (2) and (3)];
 - e) be listed by the petfood processor as an approved supplier under the processor’s RMP; and
 - f) ensure they meet the requirements of [Part 3: Harvesting and Supply of Killed Wild Animals](#) of this Chapter.

- (3) The '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)].

3.3 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.
- (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) 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;
 - free from defects that may affect the suitability for petfood processing; and
 - can be readily cleaned and sanitised.
- (5) Adequate facilities should be provided for the suspension of carcasses (for example rails) in order to avoid contact with walls, floors, ceilings or other structures, fittings and equipment.
- (6) The facility should have a refrigeration unit with sufficient capacity that can achieve the required product temperature within the specified time.

Guidance

The internal carcass temperature 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].

A refrigerator or box freezer may be considered a refrigeration facility.

- (7) The refrigeration unit 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. Refer to Chapter 2 Good Operating Practice, of this Code.

- (8) A supply of clean 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

Clean water means water that is free of excessive turbidity, colour, offensive odour, and pollutants, such as human or animal waste and toxic chemicals.

- (9) Suitable cleaning equipment should be available for the effective cleaning of the building and its facilities and equipment.
- 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.
- (10) Adequate facilities should be provided for the collection and disposal of waste materials, and all waste water should be adequately contained and ducted to a drain.

- (1) Where a toilet facility is provided, it should be located and constructed so it will not adversely affect the hygienic operation of the depot.

3.4 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)].

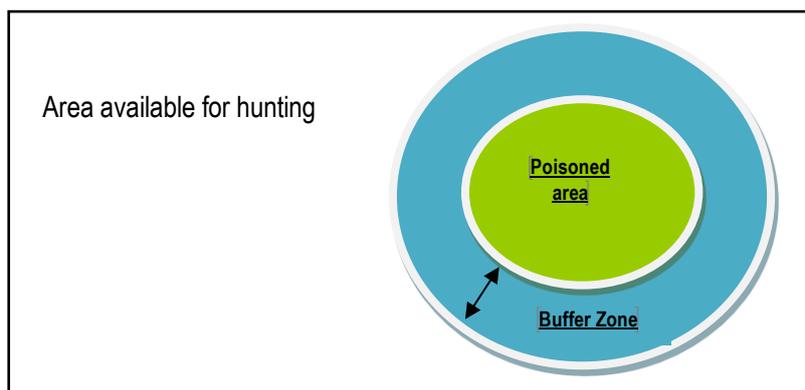
Guidance

Approved suppliers may involve other people in the hunting operation, for example helicopter pilots or other hunters. Where this occurs, the approved supplier must directly supervise the activities being undertaken, as it is their 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:
- the approved supplier has reason to believe would exceed any MRL or MPL; or
 - has been harvested from:
 - any area on which any poison listed in [Table 1](#) has been used; or
 - any area that is within the applicable buffer zone of an area of land listed in [Table 1](#); and
 - when the area is within the applicable caution period listed in [Table 1](#) [AC Spec 7.12 (1) to (5)].

Table 1: Poison groups, caution periods and buffer zones for wild animals [AC Spec 7.12]

Poison Group	0	1	2	3	4
Poison	<ul style="list-style-type: none"> Cholecalciferol Hydrogen cyanide Phosphorus Potassium cyanide Sodium cyanide 	<ul style="list-style-type: none"> Zinc phosphide Para-aminopropiophenone Sodium nitrite Any other poison not covered in groups 2 to 4 (except cyanide or cholecalciferol) 	<ul style="list-style-type: none"> Diphacinone Pindone 	<ul style="list-style-type: none"> Coumatetralyl Sodium monofluoroacetate(1080) 	<ul style="list-style-type: none"> 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
	Hares, thar, wallabies, possum	0	1 km	1 km	1 km
	Goats (excluding thar), deer	0	2 km	2 km	2 km
	Wild birds	0	2 km	2 km	2 km
	Pigs and other species	0	2 km	2 km	2 km

Figure 2: Poisoned area and buffer zones**Guidance****Poisoning Status of Land**

Poisoning activities are carried out on land to control pests and consequently there is potential for the poisons to be consumed by the hunted animals. To ensure that the land from which animals are taken for processing has an acceptable poison status, the approved supplier should check the status of the land prior to the hunt. The supplier must also ensure that the animals are not killed within a certain distance of a poisoned area ('buffer zone') and that they are not hunted for a period of time after poisons have been laid ('caution periods').

Poisons of Concern

The poisons of concern listed in [Table 1](#) have been split into 5 groups based on their likely persistence time in animals following ingestion. 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 1](#). 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](#).

Harvesters should regularly review product registrations and be aware of the currently registered poisons at the time of harvest. The following link provides access to the Agricultural Compounds and Veterinary Medicines database – [Database of Registered Trade Name Products and Active Ingredients](#). This link provides access to up-to-date database of registered products, their trade names and active ingredients.

Buffer Zone

A buffer zone is the distance between the boundaries of an area of land that is poisoned to the point where it is acceptable for the animals to be hunted. Buffer zone distances are measured as a straight line on a horizontal plane, or as the crow flies. For a diagram of a poisoned area and its associated buffer zone see [Figure 2 Poisoned Area and Buffer Zones](#).

Buffer zone distances are determined using information about the roaming distances of different species and the properties and persistence of the poisons. The distance of the buffer zone for each species and each poison is listed in [Table 1](#).

An approved supplier must ensure that the hunted animals are not taken from within a poisoned area or the buffer zone distance of the poisoned area. For example if brodifacoum has been used, pigs must not be hunted within 5km of the poisoned land.

The buffer zone may be extended by any person (for example, any government or local authority, regional council, poisoning operator, land owner or hunter) when circumstances which may increase the likelihood of contact with poisons occur, for example aerial dropping of poisons, change in migration patterns of animals, geographical features such as long valleys, known grazing ranges. Consultation and notification are the normal methods for communicating the extension, for example aerial drops with a community.

Caution Period

The **caution period** is the amount of time between when poison is used on the land to when that land is acceptable for hunting. The caution periods are determined based on their persistence times in sub-lethally exposed animals. The caution periods for each poison group are listed in [Table 1](#).

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) Regardless of subclause 3.4 (2), an approved supplier may present wild animals for primary processing, except pigs, harvested from any privately owned land if:
- a) all poisons used were poisons in groups 1, 2 or 3 of Table 1, and were:
 - i) used solely in bait stations that were correctly situated;
 - ii) used solely in, or adjacent to, buildings that could not be accessed by the applicable animal; or
 - iii) were 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.

- (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 vector free from Tb (bovine tuberculosis) by TBfree New Zealand [AC Spec 7.12 (6)].

Guidance

Tb vector-free areas

The harvesting of wild possums and deer for petfood should 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>.

3.5 Confirmation of the Poison-use-status of the Land

- (1) The approved supplier must provide the petfood primary processor with:
 - a) a correctly completed Landowner / Manager Poison Use Statement - Petfood, where the wild animals have had access to privately owned land; or
 - b) a Department of Conservation Pesticide Summary, where the wild animals have had access to land wholly or partly administered by DOC [AC Spec 7.13].
- (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)].

Guidance

Landowner/Manager Poison Use Statement - Petfood

Completing the Statement

'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 Poisons Use 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 Poison Use Statements, 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 is given on the back of the form to assist the responsible person when completing the statement.

It is important that the trade name pesticide product is linked with the active substance when completing the statement. To assist, the responsible person may need to look at the product labels, use other records or the internet to confirm what these are.

Any poisons used on the land (except sodium cyanide, potassium cyanide and cholecalciferol) must be listed on the statement, regardless of whether they have been applied in bait stations, bait bags, within farm buildings, by aerial drop or any other means. They must also be listed regardless of whether they have been laid by the responsible person (landowner or manager) or any other person or agency (for example contractors or councils).

Timeframes of Concern

When completing the Poison Use Statement, the caution periods for each poison group define the timeframes that need to be considered.

For Group 1 poisons, the responsible person needs to list any of those poisons laid over the last month. For Group 2 poisons the previous 2 months needs to be considered. For Group 3 poisons the previous 4 months needs to be considered and for Group 4 poisons the previous 3 years needs to be considered. For example the responsible person needs include on the statement any brodifacoum that has been laid over the previous 3 years, or any pindone that has been laid over previous last 2 months.

Land Area Covered by the Statement

The land area covered by the statement must be clear. To achieve this, the statement must include the farm address and a description of its physical boundaries. To assist further, a copy of a topographical map with the property boundaries marked could be signed and attached to the statement.

Inaccessible Poisons

The statement requires the responsible person to indicate whether the poisons in Groups 1, 2 or 3 have been laid in a way that the hunted animals (excluding pigs or possums) could not access them.

Poisons in Groups 1, 2 and 3 are considered inaccessible to the hunted animals if they:

- (a) were used solely **bait stations** that were correctly situated; or
- (b) were used solely in or around buildings (such as farm buildings) that could not be accessed by the animal; or
- (c) could not be accessed by the animals due to impassable geographical features (such as rivers, sea, cliffs or steep ravines).

Bait stations are defined as a rigid device or container designed or adapted to physically contain baits in such a way as to:

- (a) allow unrestricted access by target pests while preventing or minimising spillage of bait and access to off-target species; and
- (b) protect baits from the elements and extend their usable life.

A correctly situated bait station means that it is located so as to be inaccessible to the hunted animals, for example at a certain height above the ground. For more information about the correct use of bait stations, refer to the Code A13, Responsible Use of Bait Stations: An Operator's Guide, available on the National Pest Control Agencies website at www.npca.org.nz.

If the responsible person has any reason to believe that the poisons could be accessed by the hunted species, he or she must answer 'no' to the applicable questions.

Poison Use Statement Validity and Amendments

The completed Poison Use Statements are valid for 3 months from the date of signing. Poison Use Statements should be kept by the Approved Supplier for 1 year from the date of signing.

DOC Pesticide Summaries

DOC Pesticide Summaries describe poisons used on land managed or administered by the Department of Conservation. 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.

When are Statements of Poison Use Needed?

Poison Use Statements or DOC Pesticide Summaries must be provided to the primary processor to cover the period of time during which the hunting occurs and for each area of land from which the animals are taken.

In addition, if animals are procured within the following distances of the boundaries of neighbouring properties, statements of poison use must also be provided for the neighbouring properties:

- (a) 200m for rabbits;
- (b) 1km for hares, thar, wallabies and possums;

- (c) 2 km for deer, goats, chamois and water buffalo; or
- (d) 5 km for pigs and any other species.

For example if an approved supplier is hunting deer within 2 km of a neighbouring property, he/she must provide a statement of poison use for both the land being hunted and for the neighbour's property.

The statements must be provided to the primary processor when submitting the carcasses for processing, or at any other time provided the primary processor has the required statement(s) when processing the animals.

3.6 Harvesting Procedures

3.6.1 Condition of animal

- (1) Wild animals must show no observable signs of being sick or dying 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 or certified game estate supplier are eligible for processing. For example an animal that dies as a result of drowning while being hunted is not eligible for processing. Direct supervision means that the approved supplier should be in sufficiently close proximity to be able to observe the person performing all procurement activities.

3.6.2 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.
- (2) 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 risk of lead being present in the final product. Animals killed with a shotgun are also more difficult to process, often requiring extensive trimming and resulting in considerable wastage.

There are specific requirements for [leg hold traps and glueboards](#), or go to the MPI website and search on 'traps'.

3.6.3 Identification of harvesting location and killed wild animals

- (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 identify killed wild animals individually or as groups of animals and ensure that they are clearly linked to the supplier statement applicable to the animal or group of animals [AC Spec 7.16 (3)].

Guidance

The approved supplier must tag or otherwise identify each animal or group of animals submitted for processing. This allows the processor to match each animal with the waypoint, waypoint identifier and the supplier statements provided by the supplier with each consignment.

For small animals (hares, rabbits, wallabies or live possums) and where topographical maps are used to provide information about the hunt, the carcasses or live animals may be individually identified or identified as a group. If carcasses or live animals are identified as a group, all animals in the group must be killed or captured:

- (a) in an area covered by a single Poison Use Statement or DOC Pesticide Summary;
- (b) on areas of land that have the same poisoning status;
- (c) on the same date; and
- (d) by the same approved supplier.

The tag or other identification should be attached to the animal at the location where it comes to rest immediately after it is killed or is captured, and the waypoint is recorded. The only exception to this is if there is a safety risk to the supplier or helicopter. In this case, the carcass or animal should be tagged as close to the kill or capture location as possible so that it can be clearly linked to the kill location and there is no opportunity for mix ups.

It is not acceptable to move carcasses to a central location for tagging as it will make it very difficult to maintain traceability to the kill or capture location. An inability to link a carcass to the kill location is a non-compliance with the AC Spec.

3.7 Hygienic Practices

- (1) Large animals should be bled as soon as possible after killing (for example deer, pigs, goats). When bleeding animals it is important that the major blood vessels in the neck are opened. If animals are not adequately bled or bleeding is delayed, it may result in spoilage of the animal due to increased risk of microbiological growth in the meat and dark colouring, making it unsuitable for processing. At times there may be pooling of blood in the chest cavity, if possible this should be drained out when the pluck is freed.
- (2) Killed wild animals 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)].
- (3) Animals should be eviscerated in the field or in a primary processing facility.
- (4) 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) and (3)].
- (5) The heads of the animals may be removed on the field prior to delivery to the primary processor or in a primary processing facility.
- (6) The carcasses of wild animals must:
 - a) be placed under refrigeration within 4 hours of being killed (if the ambient temperature is above 10°C) or within 12 hours of being killed (if the ambient temperature is at all times below 10 °C);
 - b) have the internal temperature of the material reduced to less than 7°C within 24 hours of killing;

- c) be maintained at a temperature during storage and transport prior to processing so that they will not deteriorate; and
- d) if carcasses are to be frozen, the internal temperature should be continuously reduced to -12 °C or cooler [AC Spec 7.19].

3.8 Wild Animal Material Supplier Statement

- (1) An approved supplier must provide the petfood primary processor with a correctly completed and signed Wild Animal Material Supplier Statement – Petfood on presentation of any wild animal for primary processing [AC Spec 7.14 (1) and (2)].
- (2) 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)].

3.9 Delivery of wild animal carcasses

- (1) Harvested wild animals preserved by:
 - a) chilling only (a temperature greater than 0°C, but less than 7°C) must be delivered to the petfood processor within 72 hours of killing; or
 - b) freezing must be delivered to the petfood processor in the frozen state -12°C or cooler [AC Spec 7.20].

3.10 Records

- (1) Records of the following must be kept:
 - statements and declarations [RMP Spec 20 (2)].

Part 4: Primary Processing of Killed Wild Animals

4.1 Scope

- (1) This Part discusses the requirements for primary processing of killed wild animals for petfood.
- (2) Primary processing of killed wild animals for petfood covers all steps and activities from receiving of the killed wild animals at the processing premises to post-mortem examination.
- (3) This Part applies to all primary processors of killed wild animals for petfood.

4.2 RMP Requirements

- (1) Petfood primary processors involved in the harvesting and processing of wild animals for petfood must operate under a registered RMP [APA 13] and comply with all relevant requirements given in Chapter 2: Good Operating Practice, of this Code.
- (2) The primary processor must include written procedures in their RMP covering the following:
 - a) the system for supplier approval and re-approval, including the suppliers' ability to meet [Part 3: Harvesting and Supply of Killed Wild Animals](#) of this Chapter;
 - b) procedures for maintaining a current list of approved suppliers [AC Spec 7.11 (4)];
 - c) procedures for receiving of killed wild animals;
 - d) hygiene and sanitation procedures;
 - e) processing procedures; and
 - f) monitoring, verification and corrective action procedures.
- (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)].

Refer to Part 16 Handling and Disposition of Non-complying Products and Recall Procedures of Chapter 2 of this Code for guidance.

4.3 Receiving of Killed Wild Animals

- (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) Where the primary processor rejects raw material due to non-compliance with harvesting requirements, the processor must record the reason(s) for the rejection and any corrective action taken, and retain all documentation for verification purposes.
- (3) 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 material 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;
 - c) that the wild animal materials are clearly identified (for example tagged) and linked to the accompanying documentation;
 - d) the relevant documentation are listed below:
 - i) [Landowner / Manager Poison Use Statement - Petfood](#); or
 - ii) the DOC Pesticide Summary; and
 - iii) [Wild Animal Material Supplier Statement – Petfood](#).

- (4) The primary processor must not accept animal material for processing if the animal product operator is aware or suspect that the information in a supplier statement cannot be relied on [AC Spec 8.2 (3)].
- (5) The primary processor must inform the recognised verifier within 1 working day if the situation described in Clause 4.3 (4) of this Chapter occurs [AC Spec 8.2 (4)].
- (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, if they are not going to be immediately thawed.

4.4 Processing

4.4.1 Thawing of frozen killed wild animals

- (1) Thawing procedures and parameters (for example time and temperature) must be documented in the RMP.
- (2) Thawing of frozen carcasses should be done in a manner and under conditions that minimises contamination or deterioration of the carcasses.
- (3) If thawing is done in water, clean water must be used for each thawing cycle.
- (4) Thawing equipment (for example thawing tank or bins) must be emptied and cleaned after each thawing cycle (i.e. after thawing a batch of carcasses).
- (5) Thawed carcasses should be processed without unnecessary delay, or they must be held under refrigeration while waiting to be further processed.

4.4.2 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 (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 procedures and 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.

- care should be taken to prevent leakage onto the carcass when removing the gut set.
- scraps and trimmings that are not suitable for processing into petfood should be put in designated containers or chutes and disposed of appropriately.
- extra care needs to be taken where the wild animal material has been previously 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)].
- (5) All offal is not eligible for petfood.

4.5 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 15].
- (2) Post-mortem examination should be conducted by a person:
 - a) familiar with the normal tissues of wild animals;
 - b) able to identify abnormal tissues associated with animal diseases of concern; and
 - c) qualified as a post-mortem examiner.
- (3) Persons competent in wild animal post-mortem examination must be identified in the petfood operator's staff training records.
- (4) The general requirements described in Section 4.8 Post-mortem Examination of Chapter 3: Supply, Slaughter and Dressing of Farmed Animals - should be observed when conducting post-mortem examination of wild animals.
- (5) Carcass material determined as suitable for petfood may be handled as minimal risk material and processed into petfood.
- (6) All other material, including examined offal and condemned material, must be disposed of as medium risk material (excluding pelts).
- (7) The following judgements are to be applied to the carcass. Refer to Table 3: Carcass Examination Judgements.

Table 3: Carcass examination judgements

Problem	Guidance
Deterioration	All animals in a state suggestive of deterioration that could impact on the suitability of the material for petfood needs to be condemned.
Contamination	All visible gross contamination needs to be trimmed. Extensive contamination needs to result in the total condemnation of the carcass.
Odour / smell	Carcasses with pronounced or objectionable odour suggestive of spoiling are to be condemned.
Wounds	All wounds are to be trimmed to remove potential contamination / visible tissue damage.
Carcass bullet entry wounds	The site of contamination needs 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 be rendered.
Bone fractures	Bone fractures are acceptable for petfood and may be trimmed.

Problem	Guidance
Any other abnormality indicative of systemic disease e.g. infection or pus etc.	The carcass is to be condemned in total.

4.5.1 Offal examination

- (1) The lungs, liver, heart and kidneys needs to be viewed for abnormalities.
- (2) The following judgements and dispositions are to be applied to the carcass where abnormalities are found in the accompanying offal:
 - a) all carcasses are to be condemned where:
 - i) they are presented without the required offal for examination. One kidney missing is acceptable for examination purposes; and
 - ii) the offal shows evidence of any abnormality unexpected by the examiner who is familiar with the normal tissues of the animal.
 - b) all tissues need to be disposed of as medium risk material.

4.6 Records

- (1) Records of the following must be kept:
 - approved suppliers list;
 - assessments and evidence of personnel competencies;
 - temperature calibrations; and
 - monitoring, corrective action and verification records [RMP Spec 20 (2)].

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