Code of Practice

for Cold and Dry Stores

Part 1: Overview

Prelims

Amendment 0

December 2006

Table of Contents

Disclaimer

IMPORTANT DISCLAIMER

Every effort has been made to ensure the information in this report is accurate.

NZFSA does not accept any responsibility or liability whatsoever for any error of fact, omission, interpretation or opinion that may be present, however it may have occurred.

Website

A copy of this document can be found at: http://www.nzfsa.govt.nz/animalproducts/index.htm

Review of Code of Practice

This code of practice will be reviewed, as necessary, by the New Zealand Food Safety Authority. Suggestions for alterations, deletions or additions to this code of practice, should be sent, together with reasons for the change, any relevant data and contact details for the person making the suggestion, to:

Assistant Director (Production and Processing)

New Zealand Standards Group

New Zealand Food Safety Authority

P O Box 2835

Wellington

Telephone: 04 894 2500

Facsimile: 04 894 2643

Amendment Record

It is important that this publication is kept up-to-date by the prompt incorporation of amendments.

To update this publication when you receive an amendment, remove the appropriate outdated pages, destroy them, and replace them with the pages from the new issue. Complete instructions will be given on the covering letter accompanying the amendment. File the covering letter at the back of the publication and sign off and date this page.

If you have any queries, please ask your local verifier.

Amendment No.	Date	Initials	Amendment No.	Date	Initials
1			21		
2			22		
3			23		
4			24		
5			25		
6			26		
7			27		
8			28		
9			29		
10			30		
11			31		
12			32		
13			33		
14			34		
15			35		
16			36		
17			37		
18			38		
19			39		
20			40		

1 Purpose and Scope of the Code of Practice

Amendment 0

December 2006

This code of practice (COP) has been developed by the New Zealand Food Safety Authority (NZFSA), in consultation with an industry working group, to assist store operators meet the requirements of the Animal Products Act 1999 and to ensure that animal products processed and/or stored in their premises are fit for their intended purpose. In particular, it provides guidance for meeting the requirements for the development, registration and implementation of risk management programmes (RMP).

This COP applies to stand-alone cold stores and dry stores whose primary operation involves the refrigerated or ambient storage of animal products, including dairy.

Whenever possible, the requirements and procedures for storage have been harmonised to cover all types of animal products (i.e. dairy and non-dairy animal products). Requirements that are specific to dairy (e.g. transport of dairy products, reporting requirements for nonconforming products) are also included in this COP. This will assist those store operators who wish to develop a single RMP document that covers both dairy and non-dairy animal products.

This COP is divided into four parts.

Part 1: Overview

Part 1 gives an overview of the whole code of practice and the requirements of the Animal Products Act 1999. It explains the options available to operators for the development of RMPs. It also provides links to other relevant documents published by the NZFSA.

Part 2: Good Operating Practice

Part 2 covers Good Operating Practice and process control. It sets out the regulatory requirements, and acceptable or agreed procedures for meeting the requirements of the Act, particularly the Animal Products Specifications for Products Intended for Human Consumption, and the Dairy Processing Specifications. This will assist operators in the development and documentation of supporting systems that form part of RMPs.

Part 3: HACCP Application, and Identification and Control of Other Risk Factors

Part 3 shows how the principles of Hazard Analysis and Critical Control Point (HACCP) are applied to the storage of animal products. It also covers the identification of risk factors and controls related to the wholesomeness and labelling of products.

Part 4: RMP Template

Part 4 provides an RMP template that can be used by operators in developing their own RMP. The templates are accompanied by a guide that explains the use and application of the template.

Exclusions

This code of practice does not apply to the following:

- freezers or chillers, and other storage facilities covered by an RMP where freezing or chilling is just one of a series of processing steps for the production or manufacturing of an animal product;
- facilities for the storage of raw milk (e.g. milk storage stations, bulk silos at rail heads, collection points, on-farm silos); and
- transport operators who are not store operators and do not transport dairy.

This code of practice has been developed based on New Zealand requirements only and does not cover overseas market access requirements. Exporters must ensure that they meet the overseas market access requirements relevant to their product and intended market.

2 Requirements of the Animal Products Act 1999

Amendment 0

December 2006

The Animal Products Act 1999 is New Zealand's legal framework for the processing of animal products. It establishes a risk management system that requires all animal products traded and used to be "fit for intended purpose". The Act sets out the duties of the operator and the requirements related to RMPs, regulated control schemes, and exporter controls.

2.1 Risk management programmes (Part 2 of the Act)

All secondary processors (this includes cold and dry stores) of animal products intended for human or animal consumption are required to have an RMP. However, businesses that are covered by the Food Act regime, such as those that only handle domestic products, are exempted from this requirement.

All existing cold stores that were licensed under the Meat Act were required to have an RMP by 1 July 2005.

The requirement for an RMP was extended in 2005 to include all dairy processors based on the amendment of the Animal Products Act 1999 and the repeal of the Dairy Industry Act 1952. Existing approved Dairy Product Safety Programmes were deemed to be registered RMPs on 1 June 2005. These Dairy RMPs will need to be updated and must be fully compliant with the requirements of the Animal Products (Dairy Risk Management Programme) Specification 2005 by 1 June 2007.

All new animal product businesses that are not covered by the Food Act regime must have an RMP before the start of operation.

2.2 Regulated control schemes (Part 3 of the Act)

A regulated control scheme is a scheme developed by the NZFSA and imposed by the Director-General to manage risks, where:

- RMPs would not be feasible or practicable;
- it is more efficient for the government to run the programme; or
- it is needed to meet the market access requirements of foreign governments.

At present, there are no regulated control schemes for the storage of animal products.

2.3 Exporter controls (Part 5 of the Act)

Exporters of animal products are required to register with the NZFSA. Exporters are responsible for exporting in accordance with the Act and, where appropriate, may be required to meet specified market access requirements of foreign governments which may be additional to the New Zealand standard.

Export requirements are excluded from this COP, as they are additional to New Zealand requirements. Operators that are involved in the export of animal products must ensure that their documented systems include procedures and records necessary to demonstrate compliance with all relevant requirements notified in General Requirements for Export (GREX), and Overseas Market Access Requirements (OMAR).

The Guide for Exporters and the Official Assurances Guide discuss exporter requirements in more detail.

2.4 Imposition of authorisations, duties and responsibilities (Part 8 of the Act)

The Act provides for the recognition by the NZFSA of agencies and persons to undertake certain functions and activities (e.g. evaluation and external verification) that are important to the management of RMPs. The NZFSA maintains a public register of all recognised agencies and recognised persons, which is available on the NZFSA website.

The Act imposes duties on these key persons:

- operators of RMPs (section 16 of the Act);
- exporters (section 51 of the Act);
- recognised agencies (section 106 of the Act); and
- recognised persons (section 107 of the Act).

The Act also provides for appropriate penalties to be applied when an offence occurs.

3 Risk Management Programme

Amendment 0

December 2006

3.1 What is a risk management programme?

A risk management programme (RMP) is a documented programme designed to identify and manage hazards and other risk factors in relation to the production and processing of animal material and animal products, in order to ensure that the resulting animal product is fit for intended purpose. The risk factors that need to be considered in the development of an RMP are:

- risks from hazards to human and animal health;
- risks from false or misleading labelling; and
- risks to the wholesomeness of animal material or product.

An operator's registered RMP will be "legally binding" so it must be developed and implemented in accordance with relevant New Zealand legislation. Overseas market access requirements and commercial quality issues are not required to be part of the RMP.

The Risk Management Programme Manual provides comprehensive information on the different components of an RMP, and guidance for their development.

Note: The application of the current version of the RMP Manual is focused mainly on non-dairy animal products (e.g. meat, seafood, bee products). The NZFSA intends to revise this manual and incorporate dairy RMP requirements.

3.2 RMP configurations

An RMP may be developed for a single business or for multiple businesses.

3.2.1 Single-business RMP (Sections 12(3) and 12(4) of the Act)

A single RMP that covers the operations of a single business located on a single site is the simplest form of an RMP and its use is encouraged, whenever applicable. This is likely to be the most suitable RMP configuration for the majority of cold or dry stores.

A business may also decide to have more than one RMP. This may be useful when the operation can be logically and clearly split by product, process or premises. For example, a single business involved in the freezing of whole fish (e.g. tuna) and the storage of various packed animal products may wish to have two RMPs – one for the fish freezing process and the one for the storage operation. This arrangement can give flexibility to the operator in terms of making RMP amendments. It also allows for the suspension or deregistration of one RMP without affecting the other. However, consideration should be given to the practicality and cost of managing more than one RMP within a single business, and any market access requirements.

3.2.2 Multi-business RMP (Section 17A of the Act)

An RMP may apply to more than one business, if the Director-General approves such an arrangement for the particular business. The approval will depend on the operator being able to demonstrate that:

- the programme is appropriate to all businesses or part-businesses that it covers;
- the registered operator of the programme will have sufficient control, authority and accountability for all matters covered by the programme in relation to the other business or part-business subject to its coverage; and
- the applicant has obtained the consent or otherwise taken into account the views of any person whose business or part-business is to be covered by the programme.

An example where a multi-business RMP could apply is in a situation where the operator decides to cover the operations of several cold stores under a single RMP. In this case, the RMP operator must have sufficient control, authority and accountability for the related activities of the different cold stores, and these cold stores must consent to the arrangement.

Certain market access requirements, for example European Union (EU) listing requirements, do not allow this RMP configuration to be used. Therefore, this is not likely to be a suitable RMP configuration for stores handling animal products for export.

3.3 Contents of a risk management programme

3.3.1 Contents

The documented RMP must include the following:

- **Good Operating Practice**

Good Operating Practice (GOP) includes the practices and procedures designed to ensure the consistent production of products that are safe and suitable for their intended purpose, and that meet relevant regulatory requirements. It includes several interacting components such as hygienic practices, process control and quality assurance systems. GOP is usually documented by the operator in supporting systems of their RMP.

GOP is the foundation for Hazard Analysis and Critical Control Point (HACCP) and RMPs. GOP programmes are covered in detail in Part 2 of this COP.

- **Application of HACCP principles**

The operator must apply HACCP principles to the processes covered by their RMP to ensure a systematic approach to the identification and analysis of hazards and their control. This is covered in Part 3 of this COP.

- **Identification of other risk factors and their controls**

Other risk factors related to the wholesomeness of the product and risks from misleading labelling must be identified in the RMP. The control measures for addressing the identified risk factors must also be documented in the RMP. These are presented in Part 3 of this COP.

- **Other RMP requirements**

Other RMP requirements, such as business identification, operator's details, physical boundaries, and provision for verifiers' rights, must also be documented in the RMP. These requirements are covered in the RMP template provided in Part 4 of this COP.

3.3.2 RMP Components

The RMP must include the components listed below.

- Operator, business and RMP identification
- List of RMP documents
- Management authorities and responsibilities
- Scope
- Animal material and animal product description
- Process description
- Good Operating Practice
- Application of HACCP (identification, analysis and control of hazards to human or animal health)
- Identification and control of risks to wholesomeness
- Identification and control of risks from false and misleading labelling
- Identification and competency of responsible persons
- Corrective action for unforeseen circumstances
- Recall procedures
- Confirmation of validity
- Operator verification
- Notification requirements
- Provision for verification activities & verifiers rights
- Document control and requirements for records

4 Development of an RMP based on an Approved Code of Practice

Amendment 0

December 2006

Section 12 (3A) of the Animal Products Act 1999 allows for an RMP to be based on a COP, a template, or a model if in the view of the Director-General it is valid and appropriate for businesses of that kind. A COP that is deemed as valid and appropriate after an assessment process carried out by the NZFSA will be formally recognised as an "approved code of practice".

A COP is a valuable tool to use in the development of the RMP. Compliance to an approved COP will:

- ensure that the operator complies with current best practice or acceptable industry practices and procedures;
- ensure that the operator meets the relevant regulatory requirements; and
- simplify and reduce the cost of developing and evaluating the RMP.

The applicability of the approved COP to the particular business and the degree of the operator's compliance to the approved COP will impact on the development approach and evaluation requirements for the RMP.

4.1 Businesses whose products and processes are fully covered by an approved COP

4.1.1 Development

When the COP fully covers the scope of the operation of a business, the simplest approach for developing an RMP is to use the RMP template provided. The RMP template is a simple form that the operator completes by filling in the required information.

The requirement for the documentation of GOP supporting systems and the application of HACCP principles in the RMP can be met by incorporating the relevant sections of the COP into the RMP by reference. This will minimise the number of procedures that the operator

has to write. The operator's RMP will, therefore, consist of the completed RMP template, the relevant sections of the COP that are referenced in the template, and their own written procedures that are specific to their operation.

Confirmation by the operator that the RMP meets all the legal requirements for a valid RMP and that it will comply with the approved COP will simply involve signing a declaration in the RMP template.

4.1.2 Evaluation

An RMP that is fully based on an approved COP does **not** require an evaluation prior to registration since the NZFSA has already determined that the requirements and procedures set out in the COP are valid, and will meet the relevant regulatory requirements. Verification of the accuracy of the documented RMP and operator's compliance to the COP will be carried out at the initial verification by the contracted verifier.

4.2 Businesses whose products or processes are not fully covered by an approved COP, or those with significant variation from the COP

4.2.1 Development

Since the COP is limited in its scope in terms of the processes and procedures it covers, some businesses will need to tailor parts of the RMP template to meet their particular process variations. Some may also need to, or want to develop their own specific RMP.

Businesses whose products and processes are not fully covered by the COP, or who have decided to apply procedures or processing parameters that significantly differ from those given in the COP must write their own documentation for those parts of the RMP that are not covered or vary from the COP (including HACCP application and process control procedures). The RMP template may still be used, but the operator will need to add their own information or documents for those parts not covered by the template or COP.

The operator must be able to demonstrate the effectiveness of any alternative procedures or parameters to consistently meet all relevant regulatory requirements and produce products that are safe and suitable for their purpose. Demonstration of its effectiveness may involve the collection of evidence (e.g. data from testing or trials, published scientific information, report from an expert) by the operator for assessment of the recognised evaluator or the NZFSA.

4.2.2 Evaluation

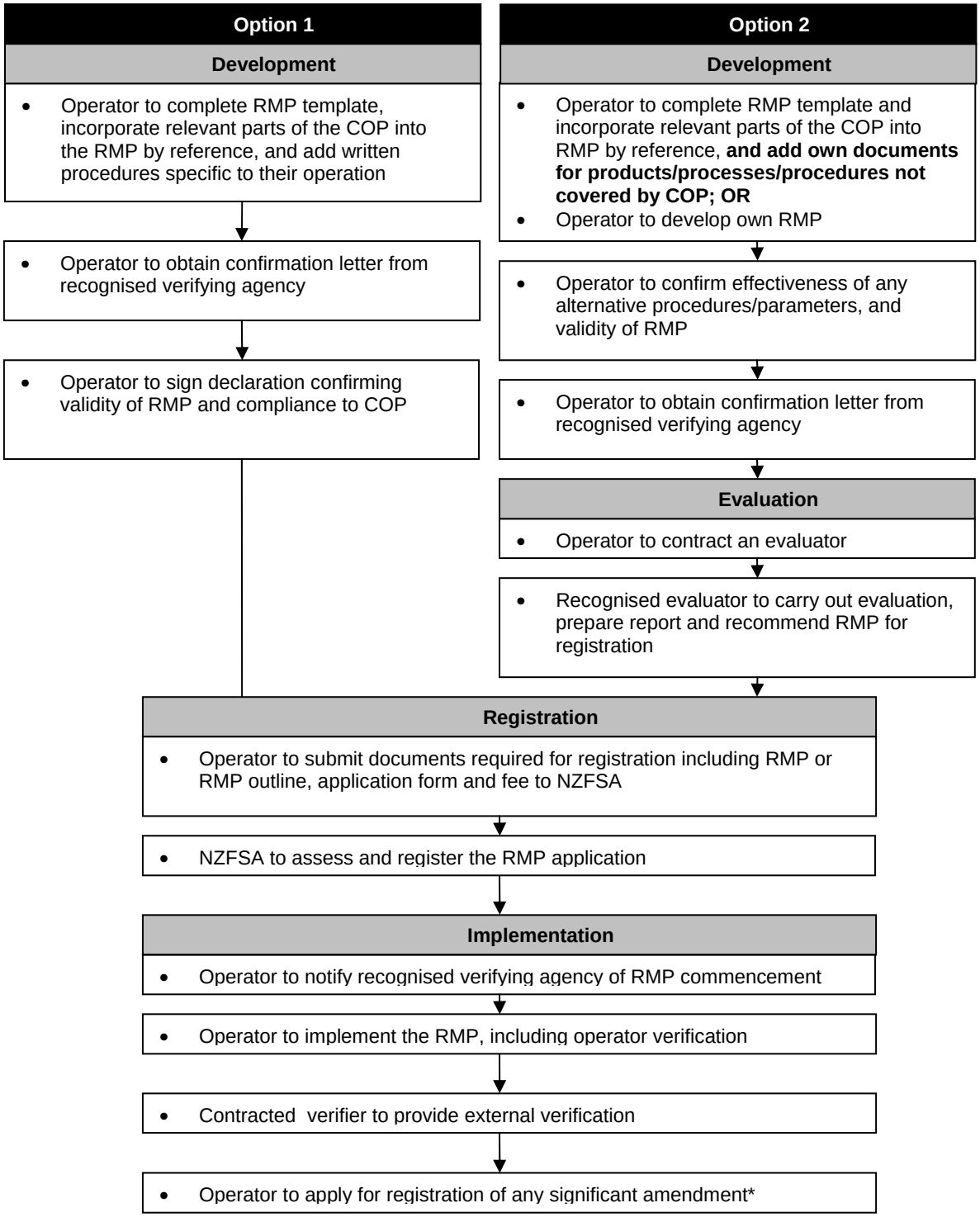
An RMP that is not fully covered by an approved COP or has procedures that vary from the COP will need to be evaluated by a recognised evaluator to confirm the adequacy of the RMP. The scope of the evaluation will be limited to those parts of the RMP that are not covered by the COP, and/or procedures that vary from the COP. Evaluation will involve a desk-top audit of the documented RMP and may require an on-site visit of the premises before registration of the RMP.

4.3 Steps for the development, registration and implementation of an RMP

The steps for the development, registration and implementation of an RMP are summarised in Figure 1. The diagram shows the steps for the two options discussed in 4.2:

- Option 1: For businesses whose products and processes are fully covered by the COP.
- Option 2: For businesses whose products and processes are not fully covered by the COP, or who have decided to apply procedures or processing parameters that significantly differ from those given in the COP.

Figure 1. Steps for the Development, Registration and Implementation of an RMP



* Significant amendments will require evaluation prior to registration

5 Other Legislation

Amendment 0

December 2006

This COP will assist store operators meet the requirements of the Animal Products Act 1999. Operators should not rely on this COP to provide them with information on legal requirements under other legislation. Operators are responsible for ensuring that they are familiar and comply with other legislation relevant to their business.

Legislation that are likely to be relevant to store operators include, but is not limited to, the Acts listed below, and their associated regulations and specifications.

- Animal Products Act 1999
- Biosecurity Act 1993
- Commerce Act 1986
- Consumer Guarantees Act 1993
- Fair Trading Act 1986
- Food Act 1981
- Hazardous Substances and New Organisms Act 1996
- Health and Safety in Employment Act 1992
- Resource Management Act 1991

6 Sources of Other Information

Amendment 0

December 2006

Information specific to store operators is available on the Stores webpage in the NZFSA Animal Products website.

Other information about the Animal Products Act 1999 and RMPs can be obtained through the RMP Help Desk or the Animal Products website.