



Code of Practice: Rendering

Part 1: Overview

Prelims

Amendment 0

September 2009

Table of Contents

Prelims	2
<i>IMPORTANT DISCLAIMER</i>	3
Review of Code of Practice	3
Amendment Record	3
1 Purpose and scope of the Code of Practice	4
1.1 Parts of the COP	4
1.2 Exclusions	5
2 Requirements of the Animal Products Act 1999	6
2.1 Risk management programmes (Part 2 of the Act)	6
2.2 Regulated control schemes (Part 3 of the Act)	6
2.3 Exporter controls (Part 5 of the Act)	7
2.4 Imposition of authorisations, duties and responsibilities (Part 8 of the Act)	7
3 Risk Management Programme	8
3.1 What is a risk management programme?	8
3.2 RMP configurations	8
3.3 Contents of a risk management programme	10
4 Development of an RMP based on an approved Code of Practice	11
4.1 Businesses whose products and processes are fully covered by an approved COP	11
4.2 Businesses whose products or processes are not fully covered by an approved COP, or those with significant variation from the COP	12
4.3 Steps for the development, registration and implementation of an RMP	12
5 Other legislation	14
6 Sources of other information	15

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 NZFSA. 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)
Standards Group
New Zealand Food Safety Authority
PO Box 2835
Wellington
Telephone: (04) 894 2500

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To update this publication when you receive an amendment, remove the appropriate outdated pages, destroy them, and replace them with the pages from the new issue.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			4		
2			5		
3			6		

1 Purpose and scope of the Code of Practice

Amendment 0

September 2009

The Animal Products Act 1999 (the Act) requires all rendering and blood-drying businesses producing animal product intended for human or animal consumption to operate under a risk management programme (RMP). In addition, an RMP is also required for rendering and blood-drying operations producing mammal or bird material or product for trade purposes, whether or not the product concerned is intended for human or animal consumption, e.g. fertiliser.

This code of practice (COP) has been developed by the New Zealand Food Safety Authority (NZFSA), in consultation with industry, to:

- assist operators meet the requirements of the Animal Products Act 1999;
- produce rendered animal products that are safe and suitable for their purpose; and
- prevent animal material and animal product that is not fit for human consumption from entering the human food chain.

In particular, it provides guidance for meeting the requirements for the development, registration and implementation of RMPs.

This COP applies to businesses involved in the production of rendered animal products intended for animal consumption, such as meat and bone meal, dried blood, fish meal, poultry meal, feather meal, tallow, fish oil and poultry fat. It covers the:

- collection of animal material for rendering; and
- rendering, drying, storage and dispatch of products.

1.1 Parts of the COP

This COP is divided into three parts.

Part 1: Overview

Part 1 gives an overview of the whole COP 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 (GOP)

Part 2 covers good operating practices 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 Animal Consumption. This will assist processors in the development and documentation of supporting systems that form part of RMPs.

Part 3: Generic Risk Management Programme (RMP) model

Part 3 provides an RMP model for a typical New Zealand rendering operation to assist operators in the development of their own RMPs. It shows:

- how the Hazard Analysis and Critical Control Point (HACCP) principles can be applied to rendered product and processes; and
- the identification and controls of risks to wholesomeness and risks from false or misleading labelling of rendered animal products; and
- how the RMP components could be written for a typical rendering process.

1.2 Exclusions

This code of practice does not apply to the following:

- rendering for human consumption; or
- collection of animal material for rendering, where the collection activities are performed by human consumption operators. This will be covered under the relevant human consumption Code of Practice.

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

September 2009

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 animal product rendering and blood-drying operations producing animal product intended for animal consumption must operate under an RMP. In addition, an RMP is also required for rendering and blood-drying operations producing mammal or bird material or product for trade purposes, whether or not the product concerned is intended for human or animal consumption, e.g. fertiliser.

All renderers licensed under section 20(1)(b) of the Meat Act 1981 were required to operate under a registered RMP from 1 July 2004.

All new rendering and blood operations that are required to have an RMP must have a registered 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.

2.3 Exporter controls (Part 5 of the Act)

Exporters of rendered 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

September 2009

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 principles and components of an RMP and provides guidance for their development.

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 in 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 rendering and blood-drying operators.

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 rendering of fish material and mammal material may wish to have two RMPs covering each material separately. 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 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 rendering operator decides to include the operations of several separate rendering businesses under a single RMP. In this case, the operator must have sufficient control, authority and accountability for the related activities of the different businesses, and these businesses 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 the majority of rendering or blood-drying operators who 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 for rendering and blood-drying is discussed 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 risk from misleading labelling must be identified in the RMP, together with control measures for addressing any identified risk factors. These are also covered 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.

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

Amendment 0

September 2009

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

The simplest approach for developing an RMP is to base the RMP on the generic RMP model that NZFSA has provided in this Code of Practice. Operators must customise their RMPs to cover specific products, processes and premises.

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

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 by, or vary from, the COP (including HACCP application and GMP procedures).

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. To demonstrate the effectiveness of such alternative procedures the operator may be required to collect evidence (e.g. data from testing or trials, published scientific information, report from an expert) for assessment by the recognised evaluator or the NZFSA.

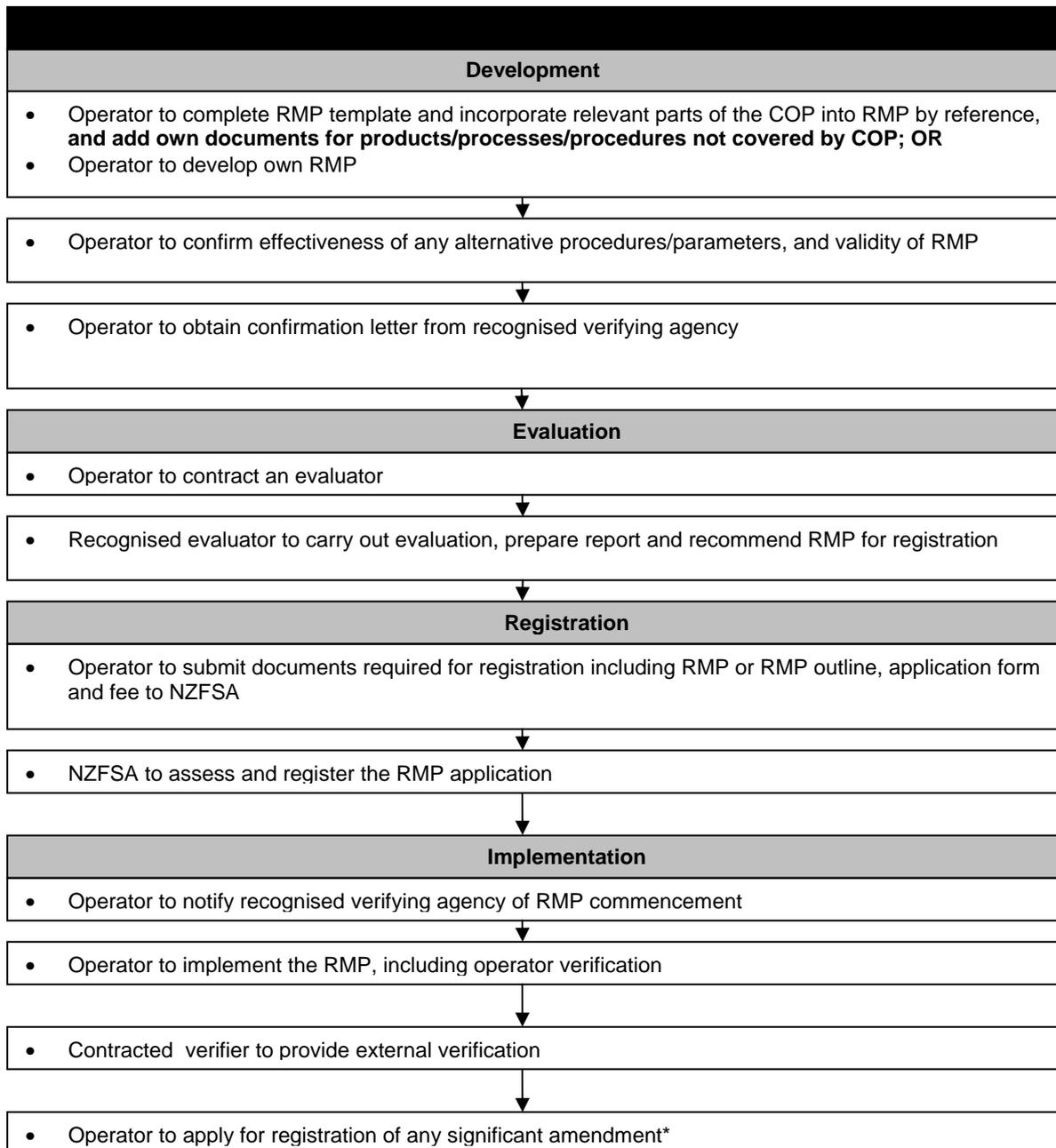
4.2.2 Evaluation

Rendering and blood-drying RMPs, whether they are based on the approved Rendering COP or have procedures that vary from the COP, must be evaluated by an independent, recognised evaluator to confirm the adequacy of the RMP. Evaluation will involve a desk-top audit of the documented RMP and 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.

Figure 1. Steps for the development, registration and implementation of an RMP



* Significant amendments will require evaluation prior to registration – refer to Appendix G of the [Risk Management Programme Manual](#) for information on significant amendments.

5 Other legislation

Amendment 0

September 2009

This COP will assist rendering and blood-drying operators meet the requirements of the Animal Products Act 1999. Operators should not rely solely 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 all other legislation relevant to their business.

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

- Animal Products Act 1999
- Agricultural Compounds and Veterinary Medicines Act 1997
- Biosecurity Act 1993
- Commerce Act 1986
- Consumer Guarantees Act 1993
- Fair Trading Act 1986
- Hazardous Substances and New Organisms Act 1996
- Health Act 1956
- Health and Safety in Employment Act 1992
- Resource Management Act 1991

6 Sources of other information

Amendment 0

September 2009

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

NZFSA is also planning to develop a webpage specific to rendering on the NZFSA Animal Products website, which will contain information specific to rendering and blood-drying operators.