

MEMORANDUM

To	RMP (processing premises) operators Bee Products Industry Standards Council – Jim Edwards
CC	Transport operators registered under the Transport RCS Wharf operators registered under the Wharf RCS Limited Processing Fishing Vessels registered under the LPFV RCS New Zealand Cold Storage Association – Garry Shaw Deer Industry New Zealand – John Moynihan Dairy Product Safety Advisory Council – Adele Gilliver Meat Industry Association – Kevin Cresswell Ostrich and Emu Standards Council – Ross Davies Poultry Industry Association of New Zealand – Michael Brooks Seafood Standards Council – Cathy Webb Abattoir Association – Gary Beecroft New Zealand Pork Processors Association – Jan Henshall Carol Barnao, Judy Barker – Standards Group Chris Mawson, Sheryl Tuck – NZFSA VA Lindsay Nicholls, CIG
Date	21 January 2010
From	Mary Western, Deputy Director (Standards) – Standards Group
Subject	Processing Premises RMP – Transport Supporting System (transport supporting system)

Summary

This transport supporting system provides a simple way for processing premises RMP operators to cover the transport of animal material and animal products, which don't require temperature control, under their RMP.

The remainder of this memo explains why a processing premises RMP operator may choose to cover transport under their RMP. The alternative to this is for transport operators to register their own operations under an RMP or the Transport Regulated Control Scheme.

Background

As of 1 November 2009 the transport of animal material and animal product for export with an official assurance must be covered under either:

- a registered risk management programme (RMP); or
- the 'Regulated Control Scheme - Transport of Animal Products and Animal Material for Export with an Official Assurance' (Transport RCS).

All modes of transport are required to operate under either a RMP or under the Transport RCS. These include road, rail, sea and air.

RMP operators registered for processes that do not include transport, who transport are deemed to comply with the relevant requirements of the Transport RCS **until the close of 31 March 2010**. On 1 April 2010 these RMP operators must either;

- be fully compliant with the Transport RCS; or
- have amended their RMP to include their transport service operations.

The operators who were listed under either:

- OMAR **00/094** Road and Rail Transport of Export Meat, Game and Game Meat Products to and from Licensed or Approved Premises; or
- OMAR **02/107** Road and Rail Transport of Fish Products Intended for Human Consumption and for which Official Assurances are required

(i.e. listed transport operators) have been automatically registered under the Transport RCS, unless those operators have registered an RMP that covers their transport operations.

Note: the **Animal Products (Transport of Export Animal Products and Handling at Point of Export) Notice 2009** revokes the overseas market access requirements (OMARs) mentioned above (i.e. 00/094 and 02/107) on 1 April 2010.

The bee product industry raised concerns over the introduction of the Transport RCS. These related to situations where:

- there is infrequent use of a number of different transport operators;
- there is the use of transporters for whom transport of food is only a small component of their business;
- operations are based in remote locations where there are only a small number of transporters available.

The key concern was that their existing transport operators would elect to no longer transport their bee products (e.g. bulk honey in drums) rather than be covered under either a registered RMP or the Transport RCS.

Update

To assist the bee product industry to comply with the transport requirements outlined above NZFSA is issuing a transport supporting system. This is essentially a new section of Part 2: Good Manufacturing Practice of the Code of Practice: Processing of Bee Products. In the interim it is being published as a stand alone document. Electronic copies are available on the 'Transport' subject page on the NZFSA web site at <http://www.foodsafety.govt.nz/industry/sectors/transport-wharves/documents.htm>.

While this transport supporting system was developed for the bee process industry it can be used by other industries under the Animal Products Act to comply with the transport requirements.

The transport supporting system **only applies** to the transport of animal material and animal products that do not require temperature control – e.g. bulk honey in drums, pallets etc and cartonised or otherwise packaged finished products (a separate supporting system template is currently under development for refrigerated product).

The transport supporting system can be used by either the dispatching or receiving RMP premises operator to cover transport. In addition, it can be used to cover transport that the Processing Premises RMP operator undertakes (i.e. using their own truck etc.) **or** using separate transport operators. In the latter case the transport operator signs a transport agreement confirming that they will ensure that they transport goods in accordance with the relevant requirements of the Animal Products Act. **The use of the transport supporting system is only one way of meeting the transport requirements. Transport operators can still independently register their own operations under an RMP or the Transport RCS.**

Use

Using the transport supporting system template to include transport is considered a minor amendment to the RMP and this will need to be notified to NZFSA using the AP50 form

<http://www.foodsafety.govt.nz/elibrary/industry/update-details-notification-ap50/> to allow us to update our records. There will be a service charge for this minor amendment as detailed on the AP50 form.

Once transport has been included into an RMP it will be subject to verification on a routine basis as part of the RMP.

If you have any queries regarding the transport supporting system please contact your local verifier in the first instance. Alternatively contact:

Lennox Vellekoop, Programme Manager (Animal Products)

Standards Group, New Zealand Food Safety Authority

P O Box 2835

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Alternatively, responses can be e-mailed to: lennox.vellekoop@nzfsa.govt.nz

Yours faithfully

Mary Western

Deputy Director (Standards)

Standards Group