



Attachment A1 - Risk Management Programme (RMP) Template for Packaging, Labelling and Delivery of Animal Products

This RMP template is issued by the Ministry for Primary Industries in accordance with section 12 (3A) of the Animal Products Act 1999 (APA) for the purpose of making the determination that the Attachment A1 is valid and appropriate for the business of this kind described in the Statement of Application.

Statement of Application

The application of the **Attachment A1** is limited to Animal Products businesses that wish to include the following additional procedures into their existing RMP:

- packaging of animal products; and/or
- labelling of animal products (for human consumption only); and/or
- delivery including on-line sales of animal products (non-dairy) direct to consumers (not businesses).

The Ministry for Primary Industries has developed material for Animal Products businesses wanting to add these procedures into their RMP with sufficient safeguards in response to COVID-19 control measures put in place by the New Zealand Government.

The transport of dairy products intended for the New Zealand market does not need to be covered by a RMP, but the transport must still be suitable and ensure the animal products are not contaminated or allowed to deteriorate.

Dated at Wellington 20th day of April 2020.

[signed]

Marion Castle
Acting Manager Animal Products
Ministry for Primary Industries
(acting under delegated authority of the Director-General)

Contact for further information
Ministry for Primary Industries (MPI)
Animal Products
PO Box 2526
Wellington 6140

Disclaimer

Considerable effort has been made to ensure that the information provided in the **Attachment A1** is accurate, up to date, and otherwise adequate in all respects. Nevertheless, this template is approved STRICTLY on the basis that the Crown, the Ministry for Primary Industries, its statutory officers, employees, agents, and all other persons involved with the writing, editing, approval or publication of, or any other kind of work in connection with the **Attachment A1**:

- (1) disclaim any and all responsibility for any inaccuracy, error, omission, or any other kind of inadequacy, deficiency, or flaw in, or in relation to, the **Attachment A1**; and

Attachment A1

Risk Management Programme Clip On

Date:

-
- (2) without limiting (1) above, fully exclude any and all liability of any kind, on the part of any and all of them, to any person or entity that applies the **Attachment A1**.

It is your responsibility as the owner to make sure you are meeting the current law at all times. This is particularly important for requirements that are subject to regular change such as those imposed by the Ministry of Health in during COVID-19 restrictions.

NB: This is a cover page only and is not to be used as part of their RMP.

Part 1: General Sections

A. Scope

Scope

Attachment A1 is written to enable businesses to sell raw, processed and ready-to-eat animal products processed within their own RMP direct to consumers in New Zealand's domestic market, in order to enable delivery procedures necessary under COVID-19 controls.

Animal product means any part of an animal, which is used for consumption and that has been subject to examination in the regulated system and declared fit for human and/or animal consumption. It includes (but is not limited to) raw fish (such as fin fish), other seafood, raw meat, processed meat, pasteurised milk and other dairy products, honey and bee products, eggs and egg products and petfood.

This programme covers:

- Packaging of animal products intended for direct sales to consumers in the domestic market under an RMP;
- Labelling of animal products (for human consumption only) intended for direct sales to consumers in the domestic market under an RMP; and
- Transporting of animal products intended for direct sales to consumers in the domestic market under an RMP.

Part 2: Supporting Systems

A. Packaging

Know	<ul style="list-style-type: none"> • Ensure that all packaging and other product contact materials meet specifications and are handled and stored properly, because unsuitable packaging can taint your animal product or make it unsafe. • Handle and store packaging with the same care as a food, ingredient or other input. • Anything that touches your packaging (i.e. bugs, chemicals or foreign matter) can make your animal products unsafe or unsuitable. • Chemicals can leach out of unsuitable packaging and contaminate animal products.
Do	<p>Compliance with regulatory requirements</p> <ul style="list-style-type: none"> • If you are packaging animal products, you must: <ul style="list-style-type: none"> ▪ implement procedures for ensuring packaging will not cause, or contribute to, animal products becoming unsafe or unsuitable; ▪ only use packaging that is suitable for use with animal product. Either: <ul style="list-style-type: none"> ○ purchase packaging labelled as being suitable for animal products; or ○ get an assurance from your supplier that it is food grade. ▪ calculate the animal product's shelf-life (if applicable), and apply the appropriate date marking, identify whether you need to either: <ul style="list-style-type: none"> ○ label your animal products; and/or ○ provide a packing or specification sheet with bulk animal products (e.g. wholesale packs). • The animal products needs to be packed in a suitable package before entering into the delivery chain.
Show	<p>Show your verifier:</p> <ul style="list-style-type: none"> • your packaging and how you know it is safe and suitable for the animal products you are packaging; • your animal product labels and how you know what to put on them; • any problems; and • any Corrective Action taken.
Ref.	<p>Refer HC Spec Part 7: Packaging</p>

B. Labelling of animal products (for human consumption only)

<p>Know</p>	<ul style="list-style-type: none"> • For all animal products (intended for human consumption) your label you must meet the rules in the Australia New Zealand Food Standards Code (the Code). • Not all animal products have to be labelled, but for those that are, the labels must meet the rules in the Code. • Animal products that may not require labelling include: <ul style="list-style-type: none"> ▪ Animal products made and packaged where it is sold; ▪ Animal products packaged in front of your customer; and ▪ ready-to-eat animal products delivered to order, such as sausage rolls. • Some animal products can become unsafe over time and deteriorate in quality, even though it still might look, smell and taste OK. It's important to let your customers know when to eat your animal products by, by determining the shelf-life and providing a Best Before or Use By date as required under the Code (Standard 1.2.5). • If you are supplying bulk animal products, these will generally need to be accompanied with a packing or specification sheet. You must supply the same information that would go on the food label. • Raw milk cheeses are not recommended for vulnerable people (i.e. young children, older people, pregnant women and people with compromised immune systems). You should let these people know raw milk cheese may not be safe for them. • If your animal product doesn't have to be labelled, you must still be able to tell your customers: <ul style="list-style-type: none"> ▪ what's in the animal product; ▪ any warning statements; ▪ if the animal product is made from or contains genetically modified ingredients or irradiated foods; and ▪ ingredients list (including a statement on cheese that the milk is raw or thermised if the milk used to make the cheese has not been pasteurised). <p>Shelf-life of animal products:</p> <ul style="list-style-type: none"> • You might need to work out the shelf-life of the animal products so that you can apply a date mark. • Some animal products have a shelf-life of more than 2 years, or where they are an individual portion of ice cream or ice confection (e.g. a popsicle) do not need to be date marked. • Note that all animal product must remain safe and suitable throughout their shelf life, whether or not there is a date mark on the packaged product.
<p>Do</p>	<ul style="list-style-type: none"> • You must meet the rules about labelling in the Code for any animal products you label. • Identify the animal products' shelf-life (if applicable), and apply the appropriate date marking. • Identify whether you need to either: <ul style="list-style-type: none"> ▪ label your animal product(s); and/or ▪ provide a packing or specification sheet with bulk animal products (e.g. wholesale packs). • Labels or specification sheets must include: <ul style="list-style-type: none"> ▪ name of the animal product(s); ▪ lot/batch identification; ▪ name and address of your New Zealand or Australian business; ▪ any applicable advisory statements, warning statements and declarations; ▪ any conditions for storage and use; ▪ ingredients list; ▪ date marking (e.g. Use By, Best Before etc.) (not required for animal products with a shelf-life of more than 2 years); ▪ net contents; ▪ nutrition information panel; ▪ nutrition content claims about carbohydrate, energy and gluten;

Attachment A1

Risk Management Programme Clip On

Date:

	<ul style="list-style-type: none">▪ information about nutrition, health and related claims (only if you've made a claim);▪ information about characterising ingredients and components; and▪ if the product is or has been made with genetically modified foods or irradiated foods.
Show	Show your verifier: <ul style="list-style-type: none">• copies of labels;• any problems; and• any Corrective Action taken.
Ref.	<p>MPI has developed guides to help you create your animal products label:</p> <ul style="list-style-type: none">• Follow A guide to food labelling to write your label.• Follow A guide to New Zealand honey labelling to write your honey label.• Follow Labelling and selling eggs in their shells (shell eggs) to write your egg label. <p>There is a guide to help you work out shelf-life. Follow How to determine the shelf-life of food.</p> <p>While not covered by this template RMP, raw drinking milk for sale to consumers has specific labelling requirements. Refer to:</p> <ul style="list-style-type: none">• Clause 54: Labelling and identification requirements in Raw Milk for Sale to Consumers Regulations 2015• Part 8: Labelling and Advertising in Animal Product Notice: Raw Milk for Sale to Consumers

C. Contactless delivery to consumers

<p>Know</p>	<ul style="list-style-type: none"> • If animal products needs to be kept under temperature or humidity control to stop bugs from growing to levels that will make people sick, it is important to make sure temperature/ humidity is kept constant through the whole chain - including while being transported. • animal products must be at its correct chilled or frozen temperature before being loaded for transport. • While animal products are being transported, the vehicle it's being transported in should be considered a food premises or food room - keep it clean and separate animal products as you would in a processing area or store room. • If you are contracting someone else to transport animal products (i.e. on-line sales), you may need to check that they are a registered food business (if applicable). • animal products (i.e. food) and non-food goods need to be kept separate. • Only use vehicles suitable for the type and amount of animal products being transported. • The transport of dairy products intended for the New Zealand market doesn't need to be covered by a RMP, but the transport must still be suitable and ensure the dairy products are not contaminated or allowed to deteriorate.
<p>Do</p>	<ul style="list-style-type: none"> • If transporting animal products that must be kept cold always use (tick which one you/your staff use): <ul style="list-style-type: none"> <input type="checkbox"/> a freezer/chiller vehicle <input type="checkbox"/> a chilly bin with ice blocks in an insulated container <input type="checkbox"/> other (write the method you/your staff use here: _____) • All parts of the vehicle that you use to transport animal products or food equipment must be clean (and sanitised if going to be in direct contact with ready-to-eat food). • Always transport and deliver animal products at the correct temperature: <ul style="list-style-type: none"> ▪ keep frozen animal products frozen; ▪ transport chilled animal products cold (i.e. at or below 7°C) and monitor this regularly (using a thermometer or equivalent); ▪ transport hot animal products hot (i.e. above 60°C); and ▪ only deliver animal products that is not shelf stable in the temperature danger zone (i.e. 5°C-60°C) if it's going to be eaten within 4 hours of entering the temperature danger zone. • Control and check humidity or environmental conditions where this is required to keep animal products safe.
<p>Show</p>	<p>Show your verifier:</p> <ul style="list-style-type: none"> • how you check animal products is kept at the correct temperature and/or humidity when being transported; • how you control temperatures and keep animal products separate while transporting them; • your vehicle(s) used for transporting animal products; and • your temperature and/or humidity records for each transport vehicle and transport run, where these are required to be controlled.
<p>Ref.</p>	<p>Refer below delivery check sheet</p>

Attachment A1

Risk Management Programme Clip On

Date:

x. COVID-19 Contactless Delivery Check sheet

Starting date: / /

Business name: _____

Date and time of delivery	Dispatched from	Product Description:	Vehicle clean and all cooling systems working?		Delivered to	Delivery Date and Time	Appropriate distancing procedures were followed during the delivery	Initial
			If yes, tick	If no, record steps taken to rectify				
<i>Example:</i> 07/05/20 7am	<i>Jim's Honey Emporium</i>	<i>4 jars of honey</i>	<i>no</i>	<i>Fish scales washed off deck, rechecked chiller and ok</i>	<i>Sim's South Sea Exports</i>	<i>25/04/20 3pm</i>	<input checked="" type="checkbox"/>	<i>JS</i>