



# Approval for 'Attachment A1: Risk Management Programme (RMP) Template for Packaging, Labelling and Delivery of Animal Products'

20<sup>th</sup> April 2020

I, Marion Castle, Acting Manager (Animal Products), approve 'Attachment A1: Risk Management Programme (RMP) Template for Packaging, Labelling and Delivery of Animal Products' dated April 2020 in its entirety, in accordance with section 12(3A) of the Animal Products Act 1999, for the purpose of making the determination that the 'Attachment A1: Risk Management Programme (RMP) Template for Packaging, Labelling and Delivery of Animal Products' dated April 2020 is valid and appropriate for the businesses of the kind described in the Statement of Application.

## Statement of Application

The application of 'Attachment A1: Risk Management Programme (RMP) Template for Packaging, Labelling and Delivery of Animal Products' dated April 2020 is limited to Animal Products businesses that wish to include the following additional procedures into their existing Risk Management Programme:

- 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 Risk Management Programme Template will enable Risk Management Programme operators to amend the scope of their operations and highlight what they need to do to comply.

The Ministry for Primary Industries (MPI) 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 food or drink is not contaminated or allowed to deteriorate.

Risk Management Programme operators must adhere to all [Ministry of Health guidelines](#) at all times, have [registered with MPI](#) as an essential business and follow the [safe practices advice on the Covid19 website](#), especially when operating during the ongoing Covid-19 alert levels.

Signed at Wellington this 20<sup>th</sup> day of April 2020.

(Signed)

Marion Castle  
Acting Manager Animal Products  
(Acting under delegated authority)



## 1. Background

1. Despite the general requirement that a risk management programme is tailored to the individual business concerned, section 12(3A) of the Animal Products Act (the Act) allows a risk management programme for a particular business, or part of a business, to be based on a template, a model, or a code of practice, if in the view of the Director-General the template, model, or code of practice is valid and appropriate for businesses of that kind.
2. The Ministry for Primary Industries (MPI) has published the Animal Products Act 1999 — Approval of Templates, Models, Codes of Practice Statement of Policy to clarify the application of section 12(3A) of the Act and provide the procedural arrangements for assessing and approving a template, model, or code of practice.
3. MPI has developed 'Attachment A1: Risk Management Programme (RMP) Template for Packaging, Labelling and Delivery of Animal Products' which is intended for use by Risk Management Programme operators who would like to include delivery of their animal products to consumers during the Covid-19 alert levels. The template Risk Management Programme clip on will enable Risk Management Programme operators to amend the scope of their operations and highlight what they need to do to comply.
4. 'Attachment A1: Risk Management Programme (RMP) Template for Packaging, Labelling and Delivery of Animal Products' was developed to assist the Risk Management Programme operators to meet the requirements under the Animal Products Act and to operate during the ongoing Covid 19 alert levels. The version approved is dated April 2020.

## 2. Justification of the approval of the Risk Management Programme Template

1. In making this approval MPI has determined that the 'Attachment A1: Risk Management Programme (RMP) Template for Packaging, Labelling and Delivery of Animal Products':
  - a) incorporates regulatory requirements that are applicable for the kind of businesses concerned;
  - b) incorporates Good Operating Practice, the application of HACCP principles and other Risk Management Programme components that are appropriate for the kind of businesses concerned;
  - c) identifies regulatory requirements distinct from strongly recommended practice distinct from helpful information, and as relevant, indicates what this distinction means in terms of application to a business; and
  - d) is practical and achievable for the kind of businesses concerned.



2. The 'Attachment A1: Risk Management Programme (RMP) Template for Packaging, Labelling and Delivery of Animal Products' clearly identified the regulatory requirements, recommended practice and guidance material in each section. MPI thus considers that the business application of 'Attachment A1: Risk Management Programme (RMP) Template for Packaging, Labelling and Delivery of Animal Products' is clear.
3. The 'Attachment A1: Risk Management Programme (RMP) Template for Packaging, Labelling and Delivery of Animal Products' has been developed primarily based on the existing pre-approved templates under the Food Act 2014 (i.e. food cards related to risk based regimes such as Custom Food Control Plan). It is also noted that no additional requirements are added to the pre-approved template and the existing guidelines may have been re-written to suit the Risk Management Programme operators and their operational activities.
4. Due to the urgency of the situation to assist Risk Management Programme operators during the ongoing Covid-19 alert levels, no public consultation on this template was carried out.

### 3. Disclaimer

1. Considerable effort has been made to ensure that the information provided in the 'Attachment A1: Risk Management Programme (RMP) Template for Packaging, Labelling and Delivery of Animal Products' is accurate, up to date, and otherwise adequate in all respects. Nevertheless, 'Attachment A1: Risk Management Programme (RMP) Template for Packaging, Labelling and Delivery of Animal Products' 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: Risk Management Programme (RMP) Template for Packaging, Labelling and Delivery of Animal Products':
  - a) 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: Risk Management Programme (RMP) Template for Packaging, Labelling and Delivery of Animal Products'; and
  - b) without limiting (a) 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: Risk Management Programme (RMP) Template for Packaging, Labelling and Delivery of Animal Products'.