
Approval for the Risk Management Programme (RMP) Template for Inshore Vessels - Fish Filleting

May 2009

I Judy Barker, Assistant Director (Production and Processing), approve the Risk Management Programme Template for Inshore Vessels - Fish Filleting dated May 2009 in its entirety, in accordance with section 12 (3A) of the Animal Products Act 1999, for the purpose of making the determination that the Risk Management Programme Template for Inshore Vessels - Fish Filleting is valid and appropriate for the businesses of the kind described in the Statement of Application.

Statement of Application

The application of the Risk Management Programme Template for Inshore Vessels - Fish Filleting is limited to businesses involved in the primary processing (filleting) of seafood on Inshore Fishing Vessels that is intended for human consumption.

Without limiting the application, the Risk Management Programme Template covers the -

- Filleting of fish
- Whole fish storage and live fish storage
- Limited processing (e.g. heading, gutting, tailing, etc)

Signed at Wellington this 14th day of May 2009.

(Signed)

Judy Barker
Assistant Director (Production and Processing)
(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. NZFSA 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. NZFSA has developed a risk management programme template for filleting of fish on fishing vessels referred to as the 'Risk Management Programme Template for Inshore Vessels - Fish Filletting'. The version approved is dated May 2009.

2. Justification

1. In making this approval NZFSA has determined that the Risk Management Programme Template for Inshore Vessels - Fish Filletting —
 - 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 Risk Management Programme Template for Inshore Vessels - Fish Filletting meets criteria 1 (a), (b) and (d). NZFSA developed the Risk Management Programme Template for Inshore Vessels - Fish Filletting in conjunction with a group of industry representatives. Feedback received from these representatives and from other consultation processes, was incorporated into the Risk Management Programme Template for Inshore Vessels - Fish Filletting.

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3. With regard to the identification of regulatory requirements, recommended practice and guidance material, NZFSA notes that the Risk Management Programme Template for Inshore Vessels - Fish Filletting clearly identifies the regulatory requirements in relevant sections and attachments. NZFSA also notes that it makes allowances for specific businesses to tailor relevant parts of the Risk Management Programme Template for Inshore Vessels - Fish Filletting to their particular operations. NZFSA thus considers that the business application of the Risk Management Programme Template for Inshore Vessels - Fish Filletting is clear.

3. Disclaimer

1. Considerable effort has been made to ensure that the information provided in the Risk Management Programme Template for Inshore Vessels - Fish Filletting is accurate, up to date, and otherwise adequate in all respects. Nevertheless, this Risk Management Programme Template is approved STRICTLY on the basis that the Crown, the New Zealand Food Safety Authority, 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 Risk Management Programme Template for Inshore Vessels - Fish Filletting:
 - 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 Risk Management Programme Template for Inshore Vessels - Fish Filletting; 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 Risk Management Programme Template for Inshore Vessels - Fish Filletting.