



Te Pou Oranga Kai O Aotearoa

Transport of Export Products

Mary Western

NZFSA

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Background

- There are different control systems in place for the transport of animal products under the Animal Products Act 1999 which replaced the old Meat Act.
- The APA was designed to provide additional control for animal products for export.



Animal Products Act

- The Animal Products Act 1999 (APA) requires the following activities to occur within registered risk management programmes (RMPs):
 - primary processing of animal products, for human or animal consumption, and
 - secondary processing of animal product for human or animal consumption intended for export with official assurances



Where does transport fit?

- Under the Act, transport and wharf handling come under the definition of secondary processing for non-dairy animal products, and primary processing for dairy products.



Current situation

- Risk management programmes for all dairy products
- Listing of transporters for non-dairy AP for export only (OMAR)



What's the problem?

- Inequitable situation
- Does not meet the requirements of the APA
- Inadequate control and traceability for non-dairy AP
- Confusing to overseas auditors who are tending more to cover the whole range of AP



Traceability and Control

- Within NZ
 - one step forward and one step back is generally adequate
 - control and management of risk is the full responsibility of the operator
 - Responsibility needs to be upon the operator in charge of animal product at any point in time



Official assurances

Control of risk is the responsibility of the operator in charge of the product and of NZFSA

- Traceability needs to be continuous and 'visible' to the verifier or auditor
- Auditable systems and records are required to demonstrate control



Options under the Act

- The Act also contains provisions for any primary or secondary process to occur under RCS in place of an RMP.
- RCS can be put in place when it is a more practical and feasible option compared to a RMP,
- or where it is more economically efficient than requiring each individual business to register a RMP.



What is an RCS?

- Sets basic requirements that apply across multiple operators under one scheme
- Do not need to have an RMP or evaluation
- Simpler and more cost-effective across a sector where risks are similar
- Requires verification



Risk Management Framework

(Science input)

Standards Evaluation team



(Policy and Legal input)

Monitoring and Verification team

Production Processing & Sale team

The RMF is a dynamic process



What is the process?

- Get a temporary exemption from the Cabinet
- Decide who needs to be included
- Decide what are the essential elements of control for such programmes
- Consult with stakeholders



Benefits

- Compliance with the Act
- Consistency
- Improved documentation & traceability
- Responsibility placed with the operator
- Verification of the operator



Consultation Process

- In June 2009 NZFSA issued a transport discussion document.
- NZFSA consulted with affected businesses on the most suitable regulatory framework for transport and handling of animal products for export with official assurances (export certification).
- The proposed regulated control schemes (RCS) are NZFSA's preferred option.
- Responses to the discussion paper generally agreed with NZFSA's preferred option.



Regulated Control Schemes

- NZFSA intends to implement two RCSs:
- An RCS for transport of animal products (for human or animal consumption) intended for export with official assurances (export certificates).
- An RCS for wharf handling of animal products being exported with official assurances



What will a Regulated Control Scheme mean to you?

- Requirements and responsibilities defined
- Documented systems and records to be kept to demonstrate control
- Performance-based verification to verify control



Notices

- **DRAFT Animal Products (Regulated Control Scheme – Transport of Animal Products) Notice 2009**
- **DRAFT Animal Products (Regulated Control Scheme - Handling of Animal Material and Animal Products at Point of Export) Notice 2009**



What will the requirements be?

- This notice will impose a regulated control scheme
 - relating to the transportation of animal products and animal material for human or animal consumption intended for export with official assurances; and
 - that is required in order to meet the applicable export requirements.
- Prime purpose of this scheme
 - to enable NZFSA to impose requirements on transporters of animal products and animal material for export that require official assurances in order to ensure there is compliance with the export requirements.



What's in?

- Transport of all animal products destined for export with official assurances
- Except for:



What's out?

- Transport of domestic product
- Transport that is already covered by RMP
- Transport that is not primary or secondary processing (e.g. transport of animals to slaughter premises, transport of fish caught on inshore fishing vessels for delivery to a land based fish processing factory).
- Transport on the vessel that is being used for taking the animal product to the importing country



Design and construction of transportation units

- Must be designed and constructed in a manner to ensure –
 - the **maintenance of the hygienic status and fitness** for purpose of animal products and animal material; and
 - the effective cleaning and maintenance; and
 - the exposure of any animal products or animal material to hazards or other risk factors is kept to a minimum.
- All internal surfaces and structures that directly affect animal products or animal material must be constructed with a material or materials that is –
 - impervious, easily cleaned, and sanitised; and
 - durable and capable of withstanding normal operating conditions; and
 - free from depressions, pits, cracks and crevices that may harbour contaminants.
 - All internal surfaces that are subject to wet cleaning must be designed to facilitate the drainage or removal of water.



Refrigeration facilities

- Must be designed, constructed and equipped to ensure that **temperatures are maintained** throughout transportation to maintain the safety and suitability of the animal products or animal material being transported.
- Must contain a **temperature control and monitoring system** that allows the driver to monitor the temperature of the refrigerated.
- A temperature measuring device must be **calibrated** and located to measure the internal temperatures of the transportation unit at the warmest point.



Vehicle docking facilities

- Vehicle docking facilities may be operated as part of a transport operator's transportation business, or they may be operated as a stand-alone business.
- A transport operator who manages vehicle docking facilities as part of their transportation business must keep an up-to-date list of all vehicle docking facility locations managed under their registration; and
- An operator of a stand-alone vehicle docking facility must identify all vehicle docking facility locations on their application to register under this scheme. A single registration may cover multiple locations.
 - A vehicle docking facility must be designed and constructed to sufficiently protect the animal products or animal material from environmental contamination and other risks.
 - A vehicle docking facility must provide adequate temperature control in order to maintain the safety and suitability of the animal products or animal material.



Cleaning and maintenance

Transportation units and vehicle docking facilities

- must be maintained in a **good operating and hygienic condition** in order to minimise contamination and deterioration of animal products or animal material.
- must follow **procedures** set out in the transport operator's documented procedures.
- must use **chemicals** in accordance with the directions of the manufacturer and in a manner that minimises contamination of animal products or animal material.
- Transportation units and vehicle docking facilities must be **checked by the transporter**, prior to being loaded with animal products or animal material, to ensure that they are visibly clean, dry and with no other signs of contamination.



Repairs and maintenance

- Transportation units, vehicle docking facilities and related equipment must be **regularly checked** by the transporter for damage or deterioration.
- Any damage or deterioration found must be identified and corrected by the transporter, with **records** kept.
- All alterations, repairs and maintenance work must be carried out in a manner that **minimises exposure** of the animal product or animal material to any hazards or contamination.

NB This does not apply to the repairs and maintenance of the vehicle itself.



Handling requirements

– During transport

- Animal product and animal material must be handled and transported in a manner that maintains the **safety and suitability** of the animal material and animal products being transported.
- Chilled or frozen animal product or animal material must be loaded, transported and unloaded **without unnecessary delay** to ensure that required product temperatures are maintained
- Animal product and animal material must be **adequately protected** from environmental elements and contaminants during loading and unloading



Problems with Handling

- The transport operator must notify their verifier and the owner of the product of any animal product or material that has been subject to contamination, deterioration, or has damaged packaging.
- Where traceability or security has been compromised, the transport operator must handle product or material in a manner that minimises –
 - exposure or spillage; and
 - contamination or deterioration; and
 - contamination of the transport environment.



Handling at vehicle docking facilities

- Vehicle docking facilities must only be used for the **direct transfer** of animal product or animal material from an incoming transportation unit to an outgoing transportation unit in accordance with the following conditions –
 - vehicle docking facilities must not be used to load final export containers; and
 - the receiving conveyance must be present before the incoming transportation unit has completed unloading; and
 - the transfer of animal product or animal material must occur as a continuous operation.



Refrigeration control

- A refrigerated transportation unit must be operated in a manner that **maintains the required temperature** of animal products and animal material throughout transportation and loaded within the designed refrigeration capacity.
- **Condensation must be minimised** and not allowed to drip on to animal product or animal material.
- The **temperature of the refrigerated transportation unit must be monitored and checked** by the transporter at a frequency necessary to ensure that required temperatures are maintained during the transport of animal products or animal material.



Personal health and hygiene

- Transporter personnel who are involved with the transportation of animal product or animal material must not handle any exposed animal product or material if they are suffering from –
 - diarrhoea; or
 - an acute respiratory infection; or
 - any infectious disease which may be transmitted through food
- **Hygienic practices**
 - minimise contamination and deterioration of animal product or animal material.
 - follow a documented personal hygiene routine before handling any exposed animal product or animal material.



Registration

- A person with the overall management or control of the transport, operation to which the regulated control scheme applies must register as a transporter of animal product or material.
- The purpose of the register is to—
 - inform members of the public which transporters are subject to this regulated control scheme, and who is responsible for various functions under this scheme; and
 - facilitate the ability of the Director-General to safeguard official assurances for animal product and animal material; and
 - facilitate the compliance, audit, and other supporting and administrative functions of NZFSA under the Act.



Registration of operators

- The Director General must register the operator if satisfied that—
 - the verifiers report confirms that the content of the operator documented system complies with the requirements imposed by or under this scheme; and
 - the applicant is a fit and proper person to operate, manage, or control operations,



Records to be kept

- Every transport operator must keep such **records** as to enable the verifier to readily ascertain—
 - that the business is operating in compliance with this regulated control scheme; and
 - the nature and quantity of animal material or product being handled by the operator; and
 - the date the operator took possession of each consignment and the date each consignment was delivered to the receiving animal product business; and
- Each consignment must be accompanied by operator documents showing the vehicle reference number, (for example a fleet number or licence plate).
- Documentation must include annotations for any changes of vehicle or vehicle reference number during the journey, and any vehicle docking facilities which handled the consignment.



Notification requirements

- The operator must notify the person responsible for the animal material or animal products without unnecessary delay when the following occurs –
 - damage, spillage, or contamination of animal material or animal products; and
 - failure to maintain product temperature, including refrigeration failure; and
 - damage to or malfunction of a transportation unit
- The operator must, without delay, report any suspected or known non compliance to the recognised agency responsible for verification.



Non complying products

The operator must **clearly identify and control** non complying product, until disposition is determined by a person with the necessary authority.

- Non complying products must be handled in a manner that prevents –
 - contamination or deterioration of other products in the same transportation unit; and
 - further contamination or deterioration of non complying products; and
 - contamination of the wharf facility environment.
- The operator must record –
 - all instances of non compliance that occurs during the handling of animal material or animal products; and
 - the corrective action taken.



Performance-based Verification

This regulated control scheme is subject to verification in accordance with the Animal Products (Export Verification) Notice 2009 with the following variations

- the initial and ceiling steps for newly registered transport operators that do not include vehicle docking facilities within their operation is unchanged;
- the initial step for newly registered transport operators that include vehicle docking facilities within their operation is step 4, and the ceiling step is step 6. Within the verification period applicable to an operator, all of their identified vehicle docking facilities must be subject to at least one verification visit;
- the initial step for newly registered stand-alone vehicle docking facility operations is step 4, and the ceiling step is step 6. Agencies and persons recognised under the Act for the purposes of carrying out verification activities must conduct verification required by this clause.



Transitional Provisions

- **Businesses operating under requirements being cancelled by this scheme** will be placed on the applicable ceiling step at the commencement of this scheme.
- **Businesses operating under RMP moving to operate under this scheme** will remain on the step that applied during the verification of the RMP.



Wharf requirements

- **DRAFT Animal Products (Regulated Control Scheme - Handling of Animal Material and Animal Products at Point of Export) Notice 2009**



Definition

- **Wharf** means port facilities used for the loading and unloading of sea freight vessels, the temporary portside storage of products while awaiting loading onto a vessel, and sites operated by the port company for the temporary holding of sea freight consignments prior to movement directly to the port.



Verification

- This regulated control scheme will be subject to verification in accordance with the Animal Products (Export Verification) Notice 2009. The initial step for a newly registered wharf operator is step 4, and the ceiling step is step 6.
- Wharf operations will be automatically placed on the applicable ceiling step if they are currently verified under notices in force prior to the commencement of this scheme, and they will become registered under this scheme on the commencement date of this notice.
- A designated person (or more than 1 person) responsible for the day to day management of the operation must be available to verifiers during operating hours.



Implementation

- Once consultation is completed, there will be a 6 month lead-in phase to allow operators to understand and then to implement the requirements

- Questions?