
Traceability

Section Detail Report

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Overview

Traceability of seafood in New Zealand extends from “sea to plate”. While the primary purpose of traceability systems is to ensure that an effective recall can be undertaken quickly and effectively, they also provide the seafood business operator with a level of transparency and integrity.

This report details the approach, implementation and conformance measures that specifically relate to traceability of seafood produced in New Zealand.

Traceability of food in New Zealand is regulated under food safety legislation. The details of New Zealand’s food safety system (including Animal Products Act 1999 and the Food Act 2014) are discussed in the *Food Safety Section Detail Report*. This report should therefore not be read in isolation from the *Food Safety Section Detail Report*.

The New Zealand approach

The objective of New Zealand’s traceability system is to allow for the identification and tracking of product as it moves along the supply chain. For seafood this is from the point of harvest or catch through to retail sale (if consumed in New Zealand) or to the point of export. Seafood operators are required to have systems that allow product to be identified and tracked on a ‘one up, one back’ basis.

While the systems and processes that individual businesses use may differ, the legislation requires them to keep records of key events that occur while the seafood is in their control, including who it was received from, what was received, the processing that occurred and to whom it was sold. This means that full traceability exists along the supply chain.

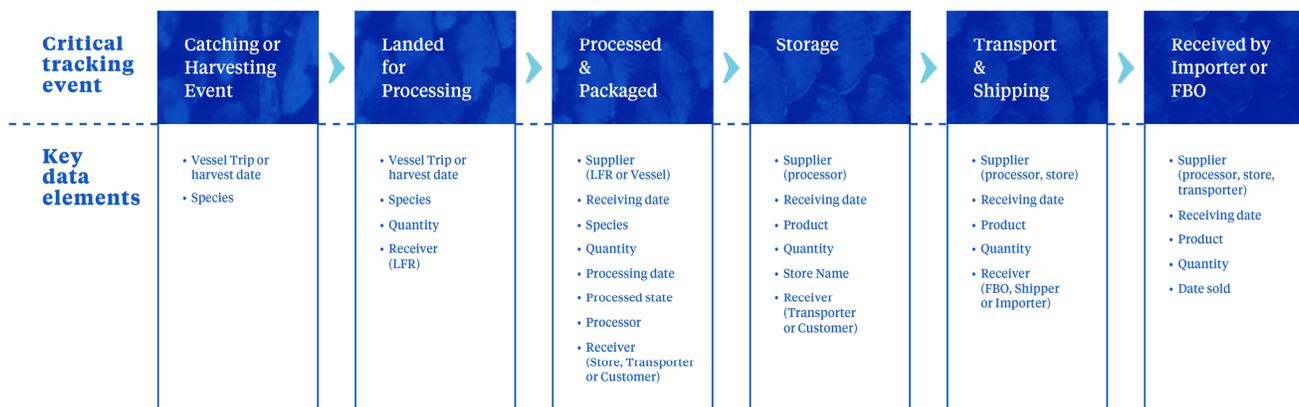


Figure 1. Simplified traceability model

Animal Products Act

The Animal Products Act was amended in 2018 to specify: A regulated person must, as and when required by regulations :

- have in place any procedures for tracing and recalling animal material or animal products; and
- conduct simulations or other tests of those procedures; and
- implement those procedures to trace or recall animal material or animal products.

Animal Products Legislation

The Regulations specify the following traceability requirements:

- All operators of risk management programmes, all exporters, and all other categories of person required by specifications to do so, to have a tracking system that allows for the identification of animal material and animal product and enables the movement of that animal material or animal product to be traced (from origin or supplier, while it is under the businesses control and to the next recipient)
- Animal material and animal product must be labelled or identified or contain information that accurately describes or differentiates so as to identify the animal material or animal product to which it applies.

The Animal Products Act also has several supporting notices which include requirements for inventory control and recall.

For example, operators are required to document and implement procedures to manage inventory control, as required by the Animal Products Notice: Specifications for Products intended for Human Consumption and Animal Products Notice: Specifications for Products intended for Animal Consumption.

The Animal Products (Risk Management Programme Specifications) Notice 2008 contains the following with respect to recall:

- Where, due to the nature of the animal material or animal product it is possible to recall it from trade, distribution or consumers, a risk management programme must contain a recall procedure, including —
 - the criteria for deciding when a recall will be initiated; and
 - how retrieval and disposition of the relevant animal material or animal product will be managed.
- A risk management programme must contain a system for notifying the following people as soon as possible when animal material or animal product is recalled from trade, distribution or from consumers because it is not or may not be fit for its intended purpose;
 - the Director-General; and
 - the recognised risk management programme verifier or recognised.

The Food Regulations

The Regulations specify the following traceability and identification requirements:

- The operator must have procedures for identifying and tracing food so that it can be traced from the supplier to the food business, while it is under the control of the food business and from the food business to the next recipient in the supply chain (other than the final consumer).
- The operator must ensure that food is identified and traced in accordance with the procedures.

The Food Standards Code

The Food Standards Code includes requirements and standards for food safety, labelling, food additives and other foods that need pre-approval (such as any genetically modified food), but also contains requirements that apply to Australian manufactures only. It is divided into four parts, and with respect to traceability, Chapter One is that which is relevant incorporating labelling and identification requirements. Specifically, Standard 1.2.2 Information Requirements – Food Identification Requirements.

Complying with the New Zealand approach

The majority of seafood produced in New Zealand is produced in land-based premises or factory vessels operating under a Risk Management Programme, under the Animal Products Act.

A Risk Management Programme is a documented system that ensures all products leaving the Risk Management Programme, are fit for their intended purpose, and if intended for human consumption, also meet the requirements of the Food Standards Code. As part of this documented system, operators must document their procedures for ensuring their traceability obligations are met.

For those seafood businesses operating under the Food Act, they must also document and implement procedures for the identification and tracking of product as part of their compliance requirements.

The New Zealand Seafood Standards Council and the Ministry for Primary Industries have jointly developed a Code of Practice for the Processing of Seafood Products (The Code of Practice: Processing of Seafood Product). The objective of the code is to outline the acceptable or agreed procedures for meeting the regulatory requirements. This includes guidance to assist seafood business operators to implement effective traceability systems.

Further details are discussed in the *Food Safety Section Detail Report*.

Conformance and enforcement measures

Traceability is required to be monitored and verified by both internal and external processes. A key component is the requirement for operators to conduct their own internal verification to ensure the system is effective.

All operators are required to confirm that their system complies with the legislation. In terms of traceability, operators must implement a system that is designed to gather sufficient evidence to determine that their processes meet the requirements. This includes conducting activities to test the accuracy and effectiveness of their system, such as product trace-back exercises.

External verification includes activities designed to determine whether an operator's system, including traceability, are in compliance with the requirements of the programme and the Animal Products Act or Food Act (whichever applies). As part of this verification, operators are expected to be able to demonstrate the effectiveness of their traceability system to their verifier.

Frequency of verification for traceability is determined by the Performance Based Verification system. This system allows the frequency of external verification to be based on performance. With good performance, businesses face less frequent external verification. Poor performance results in more frequent external verification. For the seafood businesses that export, the frequency is capped at 6-monthly audits, with a 12-weekly load-in and load-out audit. For those businesses who solely sell on the New Zealand market, the frequency is capped at annual audits.

The Ministry holds data on the frequency and number of verifications undertaken. However, this information is not publicly reported.

In term of exports, the Ministry cannot issue official assurances unless the business has demonstrated compliance through external verification. This requirement on the Ministry is prescribed in legislation.

Non-compliance

Non-compliance can result in a series of enforcement actions depending on the severity of the breakdown in traceability. As a minimum, operators are required to identify and correct any non-compliance, as outlined in the *Food Safety Section Detail Report*.

The Animal Products Act prescribes penalties for offences against the Act¹. Offences can result in fines and/or imprisonment for persons or body corporates.

Comparability to international best practice

Some New Zealand seafood companies have obtained Marine Stewardship Council (MSC) Chain of Custody certification, which verifies the integrity of traceability systems for MSC certified products².

There is currently no global, secure, interoperable support system for seafood traceability.³ Both New Zealand seafood companies and the New Zealand government maintain an active watching brief on global developments to enhance traceability of seafood.

References

Animal Products Act 1999. Available from: <http://www.legislation.govt.nz/act/public/1999/0093/latest/DLM33502.html>

Animal Products Regulations 2000. Available from:
<http://www.legislation.govt.nz/regulation/public/2000/0207/latest/DLM9546.html>

Animal Products (Risk Management Programme Specifications) Notice 2008. Available from:
http://www.foodsafety.govt.nz/elibrary/industry/risk-management-programme-specifications-and-policy-statement/Animal_Products-Contains_That.pdf

Animal Products Notice: Specifications for Products Intended for Human Consumption. Available from:
<http://www.foodsafety.govt.nz/elibrary/industry/animal-products-specifications-asd/index.htm>

Animal Products Notice: Specifications for Products Intended for Animal Consumption. Available from:

<https://www.mpi.govt.nz/dmsdocument/17617/loggedIn>

Food Regulation 2016. Available from:
http://www.legislation.govt.nz/regulation/public/2015/0310/latest/DLM6684402.html?search=sw_096be8ed81808b83_identifying_25_se&p=1&sr=13
Animal Products Notice: Export Verification Requirements. Available from:
<http://www.mpi.govt.nz/exporting/food/seafood/requirements/>

Bhatt, T., et al. 2016. Project to Develop an Interoperable Seafood Traceability Technology Architecture: Issues Brief. Comprehensive Reviews in Food Science and Food Safety. Vol.15,2016.

¹ Part 10 of the Animal Products Act 1999

² <http://cert.msc.org/supplierdirectory/VController.aspx?Path=be2ac378-2a36-484c-8016-383699e2e466&xf=1&Country=New%20Zealand>

³ Bhatt, T. (2016)

Code of Practice: Processing of Seafood Products. Available from: <http://www.foodsafety.govt.nz/elibrary/industry/code-practice-seafood/>

Food Act 2014. Available from:

http://www.legislation.govt.nz/act/public/2014/0032/latest/DLM2995811.html?search=ta_act_F_ac%40ainf%40anif_an%40bn%40rn_25_a&p=4

Food Regulations 2015. Available from:

<http://www.legislation.govt.nz/regulation/public/2015/0310/latest/whole.html#DLM6684211>

Food Standards Code. Available from: <http://www.foodstandards.gov.au/code/Pages/default.aspx>

Seafood legislation road map (links to all seafood related legislation). Available from:

<https://www.mpi.govt.nz/dmsdocument/20285-seafood-roadmap/loggedin>

Report Details

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Report author(s)	Cathy Webb, Seafood Standards Manager, Seafood Standards Council ⁴
Date of draft report	5 February 2019
Legislative review provided by	Lisa Olsen, Principal Adviser (Animal Products), Ministry for Primary Industries
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Relevant legislation, regulation and statues	Animal Products Act 1999 Animal Products Regulations 2000 Animal Products Notice: Specifications for Products intended for Human Consumption Animal Products Notice: Specifications for Products intended for Animal Consumption Animal Products (Risk Management Programme Specifications) Notice 2008 Animal Products Notice: Export Verification Requirements Food Act 2014 Food Regulations 2015 Food Standards Code
Relevant regulatory agencies	Ministry for Primary Industries www.mpi.govt.nz Food Standards Australia New Zealand www.foodstandards.govt.nz

⁴ The Seafood Standards Council is an official committee of Seafood New Zealand Limited in cooperation with the Ministry for Primary Industries. It is primarily concerned with the assurance of food safety and market access for seafood produced in New Zealand. More information can be found at www.nzssc.co.nz.