



Sourcing food from a regulated environment

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This information provides further guidance for importers about how to meet the requirements of the Food (Importer General Requirements) Standard 2008, Part 2, 6 (b)(i). This requirement is as follows:

All importers of food for sale must take all reasonable steps to ensure that, prior to sourcing any product for import and sale, the importer must document how the food product has been produced and managed in a manner that enables the food to be safe for human consumption.

The complete standard can be reviewed using the following link:

[Food \(Importer General Requirements\) Standard 2008 part 2, 6 \(b\) \(i\).](#)

General guidance information on the Standard is provided for at:

[Food Importer Standards Guidance](#)

Key recommendation

Importers should try to source products from a regulated environment, and obtain other evidence that the supplier is able to provide safe and suitable food that has been exported legally from the country of origin.

A regulated environment has a predefined set of controls with independent oversight from a government agency and/or is subject to checks by an accredited third party organisation or body. An importer can be reasonably confident that food for trade or export that is produced, processed, or manufactured within a regulated environment has had some level of standards applied to it.

Why do we recommend this?

The Ministry for Primary Industries (MPI) uses a risk-based approach for managing food safety. This includes the obligation that all sellers of food, including importers, accept responsibility for selling safe and suitable food. Under the Food (Importer General Requirements) Standard 2008 part 2, 6 (b)(i) importers must be able to provide evidence that imported food has been produced and managed in a way that results in food that is safe for human consumption. The type and amount of evidence that importers request from suppliers should be appropriate for the level of risk posed by a particular food.



MPI expects that importers will source food products that meet the requirements of the Food Act 1981 as well as any other requirements of applicable regulations and standards.

Not all countries have well developed domestic food safety regulatory systems and individual supplier food safety practises can vary. By sourcing food from a regulated market, importers can have some confidence that appropriate standards were applied during the products' manufacture.

Importers should also be aware that MPI may check their compliance with the standards through visits to importers to inspect records, or through targeted sampling and testing.

How to comply

When considering the safety and suitability of an intended product, importers should firstly assess the effectiveness of the regulated environment within which the supplier operates and secondly whether the manner of food production will lead to safe and suitable food.

MPI expects that all importers of food take reasonable steps to ensure that they source food from suppliers that are operating within a regulated environment and legally exporting it in accordance with any exporting country requirements. If the supplier is not operating within a readily identifiable regulatory environment, an importer should place more emphasis on asking questions about how the food was produced.

In addition, MPI expects that all importers of food take reasonable steps to ensure that food intended for import has been produced by the supplier in a manner that enables the importer to have confidence that the food is safe for human consumption.

Importers should ask a potential supplier about the following:

- request evidence of the regulatory environment they operate in e.g. what domestic food laws they comply with and what level of independent inspection or verification they are subject to.

If an importer is not able to confirm the supplier is operating from within a regulated environment, then they must find another supplier or place additional emphasis on confirming how the food produced and can be considered safe for human consumption.

- in all cases, importers must take steps to confirm and be confident that the product is safe and suitable to be sold within New Zealand.

To make this determination, importers should consider the nature of the food and ask the supplier to confirm how the food is produced and managed in a manner that enables it to be



safe and suitable for human consumption. If requested information is not provided, then an importer should find an alternative supplier.

- request evidence of the supplier's foods safety programme design; e.g. information on the programme of controls and implementation; including documentation of systems, monitoring, performance, decision criteria and action, laboratory capability, transportation infrastructure and provisions for certification and audit; and /or
- request evidence of specific requirements that will affect the safety and suitability of the finished product.

This includes requirements applicable to individual facilities (e.g. premises design - foreign body controls), equipment (e.g. design of food contact machinery – ease of cleaning), processes (e.g., HACCP plans – specific registration), procedures (e.g. validated cooking temperatures, use of a metal detector), tests (e.g. laboratory tests for microbiological and chemical hazards) and methods of sampling and inspection.

Note: approved certification provides evidence of safety and may be accepted for clearance of specific foods. Where this is an option the details are listed in the applicable [Imported Food Requirement](#)

Examples of evidence that food has been sourced from a regulated environment

This table provides examples of some known regulated environments.

Country	Examples of evidence that food has been sourced from a regulated environment
Australia	Health certification issued by the Australian Quarantine and Inspection Service (AQIS) Certificate of Origin issued by Department of Agriculture Fisheries and Forestry
Canada	Certification issued by the Canadian Food Inspection Agency (CFIA)
China	Chinese entry-exit inspection and quarantine bureaus (CIQ) label on all products legally exported from China Certification issued by CIQ (formerly Chinese Commodity Inspection Bureau: CCIB)
European Union	Certification issued by competent authorities of EC member states and produced in accordance with the European Union Food Law
United States	Certification issued by United States Department of Agriculture or State Department of Food and Agriculture



The following link takes you to specific country information:

[Importing from Specific Countries](#)

Example of sourcing products from within a regulated environment - China

The General Administration of Quality Supervision, Inspection, and Quarantine of the People's Republic of China (AQSIQ) manages the export regulatory requirements for affixing inspection and quarantine labels on exported food products. All food products which is subject to the scope of this requirement and that have been legally exported from China are either accompanied by a certificate of assurance for bulk and risk commodities, or have affixed to the outer shipping / transport carton the Chinese Inspection and Quarantine Bureaus exit inspection and quarantine labels (CIQ label). The CIQ label confirms that the export has been subject to AQSIQ exit inspections.

During commercial contract negotiations when asking for evidence from the supplier of the level of regulatory oversight they operate under and confirming how the food produced can be considered safe for human consumption you can also ensure that products are accompanied by the CIQ mark (certificate of assurance or CIQ label).

By doing so you will have taken all reasonable steps to confirm the food is safe, suitable, and legally exported from China.

Further information is available on the CIQ label:

[Food from China with CIQ labelling](#)