

**Analysis of Submissions: on the proposed  
Draft Animal Products Risk Management Programme (RMP) Template  
for Transport of Animal Material and Animal Products**

**Date:** 8 April 2018

MPI received 3 submissions on the proposed template. These submissions have been analysed. As a result of the consultation process, and where appropriate based on the analysis below, amendments have been made to the document. MPI would like to thank those parties who have taken the opportunity to comment on the proposed template.

**Submission Analysis**

Points MPI would like feedback on		MPI Response
Is the level of detail appropriate for the transport sector?	Yes	Noted.
Are the technical aspects correct?	As per Section 17.5 of the APA now could the operator not have the option to transport Packaged Non-Animal Food Products under the RMP as a like for like process? – the referenced guidance cannot be located - Guidance Document: Can I include non-animal products in a Risk Management Programme (RMP)	The operator can include non-animal products under the RMP as described in the new Guidance Document.  The guidance document was published immediately after the RMP template was published for consultation and the hyperlink has now been inserted into the template.
	M. Operating Procedures – Transport Depots Handling at depots:  The statement ‘Depots are only used for the direct transfer of product from an incoming transportation unit to an outgoing transportation unit’	The RMP and RCS templates are different and are issued under different provisions of the Animal Products Act 1999 and do not ‘compete’ legally e.g. the RCS is focussed on export only whereas the RMP is the NZ standard.

Points MPI would like feedback on		MPI Response
	<p>Doesn't the new legislation from 1 August 2018 over-ride the above statement? (as below).</p> <p>Animal Products Notice: Regulated Control Scheme – Transportation and Handling of Products for Export with an Official Assurance.</p> <p>3.4 Maximum time to hold relevant goods at a depot. Section (2).</p>	<p>Operators must register and comply under one or the other – not pick the 'best' out of each to comply with.</p>
<p>Are the procedures practical and achievable for the transport sector?</p>	<p>Yes – The contents aligns well to the APA and RMP requirements making it clear as per the requirements and able to be easily verified as per the template requirements and references.</p>	<p>Noted.</p>

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N/A	<p>There is no mention in the template of export loading facilities (ELF). However in the Animal Products Notice: Export Verification Requirements under Schedule 1 Transport Operators with ELFs need to be verified.</p> <p>A Vehicle Docking Facility (VDF) has a different meaning to an ELF and this draft Template can be used if you have a VDF so should ELF also be added?</p>	<p>Review and amend if required.</p> <p>Suggest adding Export Loading Facilities to the cover page -</p> <p>You can use this RMP template if you are a:</p> <p>Transport service operator</p> <p>Transport depot operator, including Vehicle Docking Facilities and Export Loading Facilities.</p>	<p>Definition for an ELF is “ a wharf or other facility from which sealed transportation units of relevant goods are loaded onto vessels or aircraft for export...” and wharves are not covered by this template.</p> <p>Wharves have an <a href="#">RCS template</a>.</p>		
Note: (under section 4).	<p>The first Note reads - Any additional processes added to this template will need to be evaluated by an MPI recognised RMP evaluator.</p>	<p>Add – Note: Any additional processes added to this template will need to be evaluated by an MPI recognised RMP evaluator e.g. Transport of non-animal material and non-animal products.</p>	<p>MPI does not categorise evaluators in this way, however the wording has been amended to:</p> <p>Any additional processes added to this template will need to be evaluated by an MPI recognised RMP evaluator <b>with the appropriate technical expertise</b>.</p>		
4	<p>On page 5, under the second text box- Other Transport Activities, Product Activity it has the following</p> <table border="1" data-bbox="277 1150 842 1278"> <thead> <tr> <th data-bbox="277 1150 842 1206">Product or Activity</th> </tr> </thead> <tbody> <tr> <td data-bbox="277 1206 842 1278"> <input type="checkbox"/> Non-animal products<sup>1</sup> </td> </tr> </tbody> </table> <p>It is my understanding that there is not a RMP or RCS that covers non-animal products.</p>	Product or Activity	<input type="checkbox"/> Non-animal products <sup>1</sup>	<p>Review and if this line is not applicable remove it from this section.</p>	<p>This table has been removed and integrated into 4. Scope of the RMP to improve clarity.</p>
Product or Activity					
<input type="checkbox"/> Non-animal products <sup>1</sup>					

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13 B. Personnel Health and Hygiene	The level of detail for “Show” documents e.g. Register of injuries, is more than what is required for a Warehouse operation where product is stored. Personal training forms should not be required in this area as it would all be covered under the Personnel Competencies and Training section.	Remove the requirement to show the Register of injuries. Remove the requirement to show Personal training forms in this section.	Agreed.  Agreed, although training records should be available for most aspects of the RMP when requested.
16 D. Operator Verification and External Verification	Table C.1: Operator verification activities and frequencies: Record checks: the frequency for record checks is ‘when completed’. It is not practical for these records to be checked once completed by a person who is independent of the process or operation. Transport has multiple depots and it is not viable to have personal at each depot that is independent of the process or operation. Records should be checked for accuracy and completed by the Operations supervisor. This person should be trained and be responsible for the accuracy and completion. Records can be checked by an independent person on an internal audit frequency scheduled programme or as required.	Remove the frequency ‘when completed’ and add ‘as required’	Agreed and changed to ‘as required’.
22 G. Cleaning and Sanitation	The cleaning of transport units should be undertaken ‘as required’ and not under a set frequency schedule. The transport units are inspected for cleanliness prior to loading which identifies any cleaning issues at this point. The cleaning requirements will also	Have separate cleaning requirements for the depot, transport units, and equipment.	The template does not stipulate any frequencies of cleaning rather that the operator must have procedures in a programme or schedule and that checks of transportation units/depots are undertaken prior to transfer of product. A programme or

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	<p>depend on the product that is loaded into the transport unit i.e. packed product or carcasses. A frequency schedule could result in transport units being taken off the road for cleaning when it is not required. This would cause unnecessary costs and downtime.</p> <p>The depots should remain on a cleaning frequency schedule but the transport units should be on an 'as required' basis.</p> <p>The equipment i.e. forklifts, jiffy jacks, freezer boards, should all be on an 'as required' basis.</p>		<p>schedule could stipulate 'as required' where needed.</p>
<p>23 H. Traceability and Identification</p>	<p>Sealing of consignments is acceptable for full loads but is not practical for LCL loads. The manufacturing / processing sector/ product owner should be responsible for packaging their consignments to prevent tampering or substitution of product in preparation for transportation. The manufacturer / processor / product owner should ensure all their consignments are labelled and tamper-proof, and should be in control of any recall that is required. The transport companies are not a storage facility. They are not responsible for recall. The manufacturer / processor/ product owner is responsible for recall.</p>	<p>Recall is the responsibility of the manufacturer / processor/ product owner. They will notify the transport company of any recall and determine if any recall product is at any depot or in transit.</p> <p>The manufacturer / processor will organise further transport requirements if required.</p>	<p>Sealing of consignments is required by MPI when transfer documentation is used. The template also describes where seals are not required. This has been re-worded to improve clarity.</p> <p>The template describes how to control non-complying product, this is not necessarily recalled product.</p> <p>The template does not stipulate that the transport operator is responsible for a recall: "Recall: We will follow instructions from our RMP verifier, MPI or owner of the product as required."</p>

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<p>33 M. Operating Procedures – Transport Depots</p>	<p>Handling at Depots:  “Depots are only used for the direct transfer of products from an incoming transportation unit to an outgoing transportation unit.”</p> <p>This is not practical. There are times when product needs to be held at a depot and await the scheduled transport unit to arrive, or be held at a depot as the DC is not open for delivery, or does not want the delivery on the day of arrival at the depot.</p> <p>It is not financially viable to reschedule a transport unit to take a few pallets to a delivery point when the schedule to a certain destination is twice per week. Product will be held and placed on the scheduled delivery frequency.</p> <p>Direct transfer is not always practical or financially viable.</p> <p>Depots under an RMP and verified by an MPI auditor should be able to hold product. They must comply with the cleaning and sanitation requirements, calibration of equipment, pest control, design and construction, control of non-complying product. These controls should justify that the holding of product is low risk. The RMP includes plans of the depot and the boundary of the site.</p> <p>The MPI auditing frequency for a depot is the same as a storage facility.</p>	<p>RMP depots can be used as a ‘holding’ facility during the transit of product from Pick Up to the Final Destination Point.</p>	<p>Agreed, the word ‘direct’ has been removed.</p>

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	This RMP template has requirements that are along the same lines as a storage facility and therefore 'holding' of product needs to be included when circumstances arise when a 'direct transfer' is not viable.		