Analysis of Submissions: Proposed amendments to the:

Animal Products Notice: Specifications for Products Intended for Animal Consumption

Date: 20 September 2019 (closing date)

MPI received 8 submissions on the proposal document(s). These submissions have been analysed in the following table. As a result of the consultation process, and where appropriate based on the analysis below, amendments have been made to the specification. MPI would like to thank those parties who have taken the opportunity to comment on the proposal(s).

Questions MPI would like feedback on			**MPI response**
1.	For the consolidated Parts of the Notice, are the requirements still clear for each sector?	1: No, for the supply of Farmed Fish, additional information required as detailed below. 2: No – see detail.	Noted.
2.	Are there any corrections needed for any content of the Notice?	1: Yes, Supplier Statement for the supply of Farmed Fish needs amendment to include additional information. In the Supplier Statement, we need to include additional tick box for the type of Risk (High, Medium, Low) in the event of declaring harvested fish showing signs of illness. So, it will serve as a documented evidence to show this information has been communicated by the Supplier to the Operator, based on which the operator is supposed to process the fish with appropriate conditions. This recommendation is in reference to **Part 6 Eligibility & Part 2 Categorisation Raw Material.** 2: Yes – see detail.	Noted. See response below to clause 7.7.
3.	What else should be included in the Notice, e.g. labelling requirements?	1: To include, acceptance of **Supplier Guarantee Program** in equivalence of **Supplier Statement,** with following notes.	Noted. See response under clause 7.7.

		In the case of farmed fish (other than bivalve molluscan shellfish), the operator must not accept the fish for processing (except for initial storage) if the required supplier statement is absent or incomplete, unless: i) the operator has a **supplier guarantee programme** and the supplier is a specified supplier within that programme; and ii) the supplier has provided to the operator information in accordance with the **supplier guarantee programme** at least on a **six-monthly basis**; and iii) the animal material is of the type that is described in the **supplier guarantee programme**; or 2: See below.	
4.	Are more guidance boxes need? If so, where?	1: See below.	Noted.

Submission Analysis:

Part	Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
General Comments				
		Although grateful for the opportunity, the submitter does not currently have sufficient resources available to fully consider the consultation material presented.		Noted.
General		The term, "The operator must ensure…." Is (over) used throughout the specification.	The specification is for the process and should focus on the outcomes required. 3.1 (1) has the requirement.	It is noted that this is a technical review rather than an outcome focussed review.
Who should read this notice		"Transport Operators" removed from this section and definitions. All the requirements in relation to transport of animal products is now the responsibility of the owner or person in	Clarification is sought in regard to the responsibilities of "Operators" and "Transport Operators".	Transport operators = RMP operators.

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		control of the producer or processor of animal material or product. However, Part 12 applies to operators who transport animal material and product……		Those RMP operators who transport must meet Part 12 requirements.
Part 1: Preliminary Provisions				
1.2 Definitions				
1.2	Definitions	**Further (petfood) processing** As renderers process animal product intended for consumption by pets from raw meat, etc. they are covered by this definition. The submitter understands from MPI that this is not the intent.	Clarity to the definition is sought to ensure that it is clear that renderers are not included in this definition and thus the requirements within the spec related to "further (petfood) processors".	Under Animal Products (Exemptions and Inclusions) Order 2000, renderers must develop and operate under a RMP. The same notice also covers the definition for further (petfood) processors. We do not repeat definitions already in higher legislation.
1.2	Definitions	**Sanitise** Worded slightly different to the HC Specs definition, and quite different to the CoP5 definition.	Consistency of definition is sought.	Agreed. Aligned with the revised HC Spec.
Part 2: Categories of Raw Material				
2.2 Medium risk raw material				
2.2	(1) c)	**Medium risk material** …… farmed animals that have died in the field	Clarification is sought as to whether what is written is the intent. E.g. if animals die in a farmer's yard or in a transport truck they are not medium risk material.	Clarification can be provided in the Operational Code: Petfood Processing (OC). This will be decided on a case by case basis dependent on the death of the animal (e.g. slipped off ramp compared to an indication of an underlying condition).

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2.2	(1) e)	Is "consumer" the correct term to use here? This is probably more applicable to human consumption foods.	Elsewhere ".....harm to animals on consumption" has been used.	Have added clarification by adding in 'animal consumer'.
		While this definition is very outcome focused veterinary medicine resides, there is international concern in regard to euthanasia drugs such as pentobarbital being used in materials for rendering. The submitter is not aware of extent that euthanasia drugs are used in destined for rendering or the subsequent consequences.	Because of the concern, the submitter would like to raise the question as to whether euthanasia drugs residues (in material for rendering) is a topic that should be included in this specification.	We are currently looking at having this information on euthanasia drugs in code of practice. We think it is appropriate there.
2.2	(1) g)	Any minimal risk raw material that has come into contact with any medium risk raw material.	Possible unintended consequence: If 2.2 (1) c) does include animals in farmers yards or a transport truck, does it make the other animals in that lot medium risk as raw material = animal material = live or dead animals.	This is dependent on if the death has occurred before or after the ante-mortem. In the field it is likely an ante-mortem would not have been completed yet. Similar to the clarification of "animals that have died in the field this will be done on a case by case basis". It is noted that if correct separation has not occurred then it is a possible consequence that minimal status will be lost. A guidance box has been added to reflect this.
Part 3: Operator Requirements				
3.2 Design and construction				

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3.2	(1) a-d)	"…material or exposed internal surface is: a) be impervious… b) be easily…"	Wording requires work.	Amended. Removed the word "be" from the start of some of these subclasses.
3.3 Facilities and equipment				
3.3	(1) a) and b)	a) Appropriate……. b) Appropriate …….	Delete "appropriate". Appropriate is subjective and the remainder of each of these sentences describes the outcome required.	Every RMP/plant is different. 'Appropriate' is deemed by the RMP operator as they see fit meeting the RMP requirements.
3.3	(6) a)	ii) "of different status"	Referring back to Part 2 this would be "of different risk status".	Have added reference for clarification.
3.5 Water coming into contact with animal material or product				
3.5		This clause is complex and prescriptive. An alternative statement is proposed. If accepted 3.5 (2) a), c) and 3.5 (5) could become guidance.	A proposed simplified statement, which is the outcome is, "The operator must ensure that water (including ice and steam) that comes into direct, or indirect contact with animal material or product being processed for animal consumption is fit for intended purpose at the point of use".	Noted. Clause has been simplified and is now aligned with the Human Consumption Specifications. We do not consider that (2) and (5) are suitable in guidance boxes.
3.6 Water not coming into contact with animal material or product				
3.6		Why is a specification requirement needed for water not coming into contact with animal material or product? If there is some reason that it is required, it could be covered under 3.5 by meeting the requirement of "intended purpose".	Delete section 3.6.	It is considered that water used for functions other than direct product contact still must meet certain requirements depending on the intended use. This section has been clarified.
3.7 Water on fishing vessels				

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3.7	(1)	"…. that are a distance offshore to ensure….."	Clean seawater is defined in definitions therefore no need to add subjective prescription such as "sufficient distance" and "pollution sources".	This is written in this way to highlight to the operator that seawater quality may change depending on the distance away from shore and in the presence of possible contamination sources.
3.8 Water management for all types or sources of water				
3.8	(4) d)	There is no reference to assessing the impact on product or material.	Add the clause 3.16 (9) c)	In 4 a) (now 3 (a)) it specifies the operator must provide information about the additional treatment (including type of treatment, operating parameters, procedures for control, monitoring/testing and acceptable limits). This is considered sufficient to cover assessing impact.
3.11 Water analyses				
3.11		3.11 Water analyses inconsistent with Schedule 1, – the use of Recognised laboratory implies it needs to be an RLP laboratory. In Schedule 1 the requirements for LAS laboratory has been removed and only requires a 17025 accredited laboratory with required tests in laboratory scope of accreditation.		Noted, it is considered that this information does not need to be duplicated in each section.
3.11	(1) and (2)	This is a repeated is Schedule 1.	Is it necessary to have twice?	Agreed, have removed the duplication.
3.11	(3)	Working the logic through, this clause means that only faecal coliforms must be performed in a recognised laboratory.	1. Is that really necessary? 2. If so, state this in the specification rather than have	1. This is the intention that microbiological testing is performed in a laboratory.

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			a complicated pathway to determine that is what is actually required.	2. This is specified in Schedule 1.
3.12 Non-complying water				
		This is basically a repetition of clause 3.9.		Agreed, 3.9 has been removed to match the new Human Consumption Specifications.
3.13 Process gases; and 3.14 Compressed air				
3.13 and 3.14		The outcome for these two clauses is the same – the contacted animal material or animal product must not be contaminated.	These two clauses could be combined and the filtered and clean source, for compressed air could be included in the guidance box.	They are treated different. As they come from different sources. Process gas in bought per canister and compressed air is made on site. Therefore, they have different requirements.
3.16 Maintenance of premises, equipment and essential services; and 3.17 Storage of animal material, animal products or associated things				
3.16 and 3.17		The term "associated things" is subjective and vague.	If the term "associated things" is needs to be.	"Associated things" is standard terminology used across legislation. This terminology comes from the Act and covers a myriad of things such as hides and skins. It is considered that in the context of this legislation and the other legislation that it is acceptable.
3.17 Storage of animal material, animal products or associated things				
3.17	(2)	"minimal risk" is a subjective term. Unclear what the outcome required is for this paragraph. b) is a human health and safety issue which is out of scope for this spec - but could be guidance.	Proposed new wording: "……animal products are handled, …….and dispatched to maintain their fitness for purpose."	a) It is written this way in order to highlight a maximum practicable possible reduction in risk which is situationally dependent. It is considered that the current wording is appropriate.

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				b) Human health is considered to be in scope due to the risk to the humans that handle the food.
3.17	(3) a)	"without unnecessary delay" is a subjective term.	Delete these words.	Noted, "without unnecessary delay" is standard terminology across other notices. This will also be left in to be consistent with the Human Consumption Specifications, and ensures there is some urgency of action by the operator.
3.17	(93) b)	"quickly as necessary" is a subjective term.	Replace with "is achieved or attained".	The intention is to allow for the time of cooling to be interpreted differently. The time period for a product to reach a preservation temperature will be different depending on what temperature the product is previously to be being cooled and what the product is.
3.17	(4)		Reword to "…records demonstrating that preservation temperature during storage is maintained"	Agreed. Amended.
3.17	(5)	Wording requires work - "…medium risk raw material, is: b) not be a source of…"		It has to be identified and the store should not contaminate the product.
3.18 Waste management				
3.18		The operator must ensure waste is kept under controlled conditions and adequately identified in a manner that will ensure that it will not be	Recommend excluding non-product waste e.g disposable gloves etc.	Noted. Both product and non-product waste should be kept under controlled conditions.

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		mistakenly or fraudulently released as fit for intended purpose.		
3.18	(4) b)	"regularly and in a timely manner" is subjective.	Delete this clause as a) states the outcome required.	It is noted that this is a technical review rather than an outcome focussed review. This terminology is commonly used across our notices and will be kept to keep consistent with the Human Consumption Specifications. We want there to be a programme in place and it left up the operator to define how necessary it is as to not be prescriptive.
3.19 Use of approved maintenance compounds				
3.19		The section includes the registration, storage and use of maintenance compounds which is not reflective in the title.	Re-title, Maintenance compounds.	Agreed. The title is now "Approved maintenance compounds". This is also now consistent with the Human Consumption Specifications.
3.19	(1)	Repetition of approved in sentence.	Delete first approved.	Agreed. It now fits with the title being "Approved maintenance compounds".
3.19	(3) b)	Labelling is covered in (3) c).	Delete labelled.	Agreed. Have removed reference to labelling and have matched with the Human Consumptions Specifications.
3.20 Cleaning and sanitation				

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3.20	(2) a)	Improve wording.	Propose; "the suitable skills a person requires for the implementation of the programme".	It is important to refer to the suitable skilled person as this term is defined and used across notices.
3.21 Health of personnel				
3.21	(3) a)	The definition of a suitably skilled person includes "in the opinion of the operator", therefore nominated by the operator is not required.	Delete "nominated by the operator".	Agreed. "Nominated" has been removed".
3.22 Competency of personnel				
3.22	(1) and (2)	Include the bracketed key tasks from 3.22 (2) in this sentence as this is the first time they are mentioned. And delete bracketed key tasks from 3.22 (2).		Agreed. Have moved key task examples to 3.22 (1).
3.22	(3)	RMP's must specify the following: ……	It is unclear as to what is required in the RMP: • The actual words outlined in the specification, or • The names of the people that meet these requirements.	This is referring to the names or position of the people referred to that meet these requirements. "Those persons" added before each sentence to clarify meaning.
3.22	(3) d)	The submitter agrees with the inclusion of a suitably skilled person being able to validate rendering sterilization. The consequence of including a suitably skilled person, makes the requirement for a "competent person" and the Schedule 2 reference redundant.	Reword to "…..as valid by a suitably skilled person." This leads to a consequential change in Schedule 2 where the section "Competent person for rendering" can be deleted.	Competent and suitably skilled have different definitions. Competent means a person that has met the specific requirements required by the regulator, while a suitably skilled person is decided by the operator. In this circumstance a competent person is more appropriate.

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3.24 Calibration of critical measuring equipment				
3.24	4	The operator must ensure safeguards are in place to prevent unauthorised adjustments to the calibration of the measuring equipment. No definition for authorised, hence the use of the term unauthorised seems extreme. Replace term with "unintended".	The operator must ensure safeguards are in place to prevent unintended adjustments to the calibration of the measuring equipment.	Unauthorised is wider and is better suited. Somebody could intend but are not actually qualified as an authorised person would be.
3.26 Pest control				
3.26		Keep waste materials in covered pest-proof containers which are regularly collected and disposed of.	Not clear if this relates only to waste containers kept outside? Wouldn't be practical to keep covers on waste bins inside processing areas – most operators use open dixies to collect waste during production.	Agreed. Amended to "(1) keep waste materials that are held outside in covered pest-proof containers which are regularly collected and disposed of."
3.27 Non-complying product				
3.27	d	held within the premises until disposition is determined by a suitably skilled person or, in certain cases, by an animal products officer or the RMP verifier. There will be instances where this may not be possible to hold within the premises. The product just need to remain under the disposition is determined.	Held by operator until disposition is determined by a suitably skilled person or, in certain cases, by an animal products officer or the RMP verifier.	It is considered that non-complying product should be contained within the physical boundaries of the premises rather than by the operator. If they want to move it, it should be through their verifier.
3.28 Operator Verification				
		This whole section would benefit from a rewrite e.g. 1. The verification programme needs to be implemented rather than documented (documentation is covered in 5.2). 2. the "what "in b) is covered in a), the "who		What is documented is also what is implemented, and it does also need to be documented. Will keep as is. "must document and implement" definition is from the Human Consumption

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		and when" in b) is covered in c), and (2) should be "The ~~operator~~ verification		Specifications for "documented procedure". It is understood that there is slight scope overlap between some of the clauses under 3.28 (1) caused by (b), however, this is considered to be appropriate to clearly spell out requirements. (2) the "verification" rather than the "operator" Agreed. Reworded to "operator verification", as this might be performed by somebody delegated by the operator.
Part 4: Operator Identification and Labelling Requirements				
		The whole identification part is very prescriptive. The submitter recommends that Part 4 be rewritten to simplify and make it more outcome focused.		This is a technical review rather than an outcome focus review. It will be considered at a later date.
4.2 General requirements				
4.2	Guidance	If the label is in a language other than English, a certified translation will need to be made available for the RMP verifier. As this is a guidance requirement a certified translation is only a recommendation of best practice. On this basis does the translation need to be certified?		This is guidance of best practice. It is considered that a non-certified label would have no guarantee of its accuracy and could be construed as misleading.

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4.2 (1)		Clarification is sought as to whether dual language labelling is required in the case of another language specified in an OMAR.		This would be OMAR dependent.
4.5 Labelling of transport outers				
4.5	(1)(e)	e) the name and address of the operator *Can this be covered by RMP Identified if the name and address of the operator differs from that of the product owner*	e) the name and address of the operator or owner f) RMP Identifier	RMP is animal product act specific and puts in additional steps to reach a contact. It is considered that the name and address is more appropriate.
4.7 Identification and security of bulk animal material or product in bulk transportation units				
4.7	(2)(a)	contained in and covered in leak-proof bins Included the term "containers", so as not to specify the actual packaging type.	contained in and covered in leak-proof bins/containers	Agreed. Amended to "bins/containers"
4.7	(2)	"Identified in an acceptable manner" is very subjective	What is the outcome required from identifying the product?	To ensure that there is a system in place to verify that you know what is being transported.
Part 6: Product Eligibility for Animal Consumption				
6.2 Eligibility				
6.2	(4) a)	There is some research, such as animal welfare, that should not need the approval granted under 7.2 (2).	Proposed alternative wording; "a) animals used for research purposes (as defined in 7.2 (1), except ……"	It is still required for MPI to check whether the specific testing method might make the animal unfit for consumption.
Other		The submitter is aware that electronic devices, such as boluses and chips, are being inserted into animals for research. These are likely to become mainstream in the future for monitoring the health of an animal, etc. To future proof the spec, consideration needs to be given to the requirements for animals that contain electronic devices as these devices may find their way into raw material for		Noted. This is considered to be covered by the drug trial approval form.

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		rendering.		
Part 7. Supply of Animal Material for Animal Consumption				
7.3 Supply of farmed animals				
7.3	(3)	All farmed animals ….. must be individually identified to enable traceback …. to the relevant supplier statement.	Practically this would be carried out by including NAIT ID's on an ASD. The requirement to link the individual animal ID to the supplier statement is currently not a requirement for human consumption and using the NAIT system would not work for non-NAIT species such as sheep. The risk that this requirement is trying to mitigate or the outcome trying to be achieved needs to be defined.	The outcome for the clause is to enable animals to be able to be tracked back to the supplier statement. I agree in that burden of this clause is extensive and that it does not reflect the recently published Human Consumption Specifications. This clause has been removed.
7.3	(5)	Statement repeats itself.	Propose; ……raw material ~~if the animal raw material does not meet clause 7.3 (4).~~	Amended to "medium risk raw material if the animal material does not meet clause 7.3 (4)".
7.3	(8)	This clause is a repetition of 7.3 (3).	Delete clause.	Deleted.
7.3	(8)	All farmed animals presented for slaughter must be **individually** identified to enable trace back of the animals to the relevant supplier statement.	Farmed animals include farmed mammals, farmed ratites (e.g. emus and ostriches), and **farmed poultry**. Recommend this excludes poultry.	Clause (8) has been removed.
7.3	(3) & (8)	We would like to draw the Ministry's attention to something we believe may be an error (or a misunderstanding on our part). Sections 7.3 (3) and 7.3 (8) (pages 37 and 38) have been amended to require:		The outcome for the clause is to enable animals to be able to be tracked back to the supplier statement. Agreed that the burden of this clause is extensive and that it

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		All farmed animals presented for slaughter must be individually identified to enable trace back of the animals to the relevant supplier statement. The submitter is concerned that the reference above to 'individually identified' is introducing a significant and unnecessarily burdensome requirement onto suppliers, and beyond those required for supply of animals for human consumption. We look forward to learning your comments on this observation.		does not reflect the recently published Human Consumption Specifications. This clause has been removed.
7.3		(1) This clause applies to the suppliers of farmed mammals and farmed birds animals supplied directly to a primary processor at the primary processing premises. (2) A supplier must present farmed animals live, generally fit and healthy for slaughter at a primary processing premises. (3) All farmed animals presented for slaughter must be individually identified to enable trace back of the animals to the relevant supplier statement. Guidance: Suppliers and primary processors of farmed cattle and deer have obligations under the National Animal Identification and Tracing (NAIT) Act. Pigs are NOT noted as excluded from this. We wonder if this is an error? We believe pigs should be excluded as there are currently no obligations in respect of pigs under the NAIT Act. This		The outcome for the clause is to enable animals to be able to be tracked back to the supplier statement. Agreed that the burden of this clause is extensive and that it does not reflect the recently published Human Consumption Specifications. This clause has been removed.

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		requirement does not apply in the Specs for human consumption consulted on earlier this year.		
7.4 Supplier statements for farmed animals				
7.4	(2)	Incorrect reference.	7.5 (3) should be 7.4 (3).	Amended.
7.4		Note also that within 7.4 info requirements are set out that are NOT all relevant to pigs (pp 39 – 40 of tracked change doc): (3) The supplier statement must contain the following information: a) name, physical address and contact details of the person signing the statement; b) details of the animals covered by the statement; and c) whether any of the animals remain within a withholding period for any veterinary medicine with which they have been treated; d) the history of the animals including: i) whether all of the animals were born on the supplier's property; ii) whether any of the animals: 1) were imported into New Zealand; 2) are under MPI movement control for residues, or any purpose other than bovine tuberculosis (TB); 3) are subject to any residue suspect list; 4) are subject to any national disease surveillance suspect list. e) whether the animals have been exposed to poisons or chemical contaminants; f) whether any of the animals have been vaccinated against Johne's disease in their lifetime; g) in the case of cattle or deer, information relating to TBb including the TBb status of the animals;		Amended. Added in brackets after these specific sub clauses and what animals these are limited to. • whether any of the animals have been vaccinated against Johne's disease in their lifetime (sheep and cattle only); • whether any of the animals have been fed ruminant protein in their lifetime (ruminant animals only);

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		h) whether any of the animals have been fed ruminant protein in their lifetime; and i) the health status of the animals covered by the statement.		
7.5 Supply and handling of farmed mammals killed on-farm				
7.5	(1)	… or killing of ~~farmed~~ on-ar in their RMP	Section is about mammals killed on-farm.	Amended.
7.5	(3) a)	… ante-mortem examiner an	The criteria are not mutually exclusive and both are required (subject to below).	Amended.
7.5	(3) b)	This is a requirement under the Animal Welfare Act and not the APA.	It is the submitter's understanding that this specification can only contain APA requirements.	Though the aim is to keep only requirements under the APA, this is necessary to be kept in for market access.
7.5	(4) a)	"Carcasses are handled and transported in such a manner that contamination and deterioration are minimized."	Minimised is subjective. Suggest; ….. a manner that any contamination or deterioration will not impact on the fitness for purpose of the carcass.	It is written this way in order to highlight a sense of urgency and encourage minimisation of any wholesomeness issues. It is considered that the current wording is appropriate.
7.5	(4) b)	The submitter questions the need or justification for prescribing 6 hours. In addition, there are other variables such as summer / winter temperatures, the time before processing on arrival, etc.	a) and b) could be combined into one outcome statement.	Though there are differing variables, the time of carcass decomposition is still considered necessary to set a hard limit between death and arrival at the premises. This is important for the purposes of post-mortem examination with issues such as rigor mortis.

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				However, we will look into for the next review.
7.5	(4)	The submitter questions why the animal material referred to in these clauses cannot be transported together, provided that they are clearly identified and separated.	Proposed wording: " c) clearly identified and physically separated from animal material: i) export eligible not suitable for animal consumption or processing for human consumption.	Agree. Have amended to: c) not transported with any animal material that is not suitable for processing for animal consumption unless the carcasses are clearly identified and are kept physically separate; d) not transported with any animal material intended for processing for human consumption unless the carcasses are clearly identified and are kept physically separate.
7.7 Supply of farmed fish				
7.7		**Supply of Farmed Fish** In the specification for **Human Consumption** there is a provision to have **Supplier Guarantee Programme** (by six monthly renewal) as an alternative option to Supplier Statement that is otherwise required daily / by each consignment of supplies. So, it is recommended we extend the same convenience to the Specification for **Animal Consumption** as shown in the next column.	To include, acceptance of **Supplier Guarantee Programme** in equivalence of **Supplier Statement,** with following notes. In the case of farmed fish (other than bivalve molluscan shellfish), the operator must not accept the fish for processing (except for initial storage) if the required supplier statement is absent or incomplete, unless: i) the operator has a **supplier guarantee programme** and the supplier is a specified supplier within that programme; and ii) the supplier has provided to the operator information in accordance	Agreed. This whole section has been updated to reflect the Human Consumption Specifications which includes acceptance of the Supplier Guarantee Programme in place of the supplier statement.

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			with the **supplier guarantee programme** at least on a six-monthly basis; and iii) the animal material is of the type that is described in the **supplier guarantee programme**.	
7.7		In the **Supplier Statement**, we need to include additional tick box for the type of Risk (High, Medium, Low) in the event of declaring harvested fish showing signs of illness. So, it will serve as a documented evidence to show this information has been communicated by the Supplier to the Operator, based on which the operator is supposed to process the fish with appropriate conditions. This recommendation is in reference to **Part 6 Eligibility & Part 2 Categorisation Raw Material.**	In the **Supplier Statement** format, include new question under **Additional information** after the question **(f)** as suggested below and additional notes in concluding page: "If live farmed fish or farmed fish carcasses covered by this statement show signs of illness or disease, how do you categorize the eligibility of these fish for animal consumption by the risk profile? ☐ High, ☒ Medium, ☐ Minimum (see notes 6 & 7 for additional information)" **Note 6**: Refer to Part 2 and 6.2 of Animal Products Notice: Specifications for Products Intended for Animal Consumption **Note 7**: Provide individual supplier statements by each product's risk category, specifying the weight of the fish that it covers for, when you have multiple category within each consignment of supplies.	The supplier statement as currently written, particularly under the additional information section, there are tick boxes to indicate things such as illness and sources of contamination. If it is indicated in any of these issues are present and identified, then it is considered to be appropriate that the fish is identified as medium risk for animal consumption.
7.7		**Supply of Farmed Fish** In the specification for **Human Consumption** there is a provision to have **Supplier Guarantee**	To include, acceptance of **Supplier Guarantee Programme** in	Agreed. This whole section has been updated to reflect the Human consumption

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		Programme (by six monthly renewal) as an alternative option to Supplier Statement that is otherwise required daily / by each consignment of supplies. So, it is recommended we extend the same convenience to the Specification for **Animal Consumption** as shown in the next column.	equivalence of **Supplier Statement,** with following notes. In the case of farmed fish (other than bivalve molluscan shellfish), the operator must not accept the fish for processing (except for initial storage) if the required supplier statement is absent or incomplete, unless: i) the operator has a supplier guarantee programme and the supplier is a specified supplier within that programme; and ii) the supplier has provided to the operator information in accordance with the supplier guarantee programme at least on a six-monthly basis; and iii) the animal material is of the type that is described in the supplier guarantee programme.	Specifications which includes acceptance of the Supplier Guarantee Program in place of the supplier statement.
7.12 Supplier to be approved				
7.12	Guidance box	An ASD may be used as a~~n alternative to the~~ supplier statement.	Superfluous words.	This wording is considered appropriate to indicate that an ASD can be used in place of a supplier statement but is a different thing to a supplier statement.
7.12		Section 1 implied that the animal can be dressed by approved suppliers.	Wording should be changed from dressed to paunched so not to imply dressing of animals is acceptable.	Noted. It has been considered that dressed in the context of an approved supplier has been defined clearly enough that

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				introducing a new definition is not necessary. The sections that define how the suppliers dress the animals can be found here 7.19 and 7.12 for clarity.
7.13 Wild mammals not to be procured from certain areas				
7.13	(7)	Training for post mortem inspection for animals received within TB areas is not clear wording currently is "passed post-mortem examination conducted by a post-mortem examiner who meets the post-mortem competency specifications set out in Animal Products Notice: Specifications for Products Intended for Human Consumption 2016 Schedule 3 Competency Specifications for ante-mortem and post-mortem examiners."	Make the required training for this inspection clear and easily accessible.	The petfood ante-mortem and post-mortem competency does not have the detail or teach the necessary skills to adequately manage the risks of TB affected meat as a minimal risk product. The intention is, that if the meat has passed for human consumption by a post-mortem examiner who holds the human consumption qualification, then it is okay to be considered minimal risk for petfood. The ante-mortem and post-mortem for human consumption is a higher qualification than the ante-mortem and post-mortem for animal consumption, has much more detail surrounding TB identification and disposition, and is considered appropriate to mitigate the risk TB.

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				This section is rewritten to more clearly reflect this intention. The issue raised in terms of the difficulty of accessing the qualification especially for smaller operators is acknowledged. It is recommended that if there is a significant market for this meat that industry should consult with their training providers.
7.14 Poison use statements				
7.14		A DOC pesticide summary means nothing and is a generic document – this should only applicable if the individual has a permit from DOC to harvest animals (a WARO) and is generally only given from a certain areas which should relate to the pesticide summary.	Make it essential if the animals were harvested from DOC land that a copy of the valid permit is attached. Without a permit harvesting wild animals from conservation estate for commercial gain is illegal.	A DOC pesticide summary shows what pesticides are being used on that land which is useful for food safety. A WARO is a permit for the culling of animals in some circumstances not for consumption but just for the purposes of pest control. It also does not contain information on the pesticides which is desired. Additionally animals killed on a farmers property which boarders DOC land will not have a WARO, these animals could

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				have entered or originated from DOC land.
7.16 Location of kill				
7.16		This is too generic and not clear.	Very easy to provide a template of a generic form for the easy identification of animal identification (numbers etc.) and the location that they were taken.	Added hyperlink in guidance to the supplier statement. Appears to be clear that the supplier must provide the location on the supplier statement.
7.17 Recovery and presentation of wild mammal material				
7.17		Number 5 is not clear.	Should read "possums and deer harvested inside TB risk areas must be supplied to the primary processor with heads on or be positively identifiable for the carcass".	Amended to "(5) If the wild mammal material supplied to the primary processor is not dressed to the degree specified in clause 7.19 Handling and Dressing of Killed Wild Animals the approved supplier must ensure that the heads are attached to the carcasses or if the heads are removed, the heads must be identified with the associated carcasses." for clarity.
Part 8: Primary Processing Operations				
8.2 Reception				
8.2	(3) a)	Inform the recognised verifier within 1 working day.	Supplementary question. Is there a requirement / procedure for the verifier once they have been given this information?	This is beyond the scope of this review. Verification services have procedures and requirements once they have been given this information. This process is manged internally.

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8.3 Ante-mortem examination				
8.3	(2)	1. Ante-mortem examination must occur within 2 hours. 2. Slaughter and killing have the same meaning.	1. We question the need to specify a time and the reason for 2 hours (at a primary processing operation) in the specification, especially when there is no time requirement for farmed animals killed on-farm. 2. Suggest that killing is deleted. Similarly in 8.3 (4) and possibly other places in the specification.	1. The ante-mortem is defined as an inspection of general health and fitness before slaughter. If it is not time limited to 2 hours or less before slaughter, it is not considered to be an accurate ante-mortem. 2. Slaughter is the term used at a premises, while killing is the term used on-farm. For this reason this terminology will be kept.
8.6 Slaughter				
8.6	(1)	Slaughter of animals must be carried out without unnecessary delay.	As per the submitter's earlier submission on the draft human consumption specification, the submitter questions why slaughter must be carried out without unnecessary delay. A delay will not impact on animal consumption or other requirements under the APA. Even in respect of animal welfare, delays are not critical, provided the welfare of the animal is considered. Furthermore, the sentence is open for broad interpretation: what does "unnecessary" mean and does "delay" mean from arrival on site,	'Unnecessary delay' refers to what can be reasonably foreseen and prevented. Further explanation should be provided in a Code of Practice or Operational Code as appropriate.

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			or from ante-mortem inspection or from stunning?	
8.7 Handling and processing				
8.7	(1)	The term minimised is used in a number of requirements in this clause. Also, clause g) uses the subjective term "without unnecessary delay". Sub-clause g) could be the outcome statement for this clause. However, there could be an argument that even this is over and above what is necessary for animal consumption.	Propose clause 8.7 (1) be deleted and replaced with "The operator must ensure that handling and processing procedures for slaughter and dressing are carried out in a hygienic manner to avoid the transfer, proliferation and redistribution of contaminants on and between animal material and product". The subclauses could then be included as guidance material.	It is noted that this is a technical review rather than an outcome focussed review. 'Unnecessary delay' refers to what can be reasonably foreseen and prevented. Further explanation should be provided in a Code of Practice or Operational Code as appropriate. Minimised is used in order to highlight a sense of urgency and encourage the reduction of any potential issues. It is considered that the current wording is appropriate.
8.7	(4)	The requirement is to have a dropped meat procedure. This could say anything, and the specification would be met. What is the outcome that is required?	Propose an outcome statement along the lines of "The RMP should include a procedure to ensure that any dropped meat is managed to ensure fitness for purpose".	It is noted that this is a technical review rather than an outcome focussed review.
8.7	(5)	A programme to monitor the performance of processing. This could mean anything such as chain rate, not of carcasses per day, etc. An outcome statement is required.	Propose "The RMP must include a programme to monitor the hygienic performance of slaughter and dressing".	It is noted that this is a technical review rather than an outcome focussed review.
8.8 Post-mortem examination				

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8.8		Post-mortem examination tissue is examined in accordance with the post-mortem examination procedures in the current version of Domestic Petfood Farmed Mammal Post-mortem Examination Procedure Tables, available at https://www.mpi.govt.nz/dmsdocument/23977. Was it intended to include this qualification for small wild animals such as rabbits and possums?		The disposition table is out of scope of this review. Reference to this is considered to be more appropriate for the Operational Code rather than the Specifications.
8.8	(2)	Inform the recognised verifier within 1 working day.	Supplementary question. Is there a requirement / procedure for the verifier once they have been given this information?	This is beyond the scope of this review. Verification services have procedures and requirements once they have been given this information. This process is manged internally.
8.8	(3)	Clarification is sought for what "infected" means.	Reference 8.8 (2) (if this is the appropriate definition).	Agreed. Reference has been made to 8.8 (2).
8.8	(3)	Mixed terminology is used. Initially fit for purpose is talked about and then medium risk material. It is possible that medium risk material could be classified as not fit for purpose.		Agreed. We have rewritten this clause to specify "fit for purpose as minimal risk raw material". To clarify the intention of this clause.
8.8	(4) b)	Material can be categorized as high risk other than by the Director-General.	Propose …..high risk raw material. ~~by the Director – General.~~	The high risk classification has been put in place by the Director-General. This has been amended to clarify meaning "provided it has not been classed high risk raw material as defined by the by the Director-General".
8.8	(5)	The submitter questions why the post-mortem petfood examiner gives handling and disposal instructions and argue that this is the		The examiner is responsible to make judgement to prevent risk

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		prerogative of the operator. The role of the examiner should be to categorise the product.		to animal health as part of the operators RMP.
8.9 Chilling and freezing				
8.9		"without unnecessary delay" is subjective and unnecessary in the sentence.	Delete "without unnecessary delay".	'Unnecessary delay' refers to what can be reasonably foreseen and prevented. Further explanation should be provided in a Code of Practice or Operational Code as appropriate.
Part 9: Further Processing				
9.4 Further (petfood) processors to be listed				
9.4	(2)	The requirements on the Director-General are very "old school".	This should be updated to using a website or similar.	Agreed. We have rewritten this clause to specify "(2) The Director-General must publish a list of all further (petfood) processors that: a) is maintained by, or on behalf of, the Director-General b) is publically available on an internet site free of charge; and c) is able to be supplied whole or in part on request for a reasonable charge for the production of the copy.

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				The Guidance box now includes a hyperlink to the Further Petfood processor web list.
9.5 Application for listing				
9.5		Refers to information as set out in clause 9 something. It is unclear what the relevant information is in this clause.		The reference has been corrected and have clarified that this section specifies what is required for the application of listing as a further petfood processor.
9.6 Listing of further (petfood) processors				
9.6	(3)	As soon as practicable is subjective.	Within 5 working days would seem to be a reasonable timeframe.	The intention is this to be subjective as specific circumstances might not allow for listings to be completed within a specific timeframe.
Part 10: Rendering of Animal Material				
10.2 High risk raw material				
10.2	(1)	1. (Rendering) Operators must not collect or process high risk material. The definition for high risk material includes product derived from live imported animals. In contrast there is no exclusion of rendering butcher shop waste that may include imported product. 2. This clause puts the onus on the renderer to ensure that high risk material is not processed. However, there is no requirement for the supplier of the material to keep records of the disposal of, or advise the renderer of the inclusion of high risk material (such as	1. The submitter requests further discussion with MPI on the risks for rendering associated with imported animals compared with waste from imported meat. 2. Additional requirements are included in the specification to ensure that suppliers of raw material inform renderers (and possibly further (petfood) processors) of any risk material that may be in the raw material.	1. Noted. 2. The owner of imported animals have restrictions on moving live imported animals which is covered under the Biosecurity Act 1993. We cannot slaughter for animal consumption. The control is already in place for animal material but not live product.

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		imported live animals) or any of the other reasons that excludes the material from being medium risk as outlined in 2.2 (1).		
10.2	(2)	This subclause is essentially a repetition of 2.1 and could be deleted with minor changes to 2.1 and 10.2 (1).	2.1 (2) ….. may not be processed for animal consumption or rendering, dealt with, ….. 10.2 (1) Add the sentence; "Refer to 2.1 High risk material".	Agreed. Have replaced clauses under 10.2 with "The operator must ensure that all high risk raw material is be treated in accordance with clause 2.1."
10.3 Medium risk raw material				
10.3	(1)	This is one way of achieving the outcome required and could be included in guidance.	Delete.	Amended. We have replaced sub clauses 10.3 (1) and (3) with a new clause 10.3 (1). "The operator must ensure that all medium risk raw material is subjected to a rendering thermal process or another treatment that has been confirmed as valid by a competent person or a suitability skilled person as per clause 3.22 (3)(d)."
10.3	(2)	This is the outcome required and should be reworded as such.		It is noted that this is a technical review rather than an outcome focussed review.
10.3	(3)	1. If above change is accepted the words "thermal processing or other treatment" become redundant. 2. If a suitably skilled person is all that is necessary, there is no need to include a	Propose wording: "The operator must ensure that that the treatment process to achieve 10.3 (2) [or new number] has been confirmed as effective by a suitably skilled person".	1. Amended. See comment for 10.3 (1). 2. Competent and suitably skilled have different definitions. Competent

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		competent person as they are automatically a suitably skilled person.		means a person that has met the specific requirements required by the regulator, while a suitably skilled person is decided by the operator. In this circumstance a competent person is more appropriate.
10.4 Security				
10.4	(2) b) and c)	Provides exemption for denaturing of raw material from dual operator butchers, homekill operators, etc.	The submitter questions why product ex primary processors is required to be denatured when these operators are exempt. Arguably these operators are an equal or higher risk.	It is considered that the risk is sufficiently low because the products from these premises are not destined to enter the human regulated food chain and are limited to feeding their own families and animals.
10.4	(2) f)	Refers to exceptions in clause 4.7 (2).	There are no exceptions in clause 4.7 (2)	Amended. This now refers to 4.7 (3).
10.5 Processing				
10.5	(2) and (3)	Rendering operators are required to have an RMP. The details in this clause are all included in the requirements for an RMP.	As all rendering operations are required to have a RMP (under the APA) this clause is superfluous.	Though this information is already required in an RMP, it is deemed appropriate to for the sake of clarity to include it here.
Guidance		This guidance is too detailed for the specification and is better placed in the Code of Practice.	Delete and replace in code of practice.	Agree. This will be removed from the Animal Consumption Specifications next review after the information is readily available in the Code of Practice.
Part 11: Miscellaneous Provisions				
11.1 Application of this part				

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11.1		Renderers process animal material to be used as an ingredient in product for animal consumption and not directly for animal consumption. It is unclear whether this part applies to renderers.	Clarity is sought as to whether this part is applicable to renderers.	Amended. It has been clarified in the introduction which sections do and do not apply to renderers. In the context of this new clarification this section does encompass renderers. Text inserted: "(3) Relevant sections specific to operators who render animal product for animal consumption include Parts 2 to 6 and 9 to 11."
11.4 Process control				
11.4	(2)	Veracity is not the term commonly used by MPI and industry in this context.	Use truth of labelling.	Agreed. Amended veracity to truthfulness and accuracy.
11.8 Thyroid tissue				
11.8		Thyroid tissue is only salvageable for pharmaceutical use.	The submitter seeks clarification as to whether thyroid tissue can be included in raw material for rendering. If not, should this be included in the definition for high risk material?	Thyroid glands will no longer be able to be used in rendered product.
		There is a Biosecurity notice that requires offal that is fed to dogs to be treated by boiling for 30 minutes or freezing for 10 days, unless the offal is from an animal slaughtered under a RMP. https://www.mpi.govt.nz/dmsdocument/12798-controlled-area-notice-in-respect-of-echinococcus-granulosus-hydatids-notice-no- 294 The submitter notes that this is a requirement under the Biosecurity Act rather than the APA	Consideration be given to whether these requirements should be included in the specification as the spec applies to farmers who this notice is applicable to. A suggestion is that they could be included as guidance.	It is considered that this is not necessary as Hydatids are covered in the disposition table and it will be condemned as medium risk. They will therefore have a required heat step regardless.

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		(as is the ruminant protein requirement referred to in 11.7) and therefore may not be eligible for inclusion in this specification.		
Part 12: Transportation				
		This entire part is very prescriptive and uses the subjective word ”minimise” multiple times.	Recast the whole part to outcome statements.	It is noted that this is a technical review rather than an outcome focussed review. Minimise is used in order to highlight a sense of urgency and encourage the reduction of any potential issues. It is considered that the current wording is appropriate.
12.2 Design and construction for transport				
12.2	(3)	…. If the transport unit provides …. refrigeration, then ……. This is a prescriptive statement and is only applicable if refrigeration is provided. That is, a transporter could be transporting product without refrigeration and not have to meet the requirement to monitor and maintain the temperature.	An outcome statement is required. Propose: “Temperatures of the animal material or product must be maintained to ensure the suitability for processing and the fitness for intended purpose is maintained”.	It is noted that this is a technical review rather than an outcome focussed review.
12.4 Operational requirements				
12.4	(5)	“The transportation process must not be used as a cooling step.”	The submitter argues that if a cooling step is required, there is no reason why it cannot occur either in full or in part, during transporting. It is the outcome that is important not the how.	It is considered that due to the setup of transportation units that they are unable to match more controlled conditions. This ensures the product is at preservation temperatures for as long as possible.

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12.4	(8) b)	The operator must have a documented plan to prevent recurrence of a transport preservation temperature failure. As it is not possible to document all possible reasons for a failure, alternative wording is proposed.	Proposed wording: "…. Including: b) a process to identify and implement actions to prevent recurrence."	Agreed. Amended to proposed wording.
12.4	(9)	The [transport] operator must ensure persons transporting material are aware of the specs and adequately trained.	There are other operators covered by the spec do not have a training requirement. Is this an oversight or a transport operators special.	The intention is that the operator of the RMP has a responsibility to make sure that the transport operator is adequately trained.
Schedule 1 – Specifications for operator supply of Clean Water				
Schedule 1		Schedule 1, Table 1 should include *E.coli* – as most rapid tests are coliforms/E.coli. The drinking water standards is for *E.coli*. MPI Animal Products consolidated lists 11.1 potable water, 11.2 process water, 11.3 depuration water has Total coliforms and *E.coli*. 11.4 seawater has *E.coli* and Total coliforms – does not have Faecals coliforms. Therefore the Schedule 1 table 1 should include *E.coli* to be consistent with other testing requirements and avoid confusion.		Agreed, Schedule 1 has been updated to include E.coli in Table 1.
		The operator must ensure that water samplers are suitably trained. This is a repetition of Part 3.11 (2)	Delete.	Agreed. Have removed repetition.
Schedule 2 – Competency specifications				
Schedule 2		3.22 (3) d) allows for a suitably skilled person, therefore, this clause is not required.	Delete.	3.22 (3) d) refers to the competent for rendering. The clause in Schedule 2 expands on the requirements of the competent person.

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				The intention is to be considered a competent person, that person must have completed a qualification relating to rendering that the Director-General recognises.
Schedule 2	Competency	Unclear of which is the standard training – and also very unclear which is the training required for.		Unsure what is meant by standard training. In terms of the most current/commonly acquired qualification we have moved it to the top of the list to help with clarity.
Schedule 3 – Approved inks				
		Provides a list of dyes that denaturing inks must be prepared from. The specification should include an outcome of what the inks are required to do (identify non-edible product) and not do (make the product not fit for purpose).	The dyes mentioned should be included in the list of approved maintenance compounds as guidance of dyes suitable for use. However, it should not be a finite list as other options may be available that achieve the required outcome.	It is noted that this is a technical review rather than an outcome focussed review.

Draft supplier statements and forms

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General comments on forms		
Wild Mammal Material Supplier Statement - Petfood		
Consignment details and poison use not fit for purpose.	Waypoint or topographical map identifier needs to be clearer. For example, for each large animal received for processing a waypoint must relate back to every animal harvested – this could become more transparent if a template animal form was provided. This could simply be animal number, and eastings and northing's.	Noted. After further discussion with the submitter, we agree with the suggested improvements to make the forms more fit for purpose. Due to the timing of this information, this change will be implemented separately to the publishing of the Animal Consumption Specifications.
Supplier Statement for the Supply of Farmed Fish		
Additional information section f. – there is only a yes and no tick box – for petfood some disease / illness is acceptable and presents no risk to pets.	As above in clause 7.7.	It is considered appropriate in this circumstance to tick the appropriate box to indicate the further details of the disease or illness separate to this document.