



Proposed changes to the National Microbiological Database (NMD) Notice.

GENERAL CHANGES

	Proposed Change - General	Detail of Proposed Changes	Justification
(1)	Incorporate the information in the Schedule in the Notice and separate the requirements for red meat and poultry into discrete sections. Remove duplication and simplify wording.	Part 1 Preliminary Provisions and Part 2 General Requirements apply across both programmes. Part 3 describes the National Microbiological Programme for Red Meat. Part 4 describes the National Microbiological Programme for Poultry. Part 5 describes transitional provisions related to the new Lab Notice.	The proposed change is intended to make the document easier to use and clarify what requirements apply to a specific processor.

CHANGES TO RED MEAT PROGRAMME

Note that the term 'red meat' includes meat derived from bovine, bobby calves, caprine, cervine, ovine, ratite (ostrich and emu), and porcine.

	Proposed Change – Red Meat	Detail of Proposed Changes	Justification
(2)	Redefine Very Low Throughput (VLT) for red meat as a substantially reduced throughput.	A premises processing less than 6000 animals in total, and does not exceed 2000 of large animals or 5000 of small animals, per calendar year will be considered VLT.	The proposed change is intended to expand the provision of VLT to all species. While the proposed thresholds are lower than the current ones, it is considered the provision should only apply to operators where microbiological process control is likely to be uncertain due to small numbers processed.
(3)	Align samples taken for all red meat species.	Change samples taken from n=3, to n=5 for cervine carcasses Increase samples taken of primal cuts from n=2 to n=5 for cervine. Increase samples taken from n=1/n=2 to n=5 for ratite carcasses No change for ovine: remains as no testing for primal cuts or bulk.	The proposed increase to n=5 is intended to align the scheme with current best sampling practice as per ICMSF. This will allow for better statistical process control. Keep the status quo for ovine as this has been scientifically justified.

	Proposed Change – Red Meat	Detail of Proposed Changes	Justification
(4)	New red meat VLT sampling requirements, with some exceptions for ovine.	<p>Increase samples taken to n=5. Product to be samples kept as per current requirements.</p> <p>Test for APC, <i>E. coli</i> and <i>Salmonella</i> (one composite <i>Salmonella</i> test for each set of n=5 carcass, cuts and bulk samples).</p> <p>No requirement to sample primal cut or bulk for ovine. No requirement to test ovine for <i>Salmonella</i></p>	<p>The proposed monthly sampling requirement is a recognition that process control is unlikely to be relevant for this type of processor. This testing is intended to give an indication of the hygienic status of the process over a longer period of time.</p> <p>The proposed increase from n=1 to n=5 is intended to align the scheme with current best sampling practice as per ICMSF.</p> <p>Keep the status quo for ovine as this has been scientifically justified.</p>
(5)	Red meat <i>Salmonella</i> testing, to apply to all red meat species except ovine.	<p>No <i>Salmonella</i> testing required of ovine.</p> <p>For plants processing red meat, excluding bobby calves, a Primary Sampling Window (PSW) of 16 consecutive clear weeks is required when first starting to process a species.</p> <p>Following completion of the PSW an operator must complete a Sampling Window (SW) of six consecutive clear week each season.</p> <p>For plants processing bobby calves, a SW of six consecutive clear weeks is required each calendar year (1 Jan – 31 Dec).</p> <p><i>Salmonella</i> detections:</p> <ul style="list-style-type: none"> • Detection during a PSW defaults to commencement of a new 16 week PSW the next processing week. • Detection during a SW defaults to commencement of a new 6 week SW. <p>VLT operators must do <i>Salmonella</i> testing once a month until achieving 16 consecutive clear samples. After achieving this, no further <i>Salmonella</i> sampling required under the NMD programme</p>	<p>The proposed changes are intended to:</p> <ul style="list-style-type: none"> • Simplify the current requirements and align the terminology and approach. • Recognise that bobby calf processing is done out of sync with the traditional processing seasons and allow for a more relevant testing regime. • Keep the status quo for ovine as this has been scientifically justified.
(6)	Replace m and M alerts with NMC M-alert.	<p>National Microbiological Criteria (NMC) tolerance limits developed for an M-alert triggered by either:</p> <ul style="list-style-type: none"> • 3 results over M in a five week moving window, or • 2 results over M in any individual week 	<p>The proposed change is intended to create a predictable and acceptable maximum level of indicator organisms allowed. This creates a level playing field while allowing commercial flexibility. The model used is aligned with the operational requirements for processing.</p>

	Proposed Change – Red Meat	Detail of Proposed Changes			Justification																								
		The proposed M values are: <table><tr><th>Species</th><th>M (APC log10)</th><th>M (<i>E coli</i> log10)</th></tr><tr><td>Bovine</td><td>4.00</td><td>2.00</td></tr><tr><td>Bobby calf</td><td>5.00</td><td>4.00</td></tr><tr><td>Ovine</td><td>5.00</td><td>Not applicable</td></tr><tr><td>Caprine</td><td>5.00</td><td>4.00</td></tr><tr><td>Cervine</td><td>4.00</td><td>2.00</td></tr><tr><td>Porcine</td><td>4.00</td><td>2.00</td></tr><tr><td>Ratite</td><td>4.00</td><td>2.00</td></tr></table>			Species	M (APC log10)	M (<i>E coli</i> log10)	Bovine	4.00	2.00	Bobby calf	5.00	4.00	Ovine	5.00	Not applicable	Caprine	5.00	4.00	Cervine	4.00	2.00	Porcine	4.00	2.00	Ratite	4.00	2.00	
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(7)	Introduce action for Too Numerous to Count (TNTC) result for red meat.	TNTC is considered a breach of M and will contribute to an M-alert.			The proposed change is intended to ensure that an appropriate dilution series is used during analysis and required data is received by MPI.																								
(8)	Introduce action for missed samples (i.e. samples not collected) for red meat.	Missed samples are each considered a breach of M and will contribute to an M-alert.			The proposed change is intended to ensure that non-compliance with the NMD sampling requirements is managed appropriately																								
(9)	Move away from using the entire database when establishing the 80th percentile.	Change from using all-date-to date 80 th percentile values or fixed values. All species proposed to use the data from the previous 4 calendar years.			The proposed change is intended to ensure the quarterly lists are set up consistently to enable better comparison against relevant data. A four year period is considered appropriate and aligns with other performance indicators.																								

CHANGES TO POULTRY PROGRAMME

	Proposed Change - Poultry	Detail of Proposed Changes	Justification
(10)	Require all chickens to be included within the NMD, but use “classes of chickens” to help set sampling regimes and any targets according to risk, or to collect data where the risk is not yet known.	Change the definition of poultry to include all chickens processed for human consumption (not just broilers).	<p>Refer to Discussion Paper: Options to include all chickens in the poultry NMD programme.</p> <p>There has been confusion about which chickens are included in the programme. It originally applied just to broilers (young birds) but with the increase in slightly older free range birds being processed this term was no longer clear enough. Also some layer and breeder chickens are slaughtered for human consumption and these did not fall into the definition of broilers.</p>

	Proposed Change - Poultry	Detail of Proposed Changes	Justification
		<p>All chickens except end-of lays and breeders to be subject to the proposed <i>Salmonella</i> Performance Standard and <i>Campylobacter</i> Performance Targets. All chickens to have the same chance of being sampled under NMD. Details of chicken type to be recorded with the sample. EF remains at 3.78 log CFU/carcass. DF remains at a default 67% detection rate of: $\geq 30/45$ for Standard, and $\geq 6/9$ for VLT.</p> <p>End-of-lays (EOLs) and breeders will be subject to the same testing requirements as other chickens for an estimated period between 12 and 24 months. The programmes will be reviewed after 12 months and sampling will continue until a sufficient number of samples have been gathered to determine the associated risk and to inform any risk management options.</p> <p>Do not apply the <i>Salmonella</i> Performance Standard and <i>Campylobacter</i> Performance Targets to EOLs and breeders initially.</p>	<p>MPI considers that it is more equitable for all chickens that are processed for human consumption (including broilers, poussin/spring chickens, small breeds, and capons) to be included in the programme, and for all chickens primarily bred for meat to be subject to the same requirements.</p> <p>MPI recognises that the risks associated with EOLs and breeders may be different due to their significantly older age and different management systems. MPI intends to collect data for EOLs and breeders so this can be considered when deciding if any targets are necessary to ensure that risks are managed appropriately.</p> <p>One of the future options may be to include EOLs and breeders in the programme permanently and to establish microbiological limits for <i>Salmonella</i> and <i>Campylobacter</i>.</p>
(11)	Amend the Salmonella Performance Standard (SPS) for chickens (except breeder and end-of-lays) to a new moving window and target.	<p>Change the SPS to no more than 5 Salmonella detections out of 51 poultry samples within a moving window'.</p> <p>Incorporate a response to each <i>Salmonella</i> detection, including undertaking an investigation and reporting to MPI, and escalating responses in the case of further <i>Salmonella</i> detections.</p> <p>Add a requirements that if the <i>Salmonella</i> Performance Standard is exceeded then operators must review the process and provide MPI Verification Services with a <i>Salmonella</i> Management Plan describing the actions to be taken to reduce the <i>Salmonella</i> prevalence. MPI may also take additional action including sanctions under Section 89 of the Animal Products Act 1999.</p>	<p>Refer to Discussion Paper: Options for Verifying Salmonella Control in Broiler Chickens under the Animal Products Act 1999.</p> <p>This is based on the 2011 USDA FSIS standard and includes the further amendment from April 2015.</p> <p>This reflects current industry practice.</p> <p>This reflects the seriousness of the situation if this standard was breached and would ensure that appropriate corrective action was taken in a timely manner to protect the consumer.</p>

	Proposed Change - Poultry	Detail of Proposed Changes	Justification
(12)	Introduce sampling requirements for turkeys and ducks	<p>Change the definition of poultry to include all turkeys and ducks processed for human consumption (not just chickens).</p> <p>Introduce requirements for sampling and testing for <i>Salmonella</i> and <i>Campylobacter</i>. Turkeys and ducks will each be subject to the same testing requirements as chickens for an estimated period between 12 and 24 months. The programmes will be reviewed after 12 months and sampling will continue until a sufficient number of samples have been gathered to determine the associated risk and to inform any risk management options.</p> <p>Do not apply the <i>Salmonella</i> Performance Standard or the <i>Campylobacter</i> Performance Target to turkeys or ducks initially.</p>	<p>Refer to Discussion Paper: Options to determine the current status of <i>Campylobacter</i> and <i>Salmonella</i> in turkey and duck carcasses at the end of primary processing.</p> <p>The Poultry Industry Association has asked for standards for turkey and duck in addition to chicken so the definition needs to cover these types of poultry so they are included in the programme.</p> <p>MPI recognises that the risks associated with turkeys and ducks may be different to chickens. MPI intends to collect data for turkeys and ducks so this can be considered when deciding if any targets are necessary to ensure that risks are managed appropriately.</p> <p>One of the future options may be to include turkeys and/or ducks in the programme permanently and to establish microbiological limits for <i>Salmonella</i> and <i>Campylobacter</i>.</p>
(13)	New Quarterly Performance Failure (QPF) for chickens, excluding breeders & end-of-lays.	<p>This new measure identifies poor performers as any premises processing chickens with $\geq 30\%$ prevalence during a quarter. Premises not complying with the quarterly performance target will be expected to complete a <i>Campylobacter</i> checklist (see attached draft) and take appropriate corrective actions which will be reviewed by the premises verifier.</p> <p>Include in the database a cumulative prevalence SPC chart for each premises to check on performance during the quarter.</p>	<p>Feedback from the industry on the Discussion Paper: Review of the Poultry NMD Programme's <i>Campylobacter</i> Performance Target (CPT) Limits(s) suggested that MPI should focus on poorer performing premises rather than changing the target for all operators. MPI analysed the data associated with each premises and determined that the propose Quarterly Performance Failure would separate out the poorer performers from the better ones.</p>
(14)	Increased sampling for new start-up VLTs (all chickens excluding breeders and end-of-lay).	<p>Require new VLT chicken processors (except of breeders and end-of-lays) to conduct sampling and apply the CPT as for a standard throughput premises until a clear CPT moving window has been achieved in order to identify and correct problems more quickly. Once a clear CPT moving window has been achieved they revert to VLT sampling and targets.</p>	<p>All poultry processors that have started operating since the CPT was established have been VLT operators initially. They have all failed the CPT and have taken some time to establish Good Operating Practices. This is another category of poor performance that has been identified by MPI.</p>

	Proposed Change - Poultry	Detail of Proposed Changes	Justification
			The new requirement will ensure that data is gathered and any problems can be identified and addressed more quickly. MPI recognises that it is too onerous for VLTs to continue to sample at the standard rate so as soon as control has been demonstrated they can revert back to current sampling rates.
(15)	For clarification, the CPT, SPS and QPF requirements are not to be applied to end-of-lays, breeders, turkeys and ducks at this stage.	Do not apply CPT or SPS moving windows and non-compliances, or the QPF.	EOLs, breeders, turkeys and ducks have been included in the NMD for data gathering purposes only at this stage. for

Further analysis and justification for the proposed poultry changes can be found in the following documents which have been circulated with this consultation document:

1. **Discussion Paper: Options to include all chickens in the poultry NMD programme.**
2. **Discussion Paper: Options for Verifying *Salmonella* Control in Broiler Chickens under the Animal Products Act 1999.**
3. **Discussion Paper: Options to determine the current status of *Campylobacter* and *Salmonella* in turkey and duck carcasses at the end of primary processing**
4. **Analysis of Submissions: Discussion Paper: Review of the Poultry NMD Programme's *Campylobacter* Performance Target (CPT) Limits(s)**

A draft Checklist for those failing the QPF has also been circulated with this consultation document.

PROPOSED TRANSITIONAL PROVISIONS

The Notice is intended to come into force on Monday 4 January 2016.

The Poultry QPF will be effective from 4 January 2016 for chicken processors that are currently subject to NMD requirements.

All other changes are intended to come into force on Monday 4 April 2016. This includes:

1. All changes for red meat.
2. For poultry; any increases or changes in sampling requirements (the frequency of sampling and/or number of samples to be taken for any species):
 - sampling for chickens other than poultry broilers (e.g. poussins, silkie), breeders, end-of-lay, and
 - sampling for ducks and turkeys.
3. For chickens; responses to the new SPS *Salmonella* detections, and moving window limit of 5/51 detections.

ABBREVIATIONS:

APC – aerobic plate count

CPT – *Campylobacter* Performance Target

NMC – National Microbiological Criteria

PSW – primary sampling window

QPF – Quarterly Performance Target

SW – six week sampling window

SPS – *Salmonella* Performance Target

VLT – very low throughput