



Summary of Submissions Received on: MPI Requirement Templates

Standards Integration Programme – Project 2

MPI Information Paper

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1 Introduction

The ‘requirements and guidance templates’ project is aimed at improving stakeholder understanding of and access to requirements and guidance documents by developing standardised templates.

Between 20 April and 20 May 2013, MPI staff and external stakeholders were asked to comment on the new look and feel of MPI’s requirements documents. We proposed that standardised templates will be used for all requirements (and related guidance) under the Animal Products Act, the Biosecurity Act, the ACVM Act, The Food Act (Bill), the Wine Act and when issuing plant export and organic product requirements.

2 Methodology

Feedback was requested for the following requirement exemplars:

- ACVM Standard ([Efficacy of Veterinary Vaccines](#))
- Import Health Standard ([Poultry Hatching Eggs and Specific-Pathogen Free Chicken Eggs](#))
- Import Health Standard ([Sea Containers](#))
- Plant Export Requirements ([Official Assurance Programme](#))
- Animal Products Notice ([Specifications for Dairy Processing](#))

These exemplars were distributed through the following channels internally:

- A Kotahi (MPI’s internal website) news story that linked to an updated version of the Standards Integration Programme Kotahi page; and
- A ‘Quality System Amendments and Updates’ email sent to all biosecurity related border staff that may not regularly access Kotahi.

For external stakeholders the exemplars were distributed through the following channels:

- Subject matter experts (SME’s) from across the Standards branch were asked to identify stakeholders in their area and send their details to the SIP Project team. An email was sent to these identified stakeholders requesting feedback; and
- the current consultation section of the New Zealand Food Safety Authority (NZFSA) website was updated. This triggers an automatic email to all website subscribers.

3 Results

13 submissions were received in total. Generally each submitter was supportive of the approach MPI has taken, with further/more specific feedback either:

- providing suggestions as to how MPI could better execute this approach; or
- requesting that MPI clarifies specific sections or wording that appears in the exemplars provided.

MPI has responded directly to all submitters either by email or phone conversation. The table on the following page provides a brief summary of each submission. MPI's response to each submission is also included.

4 Summary of all submissions received and MPI's response

Internal Submissions	External Submissions
<p>Submitter A</p> <p>Supportive of approach. Particularly the outcomes and consequences section in the IHS example.</p> <p><i>MPI Response: Comments noted</i></p>	<p>Submitter 1</p> <p>Supportive of changes being made. Clear separation between guidance and requirements provides necessary clarity. Background section provides good base knowledge on the requirement and its purpose. Suggested Title 'Issuing Authority' should be amended to say 'Issuing Legislation'.</p> <p><i>MPI Response: The term "Issuing Authority" has been used to cater for situations where the requirements are not issued specifically under legislation, for example in the case of plant exports and organics.</i></p>
<p>Submitter B</p> <p>Supportive of MPI's approach, believes there is scope to improve the plain English drafting of requirements documents.</p> <p><i>MPI Response: MPI Standards Branch are looking at initiatives, like staff training to improve performance in this area.</i></p>	<p>Submitter 2</p> <p>Supportive of approach, like the look and feel of documents. Suggests that putting requirements and guidance together in one document is preferable as it will save time.</p> <p><i>MPI Response: MPI is working to the principle of being clear about what are requirements and what is guidance, regardless of whether the information is in the same or separate documents. Where there is only a small amount of guidance it is possible to include the material in the same document. However, where there is a lot of guidance, they are likely to be in separate documents.</i></p>
<p>Submitter C</p> <p>IHS Examples provided are a marked improvement from current style. Believes there is more work to be done to improve plain English drafting of requirements documents.</p> <p>Suggests that a separate section is included, outlining the specific requirements for each process step.</p> <p>Suggests also that hyperlinks to related documents is contained in the requirements document so all information for any given commodity is easy to locate.</p> <p><i>MPI Response: Plain English (refer response above). Noted request for hyperlinks Request for specific requirements for each process step has been communicated to relevant Standard writers.</i></p>	<p>Submitter 3</p> <p>Support for initiative, where guidance and requirements must be part of two separate documents the name and reference number of each should be included in corresponding document.</p> <p><i>MPI Response: Comments noted.</i></p>
<p>Submitter D</p> <p>Does not comment on templates directly but suggests that verification staff are adequately trained so they can provide consistent and correct advice to exporters.</p> <p><i>MPI Response: Comments noted.</i></p>	<p>Submitter 4</p> <p>No feedback about templates directly. Have suggested that submission process however is lengthened or MPI flags what documents may be consulted on ahead of time.</p> <p><i>MPI Response: Comments noted. Also an extension to the deadline for submissions was provided.</i></p>
	<p>Submitter 5 and 6 (same agency)</p> <p>Submitter 5: Supportive of change format and agrees it will</p>

	<p>facilitate use of documents</p> <p>Submitter 6: Approve of look and feel of exemplars. Specifically when guidance information is included in requirements documents.</p> <p><i>MPI Response: Comments noted.</i></p>
	<p>Submitter 7</p> <p>Liked new format, introduction section and plain English drafting. Would like to clarify how the term ‘should’ is to be interpreted (i.e. mandatory requirement or nice to have).</p> <p><i>MPI Response: Comments noted, will refer to clarification about “should” to the relevant Standards writers.</i></p>
	<p>Submitter 8</p> <p>Like new look and layout and consider exemplars an improvement. Specifically the standardised sections, use of plain English and boxes around guidance material.</p> <p><i>MPI Response: Comments noted.</i></p>
	<p>Submitter 9</p> <p>Generally supportive of MPI’s attempt to clarify requirements/guidance. Concerns that:</p> <ul style="list-style-type: none"> • “one size fits all” approach may make documents less accessible to those who are not as technically literate. • approach is not consistent with other organisations that have different documents for different levels of familiarity/levels of hierarchy. • Content in exemplars is inconsistent (e.g. not all documents had links to other documents even if other documents would be relevant). • There is not one place that has all of the related documents and links so stakeholders may not be able to identify all documents relevant to their imported/exported commodity. <p><i>MPI Response: MPI agrees that one size will not fit all and will consider issuing guidance in areas where this is viewed to be necessary to help those not as technically literate. Noted comments about the inconsistencies in the documents and also the desire for more linkages to other material. The desire to find information about a commodity in a single place has been identified. This has lead to the establishment of a project called “electronic storage and retrieval of requirements and guidance.” The purpose of this project is to develop a system for electronic storage and data retrieval, so that requirements and related guidance and forms associated are easy for internal and external stakeholders to access.</i></p>