



**Summary of Submissions on the
Operational Code Petfood Processing Chapter 3**

21 December 2016

MPI received 3 submissions on the proposed documents. The 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 these documents.

MPI would like to thank all the parties who have taken the opportunity to comment on the drafts.

Points MPI would like feedback on		MPI Response	
1.	Is the level of detail appropriate for the petfood sector?	Yes	
2.	Are the technical aspects correct?	Yes	
3.	Are the procedures practical and achievable for the petfood sector?	Yes, With the exception of 6.9.1.c.	6.9 (1) (c) has been amended – refer to the amended section.
4.	Are there any areas that need more guidance?	6.9.1.c	This clause has been amended – refer below under Part 6.9.
5.	Are there any further changes needed to the Ante-Mortem Examination or Farmed Animal Supplier Statement forms?	No The change to a physical address and not a postal address on both forms is very welcome.	A further form of a “cut-down” version will be investigated.

Points MPI would like feedback on	MPI Response	
	<p>Operators request that MPI give further consideration to the versions of the statements attached, which they believe flow better and are easier to fill out.</p> <p>Also, operators request that MPI approve the use of the “cut-down” ante-mortem declaration that will be printed on the reverse of the Farmed Mammal Supplier statement. In the vast majority of cases the operator fills out both statements at the same time and duplicate the supply information. Having both forms on a single sheet would save a lot of time, be far more efficient and reduce the possibility of errors.</p>	

Part	Clause	Comment	Proposed amendment	MPI Response
2		There is no need to separate mobile slaughter from fixed premises slaughter. All the process steps are the same and the document and flowchart (figure 1) could be simplified. The only difference is 6.3 “holding in pens”, otherwise the process is identical.	The flowchart (figure 1) and clause 7.2 reads as though product from mobile slaughter is received onto a RMP premises. This is never the case as all mobile slaughter operators deliver their product to Further (petfood) Processors.	The chapter and flowchart has been amended accordingly.
4.5		Slaughter operators ‘should’ report weekly to their MPI verifier, and ‘should’ take part in the MPI on-farm verification programme. Is it intended by MPI that this a choice for slaughter operators?		This reporting procedure is not a current legal requirement however petfood slaughter operators have volunteered to do this for young calves. MPI sees this as a positive step by these members of the petfood sector for being proactive and developing an even closer working relationship with MPI.
5		We understand that the option for petfood primary processors to euthanase young calves on-farm is new. We welcome this option as it will reduce the need to transport these sensitive animals. However, it could increase the numbers killed on farm and this needs to be managed. We recommend that guidance be given to indicate that, wherever possible, on-farm slaughter of all animals (and young calves in particular) must be carried out in a place that is out of the public eye or in an area where it is unlikely that the public could view the operation. We understand that this will not always be possible where animals have gone down and are unable to be moved without causing even more stress to the animal.		The guidance box in 4.4 has been amended, which includes collection in a designated area, as well as inserting a new guidance box in 5.4 accordingly.
5.3		Checking of Supplier Statements (clause 5.3) occurs in mobile slaughter and on-farm slaughter but is	It would be simpler and more correct to consolidate this clause into the Ante-	This clause has been amended to reflect this.

Part	Clause	Comment	Proposed amendment	MPI Response
		missing from slaughter premises process, which moves from receiving to ante-mortem inspection without that step.	mortem examination clause as it is, in reality, part of the ante-mortem process.	
5.5	(2)	<p>Clause 5.5 (2) allows for the use of a gun to on-farm slaughter young calves. Processors have agreed that this is too dangerous and young calves should be on-farm slaughter using a captive bolt only.</p> <p>Concern has been expressed that there is no requirement or recommendation that on-farm slaughter should occur out of sight from the public. I'm not sure how the MPI Legal team would word such a clause but operators believe it to be important, particularly for young calves.</p>		<p>See above.</p> <p>More guidance has been included</p>
5.6		<p>A key requirement for transporting of carcasses is that these be covered during transport on public roads.</p> <p>We receive many complaints from both the rural community and the general public about transport of carcasses, whether they be destined for petfood processing or otherwise (e.g. slink collection). We consider that protecting this realistic side of the primary industry from public viewing is imperative for the image of New Zealand. One farmer commented that "Dead calf operators need to cover their loads. More phone calls to me from people around Matamata/Hobbiton with tourists waiting for their bus, watching the local club drive past with a load of dead calves on the back of the Hilux".</p>		Amended 5.5 (1) to include covered vehicles as an example. There is no current legal requirement.
6.9		This clause should be made clearer. The supplier does not "present ... animals ... intended for export".		6.9.1 (c) has been amended for clarification.

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		<p>Unlike the human consumption industry, the supplier presents animals without knowing where they are going. The onus is on the operator to determine suitability for export and to have systems in place to separate product streams. The operator also must have such systems in place to comply with customer requirements.</p> <p>This clause should make it the clear that product is eligible for slaughter, except product:</p> <ul style="list-style-type: none"> • derived from animals within withholding periods, and • product derived from healthy animals that were slaughtered on-farm, and • product prohibited by any OMAR. 		
6.9	(1) c)	This will further decrease the eligibility for export and is not in line with current OMAR requirements.	Delete this clause.	See above.