

<p style="text-align: center;"><b>Summary of Submissions on the Operational Code Petfood Processing Chapter 4</b></p>
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28 April 2017

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?		
2.	Are the technical aspects correct?	Area needs to be clear for any sign of rabbi Haemorrhagic virus present and quarantine area	Noted
3.	Are the procedures practical and achievable for the petfood sector?	Yes	Noted
4.	Are there any areas that need more guidance?	Contact Janine Duckwoth at Landcare research	Noted
5.	Are there any further changes needed to the Wild Animal Supplier Statement form?	Dangers of RHDV1	Noted

Part	Clause	Comment	Proposed amendment	MPI Response
Scope and Application			In both clauses (1) and (2) “refrigeration” should be removed to match the title of the document.	This description is not intended to match the title, rather it’s about the scope of the document. However, refrigeration has been changed to encompass supply etc. and clause (2) has been removed.
1	Definitions		Definitions of “caution period” replace the word “acceptable” with word “permitted”.	This definition matches the HC Specs and should be kept the same for consistency.
1	Definitions		Definition of “pest” (b); “s” should be “is”.	Agreed and corrected.
1	Definitions		Definition of “wild bird” should have species names added to be consistent with the rest of the animals defined.	Agreed and added in.
1	a	Rabbits must be checked for any signs or RHDV, reported to Janine Duckworth at Landcare research and reported as a new outbreak under OIE rulls	check	Noted. Guidance has been included in 3.6.1.
3.3		The word “depot” has a specific meaning under Part 11 of the HC Specs. These facilities are not depots.	(clause (8) and (11) - remove the word “depot” and replace with the word “facility” to remove any confusion with HC requirements.	Agreed and amended.
3.4	Table 1	The use of brodifacoum and other category 4 poisons must be prohibited in favor of alternatives such as encapsulated cyanide Feratox® and cholecalciferol paste Feracol® (Eason et al. 2010). The application of broadifacoum (and possible use of other category 4 poisons) in areas considered for the harvesting of wild animals for pet food (and harvesting of wild animals for human		Category 4 poisons are legally available for use in NZ, subject to specific conditions. The Code therefore needs to include details of its use to ensure their use is managed appropriately.

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		consumption) is in my experience as a wild game harvester a major hindrance and stumbling block to the development of the harvesting of wild animals for petfood or for human consumption in New Zealand.		
3.5	GD box	When are Statements of Poison Use Needed?	Add wild birds to the list of distances (a) – (d).	Agreed and wild birds have been added.
3.6.3	GD box	<p>These paragraphs read as HC requirements for deer. There are a few deer taken for petfood use but the vast bulk are small animals (rabbits, hares, wallabies, possums, birds, etc), each animal cannot be tagged “where it comes to rest”. The vast majority of animals harvested are rabbits or hares taken in a block of land or possums taken in a trapping line that are moved to central location and tagged as a group.</p> <p>If there is an issue here, we would appreciate further discussion on this point.</p>	We recommend deletion of the last two paragraphs of the guidance box in this clause, except for the last sentence.	Agreed and amended to clarify between small animals and deer.
3.7		I would like it to be considered in Chapter 4 Harvesting and Processing of Wild Animals in the new Petfood Processing Handbook that harvested wild game be able to be sold as portions or as whole animal carcasses (with abdominal viscera removed) as the end result of what is considered as primary processing of wild animals for pet food.		<p>The Code does not state that they have to be sold as portions or whole carcasses.</p> <p>The head <b>may</b> be removed to make it more practical eg for transport 3.7 (5).</p>
Other		I would like it to be considered in Chapter 4 Harvesting and Processing of Wild Animals in the new Petfood Processing Handbook that		The scope of this Code is for cats and dogs only. However, the AC Specs has a wider application which includes all animal material

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		Petfood be amplified to include the sale of wild animals harvested for pet food as diet/food for exotic wild felids (Felidae), wild canids (Canidae), and large reptiles (Varanidae) thus opening up a market for sale to zoos and aquariums and private overseas owners of exotic pets.		for animal consumption. Harvesting wild animals for exotic animals is not excluded and may be undertaken provided the requirements of the notice are met.