

Discussion Document on Review of Transport and Wharves Regulated Control Schemes

Purpose:

To review the current requirements of the Regulated Control Schemes (RCSs) for transport and handling at wharves of products for export with an official assurance under the Animal Products Act 1999.

Background:

The requirements for transport and handling at wharves for export were based on market access requirements, in particular the EU, and were formalised as market access requirements in 2000. The legal mechanism was changed in 2009 and 2010 to the current notices.

As a transport or wharf operator you can choose to operate under either an RCS or a registered risk management programme (RMP). The RCS is an alternative to an RMP. There is no requirement to operate under the RCS, but if you don't, then you must operate under a registered RMP covering your operations.

The current notices are:

- [Animal Products \(Regulated Control Scheme - Transport of Export Animal Products and Animal Material for Export with an Official Assurance\) Notice 2009](#); and
- [Animal Products \(Regulated Control Scheme – Handling of Export Animal Products and Animal Material at Wharves\) Notice 2010](#); and
- [Animal Products \(Transport of Export Animal Products and Handling at Point of Export\) Notice 2009](#); and
- [Animal Products Notice: Export Verification Requirements 2016 Schedule 1](#).

Amalgamation

Currently there exist two separate RCSs for transporters and wharf operators, enabled by a separate notice. MPI proposes to revoke the two RCSs and replace them with a single RCS. This would ensure consistency and uniformity of processes, and provide a single point of reference for the industry, other stakeholders and MPI. The enabling notice needs to be retained but has also been reviewed as part of this process.

What happens next

All submissions will be considered after consultation has closed. A summary of submissions and analysis will be sent to all submitters and posted on the MPI website. The new Notices could be in place by November 2017 or earlier.

The next phase of the review will include reviewing the RCS templates and developing a guidance document to assist operators and verifiers in explaining the expectations of MPI.

Summary of the main changes proposed

Continuous transfer

Since implementation, a number of issues have been identified with implementation and ongoing compliance to the requirements, particularly in the area of continuous transfer of products at a depot. Continuous product transfer is a market access requirement.

MPI is proposing to provide some flexibility for product transfer at a depot with 12 and 24 hour rules for RCS holders to improve the number of non-compliances. However, a clarifying OMAR requiring country listing may state these rules can only be carried out in a facility that is listed as a store with that country eg EU. Those holding RMPs have greater flexibility in that they can have storage as part of their operations.

Verification frequencies

MPI proposes to simplify verification frequencies, particularly companies with multiple depots. This would require a change to the schedule of the Animal Products Notice: Export Verification Notice. Refer to **Appendix 1** in this document for the proposed changes.

Temperature controls

The temperature of product on pick up has been included to improve process control and traceability. Calibration traceability requirements are being introduced to provide clarity and align with the Human and Animal Consumption Specifications.

Preservation Temperatures

The draft Notice introduces a change from temperature to preservation temperature and a definition has been included. Product must have reached its preservation temperature before being transported. Different product types have different preservation temperatures eg dairy is different from meat.

Dairy product dispositions

MPI is proposing to amend the Animal Products Notice: Disposal of Non-conforming Dairy Material or Dairy Product so that it applies to RCS operators as well as RMP operators.

Renewal of registration

MPI proposes to introduce a renewal system (3 yearly) - this aligns with other animal product programmes and will also assist in maintaining up-to-date information on operators.

Note that the current approvals database cannot include detailed information such as depot locations (which would assist the verification process). However a revised application form will include locations of depots and this information will be recorded in a different way.

Appendix 1 Proposed changes to verification frequencies

(Export Verification Requirements Notice)

MPI proposes the following changes to the verification frequencies for transport and wharf RCSs:

Animal product business	Initial verification step	Ceiling step
Primary processors of mammals and birds for human consumption	Step 2	Step 5
Secondary processors of mammals and birds for human consumption	Step 2	Step 5
Primary and secondary processors of seafood for human and animal consumption, including fishing vessels	Step 2	Step 6
Farm dairy RMP and raw milk transport	Step 5	Step 7
Registered transporters with Vehicle Docking Facilities (VDF) or equivalent operations under Risk Management Programme	Step 5	Step 6
All other registered transport operators	Step 6	Step 7
RMP or RCS registered transporters of refrigerated relevant goods	Step 6	Step 7
RMP or RCS registered transporters of shelf stable relevant goods with or without depots¹	Step 6	Step 7
RMP or RCS registered transporters of relevant goods with refrigerated depots² (VDFs)	Step 5	Step 6
RMP or RCS registered facilities (export loading facilities, depots) for handling relevant goods³	Step 5	Step 6
Processors of dairy product and dairy material for human consumption	Step 2	Step 5
All other processors of animal product for human consumption	Step 2	Step 5
Export stores	Step 2	Step 6
Primary processors of mammals and birds for animal consumption	Step 2	Step 5
All other processors of animal product for animal consumption	Step 2	Step 6
All other businesses that have a risk management programme but not covered by the above animal product business descriptions	Step 2	Step 5
Killed wild mammal material depots	Step 4	Step 6
Fish (other than bivalve molluscan shellfish) material depots, and apiarists	Step 8	Step 8
Bee product processors requiring risk management programmes	Step 5	Step 6

¹ [If a registered transporter has more than one depot then a physical site visit at every depot is not necessary for each verification period but a selection of consignment records held at every depot must be reviewed for each verification period.](#)

² [If a registered transporter has multiple depots with refrigerated compartments, each depot must be verified for each verification period.](#)

³ [If a registered facility for export loading such as a wharf has more than one wharf, each of those wharves must be subject to a verification visit during the applicable verification period.](#)

Businesses (excluding stores) processing blood, blood products, reproductive materials and pharmaceutical products requiring official assurances though not required to have a risk management programme	Step 2	Step 5
Businesses (including stores) processing animal material such as hides and skins, or for fertilizer and similar products, that require official assurances though not required to have a risk management programme	Step 2	Step 7
Germplasm businesses	Step 6	Step 7
Poultry hatcheries	Step 6	Step 7
Providers (if other than the risk management programme holder) of ante-mortem and post-mortem examination of mammals or birds	Step 2	Step 5