Submissions Template: Proposed amendments to the:
Operational Code Slaughter and Dressing, Chapter 5 Red Meat Code of Practice

We received a total of 10 submissions from a wide range of interested parties. Known interested parties were encouraged to participate in this process through using targeted emails as well.

The consultation provided helpful feedback on areas where the *Operational Code Slaughter and Dressing, Red Meat Code of Practice Chapter 5* could be refined and improved. Feedback from submitters and MPI's responses are in the analysis of submissions below.

	Questions MPI would like feedback on		MPI Response
1.	Is the level of detail appropriate for the red meat sector?	Yes Yes Support the changes to COP 5 Support the proposed changes to CoP5 – general consensus: updated document is easier to understand, allow more flexibility with respect to Operator Process Control, and will provide a useful tool for monitoring each slaughter process. We anticipate working closely with MPI VS at each site particularly in the initial period of implementation to ensure a smooth transition. Supportive of the changes proposed in CoP5 and the overall direction that MPI are heading	

Questions MPI would like feedback on		MPI Response
	Yes, however further work is required to develop a new COP for validation to replace IS8. Further guidance information for statistical process control monitoring would also be helpful perhaps by way of a unit standard like the US HACCP unit standard developed by MPI with PRiTO.	Working on CoP1 MPI developing an e-learning training module similar to US HACCP Unit Standard
2.	Are the technical aspects correct?	Some amendments and recommendations in the submission below Yes I believe the amendments to the code are necessary and deliver on the intent of the APA, that being having operators manage their business based on the intended use of the products being produced.	Agree
		Some of the definitions in the previous version of this Code have been removed. 'Disinfected' is gone but is probably an important one to keep.	Changed to sanitised 'Disinfected' changed to 'sanitised' throughout the document (e.g. clause 2.3.2)
		validation means obtaining evidence that a ~~product~~ or procedure(s), when properly implemented, is capable of consistently achieving a specified outcome	Agree – amended

Questions MPI would like feedback on			MPI Response
3.	Are the procedures practical and achievable for the red meat sector?	Yes We have been trailing the current CoP5 all this season and believe the changes proposed in this code are necessary in order for the code to be achievable by all industry members. Feral animals and farmed gone feral animals have idiosyncrasies particularly regarding contamination rates due to the way in which the animals are procured and handled prior to reception at processing plant.	Agree MPI acknowledges there are potential issues with wild animals however, MPI requires the processing of these animals to meet basic hygienic principles. Therefore the requirements of the statistical process control are deemed appropriate for wild animal processing also.
4.	Are there any areas that need more guidance?	Consider wider than ovine/bovine processing, a number of the recommendations below are to cover less frequent species that the sector also process No – but refer comment below on clarity Some operators may struggle with setting up SPC monitoring on site so additional support on how to create and implement SPC monitoring may be required for industry members new to the code.	MPI has considered more than ovine/bovine processing and considered the application of statistical process control is applicable also. MPI has developed a basic spreadsheet as well as training programs to help with SPC

Questions MPI would like feedback on				MPI Response
		COP1 is referenced several times throughout the document with regard to Operator Process Control. It is important that this document be made available if there is an expectation that processors and MPI are expected to reference this material regarding identification of trends and setting process limits.		References to CoP1 have been removed. Added a section on Operator Performance Criteria

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
Background		Include meat as a key word to ensure contamination to edible viscera/offal is considered as part of the risks to be managed	Care should be taken when performing slaughter and dressing procedures to minimise the edible portions of the ~~carcass~~ meat being contaminated with these bacteria	Amended
All		There is no cancelation of IS5 here? Does this still apply?	Cancel IS5 defined in COP5	Added statement on cancellation of IS5
Update email		Updates from MPI Food Safety websites in the email describes this as "Updated Consultation: Proposed chapter 5 of the Operational code petfood processing" but the link goes to COP so this is possibly an error.	Resend update?	Acknowledged
1		We would like to see the following added to 'Part 1: Guiding principles for slaughter and dressing process' which acknowledges that:		The slaughter and dressing code is about the hygienic processing of

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
		"Appropriate treatment and proper handling of animals at slaughterhouses can improve products and profitability. It is essential that optimal animal welfare is promoted and maintained throughout the slaughter process."		animals to produce safe and suitable meat. MPI and industry acknowledges the importance of animal welfare and the humane treatment of production animals. These requirements are addressed in the industry standard 4 procurement (to be replaced by Code of Practice 4)
2	1	The APA requires RMP operators to comply with all legislative requirements. This includes requirements relating to the welfare, slaughter and dressing of animals to ensure health risks to humans and animals are managed.		APA does not cover animal welfare Have included clause regarding compliance with Animal Welfare Act (2)
2	2.1	Addition to the 'Summary of general requirements for slaughter and dressing': It must be determined if an animal has become insensible after stunning, as the bleeding and dressing operations must not begin until complete stunning has been achieved. No animal must be subjected to any part of the dressing process while it is still alive.		Added general statement and reordered 2.1 (general reqs) Specific requirement is covered in the commercial slaughter code
2	2.1 (1)	IS4 is not the legal notice	Remove ref to IS4	Agree, deleted
2	2.1 (6)	The operator should assess animals presented for slaughter and manage their welfare, slaughter and dressing accordingly to facilitate the production of meat fit for the intended use.		Added
2	2.1(3)	Need to include exceptions for those not requiring ante mortem at the site	Animals must be designated suitable for processing by a competent ante-mortem examiner	Amended and re-ordered:

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
			[AM and PM Notice]. With the exception of Wild Game, Game estate and farmed gone wild type animals	Wild, game estate and farmed gone feral animals are exempt from ante-mortem examination; 2.1(1) and (2). The certified supplier must confirm that the animals showed no visible signs of being sick or dying prior to being killed to be eligible for processing [HC Specs].
2	2.1(4)	Need to include exceptions for those not dressed at the site. Performed by post mortem examiner.	Animals must be designated suitable for processing by a competent ante-mortem examiner [AM and PM Notice]. With the exception of Wild Game, Game estate and farmed gone wild type animals	Amended and re-ordered: Wild, game estate and farmed gone feral animals are exempt from ante-mortem examination; 2.1(1) and (2). The certified supplier must confirm that the animals showed no visible signs of being sick or dying prior to being killed to be eligible for processing [HC Specs].
2	2.1 (5)	Suspects may not be enough detail. USA OMAR 2.5.1c says c. The Veterinary Animal Products Officer must be available to make decisions on ante-mortem and post-mortem "suspects". But the definition of suspects relys on IS5 16.3 for the how and 17.1 for the what	Check with Market access if loss of the detail around suspects means the USA OMAR needs to be more detailed. Define if suspects is an SPVD or a line e.g. residues suspects Check if there is a clear way for APO to retain product if the references to AgM74s in IS 5 go	CoP5 is the domestic guidance. IS5 allowed for meat inspector to make these decisions – refer to 17.1: "The duties normally assigned to a veterinarian may be performed at domestic premises by the supervising meat inspector or sole charge inspector." Suspects dealt with in CoP 6, 7 & 8 and more detail to be added.

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
2	2.2	USA OMAR 2.6.1 refers to IS5 section 6 Humane slaughter Does the lack of a reference to maximum stick time mean that the humane slaughter maximums apply (ie no extension for emergency slaughter) or that there is no need for sticking in a time period eg 10minutes would be OK if permanently stunned? IS5 6.4.2 There are no specified intervals for irreversible stuns but restrictions still apply as Compensatory measures for stun errors. An interval exceeding 2 minutes for irreversible stun is considered excessive, except in the case of emergency slaughter where 4 minutes is acceptable.	Check with market access to change that to COP 5 2.2 or remove reference from USA OMAR. Insert 4 minute maximum stun-stick time if permanently stunned if this is a wholesomeness issue	CoP5 is the domestic guidance. Currently in IS4 (Emergency Slaughter); will be put in CoP4 as it refers to lairage activities.
2	2.2	Addition to the 'Summary of requirements for slaughter (stunning, sticking and bleeding)': The bleeding knife must continuously be sharpened. A blunt knife will prolong the incision and the cut ends of the blood vessels will be damaged. This may cause premature clotting and blockage of the vessels, delaying bleeding out and prolonging the onset of unconsciousness and insensitivity. Incisions should be swift and precise.1		Animals are unconscious at this stage. Have included: The use of a sharp knife to make the sticking incision is important to allow rapid voiding of the blood and to prevent occlusion of blood flow during bleeding out.
2	2.2 (4)	Refer to the Animal Welfare (Commercial Slaughter) Code of Welfare for specific animal welfare requirements.		Added
	2.2 (6)	Whenever stunning becomes inadequate, the slaughter should cease until the problem is rectified. If this takes place, it is		Simplified and added

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
		essential that maintaining the welfare of the individual animal remains a priority.		
2	2.2(7)	Consider those animals condemned by the operator prior to post mortem inspection. This supports and aligns with 4.2.4(1)	e) been condemned by the operator without receiving post mortem examination.	Added
2	2.3.1 (6)	Does this mean that thyroid glands cannot go to rendering if the rendered meal goes to pet of pig or chicken food?	Clarify	Clarified - included suitable for rendering
2	2.3.2(11)	Care to be taken with the removal of udders	Udders should be removed without milk spilling or removal of attached lymph nodes on to the exposed carcass.	Udders should be removed without milk spilling onto the exposed carcass, and without the removal of associated lymph nodes.
2	2.3.2	Skin on carcasses – this section explains the scalding process for pigs and goats, ostrich and emus are not subjected to this process.	Remove ostriches and emus from this heading.	Scalding may apply to processing of other animals

Amended |
2	2.3.2 (3)	Is this an arbitrary number? Every sixth carcass will be variable depending on chain speed etc. Not a lot of consistency.		Agree however current industry practice
2	2.3.2 (9)a	If not a requirement for PM inspection under the Code of Practice, why would the PM examiner request these bits are presented?		Because a PM examiner has the authority to request if they have reason to suspect
2	2.3.2 (32)	As noted in above section, ostrich and emu are not subjected to the scalding process, therefore this clause is not applicable.	Recommend to remove this clause and any other references to scalding.	Moved to scalding section

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
2	2.3.2 (36)	Due to the size of the ostrich/emu waxing would be impractical, but not to say this method wouldn't be used.	If feathers are removed using alternative methods, other than plucking, refer to Poultry Industry Processing Standard 5.	Amended
2	2.3.2 (39)	This clause has been covered in point (37), of washing after defeathering, but prior to further processing.	Remove this point.	(37) amended to include details on wash; (39) removed
2	2.3.2(3)	Define "disinfected" due to the regular nature of this activity to equipment (including knives).	Add definition of "disinfected"	Have replaced with sanitised. Definition added and disinfected removed.
2	2.3.2(9)	This allows trimming activities prior to post-mortem examination of lymph nodes and parts which may affect disposition.	Trimming activities prior to post-mortem examination ~~should ensure that no~~ cannot remove lymph nodes and parts which ~~may affect disposition are removed~~ are required in CoP6.	This is the existing wording from CoP6.
2	2.3.2 (18)	Gravid uteri are being currently saved for Human consumption, removing this ability will be detrimental to our business.	Gravid uteri may be saved for human consumption from those dams that have passed both ante and post mortem inspection.	The uterus of a passed animal can be saved however, science has now identified that gravid uteri needs further inspection requirements before being saved for human consumption, refer CoP7

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
?	2.3.4(5)	There is insufficient reference to steam vacs minimum standard. Should there be more detail on a NZ standard for steam vacs e.g. wash between carcasses, steam minimum 82 degrees. The EU OMAR refers to this standard 7.10.10 Steam vacs may be used in accordance with the New Zealand standard.	Put in NZ standard for steam vacs.	Agree, added: *The use of steam vacuum is acceptable, provided;* i) *good hygienic dressing practice is not compromised, and* ii) *steam minimum temperature should be 82ºC or above*
3	3.2 (3)	This guidance effectively undermines the SPC and ability to compare/contrast establishments. Recording might be standardised but if the efficiency of checking and sensitivity of visual inspection are poor then what's the point? Having a good recording system won't fix the sensitivity or efficiency and will still make it difficult to compare between establishments. I don't like this guidance. Not sure what it's trying to say.		Removed
3	3.2(8)(b)	Deer has similar type grain particles in ingesta contamination	fibrous or plant-like texture; may be smooth or tarry; may include grain particles (pigs & deer).	Amended – 'when animals have been fed grain' in line with FSIS definition

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
3	3.3(4)	Data must be collected on a run-by-run basis.	Some guidance should be added around how to manage multi species on the same chain during a single run. Example being start the run on lambs, process some goats and finish on sheep. 4.5.1(1) may need to be utilised?	Added; refer to 4.5.1 Short Runs.

This includes were multiple species are processed in the same run. |
| 3 | 3.2 (9) | The latest version mandates that an alternative process is viewed as a significant RMP amendment. The previous version (October 2015) had Appendix 1 – Validation of Alternative Processes which provides for a minor amendment. | The option in October 15 version should be reinstated. With reference to ME130 Slaughter & Dressing process the proposed statistical process control section described in Part 3 does not provide any benefit or value over our existing process control. | This clause 3.2 (9) is unchanged from the previous version.

3.2(9) refers to arithmetic mean charts as the acceptable form for SPC however, MPI acknowledges that some may develop a system more suited to their unique process.

The requirements around minor or significant amendment are documented in the RMP Specifications/Manual. |
| 4 | 4.2.2 | Should there be a maximum time for Detain cx and Offal time to be left on the slaughterfloor? May be a risk? | EU OMAR 7.10.4 The maximum permitted holding time on the retain rail for both warm and cold boning operations is 30 minutes. could apply or refer to IS6 | This is controlled by PHI requirements defined in CoP9.

Add S2.1.3 Detain Rail Time (COP9) |
| 4 | 4.2.3 | Should define the species that are included in 'Other' | Additional note to be added: | Note added

Other includes Wild, Game Estate and Farmed Gone Feral animals. |

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
			All Feral / Wild animals, Game Estate or Farmed gone Feral are to be considered as Other.	
4.2.3	3	It is not clear in here or in the meat inspection parts what the standard for fecal contamination for petfood is. It is not clear if the new petfood code applies here (in the appendix to that it says gross fecal contamination condemn – but does gross mean lots of or visible?) Also what is that status of IS7?	Define fecal contamination for petfood eg same as human or some allowed	Amended section 4.2.3 heading – 'for human consumption'

No standard for faecal contamination for petfood; for petfood processing, please refer to Petfood Code of Practice. |
| 4 | 4.4.1 (4) v) 3)

&

4.4.1 (4) viii) | 1) A little bit contradictory – 4.4.1 (4) v) 3) states that if a breach occurs during window 2 another 25 run window commences whereas in viii) it indicates that MPI will determine when the window ends (i.e. a window of indefinite period rather than 25 runs?)

2)   4.4.1 (4) v 3)

I don't see any need to start an additional 25 run (3rd) window as there are no defined actions for any further breach in an additional window.

I would expect that window 2 would continue until MPI considers the process is back in control. | | Agreed, amended.

SPC monitoring is to continue even though the process is 'out of control'; start another 25 run window and await MPI direction.

Amended as above |
| 4 | 4.5.2(2) | Include low throughput guidance for deer operators | Recommend inclusion of definition of low throughput deer operation:

c) 70 animals per week processing medium size animals e.g.Deer | Acknowledged. Define Red deer as small, Wapiti as large

Added examples |

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
4	4.5.4(2)	200+ kg stags would be very rare, at 130+ kgs dressed weight would be significantly different to normal processing and cause a problem.	a line of 130+ kg stags	An abnormal situation is a rare event, therefore the examples are identifying lines of animals that are rare.
4	4.5.4(2)	Include another abnormal situation to manage contaminated deer.	d) Farm Deer wintered on peat soil. Peat sticks to the deer's hide will not wash off, only comes off with the spring moult	This is covered in 4.5.4(5); if this is a regular occurrence then it is no longer 'abnormal'.
?	?	Should tech Brief 02 35 part 3 be cancelled or incorporated: **3. Clarification of IS5 Section 5.3.8** The section reads 'Skin roll back shall be prevented'. The way in which this outcome is achieved is not specified. The angle of the knife making the incisions is not mentioned. The outcome of the opening sequences must ensure that the distance the knife under runs the skin, from the underlying tissues as it makes the opening cut does not cause roll back. **Background** There have been various theories about how to prevent roll back. One theory is that the knife making opening cuts through the skin should be perpendicular to the surface of the skin at all times. This stops roll back because there can be no under running and is a good rule of thumb, however it is not practical in every situation and is not specified in the requirements.		We are not setting prescriptive ways to prevent skin roll back but allowing operators to manage their own operation effectively. Cancellation of 02 35 Part 3 will be considered.

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
		[For the avoidance of doubt, roll back is sometimes referred to as roll in]		
		Tech Brief 02/15 5. IS5 Ovine Sticking Issue: Recently both internal and external reviewers have identified non-compliance with IS5, in particular the extension of an opening skin cut into the thoracic stick in sheep. An example of this would include a knife being used to open the skin of the neck (inside out cut), following through into a thoracic stick - without first washing the knife. Clarification: Please ensure the requirements of IS5 are followed in all cases. IS5 section 5.2.2 (a) states; " In addition, all equipment shall be additionally rinsed after the following; (bullet point 2) - Inside-out skin incisions if the knife is subsequently used for other dressing operations on the same carcass (consecutive inside-out skin incisions may be done the same carcass without additional rinsing)". 6. IS5 Collection of ovine testis on inverted dressing chains. Issue:	Consider if TB can be cancelled	This is covered in 2.3.2 (1, 2, 3 & 4) Cancellation of TB 02/15 will be considered.

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
		Having removed the scrotum and testicle during normal dressing procedures, is the spermatic cord required to be trimmed? Clarification: IS5 section 5.3.23 provides for the collection of testicles on the inverted chain. Having removed the entire scrotum and contents from the carcass (using standard dressing procedures), the testicles are to be removed 'hygienically' from the enclosing scrotum. MAF Food have confirmed - if the skin cut used to free the scrotum and testicles from the carcass, also severs the spermatic cord, then the spermatic cord area is to be trimmed. If the company believes there is no contamination during the collection cut, then evidence would need to be collected to support this. It is recommended that companies set up a trial in this instance.		Operators are to ensure their process results in meat that is fit for purpose.
		TB 2016/07 says Raw material for the extraction and production of technical or pharmaceutical products can be saved from untagged calves and may be eligible for official assurances where an OMAR allows. Tech Brief 09-09 1. Bobby calves with no tags Notification: The meat and traditional offal from bobby calves that are slaughtered and processed with no positive identifying tags	Clarify the status of untagged bobby calves in COP5 and cancel TBs	CoP5 is domestic guidance with no requirements for export eligibility.

1. Part	2. Clause	3. Comment	4. Proposed amendment	MPI Response
		(after receipt of this technical brief) are deemed to be ineligible for export. This is due to the inability to provide overseas assurances with respect to meeting market requirements for residue testing. They are, however, eligible for release to the domestic market. Other tissues such as hides and skins, bones, vells, or raw materials for the extraction and production of technical or pharmaceutical products can be exported subject to normal controls and meeting any specific OMAR requirements.		
		TB 10 04 2 Post-mortem examination, at abattoirs and meat export premises, of farmed animal material for pet food 3 Inspection of Beef Pizzles on visceral tables	Check incorporated and cancel TB	Cancellation of TB 10/04 will be considered.