

Summary of Submissions – Proposed Risk Management Programme (RMP) Template for Micro Abattoirs and Guidance Document: How to Use the RMP Template for Micro Abattoirs

MPI would like to thank all the parties who have taken the opportunity to comment on the draft RMP Template for Micro Abattoirs (RMP-MA) and the supporting Guidance Document: How to Use the RMP Template for Micro Abattoirs.

MPI received 6 external submissions. The submissions have been reviewed and analysed. As a result of the consultation process, amendments have been made to the document where appropriate.

Introduction

The purpose of the RMP-MA is to give micro abattoir operators a simple approach for meeting the applicable regulatory requirements under the Animal Products Act 1999. It was developed to enable operators with a low throughput to perform primary processing of animals and produce regulated meat for trade under a limited scope of operations (i.e. farmed mammals, ostriches and emus, for human consumption, for domestic use or export to countries that do not require official assurances).

MPI has worked with industry throughout the RMP template development process to ensure that the RMP template is achievable and meets the regulatory requirements.

The RMP-MA is not intended for homekill service or recreational catch providers.

The summary and analysis of submissions below has been laid out based on the key topics from the consultation:

1. General view on the development of the RMP-MA.
2. Processing regulated and unregulated meat (i.e. homekill and recreational catch) on the same premises.
3. Mobile micro abattoir operations
 - a. Provisions around Design, Construction and Maintenance of Buildings, Facilities and Equipment
 - b. Provisions around Process Control.
4. Other comments and changes made.

1. General view on the development of the RMP-MA

Submitters were initially generally “supportive of the micro-abattoir concept because of the potential value it offers to rural butchers, farmers and the regional economy.” However concerns surrounding the financial viability were raised in terms of the initial investment, regulatory, cost and process barriers that may potentially limit the uptake of the framework by businesses.

Submitters also noted that they were also generally satisfied that their premises and staff can meet the requirements as set out in the RMP template to operate a micro abattoir.

2. Processing regulated and unregulated meat (homekill and recreational catch) on the same premises

Under the Animal Products Act 1999 (APA) Section 70 prohibits a micro abattoir from homekill or recreational catch activities.

The meat which is slaughtered and dressed in a micro abattoir must be subject to the process described in the RMP, including ante- and post-mortem inspection.

Concerns regarding Animal Products Act 1999, Section 70 and 71 were raised in the consultation, suggesting changes to be made in order to enable micro abattoirs to primary process both regulated meat and unregulated meat (i.e. homekill and recreational catch) in a micro-abattoir operation. The feedback has been acknowledged, however this is not the intent of the RMP template.

Micro abattoirs are not to be confused with dual operator butchers (DOB) who are able to operate a retail butchery (secondary processing) and/or sell regulated animal products, and process homekill or recreational catch.

The following table “Key comments regarding processing regulated and unregulated meat at the same premises” summarises the key comments from submitters, proposed amendments and the MPI response.

Key comments regarding processing regulated and unregulated meat at the same premises		
Submission Comment	Proposed Amendment	MPI Response
<p>The development of the RMP-MA was to allow the co-use of some facilities and processing farm animals for commercial domestic use (regulated meat) alongside the Homekill industry.</p> <p>The RMP-MA is acceptable and conforms with previous regulations and the Animal Products Act 1999, however there is a significant difficulty that limits the ability of an existing home-kill abattoir to operate as a micro abattoir. Section 71 (1) (b) of the Animal Products Act 1999 is the major impediment to operating a dual slaughter facility.</p> <p>We are however concerned that section 71 Animal Products Act 1999 is a barrier to the use of existing quality killing facilities to be registered as a Micro Abattoir.</p> <p>The requirements of the RMP-MA are in our opinion are inconsistent with:</p>	<p>The variation to section 71:</p> <p>Section 71 (1) (b) no animal that is home killed or recreational catch may be killed on or at any premises or place where regulated animal product is processed or traded unless an approved Risk Management Plan is implemented that eliminates the risk of the regulated and unregulated products mingling or becoming cross contaminated.</p>	<p>MPI acknowledges your comments.</p> <p>This RMP Template is not intended for homekill or recreational catch service providers.</p> <p>To clarify this, we have detailed who can use this RMP template (on the cover page) added several notes and another table row in the Application and Scope of the RMP Template for Micro Abattoirs to clarify this:</p> <ol style="list-style-type: none"> 1. “Under the Animal Products Act 1999 (APA) Section 70, a micro abattoir is prohibited from slaughtering homekill or recreational catch.”

Key comments regarding processing regulated and unregulated meat at the same premises

Submission Comment	Proposed Amendment	MPI Response						
<p>1. Animal Products Act 1999 Section 70 Limitations on regulated animal product and home-kill or recreational catch operations being carried out at same premises or place or both – a) Home-kill or recreational catch processing operations; or b) the processing of, or trade in, any regulated animal product for human or animal consumption.</p> <p>Subsection 2 Subsection 1 does not apply to: Retail butchers acting in accordance with section 71.</p>		<p>2.</p> <p>Table 1: Scope of micro abattoir RMP based on the template</p> <table border="1"> <thead> <tr> <th></th> <th>Included</th> <th>Excluded</th> </tr> </thead> <tbody> <tr> <td>Regulatory regime</td> <td>Processing of Regulated meat</td> <td>Processing of unregulated meat (i.e. homekill and recreational catch)</td> </tr> </tbody> </table>		Included	Excluded	Regulatory regime	Processing of Regulated meat	Processing of unregulated meat (i.e. homekill and recreational catch)
	Included	Excluded						
Regulatory regime	Processing of Regulated meat	Processing of unregulated meat (i.e. homekill and recreational catch)						
<p>Whether or not the RMP for Micro-Abattoirs is used by farming, homekill or other operations is a decision that business owners will make based on their various economic and other drivers.</p>								
<p>The proposed template for your RMP for Micro Abattoir indicates throughout, that homekill and inspected meat will be able to be killed in the same premises however Section 71 of the Animal Products Act 1999 states that no animal that is homekilled can be killed on or at any place where inspected meat is processed or traded.</p>	<p>We submit that the Animal Products Act 1999 Section 71 be changed to allow micro abattoir to kill both regulated, homekill and recreational meat be processed in the same premises, as long as a degree of seperation can be established and the company strictly adheres to the RMP and subsequent audits.</p>							
<p>The submitter invested significant resource working with MPI around the implementation process and drew their attention to a number of practical issues that emerged over this time that will prevent the uptake of the framework by the majority of homekill sector businesses.</p> <p>The suggestions made to resolve the identified issues were not accepted by MPI. The consequence is that, while the micro-abattoir framework continues to have potential for the sector, we do not believe that this will be able to be realised under the MPI imposed cost and process barriers that currently significantly constrain its implementation.</p>								

3. Mobile micro abattoir operations

Feedback from submitters showed that there was a lack of specific information around mobile abattoirs in the RMP template and guidance documents.

The following table outlines the key comments regarding mobile operations:

Key comments regarding mobile operations		
Submission Comment	Proposed Amendment	MPI Response
<p>Lack of information provided in the RMP Template about the mobile Micro-Abattoir option.</p> <p>The micro-abattoir framework, by design, offers businesses the option of using either a fixed premise (ie a building) or a mobile premise (eg a suitably designed and equipped truck/trailer to conduct the operation in).</p> <p>The latter option, while still very expensive (approximately \$250,000) for a purpose built facility manufactured overseas and imported has a significant capital cost advantage over a fixed premise and potential to purpose-build a mobile facility or adapt a current mobile homekill truck are both areas that have been explored.</p> <p>It is therefore disappointing to find that there is minimal content relating to a mobile micro-abattoir in either the draft RMP or in the Guidance Document with, the word “mobile”: used a total of nine times in both documents. In only two of these instances is there anything that could be regarded as contextual information about a mobile premise giving, perhaps wrongly, the impression of a “copy and paste” exercise from an existing document.</p> <p>Given the considerable expense involved in the purchase or construction of a micro-abattoir premise about the specific requirements relating to the potential design, construction and operation of a mobile micro-abattoir and the associated facilities/environment (such as the free-range slaughter of the animal) , the absence of this information, in the draft Guidance Document in particular is surprising.</p>	<p>Strongly recommend that a section is added to the Guidance Document that unambiguously describes the requirements/constraints relating to a mobile micro abattoir</p>	<p>The supporting systems apply to both fixed and mobile premises unless specifically stated.</p> <p>MPI has written the RMP template to be outcome focussed and practical for both small operations and mobile operators, while still being able to meet the same legal requirements.</p> <p>After further review, guidance has been provided where needed, and where details are specific to either fixed or mobile premises, this has been identified in bold and/or underlined text.</p>

Key comments regarding mobile operations		
Submission Comment	Proposed Amendment	MPI Response
"the content of the documents as they appear to have been written with a fixed micro-abattoir premise in mind and thus are of very limited utility for businesses who might be interested in exploring a mobile micro-abattoir operation."		See above.
Template, page 22: under the "Show" section there is no mention of mobile premises layouts. I assume they are meant to be included by implication, and will proceed as if this was the intent. It appears to be a proofing omission rather than deliberate, given that the rest of the document treats both styles of operation in parallel.		MPI agrees and has amended the clause to read: a) Fixed premises building plans; b) Mobile premise layouts; c)

3a. Provisions around Design, Construction and Maintenance of Building, Facilities and Equipment

For Design, Construction and Maintenance of Building, Facilities and Equipment Supporting System (Supporting System F), key feedback was regarding:

- Animal holding and ante-mortem facilities
- Killing on field (for mobile micro abattoir premises)
- Employee amenities (for mobile micro abattoir premises).

Key comments regarding Supporting System F: Design, Construction and Maintenance of Building, Facilities and Equipment		
Submission Comment	Proposed Amendment	MPI Response
<p>Re #2.1 “Animal holding and ante-mortem facilities” there appears to be no provision to allow free-range shooting of animals to relieve the stress of confinement (and the subsequent increased risk of faecal contamination of the carcase. We were of the understanding that an animal could be shot and bled outside and brought to a mobile premises as long as it was dressed in an enclosed facility but this has not been included in the draft document for consultation.</p>		<p>Fixed premises requires animal holding areas.</p> <p>Historically homekill and petfood operators were the only sectors slaughtering unrestrained mammals outside of the slaughter premises. The Animal Welfare team at MPI has been consulted and will make a provision to include mobile micro abattoir operators for slaughter outside of slaughter premises in future updates.</p> <p>For mobile premises, the following has been added for the slaughter outside of the premises (i.e. killing on the field):</p> <p>M. Process Control 5. Killing on the field (applies only to mobile premises)</p> <p>(1) After ante-mortem examination, an animal may be killed on an adjacent field or paddock by the mobile slaughter operator using a gun in accordance with the requirements of the Code of Welfare: Commercial Slaughter.</p>

Key comments regarding Supporting System F: Design, Construction and Maintenance of Building, Facilities and Equipment		
Submission Comment	Proposed Amendment	MPI Response
		<p>(2) Use solid bullets (not frangible) where an animal is killed by shooting with a gun. This minimises the potential for contamination of the product with bullet fragments.</p> <p>(3) Killing, sticking and bleeding are done in a manner that minimises the contamination of the carcass (e.g. contamination through the stick wound).</p> <p>(4) Blood for human consumption is not collected from an animal killed on the field.</p> <p>(5) Opening cuts on the animal (except for the opening cut for sticking) are not allowed to be made while on the field.</p> <p>(6) Transfer or convey the killed animal to the mobile slaughter facility in a manner that minimises the contamination and deterioration of the carcass (e.g. it is not dragged through mud).</p>
<p>Re #5 "Employee amenities", there is a need for employees to "have access to amenities". How this is interpreted by verifiers is important and if mobile abattoirs are going to be able to exist then employee amenities need to be at a suitable location outside the RMP boundary rather than within the RMP boundary.</p>		<p>Agree, added:</p> <p>5. Employee Amenities (2) For mobile premises, employee amenities do not need to be located within the RMP premises.</p>

3b. Provisions around Process Control

Regarding Process Control (Supporting System M), the key comments were around:

- Ante-mortem examination and post-mortem examination
- Slaughter - Killing on field (for mobile micro abattoir premises).

Key comments regarding Supporting System M: Process Control		
Submission Comment	Proposed Amendment	MPI Response
<p>Re #3 “Ante-mortem examination”, as with other sections of the document, it is not written with a mobile micro-abattoir in mind. While ante-mortem inspection is an important control point, the focus should be on providing as much flexibility as possible while ensuring that the risks are managed.</p> <p>For a mobile micro-abattoir, this could involve – as is the case in at least one country overseas – a veterinarian or other suitable qualified person being employed by the animal owner to provide this service with, in instances where the carcass is returned to the owner, the veterinarian/qualified person returning later to carry out the post-mortem inspection and the passing of acceptable material for subsequent sale.</p> <p>Re: #4 “Slaughter”, there is no provision made, in the Code of Welfare: “Commercial Slaughter Code of Welfare” (15 December 2016) for anyone other than a “homekill or pet food operator” to slaughter unrestrained mammals and so the requirements need to be amended as this if unchanged, presents a major practical barrier to the operation of a mobile micro-abattoir.</p>	<p>We recommend that provision is made for a suitably trained person at a mobile micro-abattoir facility to allow stunning of free range animals with a free bullet.</p>	<p>Historically homekill and petfood operators were the only sectors slaughtering unrestrained mammals outside of the slaughter premises, therefore provisions have been made for these in the Code of Welfare. The Animal Welfare team at MPI has been consulted and will make a provision to include mobile micro abattoir operators for slaughter outside of slaughter premises by in future updates.</p> <p>For mobile premises, the following has been added for the slaughter outside of the premises (i.e. killing on the field):</p> <p>M. Process Control 5. Killing on the field (applies only to mobile premises) of the RMP Template addresses killing on farm for mobile micro abattoirs.</p>
<p>The requirements relating to #6.3 “Post Mortem Examination” include that this inspection be undertaken “without delay following the dressing of an animal” (page 38). Interpreted literally, this would require a suitably qualified inspector to accompany the micro-abattoir operator throughout the day, a prohibitively expensive exercise (eg</p>	<p>We recommend that with suitable identification of each carcase and accompanying offal back to owner (with the accompanying vendor declaration card to include the identification</p>	<p>MPI acknowledges your comment. We have added:</p> <p>M. Process Control 7. Post-mortem examination (3) Post-mortem examination is undertaken:</p>

Key comments regarding Supporting System M: Process Control

Submission Comment	Proposed Amendment	MPI Response
<p>in a situation where an operator with a mobile micro-abattoir drives 200km over the course of a day, visiting three farms to slaughter two animals at each property.)</p>	<p>used) , provision be made to allow end of the day inspection of the small lines of slaughtered animals where this is at the micro-abattoir operators premise or that post-mortem inspection is carried out at an alternative premise (eg the animal owner or another operator) at premises operating under a RMP or Food Control Plan.</p>	<p>a) without delay following the dressing of an animal except when (4) below applies; b) in a way that minimises cross-contamination between carcasses; and c) in accordance with the procedures given in the <u>Red Meat Code of Practice Chapter 7: Post-mortem Examination</u>.</p> <p>(4) Post-mortem examination of a carcass or group of carcasses and their parts may be delayed till the end of the processing day (the same day they are killed) provided that all the animal material are held:</p> <p>a) with adequate separation and identification of carcass parts (i.e. all parts remain positively identifiable to the carcass until completion of post-mortem examination); b) under hygienic conditions to prevent cross-contamination; and c) at a temperature of 7°C or cooler to prevent microbiological growth on the product and product deterioration.</p>

4. Other comments and changes made

Other comments and changes made		
Section	Submission Comment/ Proposed Amendment	MPI Response
4. Scope of the RMP	<p>Currently in Section 4 reads:</p> <p>“Alpaca”</p> <p>Would suggest an edit to be:</p> <p>“Alpaca/Llama” or possibly have Llama as a separate category.</p> <p>Not sure if it was appropriate if it would be tailored to each premises, but would appreciate the opportunity to process either through a micro-abattoir.</p>	<p>Added ‘Llama’ to the list of species of farmed live animals.</p>
Supporting System J: Packaging	<p>micro-abattoirs are specifically precluded from exporting in sections 2 and 3 of the Guidelines, so I imagine that Packaging 2. (a) and (b) are in fact here in error. However we will not be wrapping the product (chilled carcasses), so whether or not this instruction is needful for some, it will not apply to our operation, and I will make a comment to that effect in the RMP.</p>	<p>Micro abattoir operators can manufacture meat for the domestic New Zealand market as well as for export to countries that do not require official assurances.</p> <p>Suppliers of packaging or other product contact material must provide specifications/a written guarantee to ensure that it meets the Animal Products Notice: Specifications for Products Intended for Human Consumption 2016.</p> <p>The section has been amended:</p> <p>(2) A written guarantee or specification is obtained from the supplier of each type of packaging confirming that it:</p> <p>a) complies with the requirements specified in the current US Code of Federal Regulations, Title 21, Parts 170-199, which applies equally to coatings and linings of containers and cartons where these are the direct product contact surface; or</p>

		<p>b) complies with the requirements specified in the current “Australian Standard: Plastic materials for food contact use”, AS2070-1999”.</p>
<p>Supporting System C Personnel Competencies and Training</p>	<p>there is mention at 3.(e) that registration as a vet is sufficient to be an inspector of animals and carcasses at pre- and post-mortem. I have been informed by a member of the Primary ITO that a vet is not automatically able to inspect animals for these purposes, but that personnel inspecting must be trained and certified by AsureQuality. Can you let me know which is correct, please, as we may have to reconsider some of our plans.</p>	<p>Please refer to Human Consumption Specifications 2016, Schedule 3 Competency specifications, 1 Ante-mortem and post-mortem examiners of mammals. The Schedule lists the qualifications and competencies required of ante-mortem and post-mortem examiners.</p> <p>(1) Ante-mortem and post-mortem examiners must hold one of the qualifications listed below. The qualifications held may be species specific. Also, it is not necessary for post-mortem examiners to hold qualifications for ante-mortem examinations:</p> <ul style="list-style-type: none"> a) National Certificate in Meat Inspection Services, registered by the NZQA; b) Certificate of Meat Inspection, issued by the Director, Meat Division, MAF; c) Certificate of Competency for Meat Inspection, issued by MAF Quality Management; d) Qualification in Meat Inspection, issued by the Australian Quarantine and Inspection Service; e) registration as a veterinarian under the Veterinarians Act 1994; f) an alternative qualification accepted by the Director-General. <p>(2) For the National Certificate in Meat Inspection Services described in Schedule 3 clause 1(1)(a), an ante-mortem examiner must hold the Optional Advanced Meat Inspection Service Strand of that Certificate for the same species as the post-mortem qualification.</p> <p>(3) Any person performing ante-mortem or post-mortem examinations must have knowledge of the relevant specifications.</p> <p>(4) If a post-mortem examiner is only conducting detain rail activities as defined in the Animal Products (Export Requirement: Company Ante-Mortem and Post-Mortem Inspection) Notice 2013:</p>

		<ul style="list-style-type: none"> a) Schedule 3, clause 1(1) does not apply; and b) the post-mortem examiner must instead meet the competencies specified in clauses 5(8) and 5(9) of that notice.
<p>Guidance document.</p> <p>Section 2: Background (page 3)</p>	<p>States “All businesses that are involved in the primary processing of animal products, including the slaughter and dressing of animals for human consumption, are required to implement a risk management programme (RMP) under the Animal Products Act 1999 (APA)”. This statement appears to include those businesses (such as listed homekill service providers) that are exempt under Part 6 of the APA.</p> <p>We recommend that the wording should be changed to read (emphasis added) “All business ... including the slaughter and dressing of animals for human consumption for trade, are required ... under the Animal Products Act 1999 (APA)”</p>	<p>Agree – added ‘for sale for human consumption’.</p>