

## Summary of Submissions

MPI Discussion Paper No: 2018/11 – Proposed amendment to requirements relating to export approved premises (EAPs)

<b>Consultation opening date</b>	Wednesday 8 August 2018
<b>Consultation closing date</b>	Wednesday 5 September 2018
<b>Number of submissions received</b>	5

<b>Submitter</b>	<b>Submission</b>	<b>MPI response</b>
Submitter 1	Agree with the proposal for germplasm and live poultry EAPs to have documented operating procedures as long as these can be sufficiently generic to avoid constant change. Specifying step by step procedure for processing chicks to each country is setting up premises to have out of date standard operating procedures.	It is expected (MPI) that EAPs will have documented procedures that are detailed enough to adequately demonstrate how the operator will meet, or, is meeting overseas market access requirements (OMARs) of importing countries they are processing for. Furthermore, most OMARs do not undergo regular amendments.
	Agree with the proposal for germplasm and live poultry EAPs to be associated with a veterinarian who would carry out specific functions as outlined in the Notice.	Noted.
	Agree with the proposal for the Notice to allow MPI to approve germplasm and live poultry EAPs as a compartment for the purposes of meeting overseas market access requirements in relation to animal disease status recognition.	Noted.

Submitter	Submission	MPI response
Submitter 2	<p>Agree with the proposal for germplasm and live poultry EAPs to have documented operating procedures. However, the Notice should clarify that this requirement is restricted to those <u>directly</u> involved in ensuring that a premises' operation complies with export requirements as documented in:</p> <ul style="list-style-type: none"> <li>• OIE (World Organisation for Animal Health) requirements,</li> <li>• applicable country-specific OMARs</li> <li>• official assurance requirements.</li> </ul> <p>A poultry hatchery is a complex place and its documentation includes large numbers of procedures for diverse processes that have nothing to do with meeting the requirements of this notice. e.g. measures to ensure strain security; timing of setting in relation to egg age, pre-warming of eggs; storage temperature and turning of eggs in relation to proposed set dates; hatch window analysis, collection of samples in respect of matters not covered in any OMAR, operation of washing machines for clothes; timing of transfer.</p>	<p>MPI agrees. For clarification, clause 2.8.4(1)(a) has been amended to say as follows:</p> <p>(1) <i>The operator of an export approved premises where germplasm and live poultry are processed must ensure that the premises has standard operating procedures that:</i></p> <p>(a) <i>document the premises' operation <u>in line with all applicable requirements of this Notice and any other export requirements set under the Act including overseas market access and official assurance requirements</u></i></p> <p>Also, the following clarification provision has been added as a new sub clause 2.8.4(2):</p> <p><i>To avoid doubt, standard operating procedures are not required to specify procedures or tasks that exist for purposes other than to meet the requirements of this Notice, and any other export requirements set under the Act, including overseas market access and official assurance requirements.</i></p>
	<p>Agree with the proposal for germplasm and live poultry EAPs to be associated with a veterinarian who would carry out specific functions as outlined in the Notice. However, with this recognition should come the</p>	<p>Veterinarians approved the Notice can only perform tasks specified in the OMARs to be performed by non-official veterinarians. They cannot perform tasks that are required to be carried out by official or</p>

Submitter	Submission	MPI response
	<p>recognition by MPI that the approved veterinarian is able to carry out the tasks of a Government veterinarian where these are mentioned/specified in the various OMARS, Import permits and negotiated export certificates.</p>	<p>Government veterinarians. During negotiations with overseas countries MPI tends to ensure that official/Government veterinarians are only involved in final certification. Official/Government veterinarians who issue official assurances (export certificates) are authorised persons for the purposes of the Animal Products Act 1999 and therefore have to be employees of MPI.</p>
	<p>Agree with the proposal for the Notice to allow MPI to approve germplasm and live poultry EAPs as a compartment for the purposes of meeting overseas market access requirements in relation to animal disease status recognition.</p>	<p>Noted.</p>
Submitter 3	<p>Reference to clause 2.2 with the introduction of the new Notice it is not clear if all centres have to re-apply to the DG to be approved as an Export Approved Premises or will all current registration automatically be accepted?</p>	<p>A new Part 4 titled “Savings and transitional provisions” has been added to the Notice to clarify the application of Part 2 of the Notice (i.e. application to be an export approved premises) to existing export approved premises.</p>
	<p>Reference to clause 2.8.2 and 2.8.3 it is unclear if or when the centre veterinarian will need to apply to the DG to be approved as a Centre veterinarian or will all current approval be automatically be accepted? Is this an annual requirement?</p>	<p>A new Part 4 titled “Savings and transitional provisions” has been added to the Notice. A new clause 4.1.3 now clarifies that the status of existing premises’ veterinarians will be recognised and continued. Application for re-approval will be required at the 3 year anniversary of the premises’ most recent re-approval as an export approved premises (i.e. at the expiry date of the premises’ approval as specified on the EAP List as published on relevant MPI website).</p>

Submitter	Submission	MPI response
Submitter 4	With regards to the proposal for germplasm and live poultry EAPs to have documented operating procedures, it is proposed that the procedures are re-assessed by the verifier every two years. This is unnecessary because the verifier reviews the procedures on a rotational basis as part of the EAP's annual scheduled verification. MPI should consider 3 years as the timeframe for re-assessment.	<p>MPI agrees. The timeframe for re-assessment of documented operating procedures has been extended to 3 years as suggested.</p> <p>For existing EAPs saved by the savings and transitional provisions, the reassessment date of their standard operating procedures is the date that is 3 years after the date of their most recent verification audit.</p>
Submitter 5	In relation to the proposal for germplasm and live poultry EAPs to be associated with a veterinarian, how long the vet will remain approved, will it be a one off or same as for the EAP (2 years)?	<p>As stated, a new clause 4.1.3 has been added to the Notice to clarify that the status of existing premises' veterinarians will be recognised and continued. Application for re-approval will be required at the 3 year anniversary of the premises' most recent re-approval as an export approved premises (i.e. at the expiry date of the premises' approval as specified on the EAP List as published on relevant MPI website).</p>