Analysis of Submissions: Proposed amendments to the:

Animal Products Notice: Specifications Intended for Human Consumption

Date: 27 May 2019 (closing date)

MPI received 13 submissions on the proposal document(s). These 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 the specification. MPI would like to thank those parties who have taken the opportunity to comment on the proposal(s).

Questions MPI would like feedback on		Responses:
1.	For the consolidated Parts of the Notice, are the requirements still clear for each sector?	• No comment • Yes
2.	Are the requirements clear for harvesting wild birds? Is the definition clear? e.g. should it be wild game birds?	• No comment
3.	Are there any corrections needed for any content of the Notice?	• Yes
4.	What else should be included in the Notice?	• No comment • Requirements for rendering tallow for human consumption • Please can this document refer to animal welfare requirements
5.	Are more guidance boxes need? If so, where?	• No comment • Tallow definitions

Analysis of Submissions: Proposed amendments to the Human Consumption Specifications

Submission Analysis:

Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
1.2		We recommend that a definition for By-Products be added.	As the term is not used in the Notice, there is no definition needed.
1.2	Carcass Can there be some context around why a quarter carcass would be classified in the same category as a whole carcass.		This ensures that the rules for meat, before breaking down a carcass, applies to all carcasses whether it is a half or quarter etc.
1.2	Casings	This definition is different to that in the Codes of Practice, they should be the same.	Agreed and amended the definition.
1.2	Commercially sterilised The inclusion of the word "commercial" appears to be superfluous or alternatively the definition should include what is meant by "commercial".		Noted. Traditionally, this process has been called commercially sterilised for achieving longer term shelf life. It recognises that the process doesn't guarantee absolute sterility.
1.2	Green Offal	This definition is different to that in the Codes of Practice, they should be the same.	Noted. Codes can add more specificity to content where appropriate.
1.2	Finished product The proposed definition only refers to product awaiting a compliance decision. However, in common use, the term also applies to compliant product.	Pending finished product is a suggested term as an alternative to meet the definition.	Noted. The definition for finished product has been amended.
1.2	Meat 1. This definition captures, hides, rendered products, offals, etc. Is this the intent? 2. Clarity is sought on who is able to judge safe and suitability for human or animal consumption.		1. This definition matches the definition in CoP 9. 2. RMP operator is able to judge in this context.
1.2		We recommend that a definition for Pests be added.	Noted. Pest is defined in the Animal Products Regulations 2000 and thus is not repeated in a Notice.

Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
1.2	The term sanitise was clarified in 2013 in the context of cleaning containers for protein meal. The clarification noted examples of a physical agent were: "steam or compressed air or water blasting or a combination of these". Clarification in the definition is recommended to ensure that there is no confusion with the use of this definition for products for animal consumption.	Suggested; …. Or physical agent e.g. steam or compressed air or water blasting or a combination of these, with the intention of … Refer to Tech Brief 2013-14.	Agreed and amended.
1.2	1.2 Definition of a Whole Flock Health Scheme – clause d adds the new requirement for approved maintenance compounds to be used. This will restrict the compounds (lubrication, cleaning, sanitising) that can be used on farm and the grower would need to be aware of the constraint and how the approval system works. This seems unnecessary – the requirement does not appear to apply to other agricultural sectors.		Agreed. Whilst there other sectors where this applies, it would not apply for meat chicken farms as they not need an RMP.
1.3	APN should be in full or included in the definitions.	In a quick scan of the document APN appears to always be used in full.	Amended APN to be in full.
2.3 (1), (2)	What is meant by the term "appropriate" animal holding facilities. Outcome statements should be used.	e.g. Animal holding facilities that safely constrain animals prior to slaughter Are to be provided. They must be operated……	Disagree, needs to be appropriate to cover the wide range of classes of animal material covered by this Notice.
2.5, 2.5.5, 2.5.6 (4), 2.5.8 (3) .	this provides for "operations under a boil water notice" or other issue with water supply. We should welcome this but ensure that the industry members are aware. This will prevent the "emergencies" that have happened previously.		Noted. This is guidance and further clarification could be included in Codes of Practice or Operational Codes.

Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
3.3 (1)	The requirement to use only approved maintenance compounds is very limiting, especially when these need to be sourced from overseas Having a dairy and non-dairy list is confusing for operators processing both	Recognition of equivalent food standards for maintenance compounds e.g. where a compound has current US FDA approval Combine the dairy and non-dairy lists	A separate project on reviewing approved maintenance compounds is currently underway within MPI. Once the results of this review are determined, changes to this Notice will then be made as appropriate.
4.2	the MoH infectious diseases table (2.4) is much easier to use than previously but is not easy to find, it is in Appendix 2 – I think that this guidance should be provided.		Agreed and guidance inserted.
5.2	The list of competencies should be extended to include people who design (and possibly supervise) the pasteurisation (non-retort cooking) and cooling of ready to eat animal products.		There are no current training courses that achieve qualifications in pasteurisation at this time. Nevertheless, a guidance box has been inserted underneath 22.4 Thermal Processing of Low-acid Commercially Sterilised Products to ensure thermal processing conditions are validated and managed by a suitably skilled person.
8.3, 8.4	There is a lot of duplication within both sections relating to bulk transportation units.	Duplication should be avoided.	Agreed and amended.
10	We wish to see improvement in MPI's ability to identify the location of livestock farms and to rapidly trace movements of mobs of sheep, goats, pigs and camelids between these for biosecurity readiness and response purposes. Electronic recording of information about the provenance and movements of groups of	If applicable / necessary, We would like the Notice to be amended to reflect that information submitted for the purposes of complying with regulations under the NAIT Act can be used to satisfy the requirements of the Notice.	Noted.

Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
	stock will also deliver cost efficiencies for farmers and processors. We believe this requires the establishment of a centralised database of farm locations and electronic records of movements of groups of animals, to be populated with information provided by producers on a mandatory basis. The NAIT Act (2012) may be the most appropriate piece of legislation to enable this.		
10.1 (1)	This clause excludes movement of animals to primary processors from the requirements of Part 10. However, Part 10 contains the detail that is required by primary processors.	Considering this and the comments below on Parts 10 and 11, the Parts covering the movement of farmed animals needs to be reconsidered.	Noted.
10.2 (7)	Statements a) and b) are ambiguous. It should be either 63 or 91 days.		Agreed and amended.
10.2 (7)	The text regarding different requirements for withholding periods is confusing. *(The person in control may consider the withholding periods of any treatments previously administered (by any previous person in control) to have expired in the case of: a) if the animals have been in that persons control for 63 days or more prior to movement and have not themselves administered a treatment; and b) farmed pigs, farmed ostriches or farmed emus, 63 days or more, prior to the movement of those farmed animals; and c) other farmed animals, 91 days or more, prior to the movement of those farmed animals)*	We recommend redrafting this to improve clarity of the requirements.	
10.2 (13)	This clause requires operators to have a declaration for bobby calves, but the		Agreed and amended by moving to Part 11.

Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
	application of this part excludes movement of animals to primary processing premises.		
10.2 (14)	We recognise that changes to the content of the ASD are outside the scope of this consultation. However, MPI need to be aware of initiatives around developing a standard grass-fed definition with more clarity than the current definition on the ASD		Noted. Changes to the ASD are outside of the scope of this consultation.
10.2 (14)(c)	1. This needs to be clear which NAIT number is required. The animal (tag) number, farm number or person in charge number? 2. Herd and NAIT numbers only required for cattle and deer therefore the specification needs to be clear on that fact.	….NAIT farm number in the case of cattle and deer; and … N.B. NAIT farm number may not be the correct term.	Noted. Changes to the ASD are outside of the scope of this consultation.
10.2 (14) j) ii) and 10.2 (14) l) i)	We understand the reasons for these two clauses being on the current ASD. We submit that as they are not NZ requirements, but commercial or market access issues, they are not appropriate to regulate under this notice.	The concern is that 11.4 (1) and 19.3 (1) requires processors to have a completed and signed supplier statement for primary processing. In a situation where the questions have not been answered, the processor cannot proceed with processing, even though they may be processing for a market that does not have these as market restrictions.	Noted. Changes to the ASD are outside of the scope of this consultation.
10.2 (14) (m)	1. As MPI will be aware changes are being made to the TB strategy. It may be that these TB attestations will not be those that are required going forward. 2. It is also noted that the supply of this information is mandated under the Biosecurity Act, while this notice puts in place specifications from the APA. While it is practical to have the information on the	It may be appropriate to add a clause that allows for other information as approved by the DG rather than detail the TB requirements in this notice.	Noted. Changes to the ASD are outside of the scope of this consultation.

Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
	same declaration, we question whether this specification should mandate biosecurity requirements.		
11.4	This Part requires there be a signed supplier statement when animals move to a primary processor. However, unlike the previous Part, there is no detail on what information is required in the supplier statement.		Noted. Refer to the definition for ASD (a type of supplier statement), and the ASD detail is already covered in Part 10: Movement of Animals.
11.4 (6)	We recognise that changes cannot be made to this section at this time but questions the need for electronic supplier statements to be retained in an "electronic system".	Suggest reference to retaining in an electronic system be deleted.	Noted. Changes to these clauses are outside of the scope of this consultation.
11.4 (7), 11.4 (8) and 10.2 (8)	These three clauses are repetitive.		Noted. Changes to these clauses are outside of the scope of this consultation.
11.4 (9)	This clause mentions premises, property or saleyard, yet the application of Part 11 only applies to primary processors.		Noted. Changes to these clauses are outside of the scope of this consultation.
11.5	Although 11.4 exempts the requirement for a supplier statement for growers that are part of the WFHS of a processor, if birds are transferred/sold to another processor then the requirements of a supplier statement are now much more onerous. I believe that this is unnecessary. A simple agreement that the new processor accepts the standards of the normal processors WFHS would suffice		The supplier statement for poultry already exists and the intent is to be more explicit on its use. This is to cover the situation where poultry may be transferred or sold to another processor (i.e. not direct from the supplier with a whole flock health scheme), so a new clause 11.5 (2) has been inserted to further explain: *The supplier of farmed poultry who has received poultry intended for primary processing and transfer(s) or*

Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
			sell(s) to another processor must use a supplier statement to confirm the fitness for purpose of that poultry.
15.2	The lack of verification of wild/feral velvet supplier statements incentivises marketers to take the supplier statements at face value and accept all product offered to them. The upshot is that farmed velvet that does not meet RCS standards may be unsuitable for human consumption yet enter the human food chain (by being offered to marketers as purportedly from wild/feral deer) and cause reputational risk to the farmed deer industry. Our view is that the RCS requirements, by virtue of their comprehensive coverage of all risk areas and the auditing system, are the appropriate standard that all velvet intended to enter the human food chain - domestically or overseas - should meet. Velvet that does not meet those standards should be eligible for animal consumption only.	We suggest that the appropriate rule in the human consumption notice regarding veterinary medicine use be that supplied velvet must be accompanied by the declarations on agricultural compound and veterinary medicine use required by the RCS.	Agreed and amended to include a declaration. Clause 19.7 has likewise been amended.

<table>
<tr><th>Clause</th><th>Submission comment(s)</th><th>Proposed Amendment(s)</th><th>MPI Response</th></tr>
<tr><td>15.2</td><td>We do not understand the requirement in draft rule 15.2 (2) requiring farmed velvet to be tagged as per the NVSB tagging system OR be supplied accompanied by detailed veterinary medicine information. The presence of a NVSB tag does not signify anything in relation to the actual use of veterinary medicines on the stag in question. The tag indicates that the velvet was removed by a competent velvetter for the purposes of animal welfare legislation.</td><td>We contend that to maintain adequate controls on the fitness for human consumption of velvet and to protect the New Zealand farmed velvet industry that has made significant investments in quality assurance systems, the only permissible velvet sales channels should be as follows:
<table><tr><th>Deer Velvet Source</th><th>Market</th><th></th></tr><tr><td></td><td>Petfood</td><td>Human consumption (domestic and export)</td></tr><tr><td>Farm (RCS compliant)</td><td></td><td></td></tr><tr><td>Farm (RCS non-compliant)</td><td></td><td></td></tr><tr><td>Wild or feral killed</td><td></td><td></td></tr></table>We therefore recommend that the regulatory framework applicable to for velvet marketing channels - whether through the animal or human consumption animal product notices - be revised in light of our recommendations.</td><td>Agreed and amended the wording to focus on identification of velvet. New guidance boxes have been included to align with the RCS for Deer Velvet Harvest in this and other relevant clauses.</td></tr>
<tr><td>16.2 (1)</td><td>It is not clear what would constitute acceptable identification. Live fish are often transported in bulk containers (with or</td><td></td><td>Agreed and a guidance box has been inserted.</td></tr>
</table>

Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
	without seawater) and/or are not able to be easily labelled. It is assumed that identification can be provided in accompanying documentation, but this needs to be made explicit to avoid confusion.		
16.2 (4)	This clause refers to itself.	I think it should refer to 16.2 (5).	Agreed and amended.
16.2 (5)(f)	This clause doesn't read very well – missing the word 'has'?	whether any fish (**has**) been subjected to chilling or freezing from the time of harvesting to the time of dispatch to the processing premises; and	Agreed and amended.
19.9	Overall this whole 19.9 section seems to be requiring procedures that are not currently in place for farmed mammals, and difficult to see the context behind why the level of detail is required.		Agreed and amended by removing the Branding Notice clause as it is covered in the AM/PM Notices.
19.9 (2)(a)	This clause is too prescriptive.	The following wording is proposed: a) Condemned animals from the yards are clearly identified	
19.9 (2)(b)	This could be removed		
19.9 (2)(c)	Need clarity on the level of details / reliance required for this clause. What is the expectation.		
19.13	It is assumed that fish should be excluded from all clauses included in 19.13, and not just clause 19.13 (1) – by specifically excluding fish from clause 19.13 (1), it infers that the other clauses do apply to fish, which they clearly shouldn't (we don't dress on the floor or have hides and pelts etc).	It is suggested that you add a full exclusion at 19.13 for fish or remove the exclusion from clause 19.13 (1) altogether.	Agreed and amended.
13. 16	it should be made clear that not all of the clauses in these two sections apply to poultry.		Agreed and amended clauses 19.13 (3) and (4).

Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
	This was done under clause 13.7 in the existing Notice – which covers similar activities.		
19.11 (1)	We question why slaughter must be carried out without unnecessary delay as a delay will not impact on food safety or other requirements under the APA. Even in respect of animal welfare delays are not critical, provided the welfare of the animal is considered. Furthermore, the sentence is open for broad interpretation; what does "unnecessary" mean and does "delay" mean from arrival on site, or from antemortem inspection or from stunning?		'Unnecessary delay' refers to what can be reasonably foreseen and prevented. Further explanation should be provided in a Code of Practice or Operational Code as appropriate.
19.13 (2)	Word missing.	…..and animals are not dressed on the floor.	Agreed and amended.
19.14 (1)(a)	This clause requires the operator (at the point of handling and processing) to ensure that the live fish were free from signs of illness or disease immediately prior to harvesting. The primary processor is not able to do that at the point of processing. Either the clause should be the operator is to ensure that the live fish are free from signs of illness or disease immediately prior to processing or alternatively, it is suggested that this requirement is already covered by clauses 11.4 and 16.2 (5), with the provision of the supplier statements.	a) the live fish were free from signs or (**of**?) illness or disease immediately prior to harvesting; and	Agreed and amended.
21.1 (1)	This Part applies to RMP operators who harvest honey and other bee products for processing for human consumption, and such	I'm not sure about the wording on this – it implies that beekeepers who provide honey to the RMP are not required to comply, that only	This Notice does not apply to the primary processing of bee products i.e. bee hive management. Therefore

Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
	operators must comply with the provisions of this Part.	RMP operators who harvest honey are applicable (a small part only)	the obligations to ensure bee products are fit for purpose is managed by bee product processors.
21.2 (1)(a)	Beehives are constructed of various products that maybe considered a source of hazard eg wood or plastic. It is not realistic to assume that beekeepers can construct a beehive that would not be potentially hazardous as written in this clause. Any possible contamination from the product is removed through the processing procedure.		MPI agrees that any materials used in hive construction could be potentially hazardous if the hive is not well constructed from suitable materials or properly maintained. Also, there is no guarantee that contaminants will be removed through processing e.g. comb honey does not undergo any 'processing'. This clause is here to make sure beekeepers know it is their responsibility to choose hives and hive are made of suitable materials and that they look after them properly, not to suggest that beehives could be made of a material that could never become a hazard.
21.3	Of concern is the reference to 'unnecessary delay'. There are no guidelines and this will be open to interpretation and misunderstandings. An RMP operator is required to manage their product in a timely manner managing the food safety requirements for their product.	Please remove the words 'unnecessary delay'.	'Unnecessary delay' refers to what can be reasonably foreseen and prevented. Further explanation should be provided in a Code of Practice or Operational Code as appropriate.
21.3 (a)	any bee product is processed without unnecessary delay after harvesting and in a manner that manages the actual and potential distribution and proliferation of contaminants;	Understand the desired outcome, but what constitutes unnecessary delay?	

Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
22.2	Tallow should include the rendering requirements and definitions of different types of tallow e.g. edible, technical Edible tallow going to a secondary processor for refining should be considered a further processed product as it is low risk	Include rendering requirements and definitions of tallow types Exempt further refined edible tallow from the 'meat' requirements	Noted. Edible or technical tallow is out of scope of this Notice.
22.6 (2)(d)	Request clarification of what is meant by: The operator must ensure that the temperatures of bones, carcasses or parts of carcasses that are intended to be processed using mechanical separation methods are immediately placed in a freezer and frozen within 48 hours of boning.		Agreed and mended for clarification.
27	It is not clear if this Part applies to transporting of product not for human consumption. (The previous section Storage, clearly defines this.) As transport of material for rendering is the responsibility of the renderer, they should not have to be familiar with the human consumption specs to find their requirements.	This part needs to clearly define the scope of application. Furthermore, if it does apply to products for animal consumption, there needs to be directions to this part in the animal consumption notice.	Agreed and amended.
27.5 (2)	The term "unnecessary delay" is subjective. In addition, there are other measures that should be taken to ensure temperatures are maintained e.g. not in the direct summer sun.	Suggest, "The operator should load, and unload refrigerated products to maintain preservation temperatures".	Unnecessary delay' refers to what can be reasonably foreseen and prevented. Further explanation should be provided in a Code of Practice or Operational Code as appropriate.
29.2 (1)(a)	Unclear what is meant by this statement. Assuming origin means the birth farm of the animal; the whole of chain responsibility is not the responsibility of the operator. Consideration also needs to be given to the term "finished product" in (1) and (2) as this is		See previous comment 1.2 on the definition for finished product.

Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
	currently defined as, until awaiting a compliance decision.		
30.5	(1) The operator must: a) locate pest traps (including rodent boxes, bait stations and electric insect traps) where they do not present a risk of contamination to the animal material, animal product or other associated things e.g. not in processing areas, not directly above product conveyers or walkways; It is inevitable that some bees may come in with boxes despite beekeepers best intentions. Electric insect traps should be acceptable in processing areas to attract bees and insects that may inadvertently be in the processing area. Care must be exercised in the placing of insect traps to avoid potential contamination of product.	Please remove reference to Electric insect traps not in processing areas	Agreed and amended.
Schedule 1 1.4.1(c) (page 140)	In the draft notice in Schedule 1, part 1.4.1 'Ongoing water testing' is states: *c) the operator must ensure that the training of water samplers is undertaken by a laboratory referred to in paragraph b);* The requirement has been removed from part 2.5.7 'Water analyses' which contradicts this sub-clause.	Remove requirement "*by a laboratory"* under Schedule 1: 1.4.1	Agreed and amended.
Schedule 3	This needs to be updated – it is requiring all of the unit standards from b) to g); and that is not necessary, they are acceptable competency options, some of the unit	Fish handling and hygiene (1) The NZQA qualifications for persons involved with fish handling or hygiene activities are: a) either: i) 5331: Handle seafood product; or	Agreed and amended.

Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
	standard titles also need to be updated to reflect the latest version. It should read:	ii) 15344: Demonstrate knowledge of handling, and handle bivalve molluscan shellfish product; or iii) 31493: Demonstrate knowledge of handling practices, and produce seafood product fit for its intended purpose; and b) either: i) 5332: Demonstrate knowledge of and use hygienic work practices while working with seafood; or ii) 28630: Apply hygiene and food safety requirements to own work area in a primary products food processing operation	
Schedule 3 1	This is referring to qualifications issued by an organisation no longer in existence eg MAF. It is assumed that these references are here to confirm that qualifications issued by MAF are still valid and have not been superseded.		Correct.

Analysis of Submissions: Proposed amendments to the Human Consumption Specifications

Submission Analysis of Supplier Statement for Poultry

Part	Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
		Additional information f. Can you confirm that the live birds were free from any signs of illness or disease?	This is difficult. If the birds have coccidiosis and or a pad dermatitis then this statement cannot be given—Should it not state diseases that affects the birds as being not fit for Human consumption or similar?	Agreed and amended.

Submission Analysis of Certified Supplier Statement Farmed Mammals Become Feral and Killed

Submitter Ref	Part	Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
N/a	N/a	N/a	N/a	N/a	N/a

Submission Analysis of Certified Supplier Statement for Wild Birds

Submitter Ref	Part	Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
N/a	N/a	N/a	N/a	N/a	N/a

Submission Analysis of Wild Mammal Material for Human Consumption

Submitter Ref	Part	Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
N/a	N/a	N/a	N/a	N/a	N/a

Analysis of Submissions: Proposed amendments to the Human Consumption Specifications

Submission Analysis of Certified Supplier Statement for the Supply of Live Possums

Submitter Ref	Part	Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
N/a	N/a	N/a	N/a	N/a	N/a

Submission Analysis of Certified Supplier Statement for Farmed Fish

Submitter Ref	Part	Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
N/a	N/a	N/a	N/a	N/a	N/a

Submission Analysis of Game Estate Mammals

Part	Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
		Add some bullet points to the guidance that the declaration must: • Confirm not treatments such as vaccines, antibiotics or other veterinary medicines have been applied to the fish or fish has been treated but the required withholding period has been met; • Fish are not showing any signs of illness e.g. abnormal behaviour, open sores, side swimming, at the time of harvest; • There are no environmental conditions that would result in fish being unacceptable to harvest e.g. fuel spill;		Agreed and Notes have been added to the back of the supplier statement.

Part	Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
		• Harvest declarations/supplier guarantees need to be identifiable to each harvest so either by date, sequential numbering etc.		Agreed and a new clause has been inserted into Reception of fish.

Submission Analysis on the ASD

Part	Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
		Updating the form with the new TB logo and replacing AHB references.		Noted. Changes to the ASD are outside of the scope of this consultation.
Q6.4		Amend to include a N/A option due to guidance for AQ meat inspectors who will be doing ante mortem or carrying out checks of ASDs to ensure the status of the animals. The N/A will be applicable to Clear Monitored (CM) herds which do not require TB testing.		Noted.
Q6.5		Amend to include: is a permit attached? Y/N		Noted.
Q6.6 and Q6.7		Amend Q6.6 and Q6.7 to one Q? To be discussed further.		Noted.
Q6.8		Amend Q6.8 to be removed?		Noted.
		Could you please advise what the next steps are? 1. Will there need to be consultation over any proposed minor TBfree changes? 2. Could you please clarify which approved versions will be kept in circulation?		Noted.

Part	Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
		3. Will or do MPI on-farm audits include TB declarations made on ASDs? Is there any other auditing undertaken or planned?		
		I would like to raise the possibility of having a an antibiotic question included in the ASD	1.0 Antibiotics 1.0.1 Have any of these animals been treated with Antibiotics in their lifetime (see note 1.0 of the requirements) YES NO 1.1 Withholding periods – all animals (see note 1.1 of the requirements) YES NO 1.1.1 Are any of these animals within the withholding period of any treatment? 1.1.2 If Yes, state the product name, method of treatment and dates applied (NB: these animals are NOT eligible for slaughter for human consumption until outside the withholding periods)	Noted.
		We are seeking MPI's support in increasing the uptake and benefits available from membership of the New Zealand Farm Assurance Programme (NZFAP). This Programme is a flagship initiative of the Red Meat Profit Partnership and will: • Increase efficiency of assurance verification • Support ability to capture value from market premiums	A new question on the Animal Status Declaration (ASD) for sheep, cattle and deer regarding the Farm Assurance status of the livestock. This could be placed on the ASD as part of Q2 regarding animal history. We propose a question: "Are all of the animals in the consignment New Zealand Farm Assurance programme (NZFAP) accredited?" Answers: ["YES" / "NO"]	Noted.

Part	Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
		associated with the 'Taste Pure Nature' brand. • Serve as a platform where the industry can capture value associated with increases in production standards as an adjunct or potential alternative to regulation. The benefits of such an amendment would be to: • Simplify the verification of life-time farm assurance status of livestock which is being increasingly sought by customers; • Increase the uptake of farm assurance by farmer who do not supply meat processors/exporters directly (i.e., store farmers) and encouraging the stock and station agents to support farm assurance; and Increase the pool of livestock potentially suitable for customers seeking life-time traceability and/or farm assurance	We propose the ASD also includes questions pertaining to the residency requirements of NZFAP.	
		The current Biosecurity (National Bovine Tuberculosis Pest Management Plan) Order 1998 requires the ASD to be accompany cattle during any movement. The introduction of the eASD does not readily permit the ASD to accompany the cattle on the	Consideration should be given as to how the existence of a completed eASD can be notified to transport operators to ensure that animals are only transported with either a paper ASD or an existent eASD.	Noted.

Part	Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
		truck where the truck does not have internet connectivity (either through infrastructure or reception). This requirement should be reviewed in conjunction with the review of the ASD form itself to eliminate barriers, real or perceived, to the uptake of eASD by farmers and transport operators.		
		We are seeking MPI's support in increasing the uptake and benefits available from membership of the New Zealand Farm Assurance Programme (NZFAP). This Programme is a flagship initiative of the Red Meat Profit Partnership and will: • Increase efficiency of assurance verification • Support ability to capture value from market premiums associated with the 'Taste Pure Nature' brand. Serve as a platform where the industry can capture value associated with increases in production standards as an adjunct or potential alternative to regulation.	A new question on the Animal Status Declaration (ASD) for sheep, cattle and deer regarding the Farm Assurance status of the livestock. This could be placed on the ASD as part of Q2 regarding animal history. We propose a question – "Are all of the animals in the consignment part of a recognised farm assurance programme? (YES / NO") If 'Yes" - 'Are they NZFAP or 'Other' (Tick boxes & free form) The benefits of such an amendment would be to: • Simplify the verification of life-time farm assurance status of livestock which is being increasingly sought by customers; • Increase the uptake of farm assurance by farmer who do not supply meat processors/exporters directly (i.e., store farmers) and encouraging the stock and station	Noted.

Part	Clause	Submission comment(s)	Proposed Amendment(s)	MPI Response
			agents to support farm assurance; and Increase the pool of livestock potentially suitable for customers seeking life-time traceability and/or farm assurance	
		The Definition of 'Pasture Raised'	The red meat sector is currently seeking to establish a "grass-fed" standard definition in conjunction with meat processor/exporters. The exact definition has yet to be determined and may include a two-tiered approach incorporating a definition for "pasture raised" that is similar to the current definition. If industry is able to reach an agreement on a suitable definition and subsequently with MPI regarding that definition, it would seem appropriate for the new "grass-fed" definition(s) to be incorporated in the revised ASD. Rationale: Consultation has shown that the red meat sector believes that it is important for New Zealand to develop its own national definition of grass-fed, and that this definition should be Government endorsed. We believe that such a standard should in time supersede some of the current Taste Pure Nature origin brand eligibility criteria.	Noted.