

## MEMORANDUM

<b>To</b>	Premises that slaughter and/or further process bobby calves and caprine Abattoirs Association of New Zealand Meat Industry Association Other interested parties (LAS laboratories, IANZ, Global Proficiency, AgResearch, LAS Consultative Panel)
<b>CC</b>	MAF Verification, Verification Systems Branch (Chris Mawson) MAF Market Assurance, Systems Audit (Di Carter) MAF Market Assurance, Science and Risk Assessment (Roger Cook) MAF Market Assurance, Market Access Coordination (Neil McLeod) MAF <i>Salmonella</i> Strategy Risk Management Working Group (Judi Lee)
<b>Date</b>	<b>12 March 2012</b>
<b>From</b>	Tim Knox
<b>Subject</b>	<b>Consultation on the Discussion Paper; Review of Bobby Calf and Caprine NMD Testing Requirements</b>
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### Background

The National Microbiological Database (NMD) programme for bobby calf and caprine sampling and testing presently applies to only US and/or EU listed premises.

### Consultation

MAF is undertaking industry consultation on MAF's proposed inclusion of all operators of bobby calf and caprine processing and further processing in the NMD sampling programme. This will require an amendment to the Animal Products (National Microbiological Database Specifications) Notice 2011. MAF has developed a Discussion Paper for your consideration. A copy is attached.

You are invited to make submissions on the Discussion Paper by **5:00pm, Friday 23 March 2012**.

We apologise for the short timeframe for consultation, however a decision on the proposal to amend NMD needs to be made before the commencement of the bobby calf season in 2012.

Submitters are asked to include the following information with their submissions:

The name and title of the submitter;

Organisation's name where applicable;

Submitters address and contact details (phone, fax and e-mail if available);

The titles and number of clause(s) commented on where appropriate.

Submissions should be addressed to:  
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All submissions are subject to the Official information Act 1982. Therefore if you consider that all or part of your submission is commercially sensitive or should be treated as confidential, please state this clearly when making your submission.

Yours faithfully

[signed]  
Tim Knox  
Director Market Assurance  
Market Assurance



# Review of Bobby Calf and Caprine NMD Testing Requirements

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Prepared for Market Assurances Directorate, Animal & Animal  
Products Directorate and *Salmonella* Risk Management Strategy  
Group  
by Gail Duncan – 12 March 2012

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# Proposal

The purpose of this paper is to examine the NMD sampling requirements to ensure that all processors are contributing information to enable consistent control of microbiological standards for New Zealand meat producers. **The proposal is to amend the Animal Products (National Microbiological Database Specifications) Notice 2011 to extend bobby calf and caprine National Microbiological Database (NMD) sampling requirements to all operators with a Risk Management Programme (RMP) for primary processing of bobby calf and caprine species.**

The proposed testing for domestic, non-EU and non-US listed operators is carcass testing of 5 fresh carcasses, 5 primal cuts and 5 bulk meat every processing week for APC/*E. coli*, plus seasonal chilled carcass APC/*E. coli* and seasonal *Salmonella* testing. This would be reduced to 1 carcass, primal cut and bulk meat per week for Very Low Throughput operators processing less than 400 animals per week throughout the season. *This is the same NMD testing programme as that currently applied by EU and US listed bobby calf and caprine operators.*

## Background re bobby calf and caprine NMD sampling

Bobby calf and caprine non-EU and non-US processors are presently omitted from NMD testing which has led to inconsistencies in oversight and implementation of standards related to reduction of pathogens at end of slaughter and dressing, and further processing. In the 2011 bobby calf season several bobby calf operators enquired to be excused from the NMD as they were not exporting to either the EU or US, or were in the process of obtaining a US and/or EU listing but were not currently listed.

In 2011 there were 28 bobby calf processors and 14 caprine processors, however only 27 bobby calf processors participated in NMD at the commencement of the season. By the end of the season the one bobby calf processor who had not initially contributed results, voluntarily submitted these as described below. All 14 operators with RMPs for caprine that were processing in 2011 contributed results to NMD.

During 2011 one operator, who was applying for US listing, did not submit results to the NMD. This operator was processing bobby calf for the first time and conducted testing for APC, *E. coli* and *Salmonella* testing according to NMD protocols since they were in the processing of applying for US listing. When sequential *Salmonella* detections were reported to MAF Verification Services (MAF VS) and subsequently discussed with MAF the backdated data was voluntarily submitted to the NMD.

In addition to the above; two of the 28 bobby calf processors are not EU or US listed for bobby calves, and one of the caprine processors is not EU or US listed for caprine. The NMD Administrator has fielded enquiries in 2011 from such premises on withdrawal from NMD sampling. Fortunately, although not required to participate as they were neither EU or US listed the aforementioned two bobby calf operators, and one caprine operator elected to participate in the NMD in 2011.

The examples highlight how important it is for all bobby calf and caprine operators to be required to undertake NMD sampling and report results each processing week to ensure:

- 1) consistent application of NMD standards and subsequent actions are taken for all processors irrespective of the market.

2) contribution towards the salmonella strategy.

Results from all species participating in the NMD *Salmonella* sampling programme, including bobby calf and caprine, now contribute information to Animal Diseases; part of the Biosecurity, Food and Animal Welfare Directorate of MAF. This highlights that for a full New Zealand profile the NMD programme must include all processors.

## NMD Notice 2011<sup>(1)</sup> current requirements

The bobby calf and caprine programme involves sampling of carcasses each processing week only if the operator is US and /or EU listed. **The exception applies to operators that only supply the domestic market, or operators producing only for markets other than US and EU. This exception does not apply to any other species requiring NMD sampling (bovine, ovine, cervine, ostrich and emu, porcine and poultry).**

The current sampling requirements for bobby calf and caprine EU and/or US listed operators is:

- Standard throughput operators; five fresh carcasses, primal cuts and bulk meat per processing week and seasonally 5 chilled carcasses per week for 6 processing weeks, or
- Very Low Throughput (VLT) operators (those processing less than 400 bobby calf/caprine animals per week throughout the season); at least one carcass, primal cut and/or bulk meat each processing week, and seasonally 1 chilled carcass for 6 processing weeks.

Analyses required are:

- Aerobic plate count (APC) and generic *Escherichia coli* (*E. coli*)
  - Three sites must be taken from one side of each carcass, and tested for APC and *E. coli* each week.
  - One site from each primal cut, and 5 sites combined from each carton are sampled and tested for APC and *E. coli* each week.
- *Salmonella* samples from
  - the three sites on the other side of each fresh carcass,
  - each primal cut
  - each bulk meat sampleare composited for a single *Salmonella* test for each product type (fresh carcasses, primal cuts and bulk meat) each processing week during the seasonal *Salmonella* sampling window for:
  - 16 weeks of a primary sampling window or
  - 6 weeks of a secondary sampling window, and
  - 16 weeks following any *Salmonella* detection.

In addition to the above, in NMD Schedule 1 section 6.7.1 'Group 1 and porcine Group 2 *Salmonella* performance standard' has been upgraded to highlight operator responsibilities. To aid operators in responding to any *Salmonella* positives the *Salmonella* response guidance and check sheet was published in September 2011, to be updated in March 2012, and can be found at :

<http://www.foodsafety.govt.nz/industry/general/nmd/>



## Review of results to date (2)

Twenty eight (28) bobby calf operators and 14 caprine operators participated in NMD in 2011. The number of tests conducted during 2011 are as follows:

### NUMBER OF TESTS

BOBBY CALF NMD TESTING 2011

	APC & <i>E. coli</i>	<i>Salmonella</i>
fresh carcasses	2021	280
cut	1905	239
bulk	1869	253
post chill carcasses	1710	0
<b>TOTAL</b>	<b>7505</b>	<b>772</b>

CAPRINE NMD TESTING 2011

	APC & <i>E. coli</i>	<i>Salmonella</i>
fresh carcasses	1193	94
cut	293	38
bulk	244	30
post chill carcasses	290	0
<b>TOTAL</b>	<b>2020</b>	<b>162</b>

### DISTRIBUTION OF *SALMONELLA* RESULTS

The distribution of the *Salmonella* positive results from NMD sampling of all species/product types in 2011 is represented in Table 1:

**Table 1 NMD *Salmonella* detections in 2011 (January – December)**

Species	<i>Salmonella</i> detections
Bovine	2
Bobby Calf	19
Caprine	1
Cervine	0
Ostrich and Emu	0
Porcine	5
Poultry	5
	<b>TOTAL for 2011 = 32</b>

*Note that premises processing all the species above, except non-EU and non-US listed bobby calf and caprine premises, are required to participate in the NMD each processing week. Porcine from January 2012 and ovine since 2005 participate without Salmonella testing, but do conduct sampling for APC and E. coli (porcine) and APC (ovine) each processing week.*

### STATISTICAL SUMMARY

The NMD programme testing (APC, *E. coli* and *Salmonella*) conducted by bobby calf and caprine operators is important for market access and contributing data to the *Salmonella* Strategy.

Considering the relatively high numbers of *Salmonella* detected by routine testing for bobby calves in the 2011 year it is recommended that NMD sampling of carcasses, primal cuts and bulk meat for APC, *E. coli* and seasonal *Salmonella* is undertaken by all bobby calf operators; without exceptions regarding markets.

For consistency in NMD approach, MAF recommends that both bobby calf **and** caprine operators, regardless of whether processing for domestic or overseas markets should be required to participate in the NMD each processing week. This would mean that all caprine and bobby calf operators would continue with the same NMD product testing and analysis requirements as is currently required for EU and US listed operators. This would apply a

consistent standard across all these operators without exception, and would give MAF the best data set for analysis, including for *Salmonella*.

## NMD VERIFICATION

NMD verifications will continue to be undertaken according to RMP, and NMD verification parameters to ensure the highest standards of hygienic slaughter and dressing and further processing; the aim being to prevent *Salmonella* occurrences in the first instance.

## Options

	<b>OPTION</b>	<b>Pros</b>	<b>Cons</b>	<b>Cost</b>
(1)	<b>STATUS QUO</b>  Fresh carcasses, primal cuts and bulk meat tested every processing week (plus seasonal chilled carcass sampling and seasonal <i>Salmonella</i> for fresh carcasses, primal cuts and bulk meat) for EU and/or US listed operators only.	Provides an important basis for market access negotiations.	Operators who are exporting to markets other than EU or US, or are in a limbo situation of applying for EU and/or US listing can choose to opt out of NMD participation.	No change
(2)	<b>THE CURRENT EU, US LISTED PROGRAMME APPLIED TO ALL</b>  Fresh carcasses, primal cuts and bulk meat tested every processing week (plus seasonal chilled carcass sampling and seasonal <i>Salmonella</i> for fresh carcasses, primal cuts and bulk meat) by all operators processing bobby calves and caprine.	In addition to above: applies a consistent sampling programme for NMD across the industry for all markets.  Ensures all bobby calf operators with detections will be undertaking the same investigation and review processes to ensure the best food safety outcomes are achieved.  Caprine and bobby calf ; participation in NMD by all operators to ensure consistency.	A cost burden to operators producing only for domestic. However MAF understands that all bobby calf and caprine operators are processing for overseas markets at least some of the time.	Same costs to domestic, non-EU and non-US listed operators as is current for EU and/or US listed operators– noting domestic only are unlikely to be further processing. Presently there are no domestic only operators.

## Conclusion

The purpose of the NMD is to monitor microbiological process control; using the APC, *E. coli* and *Salmonella* results from bobby calf and caprine carcasses, primal cut and bulk meat product (including APC and *E. coli* results from chilled carcasses). Since 2005 NMD has become a specification and a New Zealand standard to be applied to all operators; domestic and/or producing for all overseas markets. Data from NMD has contributed to the *Salmonella* Risk Management Strategy, Antimicrobial Resistance project, UCFM standard, and Animal Welfare and has generated a baseline for New Zealand product to compare against imported product <sup>(3)</sup>.

To enhance the application of the same microbiological standards in New Zealand to all markets; domestic and export, and ensure biosecurity is consistent, the current NMD sampling programme needs to be extended to all bobby calf and caprine operators. This will also reduce any confusion for bobby calf and caprine operators regarding NMD requirements.

## References

(1) *Animal Products (National Microbiological Database Specifications) Notice 2011*

<http://www.foodsafety.govt.nz/elibrary/industry/animal-products-national-nmd/schedule-2011.pdf>

(2) *National Profiles, MAF NMD website(password protected).*

<http://www.foodsafety.govt.nz/password-protected/nmd/natprofiles/index.htm>

(3) *NZFSA Statement of Intent*

[http://www.foodsafety.govt.nz/elibrary/industry/Statement\\_Intent\\_2009-Describes\\_Nzfsa.pdf](http://www.foodsafety.govt.nz/elibrary/industry/Statement_Intent_2009-Describes_Nzfsa.pdf)

# Appendix 1 Proposed Changes to Schedule 1 of Animal Products (National Microbiological Database Specifications Notice 2011

(a) section 1.1 Species to which the National Microbiological Programme Applies, Table 1 revoking the fourth and fifth rows relating to Bobby Calves and Caprine and replacing them with -

Species	Domestic, non EU and non US Listed Premises	EU Listed Premises	US Listed Premises
Bobby Calves	Every processing week	Every processing week	Every processing week
Caprine	Every processing week	Every processing week	Every processing week

(b) in section 2.1 Products sampled, in addition to the seven existing bullet points include a new bullet point as the first bullet point -

- Bobby Calves and Caprine: all product types (carcasses, primal cuts and bulk meat) processed under their RMP

(c) in section 2.3 Summary Table, Table 2 Number of samples required per week revoking the fifth row relating to Bobby Calf and Caprine and replacing it with –

Species	Product type	Technique	Domestic and non EU and non US listed	EU and US listed standard throughput	EU and US listed VLT
Bobby Calf and Caprine	Carcass	Multiple Swab Technique	5 per week VLT 1 per week	5 per week	1 per week
	Primal Cuts	Multiple Swab Technique	5 per week VLT 1 per week	5 per week	1 per week
	Bulk Meat product	Whole Tissue Composite Sampling	5 per week VLT 1 per week	5 per week	1 per week
	Post Chill Carcass	Multiple Swab Technique	5 per week for 6 weeks VLT 1 per week for 6 weeks	5 per week for 6 weeks	1 per week for 6 weeks

Explanatory note: This amendment is an immediate change for operators processing bobby calf and caprine carcasses to include product sampling whether or not the operator is US and or EU listed to ensure consistent application of New Zealand microbiological standards and *Salmonella* Risk Management Strategy.