



Analysis of Submissions: Proposed amendments to the Animal Products (Homekill and Recreational Catch Service Provider Records and Information) Specifications

January 2015

The Ministry for Primary Industries (MPI) proposed to amend the Animal Product (Homekill and Recreational Catch Service Provider Records and Information) Specifications. This Notice applies to homekill and recreational catch service providers and specifies the records and other information that must be kept to demonstrate that all animal material and product is accounted for. Records of animals that are processed and the destination of the resulting product is essential to ensure that homekill or recreational catch is not traded for consumption or is mingled with export product, and to allow the tracing of animal material or product if there were to be a major disease outbreak. The amendments to the Notice were proposed to clarify details of the animal owner, the animals processed and disposition of all resulting animal material and product, and to require confirmation in relation to homekill that the animal owner has maintained the animals (or animals of the same kind) for at least 28 day prior its killing.

The amended Notice will come into effect on 1 May 2015. This will give the service providers 3 months to implement the new records and other information requirements.

MPI received eight submissions on the proposed amendments to the Notice. The submissions have been analysed in the following table and the MPI response provided. Where a number of submissions have raised the same point, a single response only has been provided and referenced to that for the remaining submissions.

Following the analysis of the submission, amendments were made to the Notice where appropriate. MPI would like to thank those parties who have taken the opportunity to comment on the proposals.



Respondent	Submission Comment ¹	MPI Response
1.	MPI to do inspections to check facilities regularly...minimal records...trading homekill must be allowed.	<p>The original homekill provisions were contained in the Meat Act 1981. This Act allowed farmers and animal owners to have their stock slaughtered provided the meat was not sold. It also allowed farmers to provide meat to their farm employees. In the late 1990s the policy relating to homekill and recreational catch was completely reviewed and as well as homekill, the provision were expanded to include requirements relating to recreational catch. Currently there is no plan to review the legislative requirements relating to homekill and recreational catch.</p> <p>It is noted however, that there is a gap in the market in relation to the availability of registered processors who are willing and able to process small lots, and limited options for people seeking these services. To help address this, MPI intends to develop resources for small operators interested in setting up regulated processing premises.</p>
2.	<p>Eco Meats Ltd. supports robust and appropriate record keeping requirements for homekill and recreational catch service providers, and recognises the importance of animal products and material being traceable. However, it is important that record keeping requirements are fair, practical to implement, and do not place a burden on the service provider that outweighs the usefulness of the information collected.</p> <p>A key aspect that must be considered is the dual responsibility of the service provider and the animal owner. A service provider cannot be held accountable for any other individual meeting, or failing to meet, his or her</p>	Noted and agreed. The requirements specified in the Notice are the responsibility of the service provider. Meeting these requirements is a way to support the exemption granted to service providers from the need to have a risk management programme.

¹ In most cases the comments are taken directly from the submissions received, except where it has been necessary to make changes to improve readability



Respondent	Submission Comment ¹	MPI Response
	obligations under the law.	
	<p>1.3 Records</p> <p>1. Homekill/recreational catch service provider must keep records in relation to any animal material that the provider kills, processes or otherwise receives.</p> <p>The records must specify or include all of the following information:</p> <p>a) the name, address and phone number of the animal owner for which the service is provided;</p> <p>We agree that keeping records of animal owner contact details is appropriate.</p>	Noted.
	<p>b) the date the service was provided;</p> <p>We agree that keeping records of the date the service was provided is appropriate.</p>	Noted.
	<p>c) a description of the service provided;</p> <p>We agree that information kept should include a record of the service provided. However the level of information contained in a description of the service provided may vary between providers and a basic description should be sufficient (e.g., 'processing: pork/sausages').</p>	Noted. Examples of records will be provided in guidance.
	<p>d) the locations that the slaughter and processing service were provided including where an animal is killed at a location other than the animal owner's own property or a homekill and recreational catch service provider's premises or place for humane reasons;</p> <p>We do not agree that it is the service provider's sole</p>	Noted, the wording will be modified to clarify that the location only needs to be recorded in relation to the services provided. The service provider will need to record if the animal was received from another service provider, but details of the location where the other service was provided will not be needed.



Respondent	Submission Comment ¹	MPI Response
	responsibility to gather and record this information. In many instances a service provider is not involved in the slaughter of an animal, as the animal owner delivers (or arranges delivery) of the carcase to the service provider. It is therefore unfair to expect a homekill and recreational catch service provider to gather information from an animal owner as to where the animal was slaughtered, particularly in cases of recreational catch. If a service provider is directly involved in the slaughter of an animal it is reasonable to expect that records are kept as to where that service was provided. It is reasonable to expect a service provider to keep records of where processing services are provided, whenever that processing occurs in a location other than that service providers premises.	<p>e.g. killed by Joe Bloggs (service provider).</p> <p>Other service providers in the supply chain must keep their own records as appropriate to the service provided.</p> <p>The location that a recreational catch animal was killed does not need to be recorded as this would not have been a service that was provided. This will be further clarified in guidance.</p>
	<p>e) the number of animals killed or processed;</p> <p>We agree that it is reasonable to expect that information as to the number of animals killed or processed is kept by a service provider.</p>	Noted.
	<p>f) the animal species or class (e.g. mutton, lamb, cow, bull, steer, deer, goat, salmon);</p> <p>We agree that it is reasonable to expect that information about the animal species or class is recorded. However, in some cases specific detail may depend on the animal owner; therefore basic information in the service provider's records should be acceptable (e.g., 'beef' rather than 'steer' or 'heifer').</p>	Agreed, the wording will be amended so that only species is required.
	g) in the case of homekill, written confirmation from the animal owner that he or she has been actively engaged in the day to day maintenance of the animal (or animals of	Section 131 of the APA imposes an offence on homekill and recreation catch service providers who kill/process animals knowing that the person presenting the animal has not been



Respondent	Submission Comment ¹	MPI Response
	<p>the same kind) for at least 28 days immediately prior to the killing of the animal;</p> <p>We do not agree that records of written confirmation from the animal owner that they have been engaged in the day to day maintenance of the animal (or animals of the same kind) for at least 28 days prior to the killing of the animal should be kept by the service provider.</p> <p>It is the responsibility of the animal owner to ensure that he or she meets their legal obligations. It is not the sole responsibility of the service provider. In addition, it is not practical to expect the service provider to gather this information as in many instances their first/only physical contact with the animal owner is at the time the product is collected. It is reasonable to expect that information about the animal owner's obligations in this respect is available (or displayed) at the service provider's premises, but the responsibility rests with the animal owner.</p>	<p>actively engaged in the day to day maintenance of the animal. The fines are significant. Section 131 also imposes an offence on the person submitting the animal for processing. This gives MPI the ability to pursue both the service provider and the person submitting the animal if there was a problem.</p> <p>The Notice will be amended so that the animal owner does not need to provide written confirmation, but will still require the service provider to confirm and record if the person submitting the animal was responsible for its day to day maintenance (or maintenance of animals of the same kind), or if the animal was received from another listed service provider. The service provider who killed the animal would need to make a record of the day to day maintenance.</p>
	<p>h) how all animal material or product derived from the homekill or recreational catch animal was disposed of, including describing which, if any:</p> <p>i. edible parts were returned to the animal owner;</p> <p>The information about the edible parts that were returned to the animal owner is available on the retained copy of the docket or invoice provided to the animal owner. It is not reasonable to expect that it is duplicated in any other way or form.</p>	<p>The form of the record has not been specified. If a retained copy of the docket or invoice contains the required information and the service provider can keep a track of these records this may be all that is required.</p>
	<p>ii. non-edible parts were returned to the animal owner;</p> <p>It is unreasonable to expect that specific records be kept about any non-edible parts returned to the animal owner</p>	<p>This clause allows traceability of all animal materials and products. It does not require that non-edible parts be returned to the animal owner, but rather requires a record of waste that</p>



Respondent	Submission Comment ¹	MPI Response
	for each animal processed. Animal owners may or may not wish to have parts such as bones or hides returned to them.	<p>was returned to the animal owner. This would not need to be a detailed record of the animal parts, but a general description e.g.</p> <ul style="list-style-type: none"> - all waste left on-site except for the hide - no waste returned to the animal owner. <p>Examples of acceptable records will be provided in guidance.</p>
	<p>iii. non-edible parts were disposed of as waste, in which case, the location of the waste disposal;</p> <p>It is not reasonable to expect that service providers keep specific records of the non-edible parts disposed of as waste for each animal. However, it is reasonable to expect that a service provider has a documented waste disposal/management plan in place that includes information such as where and how waste will be disposed of. It may also be reasonable to expect that any deviations from this plan are documented.</p>	<p>If the service provider disposes of waste to a specified location, details of this could be recorded once in the records book. In the record for a particular client, the service provider could either indicate that the waste has been disposed of to that location (e.g. by a tick in a column), or record more detail if the waste was disposed of elsewhere. Examples of acceptable records will be provided in guidance.</p> <p>The wording of the Notice does not need to be changed to allow for this.</p>
	<p>iv. non-edible parts were disposed of to a renderer or other person, and the name and address of the render or person to whom the material was supplied and the date of the transaction;</p> <p>It is not reasonable to expect that specific information about disposal of any non-edible parts to a renderer or other person be kept for each animal. It is reasonable to expect that a service provider specifies the name and address of the renderer (or other person) to whom non-edible parts are disposed of in their waste disposal/management plan, and documents any deviation from this plan.</p>	<p>See previous comment in relation waste disposal. For example, if all waste (other than hides or skins) are disposed of to a particular renderer, the details of that renderer could be recorded once in the records, and the date the material was disposed of could be recorded for particular clients. Examples of acceptable records will be provided in guidance.</p> <p>The wording of the Notice does not need to be changed to allow for this.</p>



Respondent	Submission Comment ¹	MPI Response
	<p>v. hides and skins were disposed of, and the name and address of the person to whom the material was supplied, the number of hides or skins provided, and the date of the transaction;</p> <p>It is not reasonable to expect that specific information about disposal of hides or skins be kept for each animal. It is reasonable to expect that a service provider specifies the name and address of the person/s to which hides and skins are disposed of as a part of their waste disposal/management plan, and documents any deviation from this plan.</p>	<p>For hides and skins MPI is seeking a record of the number disposed of. This will assist in providing further information about the number of animals being processed by service providers. The same approach as for waste supplied to a renderer could be used for tanneries. The record for a particular client would still need to include the date the hides or skins were picked up and the number supplied. Examples of acceptable records will be provided in guidance.</p> <p>The wording of the Notice does not need to be changed to allow for this.</p>
	<p>vi. non-edible parts such as feathers, antlers or trophy heads were disposed of, and the name and address of the person to whom the material was supplied and the date of the transaction.</p> <p>It is not reasonable to expect that specific information about disposal of any non-edible parts such feathers, antlers or trophy heads be kept for each animal. It is reasonable to expect that a service provider specifies the name and address of the person/s to which such parts are supplied in their waste disposal/management plan, and documents any deviation from this plan.</p>	<p>This requirement has been removed from the Notice. On further consideration it was decided that this information is unlikely to add significant value to the records being kept.</p>
	<p>2. A homekill and recreational service provider must have a system to identify and distinguish each animal owner's animal material and animal product from any that belong to another owner and must return the edible part of the homekill or recreational catch product to the relevant owner.</p> <p>We agree that service providers should have a system to</p>	<p>Noted.</p>



Respondent	Submission Comment ¹	MPI Response
	identify and distinguish each animal owner's animal material and animal product from any that belong to another owner and must return the edible part of the homekill or recreational catch product to the relevant owner.	
	<p>3. Records must be:</p> <p>a) up to date;</p> <p>b) accessible to animal product officers and the Director-General and any other person authorised by the Director-General;</p> <p>c) retained for a period of at least 4 years.</p> <p>We agree that it is reasonable to expect that records are up to date, accessible, and retained for a four year period.</p>	Noted.
	<p>It is important that robust and accurate records are kept containing key information relevant to ensuring that animal material and products are traceable, and do not get mixed with products intended for trade or export. However, there are a number of players who all must share in the responsibility for this, including the animal owner, and those involved in the disposal or further handling of non-edible parts.</p> <p>The required records should be meaningful, and only required if they contribute to the purpose of gathering information that aids traceability or in ensuring that this product does not get missed with product for trade/export. For example, records that aid traceability includes information such as contact details of the animal owner, type of animal slaughtered/processed, and how/where waste or other non-edible parts are disposed of. Whether or not the animal owner has been engaged in the care of the animal (or others like it) for a 28 day period prior to</p>	<p>MPI agrees that only those records that are necessary to manage the risks from homekill and recreational catch should be required. As a result of this consultation process, the Notice has been thoroughly reviewed and non-essential requirements removed.</p> <p>Under the APA, renderers and tanneries for example, are required to keep their own records. These are not seen as a duplication of the service provider records, but would assist in verifying the accuracy of the service provider records if needed.</p> <p>The purpose of the record of the day to day maintenance is to provide an additional control around the original policy intent of allowing the continuation of a traditional farming activity, whilst ensuring no increase in the availability of unregulated meat. It will support the offence provisions in the APA in relation to homekill.</p> <p>An increase in the availability unregulated meat would</p>



Respondent	Submission Comment ¹	MPI Response
	<p>that animal's slaughter, does not assist, or in any way facilitate, the traceability of the animal material or product, but does place a significant, and in most cases paper-based burden on service providers. In addition, many animal owners use the same service provider multiple times – the proposed regulations do not make it clear if a signed declaration is required for each person, each animal, or each time they use the service. Any requirement to gather information that will not aid traceability places service providers under undue pressure. It is also important that the records required not duplicate information gathered elsewhere or through other methods.</p> <p>We are keen to support the MPI to develop robust record keeping requirements that are fair, reasonable and provide meaningful information. We also believe that part of this process needs to be a focus on educating those involved in homekill and recreational catch service provision about the record keeping. It should also involve education for animal owners about their obligations with regard to being engaged in the care of the animal (or others like it) for the 28 day period, and about the need to use a listed service provider. If all animal owners used listed providers who kept proper records traceability of animal material and products will be much improved.</p>	<p>increase the opportunity for issues associated with food safety to occur and for the mingling of regulated and unregulated meat, with the potential for leakage into export markets. If this were to occur it would jeopardise New Zealand's position as a trusted supplier of animal products and would very likely result in a complete review and tightening of the current homekill and recreational catch provisions.</p> <p>A signed declaration could be one way of meeting this requirement but this will not be mandatory.</p> <p>Examples of records will be provided in guidance.</p>
3	<p>(1) a) to f) we support these requirements but note that rapid numbers do not exist for some properties we visit. The reason for this is many farms are purchased by landowners who subdivide off the house with a few acres and sell that as a lifestyle property, leaving the bare block, which they then farm in conjunction with their original property, leaving the new bare block without a valid rapid</p>	<p>Noted. Rapid number was given as an example only but will be removed from the Notice and provided in guidance only.</p>



Respondent	Submission Comment ¹	MPI Response
	<p>number.</p> <p>g) The idea to have every animal owner provide written confirmation that they have been actively engaged in the daily maintenance of the animal or a like kind for 28 days before slaughter is impossible for us to achieve. On farm killing involves us entering a property following instruction's received either by phone, e-mail, fax or verbally in person. While driving in we observe the surroundings and can easily identify what classes of stock are present.</p> <p>A dairy farm milking cows means yes, the property is engaged with animals of a like kind. On entering a sheep or beef farm we have observed animals of a like kind present while driving into the property.</p> <p>On the lifestyle block it's not hard to observe the classes of animals present often we see a the animal we are booked to kill in company with a younger animal growing up for next year's kill.</p> <p>In all these situations we may have been working for our clients over many years and we have a professional working relationship with the entire family or staff members on the property.</p> <p>In all these cases a declaration about ownership is unnecessary and some clients have taken offence to the idea they should provide evidence of ownership when the APA gives them the right to consume their own stock by using professional service providers.</p> <p>Since the last record specifications issued back in the year 2000 there have been some major changes in the ownership of farmland in New Zealand. Back then the</p>	<p>The term "animal owner" as noted in your submission, could include a company etc, in which case the person submitting the animal, as an employee would then be an agent of the owner. It would be that person who is responsible for the day to day maintenance of the animal.</p> <p>The submission does not support the need to keep individual records of animal ownership for each transaction where the person presenting the animal is known to the service provider. MPI agrees that a single record for a client known to the service provider as an animal owner responsible for the day to day maintenance of animals could be acceptable provided it meets the requirements of the Notice.</p> <p>The wording has been amended so that the service provider only needs to confirm that the person submitting the animal has been actively involved in the day-to-day maintenance of the animal (or of other animals of the same kind) for a period of at least 28 days immediately preceding the presentation of the animal. This removes the need for written confirmation to be provided by the animal owner</p> <p>This submission supports the need to confirm day to day maintenance for 28 days where the person seeking the service is unknown to the service provider. A signed declaration could be one way of achieving this but a declaration will not be mandatory.</p>



Respondent	Submission Comment ¹	MPI Response
	<p>family farm was the dominant model of ownership of the land and we knew basically who the owner of the livestock was. In the current time there are a lot of different ownership models out in rural New Zealand, making it impossible to know who owns the farm and livestock now.</p> <p>In our area of operations some farms are owned by a group of investors who might own the stock but have no involvement in the daily running of the property. On some farms, the stock may be owned by the sharemilker or the farm owner. The farm might be run by a manager, or contract milkers might be running the property with input from a corporate model of ownership. Some properties are owned by a large farm ownership group who own the stock in the body corporate name but aren't involved in the daily running of the property. Equity partnership models are now appearing in all classes of livestock farming as a means for younger people to progress up the farm ownership ladder, meaning joint ownership of animals.</p> <p>In most of the above cases I would not be able to comply with the 28 day ownership requirement, as the animal owner is not present on farm nor involved in the daily operation but his or the corporate staff are employed to carry out that function and are then entitled to have homekill meat processed by our business. Surely that means it is totally unnecessary to require our business to collect written confirmation of ownership, when we will be recording the details of who has engaged our services in an on farm situation, which can be checked by an Animal Product Officer, if ever deemed necessary.</p> <p>Our business does see a need to collect a declaration</p>	



Respondent	Submission Comment ¹	MPI Response
	<p>from an unknown person who arrives at our premise or place with some livestock and wants us to slaughter them for their own use or consumption. Not knowing such a stranger, it is fair to expect them to sign confirmation on the 28 day ownership. Then we would be happy to provide our services without fear or favour even though we would have no way of checking the truth of the declaration. But clearly, we would have complied with the legal requirements.</p> <p>We submit that the 28 day ownership declaration should only be used in the situation of unknown persons approaching us to provide our services to slaughter livestock at our service providers premise or place, as in this situation, we have no other way of determining length of ownership.</p>	
	<p>h) i) When only providing a slaughter service to the animal owner and then delivering the animal to another service provider for processing our business would not be able to provide this information.</p>	<p>The wording will be amended to address the situation where animal material is transferred to a subsequent service provider. The receipt of the animal carcass from another service provider would then be recorded.</p>



Respondent	Submission Comment ¹	MPI Response
	<p>ii) to v) Our business removes all inedible offal off farm without exception only leaving any requested edible kidneys or heart on the property. Except for the occasional tongue we do not take offal to our or any other service providers premises.</p> <p>All offal is delivered to a depot for transport to a renderer on the same day as the service was provided and the details are entered in the depot register stating whether beef, pork, sheep or venison offal was delivered.</p> <p>Our business has supplied the same hide merchant for some 25 years who operates out of the depot at which we place our offal. The register is filled out for each and every delivery of hides after each day's kill.</p> <p>This information about each day's kill is already recorded in our records and the offal and hide deliveries in the depot records. Therefore, we submit that we should not be required to record the details of the depot or renderer to which we supply our waste and/or hides and skins for each delivery. But, at the front of our record book, we list our delivery places for offal, hides and skins.</p>	See previous comments about a service provider disposing of all waste to a specified person (including an agent, renderer, tannery or transporter). Where the specified person is listed in a record, it may be acceptable to only record when the waste is disposed of elsewhere. The date of the transaction is required and for hides and skins, MPI would still require the number supplied to be recorded.
	vi) This does not apply to our business. Any trophy heads are missing off any game we skin etc., as it is previously taken by the owner	Noted.
	(2) We fully endorse this requirement for an identification system.	Noted
	(3) We agree with the availability of the records for inspection but don't agree that it should be necessary to keep them for 4 years when the animal would have been	The limitation period for failing to comply with the record keeping requirements in the Notice is 2 years from the date of the offence. However, the limitation period for contravening



Respondent	Submission Comment ¹	MPI Response
	consumed well before then.	<p>section 131 of the APA “Offences in relation to homekill and recreational catch” is 5 years.</p> <p>4 years is a standard records retention time for businesses operating under the APA and so for consistency and to provide a slightly longer time frame in the event of contravention under the APA, 4 years will be applied.</p>
4	<p>How is it that you can ask for written evidence that person has owned an animal for twenty eight days but a hunter can bring you an animal the same day they catch/slaughter it? I still struggle to make the difference between homekill and recreational catch around this twenty eight day rule.</p> <p>Personally I think our current record keeping is adequate.</p> <p>If this proposed change goes through then I think the best thing MPI can do is draw up a template to distribute to all service providers. This way we can do our best to gather the correct information relating to the twenty eight day rule.</p>	<p>See previous comments about the reasons for requiring evidence of maintaining farmed animals for 28 days and the desire to minimise illegal select and slaughter activities outside of the regulated system.</p> <p>Changes to this Notice were proposed largely to simplify the wording rather than to make significant changes to the information to be recorded.</p> <p>Confirmation that the person submitting the animal has maintained it for the previous 28 days was included to align with the offence provisions in section 131 of the APA. This is an existing requirement and the Notice only seeks require a record to confirm that this requirement has been met.</p> <p>It is MPIs intention to update the guidance once this Notice is finalised and to create a records template to assist service providers.</p>
5	We support the changes in the records as set out in 1.3 Records a) to g) except to note that rural rapid numbers are not available for all rural properties.	Noted. See previous comment about rapid numbers.



Respondent	Submission Comment ¹	MPI Response
	<p>h) A signed declaration from each animal owner confirming that they had been actively engaged in the daily maintenance of the animal or a like kind for 28 days prior to slaughter would be impossible to achieve in the on farm situation.</p> <p>Rural Butchers are providing a service to the rural farming or lifestyle families; our core role is to provide a safe professional service while on the property, not to be detectives on deciding who owns the animal. The ownership structures of farms has changed significantly in the last 14 years. Rural butchers now service properties that are owned by overseas owners, corporate owner groups, city dwelling investors, share farming partnerships, equity partnerships, family trusts as well as the family farm. These groups own the land and in some cases the animals as well but are not all actively involved in the day to day running of the property. Add to the mix dairy sharemilker's who may or may not own the animal presented for slaughter we are left in a difficult situation to decide who to ask to sign such a declaration. However any farm workers present would be able to have homekill as provided by the APA 1999 but couldn't legally sign a declaration not being the animal owner</p> <p>Most members stated that often they don't see anyone either the owner or any staff while on farm but are given instructions as to where the animal is and members then find the animal and complete the process and drive on to the next job. We asked our members how long their waiting list was for responding to a booking to visit and provide an on farm service. Members reported that for 10 months of the year waiting times mostly exceeded the 28 day period which would negate the need for a declaration</p>	<p>See previous comments about animal ownership.</p>



Respondent	Submission Comment ¹	MPI Response
	<p>anyway. Rural Butchers are well known in the districts they work and do observe what animals are present on each property they visit.</p> <p>Members noted that the NAIT system requires the person in charge to fill out the paper work while the ASD cards accompanying animals off farm movements require the owner or farm manager to complete the form better recognising the farming ownership changes listed above.</p>	<p>The NAIT system and ASDs do not currently duplicate the records to be kept under this Notice.</p>
	<p>The general consensus among members was that the declaration in an on farm situation was unnecessary and pointless and would certainly go against the Government's stated policy to reduce the compliance burden on small business.</p> <p>We discussed the situation that might arise if this requirement was issued as a specification but the owner said they wouldn't sign the declaration. If the listed service provider refused to kill the animals and drove out the gate it was felt that the owner would get someone else to do it who may not be listed at all. This situation would be pushing the homekill underground avoiding GST and income tax and would also mean there would be no record of an address or contact details recorded in any records anywhere that could be checked. This is not a situation Rural Butchers want to see happen.</p> <p>A question was put to members. Was there any situation that a declaration would be useful? A common response during social times was; yes at my premises or place I could use that if I have persons who I don't know present animals for slaughter. In this situation we have no way of knowing such a person's background or what animals are present on their property or whether they had been</p>	<p>See previous comments about mandatory declarations. A declaration could be one way of meeting this record requirement but MPI does not intend to mandate this.</p> <p>Using a person who is not listed as a service provider would be an offence under section 131 of the APA and could result in significant fines.</p>



Respondent	Submission Comment ¹	MPI Response
	<p>farming the animals or a like kind for 28 days but receiving written confirmation of ownership members would have fulfilled their obligations under this specification.</p> <p>Our members reported that many busy livestock farmer clients are now sending sheep to the service provider's premises or place to be slaughtered using the professional skill and expertise of rural butchers rather than doing the job themselves eliminating any risk of spreading sheep measles on their farm. These farmers are known by us and it wouldn't be necessary for them to fill out a declaration.</p> <p>Rural Butchers submit that the wording of (1) g) be changed to "Unknown Persons presenting animals for slaughter at a Listed Service Providers Premises or Place be asked to provide written confirmation they have been actively engaged in the ongoing daily maintenance of the animals or a like kind for at least 28 days"</p>	
	<p>h) Members expressed concern about the need to list every day where hides, skins, offal and waste went.</p> <p>Members thought that because they supply to one place that an entry in the front of their records would be sufficient to provide traceability for hide's skins and offal while processing records would record what was returned to the owner.</p> <p>Members reported that they either filled out a public register when delivering to a hide collection point or a renderer of what they were dropping off or a transport operator recorded what was picked up from the service provider. Members could see no benefit in duplicating</p>	<p>See previous comments about recording specified companies or people to whom waste is ordinarily disposed.</p> <p>MPI does not intend to record the number of hides and skins supplied by service providers on a public register at this time.</p> <p>MPI agrees that not all hides and skins are sold to tanneries and that some, for example, are returned to the animal owner or are disposed of elsewhere. As such, relying on the records generated by the tanneries would provide incomplete information.</p>



Respondent	Submission Comment ¹	MPI Response
	<p>these records already available for MPI to audit.</p> <p>Our members do not wish to record numbers of hides or skins in any public register as we consider that information to be commercially sensitive but that information would be held in the hide merchant's private records for MPI to check if ever deemed necessary.</p> <p>It was noted that many animal owners wish to retain their hides or skins to have then tanned by themselves or by a commercial business so hides and skins sold often don't match the numbers killed. Therefore it would be a simple matter to record that a hide or skin was retained on the property.</p> <p>Rural butchers submit that the wording in i) to v) be changed to - service providers to list the business name and address who they supply hides, skins, offal and waste to in the front of the record book.</p> <p>Any hides and skins left on the property to be recorded in the daily records against the client's name and address already recorded in the record book.</p>	<p>The number of hides and skins should match the number of animals killed unless the service provider only receives a skin off carcass for further processing.</p> <p>The approach suggested by the submission maybe an acceptable form of a record. Examples of acceptable records will be provided in guidance.</p>
	vi) Was considered irrelevant to our industry as such parts are retained by the owner before reaching our premises.	See previous comments. This requirement will be removed from the Notice.
	(2) We fully support the need to have an identification system.	Noted.
	(3) c) retaining records for 4 years doesn't have our support. We suggest a maximum of 2 years would be more suitable.	See previous comment about records retention.



Respondent	Submission Comment ¹	MPI Response
6	<p>As we know, under the MPI's Animal Products Act 1999 (APA) issued on July 7 2000, homekill operators are required to record information concerning the "animal owner," defined in section 67 (1) (b) of the APA as being someone "...who has been actively engaged in the day-to-day maintenance of the animal, or of other animals of the same kind, for a period of at least 28 days immediately preceding the killing of the animal..."</p> <p>As we also know, it is essential to demonstrate that all animal material is accounted for to ensure that homekill or recreation catch is not traded for consumption, in case of a major disease outbreak.</p> <p>As I understand it, the amended Notice, in the ministry's view, would not actually change or add to anything that is not already required under or in the scope of the APA that had been in place since 1999/2002. It was just to clarify requirements in relation to the animal owner and the animal to be processed, the disposal of the products, and the requirement for written evidence of farmed animal ownership, in accordance with the act.</p>	<p>Nothing in this amendment would prevent a person from purchasing an animal and killing it themselves for their own consumption or use. However, the person would need to keep in mind any restrictions that may be applied by local council Bylaws and the need to comply with the animal welfare codes of practice issued under the Animal Welfare Act. Another option would be for the person to have the animal processed through a registered processing plant as regulated meat.</p>
	<p>Determination of the legal right to occupy a property; This is covered in section 67(4) of the APA, which states: "In this section, own property, in relation to an animal owner, means land which the owner—</p> <p>(a) owns or leases; or</p> <p>(b) has a legal right to occupy or use, and does in fact occupy, or use to conduct farming or similar operations"</p> <p>ANIMAL, OWNER and PROPERTY</p> <p>On further advice, I was told that in other words, the</p>	<p>The homekill provisions were put in place under the APA to allow the continuation of a traditional farming activity. It was intended to allow the animal owner and their farm workers to use a professional to slaughter and process their animals for their own consumption or use, rather than undertake the task themselves.</p>



Respondent	Submission Comment ¹	MPI Response
	<p>animal, the owner and the property on which they are kept are directly linked. It is therefore not possible – under this APA section - for an animal owner who wishes to use the homekill pathway, to leave the animal (that they, for example, have purchased) on another property that they have no legal right to occupy (such as the one owned by the previous animal's owner) for the time necessary for the new owner to claim ownership under the “28 day rule”, as this does not meet the “own property” test.</p> <p>Again, I was told that this is not a new requirement as it is part of the APA and the amendment was more about improving clarity around the records to be kept to meet the act's requirements.</p> <p>What I also found out is that because the ministry had already put work into clarifying the record-keeping issue, it was deemed appropriate for the definition of an “animal owner” to be included [Part 1:1.3 (1)(g)] in the new specifications outlined on the Animal Products Notice, currently under discussion.</p>	
	<p>I still have concerns about the wider implications of making amendments and who it is trying to protect or indict, and what's behind it. I'd be interested in knowing the statistics of how many operators are failing to keep proper records. Is it a regional or national trend, or just a few individuals? Was there a particular situation that caused concern, and who instigated it?</p> <p>I'm concerned that added bureaucracy will create segregation and elitism in who owns animals and who doesn't, as well as who is a landowner and who just leases or uses the land.</p>	<p>An audit of the homekill and recreational catch service provider sector in 2013 consistently found gaps on their knowledge about the requirements for homekill and recreational catch. The audit report recommended that a records template be developed for service providers and to ensure that all service providers are provided with guidance and copies of the Notice. The amendment to this Notice is the first step in this process. Once the Notice has been updated, work will be undertaken to improve the guidance and the information will be provided to all listed service providers.</p> <p>Currently all service providers, on listing and on renewal of listing, are provided with a pamphlet which explains the rules</p>



Respondent	Submission Comment ¹	MPI Response
	I'm also concerned about how much more onus and pressure this puts on homekill operators. We provide a service for animal owners. We are not lawyers, police or detectives and politicians, nor do we want to go down the road of being the judge and jury of our clients.	and their responsibilities under the APA. Comprehensive information about the rules and requirements for homekill and recreational catch can also be found on the MPI website at the following link: http://www.foodsafety.govt.nz/industry/sectors/meat-ostrich-emu-game/homekill-game-wild-foods/homekill-recreational-catch.htm
7	<p>1.3 (1) a) "Written evidence of farmed animal ownership for at least 28 days prior to the killing of the animal".</p> <p>There is no problem with the new requirements; however the new proposed process should not fall on the butcher/processor. I believe this could create negative trade for the butcher/processor as it will be up to us to have to present paperwork to the animal owners, explain MPI requirements and get them to sign. Then in the event of the customer not wanting to sign a declaration we will have to turn the business away which then creates all sorts of negativity.</p> <p>MPI should deal direct with animal owners, advertise the changes to them and come up with a MPI generated generic ownership form that gets sent in with the animal when it comes on to the premises. It should be up to MPI and the animal owners to own this process. Not the butcheries/processors as we are just providing a service.</p>	<p>See previous comments about evidence of animal ownership.</p> <p>The APA places obligations on both service providers and animal owners. This Notice deals with the service providers only.</p> <p>If a supplier is unwilling to confirm that they have maintained the animal (or animals of the same kind) for the preceding 28 days, the service provider should not provide services to that person. MPI has created an A4 poster which can be downloaded and displayed at the service provider's premises to help educate customers. The pamphlet can be seen at the following link, or hardcopies can be obtained from MPI.</p> <p>http://www.foodsafety.govt.nz/elibrary/industry/homekill-brochure-2012.pdf</p> <p>MPI continues to take opportunities to educate animal owners about the homekill requirements.</p>
8	For the last 17 years, the unregulated homekill industry in New Zealand has been of growing concern to the Association for a number of reasons, all of which undermine the reputation of New Zealand's meat industry, both domestically and on the global market. Current legislation, under the Animal Products Act (1999) states	Prior to the introduction of the APA there were licensed custom kill processors, but no licensing or approval of itinerant slaughterman. It was therefore difficult to determine how many people were in the business of providing homekill services under the Meat Act 1981. Since the introduction of the APA all people who are involved in providing homekill services must



Respondent	Submission Comment ¹	MPI Response
	<p>homekill product must only be used or consumed by the owner and their household.</p> <p>The AANZ believes this is poorly understood by the New Zealand public, which is evident by meat consumption statistics, revealing a significant amount of homekill product is being traded outside this allowance.</p> <p>The proliferation of homekill operators throughout New Zealand and the resulting negative implications need addressing. The AANZ would like to see the same standards applied and enforced across everyone in the industry.</p> <p>Registered abattoirs are required to have Animal Status Declarations (ASD) for every individual animal going through their plants for the purposes of ensuring meat contains no residues. They operate under the National Animal Identification and Tracing (NAIT) system for beef traceability. They are also required to certify all byproducts including hides and skins. To keep homekill operators in line with standard practice AANZ strongly believe it should be mandatory for all homekill operators to operate under these same conditions.</p> <p>AANZ have been part of the Unregulated Meat Working Group since its inception and whilst we appreciate the efforts by MPI to establish appropriate standards we are strongly of the view that not only should homekill operators operate under the same standards as registered abattoirs, but of equal importance is the issue of enforcement. The fact that homekill operators do not have to undergo regular and ongoing audits is unacceptable and unfair to registered abattoirs.</p> <p>Regulations which require homekill operators to operate</p>	<p>be listed. People providing recreational catch services were also included under the APA.</p> <p>The ability of farmers to kill their own animals and consume their own stock is considered part of the NZ way of life. The policy under the APA is to allow this to continue but ensure that meat for sale would come through the regulated system. It was also agreed that there would be a distinction between food which is for sale and situations where people were consuming their own animals. Animal owners and people who are able to consume homekill would do so at their own risk. There is no sale of meat occurring in these situations</p> <p>There is a fundamental trade-off around homekill. The policy is to allow for homekill services to still exist while providing for sufficient control to ensure that risks to consumers and users in the traded markets can be managed. The Notice contains the requirements for some of the control measures and it is important the service providers comply with their obligations under the Act.</p> <p>NZ is a major exporter of meat and other animal products and foreign Governments look for assurances that the animal products entering their marketplace are safe. Any activities or changes that may reduce the level of assurance potentially damages New Zealand's market access.</p> <p>MPI provides information about the rules around homekill on its website. We have also developed pamphlets outlining the rules and from time to time undertake a targeted communications programmes in this area.</p>



Respondent	Submission Comment ¹	MPI Response
	<p>under the same standards as a registered abattoir (as outlined above) are, in the AANZ's view, a robust way of implementing an audit process. This would create a new revenue stream so any associated costs would be offset.</p> <p>If a public health issue caused by homekill product was to occur it would denigrate the reputation of the entire New Zealand meat industry, both nationally and internationally, as a trusted supplier of safe food. This is a serious issue for the industry and the issue around the enforcement of the regulations should reflect this.</p>	