



**Summary of Submissions on the
Proposed Amendment: Operational Code: NZCP1: Design and Operation of Farm Dairies**

19 May 2017

MPI received 9 submissions on the proposed document from dairy companies and associations. The 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 this document.

MPI would like to thank all the parties who have taken the opportunity to comment on the draft.



Submitter ref	Part	Clause	Submission comment	Submission proposed amendment(s)	MPI Response
Sub 1	General		Is this document intended for the 17/18 or 18/ 19 season?		This amendment is intended for the 2017/2018 season.
Sub 9	General		<p>We would not be supportive of taking away the ability for machine testers to specify extended time frames for a 'full machine test'.</p> <p>Do have some pie in the sky ideas in this space, such as requiring a full machine test at least every 5 years and reduced/mini tests to be required when a full machine test is not performed. – Mini tests are only allowed if no changes have been made to the farm dairy, i.e. added number of cups. This would require some further and full industry discussions though.</p> <p>I feel that there would be more benefit for the industry to require washing system assessments rather than yearly 'full machine tests'. This of course would require a bit of development before it could be implemented.</p>		<p>Out of scope of this amendment. Comment will be considered as part of the full 2017 review.</p> <p>MPI has not proposed any amendment to the frequency of machine testing.</p>
Sub 4	General		Producing milk for other purposes: The example for 'other purposes' speciality milk products and organic products, this is followed with additional information that is only specific to raw milk, for completeness include other references e.g. organics references.	Include other reference to support in addition to the raw milk.	Amended.



Submitter ref	Part	Clause	Submission comment	Submission proposed amendment(s)	MPI Response
Sub 8	General		We recommend that MPI checks with popular farmer software providers in order to make sure data can be recorded easily, before this new operational code comes into force. We recommend that MPI also checks with those providing paper recording systems that new recording requirement will be included in time for implementation.		Noted.
Sub 1	3	3.8.2	Table 1. Minimum Approved Distances.	Remove the reference to the clause 6.10 (5) and replace with; >30,000L must not be within 45m of the milk storage area on a separate line. This makes the clause 6.10 (5) obsolete.	Disagree. The reference to 6.10 (5) is needed because of the additional detail provided. We also note that tank capacity is limited to 30,000 L but there may be more than one tank.
Sub 3	4	4.2 (1)	Clarification around ...or other similar material.	To include the use of tanalized timber for existing dairies only provided that it is permanently mounted onto and flush with the concrete yard. (Explanation – require a simple fix solution to bring some existing old dairies up to a standard).	Out of scope of this amendment. Comment will be considered as part of the full 2017 review.
Sub 3	4	4.3 (1)	Clarification around ...or other similar material.	To include plastic piping material to be of sufficient diameter min.150mm diameter (explanation – pipe cut in half length ways will give an easy/cheap option to bring existing old dairies up to standard).	Out of scope of this amendment. Comment will be considered as part of the full 2017 review.



Submitter ref	Part	Clause	Submission comment	Submission proposed amendment(s)	MPI Response
Sub 3	4	4.3 (2)	Necessity and clarity for the requirement of all drains from the main sump to effluent disposal point must be fully enclosed and impervious to moisture. (Confusion on understanding with the meanings of 'main sump' and 'effluent disposal point').	Delete requirement (explanation – if talking about effluent irrigators being the final point they have to be piped for the pumping to work. Effluent ponds – where is the final point??).	Out of scope of this amendment. Comment will be considered as part of the full 2017 review.
Sub 3	4	4.7 (1)	The necessity to have ceilings to be made of material with a final surface that is impervious to moisture and be able to be cleaned –given that some bail ceilings are up to 20 meters high off the floor what moisture will be in contact with it and practically impossible to be cleaned. Amendment is similar to previous version.	All rooms attached to the farm dairy and including the walls of the milking area are to be made of material with a final surface that is impervious to moisture and be able to be cleaned.	Out of scope of this amendment. Comment will be considered as part of the full 2017 review.
Sub 4	4	4.12 (7)	Consideration given to allow Veterinarians to give alternate directions on suitable storage.	If storage conditions apply to all treatments then consider applying label storage instructions only when in storage (i.e. not in use).	Amended.



Submitter ref	Part	Clause	Submission comment	Submission proposed amendment(s)	MPI Response
Sub 4	4	4.12 (7)	<p>Consideration given for storage conditions to apply to RVM's only. Applying label storage conditions for general treatments (teat sprays, food baths) could make providing storage solutions overly onerous. Some of these products are stored in the dairy as in use. <i>Example: Teat spray label directs the product to be stored "locked up"</i> Storage conditions for non-RVM treatments could in some instances have been assessed without a standard process of assessment.</p>	<p>Recommend clarifying the 'mixed' product storage requirements with ACVM, e.g. teat spray in use in dairy.</p>	<p>Amended to reflect storage prior to preparation for use.</p>
Sub 1	5	5.2.3 (3)	<p>Taking the packaging label when authorisation is attached (e.g sticker attached to the outer packaging)</p>	<p>Not practical.</p>	<p>Noted.</p>



Submitter ref	Part	Clause	Submission comment	Submission proposed amendment(s)	MPI Response
Sub 6	5	5.2.3	<p>This is an area that we are not only trying striving to improve compliance but also have a robust system.</p> <ul style="list-style-type: none"> • While I understand that a “sticky label” on the side of a box of drugs is currently legal, I don’t think it portrays the depth of “Authorisation and Consultation” needed from Vet to Farmer. • We feel it is difficult to historically review the treatments against the Authorisation if it includes some sticky labels. Chances are these are disposed of when drugs are finished with. 	<p>(3) All veterinary authorisations must be retained by the Farm Dairy Operator whether in hard copy or electronic form. If RVMs are to be purchased outside the current Authorisation, then the Authorisation must be updated to include new RVMs.</p>	<p>The amendment as proposed clarifies the ACVM requirements. To restrict the provisions of the ACVM Act will require further consultation. We will consider this as part of the full 2017 review.</p> <p>Guidance has been included to further clarify expectations.</p>
Sub 4	5	5.2.3 (3)	<p>There needs to be clear definition of what is considered acceptable as an authorisation verses manufacturers/suppliers label(s) Consideration should be given to provide direction on the time period that veterinary authorisations must be retained. Reference has been made to a sticker (authorisation) attached to the outer packaging clear guidelines to define what must be included on packaging labels to comply with authorisation requirements. General label instructions are not considered to be an Authorisation.</p>	<p>(3) <i>All veterinary authorisations must be retained by the Farm Dairy Operator whether in hard copy or electronic form for a period of four years.</i> A note stating the stat date for the 4 year retention requirement would be needed.</p>	<p>Guidance has been included to further clarify expectations.</p>



Submitter ref	Part	Clause	Submission comment	Submission proposed amendment(s)	MPI Response
Sub 4	5	5.2.4	Consideration given to allow Veterinarians to give alternate directions on suitable storage.	If storage conditions apply to all treatments then consider applying label storage instructions only when in storage (i.e. not in use).	Amended.
Sub 8	5	5.2.4	<p>We note that not all the new recording requirements (Sn 5.2.4) are on the current checklists dairy companies send to farmers</p> <ul style="list-style-type: none"> We understand the requirement to set standards and for records to be kept. However, the capacity to link in with current electronic data collections and paper based diaries must be factored into the implementation timeline (August 2017) in order to make it simple for farmers to comply with record keeping. If items like the Dairy Diary (in paper form) have already been printed for the next season, then we recommend that implementation of the new recording requirements be postponed until the following season. 		Noted. The additional clauses 5.2.4 (9) and (10) provide options to reduce the recording burden. A farmer may still opt to record any treatment by animal as required previously.



Submitter ref	Part	Clause	Submission comment	Submission proposed amendment(s)	MPI Response
Sub 8	5	5.2.4 (8)-(10)	Some animal treatments that appear in 5.2.4 (8) will be done on a herd basis, rather than an individual basis. We note that new section 5.2.4 (9) manages this, while new section 5.2.4 (10) manages the use of non-Restricted Veterinary Medicines (RVMs) with no withholding periods (WHPs). This simplification is useful as many farmers will question the need to record such things as teat salves and foot baths. However, again, we stress the need to make sure that these can be recorded on databases (both soft and hard) before implementation.		Noted. The additional clauses 5.2.4 (9) and (10) provide options to reduce the recording burden. A farmer may still opt to record any treatment by animal as required previously.
Sub 7	5	5.2.4 (10)	<p>The recording requirements for over the counter treatments is a bit unrealistic and not very practical. Recording of the lot/ batch ID goes far beyond what is required for the even the restricted vet meds. Which for something with no withholding period might be overkill. This is the same for recording the expiry date. This is not required for restricted vet meds only a check to ensure that all expired drugs are discarded.</p> <p>Also recording the last date of use will be problematic as some treatments can be used very frequently, sometimes daily, so after every use a new last date of use is needed? I am not sure that this will work.</p>	<p>10) For treatments used during milking (for example udder creams, teat salves or teat sanitisers) that are not RVMs, and do not require milk withholding, records must include the following:</p> <p>a) the name of the product;</p> <p>b) the condition treated/reason for use;</p> <p>c) the product lot or batch ID and expiry date;</p> <p>d) the dose used if relevant;</p> <p>e) the date first used (for this lot/batch ID); and</p> <p>f) the date last used.</p>	Amended.



Submitter ref	Part	Clause	Submission comment	Submission proposed amendment(s)	MPI Response
Sub 4	5	5.2.4	<p>Consideration given for storage conditions to apply to RVM's only. Applying label storage conditions for general treatments (teat sprays, food baths) could make providing storage solutions overly onerous. Some of these products are stored in the dairy as in use. <i>Example: Teat spray label directs the product to be stored "locked up"</i> Storage conditions for non-RVM treatments could in some instances have been assessed without a standard process of assessment.</p>	<p>Recommend clarifying the 'mixed' product storage requirements with ACVM, e.g. teat spray in use in dairy.</p>	<p>Noted.</p>
Sub 1	5	5.2.4 (7) f	<p>Foot bath has replaced Pesticides. Is this a mistake?</p>		<p>This is an intentional change to reflect that pesticides are not an appropriate animal treatment (as per clause 5.2.4 (1)).</p> <p>If the pesticide also had an ACVM registration as a veterinary medicine (e.g. streptomycin registered for use in animals and in kiwifruit), it would not be considered a pesticide under this clause.</p>
Sub 4	5	5.2.4 (10)	<p>This is a change in information that is required to be recorded is not able to be reflected in quality management documents that have already been published for the coming season, with supporting information to inform and educate farmers on</p>	<p>Note on item 5.2.4 (10) that this is desirable for the coming season (17/19) and will be compulsory (18/19) 10) for treatments used during milking (for example udder creams, teat salves or teat sanitisers) that are not RVMs, and do not</p>	<p>Amended. The additional clauses 5.2.4 (9) and (10) provide options to reduce the recording burden. A farmer may still opt to record any treatment by animal as required previously.</p>



Submitter ref	Part	Clause	Submission comment	Submission proposed amendment(s)	MPI Response
			requirements. Considering that these treatments are not RVMs and no withholding periods are required the proposed amendment on the right is suggested. Since the product is not a RVM the recording of product lot of batch number is considered too much detail and should be removed.	require milk withholding, records must include the following: a) the name of product; b) the condition treated/reason for use; c) expiry date; d) the dose used if relevant; e) the date first used and f) the date last used	
Sub 1	5	5.2.4 (10) a to f	“C” is not covered in our Dairy Diary 2018 – this document has been printed unable to change.		Amended.
Sub 4	5	5.2.5 (3)	This is new and appears to reflect, in general, the application instructions that will be on the product label – as vet meds are required to be used on label why duplicate this in this document?	Remove from NZCP1;	This clause is new and has been included due to ongoing concerns regarding teat sealant administration practices.
Sub 4	5	5.2.5 (4)	The removal (hand stripping) is on some of the labels, a condition of use. Why are label requirements being repeated in this document, (refer to comments above)? Should there be reference to meeting ACVM and label requirements.	Remove from NZCP1 and Recommend/get confirmation from ACVM group that the removal (hand stripping) be included in requirements for conditions for use on label.	Noted. See above comment.
Sub 3	5	5.2.6 (3)	Clarity and removal of the reference to the use of quarter-milkers. This amendment may also be attached to the previous section.	When treated all milk must be withheld even if not all quarters were treated.	Disagree. MPI considers it necessary to be explicit that quarter-milkers are not acceptable.



Submitter ref	Part	Clause	Submission comment	Submission proposed amendment(s)	MPI Response
Sub 4	5	5.2.7	A new requirement, information and education for the farmers cannot be reflected in RMP operator's quality management documents as they have already been published for the coming season.	Note that this is desirable for the coming season and required in the following (18/19).	For clarification, 5.2.7 (1) is unchanged. 5.2.7 (2) provides farmers with more flexibility to manage animal treatments, but will not apply if 5.2.7 (1) is met.
Sub 4	5	5.2.7 (1)	For consistency should include the highlighted text in (1).	(1) Animal treatments must be discarded in a secure manner (e.g. return to treatment supplier) once expired.	Noted.
Sub 4	5	5.2.7 (2)	A new requirement, information and education for the farmers cannot be reflected in RMP operator's quality management documents as they have already been published for the coming season.	(2) Farm Dairy Operators should review all animal treatments at least every 6 months, and: a) remove and discard any expired animal treatments or any products with illegible labels in a secure manner (e.g. return to treatment supplier); and b) the date of the review should be recorded	Disagree. This clause is considered necessary to provide farmers with a practical mechanism to manage expired animals treatments.
Sub 1	5	5.2.7 (2)	Review of treatments at least every 3 months, is not covered in our Dairy Diary 2018 – this document has been printed unable to change.		Noted. Farmers will be required to dispose of expired animal treatments without the qualification provided in clause 5.2.7 (2).
Sub 3	5	5.3	Relevance of the requirements of bobby calf being free from residues within the context of NZCP1 –Design and operation of Farm dairies	Delete (explanation-this requirement is covered under other pertinent stringent legislation)	Out of scope of this amendment. Comment will be considered as part of the full 2017 review.



Submitter ref	Part	Clause	Submission comment	Submission proposed amendment(s)	MPI Response
Sub 3	5	5.5 (10)	More clarity around the use and storage of rodent baits	Rodent baits to be used only in a block form, enclosed in bait stations or similar secured device and in a position to minimize the risk of being picked up and spread by the rodents, dogs, other animals and children. They must not be laid within the dairy or associated buildings. Rodent baits must not be stored within 20 meters of the dairy.	Noted.
Sub 1	5	5.11 (5)	The Teat washing facility is not covered in our Dairy Diary 2018 – this document has been printed unable to change.	Could put in Protocol as a minor with the intension to advise it would move to a major next season.	Noted. This is not a new requirement. The ability to clean teats is considered essential.
Sub 7	5	5.16.1 (2)	Typo – see highlighted text	(2) Milk that has not been cooled in accordance with clauses 5.14 and 5.15 must be withheld from supply. The exception is when the milk has been assessed and confirmed as fit for intended purpose by the RMP Operator / dairy company through measures such as:	Amended.
Sub 4	5	5.16.1 (2)	Additions as highlighted text.	2) Milk that has not been cooled in accordance with clauses 5.14 and 5.15 must be withheld from supply. The exception is when the milk has been assessed and confirmed as fit for intended purpose by the RMP Operator/dairy company through measures such as: a) sensory evaluation; and/or b) microbiological testing; and/or c) titratable acidity; and/or e) a validated risk assessment model	Amended.
					Amended, stating and/or is not required.



Submitter ref	Part	Clause	Submission comment	Submission proposed amendment(s)	MPI Response
Sub 1	5	5.16.1 (2)	The word exception.	Remove the word exception and replace with when milk is collected outside of 5.14 & 5.15. Exception has another meaning when you have an MPI auditor's interpretation.	Amended.
Sub 8	5	5.21.3	We would welcome the statement: ' <i>Routine inductions of dairy cattle are not permitted. Inductions for welfare other recognised purposes are managed through the Operational Guidelines: Induction of Calving.</i> ' This makes it very clear to all parties what is allowed.	<i>Routine inductions of dairy cattle are not permitted. Inductions for welfare other recognised purposes are managed through the Operational Guidelines: Induction of Calving.</i>	Out of scope of this amendment. Comment will be considered as part of the full 2017 review.
Sub 3	6	6.7 (10)	Extra requirement in regard to covering wash tubs as some company's protocols require this. May also be under the MPTA guidelines.	All wash tubs should be covered to prevent the risk of contamination of the wash water.	Out of scope of this amendment. Comment will be considered as part of the full 2017 review.
Sub 1	6	6.16 (1)	The word dry has been removed. This was an issue with MPI this season and all our Dairy Diary & Supplier hand book calls for clean dry teats.	Put it back into clause.	This has been amended at the request of industry.



Submitter ref	Part	Clause	Submission comment	Submission proposed amendment(s)	MPI Response
Sub 5	7	7.6 (1) a)	To identify the issuing body of the recognised Practising Certificate to prevent other entities issuing their own 'Practising Certificate'. NZMPTA holds the Register of approved Registered Testers. Specifying of 'a greater frequency' removes the ambiguity of the former statement which could have allowed for machines to be tested only once every two or three years etc. All machines should be checked, at least, annually.	(1) Milking machine must be tested: a) by a registered milking machine tester with a current NZMPTA Milking Machine Testing Practising Certificate at least once per season or at a greater frequency specified in writing by the registered tester (a full list of registered testers can be viewed at www.nzmpta.co.nz); and b) unchanged	Amended. The current stated frequency is considered appropriate.
Sub 4	11	11.2	This is a new requirement a period to introduce the range is considered necessary to educate equipment providers and farmers and allow for changes in plant.	It is recommended that the communication to suppliers is required from MPI for the 17/18 season. An introduction period for the 18/19 season will be required to allow for retrofitting and new equipment development before RMP operators will be able to include this in farm dairy assessments.	Amended with introduction period for existing farms.
Sub 3	13	13.4.2 (b)	Given that reverse flow wash system is not a recommended cleaning system the wash water guidelines should be removed.	Reverse flow cleaning systems are not a recommended cleaning system.	Out of scope of this amendment. Comment will be considered as part of the full 2017 review.



Submitter ref	Part	Clause	Submission comment	Submission proposed amendment(s)	MPI Response
Sub 6	16	16.1 (7)	<p>(7) Farm Dairy Assessors must rate each finding as it is first observed. If a non-conformance is rectified during the assessment, the assessor will note this down, but the original rating will stand.</p> <p>This is currently a variation to our current practice where the defect is still recorded but if improvement action at the time of the visit is carried out then this becomes the final outcome for the assessment. Both approaches have merit and need full discussion at DITAG over next months with view to change in 18/19 season.</p>		Disagree. The current wording is considered appropriate.
Sub 4	16	16.1 (7)	<p>NZCP2 is better places to clarify how this would work in conjunction with the rest of the assessment.</p> <p>The ability for the Operator to rectify a hazard and then be re-rated is no different to a re-visit two weeks or 24 hours later. The ability to re-rate an assessment gives the ability for the RMP Operator to quickly address the hazards under supervision of the Farm Dairy Assessor. There is also an incentive for the Operator to rectify the hazard. we contend that a “note” on the assessment is not sufficient to close a hazard.</p>	<p>7) Farm Dairy Assessors must rate each finding as it is first observed. If a non-conformance is rectified during the assessment, the report must show that hazard has been removed and the section score should show it has been re-classified. The original hazard and section rating must also be on the assessment report.</p>	Noted. This statement provides advice for Farm Dairy Operators while NZCP2 is directed at Farm Dairy Assessors.
Sub 1	16	16.2 (1)	MPI require FDA to undertake	This should read; “RMP Operators” not MPI.	Amended.



Submitter ref	Part	Clause	Submission comment	Submission proposed amendment(s)	MPI Response
Sub 2	16	16.2 (2)	<p>Unannounced Farm dairy assessments- Below is what is proposed. However under NZCP2 there is different wording. Should these be aligned?</p> <p>(2) For unannounced assessments, the Farm Dairy Assessor may provide very short notice of the upcoming assessment.</p>	<p>Un-notified Assessment At least 5% of farm dairies covered by the RMP must receive an un-notified assessment. For this assessment advance notification is to be limited to less than 6 hours. Un-notified assessments may be limited to inspection of facilities and equipment unless the Farm Dairy Operator is present. NZCP2</p>	Amended.