



**Summary of Submissions on the
Proposed Processing of Poultry Operational Code Part 2 Good Operating Practice**

31 October 2017

The Ministry for Primary Industries (MPI) received one submission on the proposed document Operational Code- Processing of Poultry, Part 2 Good Operating Practice. The submission has 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 has developed a consolidated Operational Code – Processing of Poultry Part 2 Good Operating Practice (Code). The Code is written for operators who process poultry products for human consumption (and animal consumption), where produced on the same site. The Code describes good operating practices designed to help ensure that the processing of poultry results in products that are wholesome and fit for their intended purpose. The Code combined the following previously published chapters of the existing code;

- Part 2, Chapter 2: Repairs and maintenance
- Part 2, Chapter 3: Hygiene and sanitation
- Part 2, Chapter 5: Slaughter and dressing
- Part 2, Chapter 9: Secondary processing

into a single document. New chapters about generic good operating practices and those for design and construction have also been included in the COP. The Code was also updated to reflect the current legislation including the *Animal products specifications for products intended for human consumption notice 2016* and the *Australia New Zealand food standards code*.

MPI received one submission on the draft Code. It was from an industry organisation that represents many poultry processors. Their comments together with MPI's responses are presented in the following table.

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

Part	Clause	Comment	MPI Response
General		The clause numbering should be consecutive throughout the document – not limited to each part, specific items would then be much easier to find from the contents page.	Noted. The clause numbering has been amended accordingly so it is consecutive throughout the document. The order of the clauses has also been amended for a logical structure.
General		There is much repetition, only one corrective action, verification etc. clause (or series of clauses) is needed – this would both shorten the document and make it clearer.	Noted. MPI has put generic clauses at the start, and have more specific clauses later on.
General		The reprinting of clauses from other documents, and the reference to specific clauses in other documents – previous experience has indicated that MPI does not have the resources to update these when the referenced document changes. It would be simpler, and future proof the document if the name of the reference document only was given – the reader could then find the relevant clauses from the contents page of the document.	Noted. The clause referencing is consistent with MPI's requirements and guidance programme.
General		The guidance boxes should contain relevant information about industry practice – this is not always the case.	Noted. MPI will recheck guidance boxes to ensure guidance is relevant to both standard throughput and very low throughput poultry operators.
General		Comments on animal welfare and Weights and Measures requirements are surely out of scope for this Code of Practice. If required a comment in the introduction will maybe suffice.	Noted. MPI will refer to principal documents and clarify references at the Introduction section of the document.
Page 34		The calibration of thermocouples and data loggers is far too complex for most operators – better to advise that a calibration service is used.	Noted. Document has been amended accordingly.
Page 51	13.3(1)	Water in contact with poultry must be potable. The water in the pre-wash section of an immersion chiller could not be considered to be potable. Perhaps this clause should be re-worded. Clause 2 permits an alternative standard but later clauses repeat the error. There is no logical reason why water used in slaughter and dressing needs to be potable, it has relatively high levels of antimicrobials and many sites are looking to recycle water into these systems. Any contact with water after immersion chilling and post chill dips and water used as an ingredient may need to be potable but water used before the end of primary chilling/decontamination would not, and should not need to meet this requirement.	Noted. However, the Animal Products Notice: Specifications for Products Intended for Human Consumption 20016 mandates that water that comes into direct contact or indirect contact with animal material or animal product must be potable water, at the point of use. Therefore water coming in contact with poultry at all stages of processing must be potable. MPI are currently not in position to change this requirement. However, MPI are considering a proposal to allow poultry processor to process following a 'boil water alert'.
Page 56	13.9	Procedures are required to alleviate the significant animal welfare issues that would be the consequence of a boil water notice applied to a poultry processing plant. An agreement from MPI is sought due	Proposal to allow processing to continue after a 'Boil Water notice" is still under consideration and therefore the section of the Code has not changed. MPI will review this section

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		to the very short timescale between receipt of the notice and subsequent breaches of the animal welfare code that would ensue. The limited processing that would be applied, if agreed, should be written into this section of the document	once the proposal has been reviewed. Therefore the current wording of the section needs to remain in the Code to comply with the Animal Products Notice: Specifications for Products Intended for Human Consumption 20016.
Page 83	4.4(1)	Requirement for resinous materials to meet CFR 21 standards. The requirement should allow other relevant standards – such as materials complying with the relevant EU directives – much processing machinery comes out of Europe.	Noted. Document has been amended accordingly.
Page 86	4.9(2)	Not sure about lubricants complying with the ACVM act. Compliance with MPI's Approved Maintenance Compounds (Non-Dairy) Manual is probably more appropriate	Noted. Document has been amended accordingly.
Page 89	4.10.4.3	Not all pieces of plant (e.g. spiral freezers) are CIP cleaned daily. Can this clause please be changed to disassembled after each clean, rather than daily?	Noted. Document has been amended accordingly.
Page 92	7.7.2	Not sure what the intent of this clause is, most plants do not have birds in the lairage following hanging.	Noted. Clarified wording so intent is clear.
Page 95	9.3(2)	This clause refers to red meat rather than poultry, should be changed to carcasses and portions	Noted. Document has been amended accordingly.
Page 119	1.10.2 Guidance	The frequency of cleaning and sanitising of storage chillers where the product is fully packed – monthly is not tenable, nor normal industry practice. Chillers of this type rarely (if ever) need sanitising and individual bays are dry cleaned when empty, the aisles are cleaned more regularly.	Noted. This is for guidance only, and the content has not been changed from the Poultry Code of Practice Chapter 3 in 2009. The outcome chillers and freezers should be cleaned and sanitised at a frequency specified in the cleaning and sanitation programme.
Page 124	1.4.1	Some plants operate continuously (no breaks), the provision in this clause has proved unnecessary and has no impact on the microbiological outcome. Clause should be removed.	Disagree. Automated equipment especially equipment involved evisceration and cropping needs to be rinsed between every carcass to prevent cross contamination.
Page 125	1.5.2	Decontamination by trimming or skinning is not common practice in the industry and heavily contaminated product is disposed of as unfit for human consumption. Knife sanitisers or sterilisers are not normally fitted to the bird wash stations. References to trimming or skinning in this context should be removed.	Disagree. This content was agreed upon during Poultry Code of Practice Chapter 5 consultation in 2007, it has not changed since then. This standard is still applicable to poultry operations.
Page 127	1.6.1 Last Point in Guidance	Slowing down an automated line to deal with full crops makes no difference to the outcome. Can this point please be modified to refer to manual processing lines only?	Noted. This is for guidance, and the content was agreed upon during the Poultry Code of Practice Chapter 3 consultation in 2009, it has not changed since then.

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Page 127	1.7 Guidance	Blood is only a very minor contributor to the organic loading of the scald, the major source is the faecal matter clinging to feathers. There will also be no impact on red birds – there will only be light bleeding by the time the bird enters the scald. Perhaps this guidance box should be removed	Noted. This is for guidance only, have expanded guidance to include faecal in feathers contribute organic loading.
Page 128	1.8 Guidance	Hard scald, temperatures >55C provide a significant log reduction in Campylobacter. Below 55C the log reduction is reduced.	Noted. Additional bullet point is provided for guidance.
Appendix 2		The first part of this appendix is very difficult to read.	Noted. Document has been amended accordingly.