

**Summary of submissions on the proposed animal products notices and changes to control schemes for transport and handling of export products 2017**

1<sup>st</sup> May 2018

MPI received three submissions received on the notices for transport and handling of export products. 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 were made to the notices. MPI would like to thank the parties who have taken the opportunity to comment on the revised notices.

Points MPI would like feedback on			MPI Response
1	Is this level of detail appropriate for transport and wharves operators?	Yes	Noted
2	Are the technical aspects correct?	No I don't consider point 3.3.(2) a) as correct and impossible to comply with for LCL product	Noted. Discussed below. 3.3 (2) refers to the maximum time for refrigerated goods is 12 hours. (LCL = Less than Container Load)
3	Are there parts of the RCS that need only apply to couriers?		

**Export Requirements for Transportation of Products for Export with an Official Assurance: No feedback was received.**

**Schedule 1 of the Export Verification Requirements (Discussion Document): No feedback was received.**

**Regulated Control Scheme – Transportation and Handling of Products for Export with an Official Assurance:**

Part	Clause	Comment	Proposed amendment	MPI Response
Prime purpose of the scheme	1.2	As stated in our objection to section 2.2-2.4, it is our opinion that these requirements are in excess to that which is necessary to achieve the stated goals of this section. The use of ED's, stating the name of the transport operator, seals on product, recording transport information and the checking of product on arrival negates all the risks mentioned and does not require the transport operator to run an RCS or RMP.		<p>The (market access) requirements are intended to ensure that all animal products transported from premises to premises and transhipped through a VDF remain within the regulatory system and thus remain eligible for export with an official assurance.</p> <p>Under the <i>Official Assurances Specifications for Animal Material and Animal Products Notice</i> operators must use E-cert to obtain official assurances. The Animal Products E-cert system requires the entry of an RMP or RCS identification in order to generate an ED.</p>
Registration under the regulated control scheme	2.2 – 2.4	<p>It is our opinion that traceability of honey product can be achieved without requiring transport operators to be registered or operator under RMPs. The risk with bulk honey can be minimised by the utilisation of seals on drum – and the risk of contamination with retail packed product is already minimal.</p> <p>All of the transport operators we work with already have consignment tracking in place and the likelihood of contamination during movement is low.</p>		<p>Noted.</p> <p>This is out of the scope for this particular consultation.</p> <p>There have been incidents where animal products have been stored and or transported outside the regulatory system resulting in dispensation requests for official assurances or limited exemptions.</p> <p>The Animal Products Act 1999 specifies that to enable the export of e.g. honey products into overseas markets with official assurances the control of an RCS or RMP are needed to ensure oversight, verification etc.</p>

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Operator Requirements	3.2 (2)		Wording should change to state the - Exporter shall provide clearly labelled carton or pallet to identify the product is for export, or documentation clearly identifying the products export status on collection.	Noted. This is out of the scope of this particular consultation however a suggestion has been forwarded to the MPI team responsible for the Official Assurance Specifications for their consideration when it is next reviewed.
Operator Requirements	3.3	This section requires clarification. Would it include the final freight forwarder prior to export? If so 24 hours is a very limited time frame for a non-perishable product. We have often had instances in which for various reasons we have had to roll over shipment dates and have had honey remain at a freight forwarders for 48hrs or longer.		A final freighter forwarder would be airport holding facility (AHF) e.g. DHL ELF at the airport in the export chain. This clause applies to depots that tranship relevant goods.
Operator Requirements	3.3 (2) (a)	We require the following clause to operate in the NZ landscape – Product moving from Chch to Auckland for consolidation can incur a transit during a weekend at a VDF. At certain time of the year there is not enough transport units to hold or move all export products within 12 hours. To coordinate loads product is consolidated into loads. These can result in a 24 hour turnaround time depending on destination and location.	Wording we would prefer and per original document: Transshipment of relevant goods at a depot during a journey must not exceed 24 hours or a weekend, which is the maximum.	Continuous product transfer is a market access requirement. MPI is proposing to provide some flexibility for product transfer at a depot with 12 and 24 hour rules for RCS holders to improve the number of non-compliances. This is as far as MPI can go in terms of flexibility at this time. As an alternative those holding RMPs have greater flexibility in that they can have storage as part of their operations and have their store listed by the country concerned if needed. It is a commercial decision whether to have a registered RCS or RMP.

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		Please note these are all LCL - not full loads.		
Additional requirements for refrigerated relevant goods	5.4 (1) iii		This wording should change to record the set point of the unit. The reason for this is the unit temperature will change during loading and the set point is more important because we are already recording the product temp at loading.	The clause has been amended to reflect the requirement to record both set point and loading point temperatures.
		<p>NZ Beekeeping Inc., contends that the requirement for honey to be subject to the provisions of the Animal Products Notice: Regulated Control Scheme-transportation and handling of Products for Export with an Official Assurance, is substantially more than is required to transport such a low risk commodity.</p> <p>NZ Beekeeping recommend that MPI grants an exemption for beekeepers and transport operators, under the Animal Products Act sec 167 (1) (a) to transport honey and bee products under the requirements of the RMP or RCS – transport and handling requirements.</p> <p>In proposing that honey is exempt from the regulations NZ Beekeeping envisage</p>		<p>Noted.</p> <p>This is out of the scope for this particular consultation.</p> <p>The Animal Products Act 1999 specifies that to enable the export of animal products, e.g. honey products, into overseas markets with official assurances that the products need to be controlled by RCS or RMP to ensure oversight, verification, etc. The RCS provides an alternative to an RMP.</p> <p>This type of market access measure provides confidence to NZ’s overseas trading partners on NZ’s systems. It is not based on the level of risk of the product per se, rather it is about the controls over product movement within NZ through oversight, verification etc.</p>

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		<p>there will be no compromise to the fitness of the honey for human consumption and thus still eligible for Official Assurance by MPI. NZ Beekeeping consider the purpose of the RCS (Part 1.2) will be able to be carried out by non RCS Transport operators and appears to be part of the normal service offered by most freight operators. With respect to product substitution – NZ Beekeeping find it strange that there is a suggestion product could be substituted without the knowledge of generally reputable people in the freight companies. NZ Beekeeping seeks further clarification how and for what benefit has ‘substitution’ of product occurred to necessitate the inclusion of this provision into the regulations.</p>		<p>Noted.            APA s 167 (1)(a) and s14(1) allow for limited exemption but not for a permanent exemption as you suggest. A change would be needed through an Order by Council (ie at regulation level by government) which is out of scope of this review.</p>
		<p>Could you please explain to us why you consider it necessary for the transporting of honey should be controlled by RMPs and RCSs and therefore putting up the cost of the product to the consumer?</p> <p>One again, I retreat that I support fully the submission sent by New Zealand Beekeeping Inc. representing the views of their members. This association is the</p>	<p>MPI, please grant exemptions to the New Zealand Beekeeping industry and to the Transport Industry from these Transport RCS and RMP requirements</p>	<p>As above.</p>

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		association which truly represents NZ beekeepers.		