



Memorandum

To: Risk management programme operators (products intended for human consumption)
Listed game estate operators
Recognised evaluators and verifiers
Certified suppliers and certified game estate suppliers
AsureQuality Ltd
Meat Industry Association of New Zealand
Retail Meat New Zealand, Abattoir Association of NZ
National Beekeepers Association
Poultry Industry Association of New Zealand
Egg Producers Federation
New Zealand Pork
Seafood New Zealand
Deer Industry New Zealand
Federated Farmers of New Zealand
OSPRI New Zealand
New Zealand Cold Store Association
Road Transport Forum NZ Inc
Game Estate Association
The New Zealand Food and Grocery Council

Cc: Scott Gallacher, Deputy Director General, Regulation & Assurance, MPI
Matthew Stone, Director Animal and Animal Products, Regulation & Assurance, MPI
Chris Mawson, Manager Agency Technical, Verification Services, MPI
Melinda Sando, Manager Food Compliance, MPI

From: Judy Barker, Manager Animal Products, Regulation & Assurance, MPI

Date: 7 April 2015

Subject: **Proposed amendments to the Animal Products (Specifications for Products Intended for Human Consumption) Notice 2013 (HC Spec)**

Background

The Animal Products (Specifications for Products Intended for Human Consumption) Notice (the notice), which was first issued in 2000, applies to operators and other specified persons supplying and processing animal product for human consumption under the Animal Products Act (APA).

Since 2000 a series of amendments have been made to the notice to introduce new requirements, address changes in technical processing requirements, improve the robustness of the regulatory controls, remove requirements that were no longer necessary and to amend drafting and other errors.

Certain aspects of the notice have once again been reviewed, resulting in a number of proposed amendments. Details of the proposals and the reasoning for them can be seen in the accompanying table. A draft of the proposed notice is also provided to better clarify the proposed wording. These documents should be read in conjunction with the current version of the notice, available on the website at the following address: <http://www.foodsafety.govt.nz/elibrary/industry/animal-products-specifications-asd/Animal-Products-Specification-for-Products-Intended-for-Human-Consumption-Notice-2013.pdf>

Notice format

MPI has undertaken a programme to standardise the format of the requirements documents issued by MPI (including notices under the APA). Consequently, this notice will be published using the new template. A key change resulting from the use of this template is the clause numbering. All clause numbering will be changed and additional titles may be added to clarify their application. To assist in referencing between the clauses of

the current and new notice during consultation, the current clause numbering has been included in square brackets beside the main headings. All cross referencing within the clauses have also been left unchanged. The current numbering will be removed when the notice is finalised and all clause numbers and cross references will be updated. However, if your risk management programme (RMP) references particular clauses within the current notice, these will need to be updated. Also it is likely that future amendments to the notice that involve deleting or including clauses will result in the renumbering of the notice, rather than as has previously been the case, new clauses have been inserted or clauses deleted without impacting on the numbering in the remainder of the notice. This needs to be considered when deciding on how to best reference clauses from the notice in your RMP.

Proposed amendments

The proposals in this amendment are wide ranging covering many aspects that are relevant to many processors. It is recommended that you take the time to review the contents of these proposals. Some of the proposals that you should be aware of are:

- removing the need for the specified earmark for animals treated with Johne's disease vaccine
- requiring a listeria management programme for certain ready to eat product processors
- updating terminology in relation to veterinary medicines
- clarifying the legal requirements around listing of animal material depots
- changes to the wording in relation to the processing of farmed mammals
- traceability requirements for deer antler
- changes to the requirements for casing and mechanically separated meat
- additional requirements for layer farms and egg processors
- providing for the ability for animal status declarations (ASDs) to be submitted electronically and clarifying the record keeping requirements for ASDs
- clarifying that canning of low acid canned foods includes aseptic processing and packaging operations and including the two Codex documents that apply to aseptic processing in the notice. Also the inclusion of additional courses for the canning industry and for aseptic processors.
- updates to the requirements for bivalve molluscan shellfish

Next steps

You are invited to comment on these proposals by 22 May 2015.

Submitters should include the following information with their submission:

- the name and title of the submitter;
- organisation/company name, where applicable;
- address and contact details (phone, and e-mail, if available);
- name and title of the clause being commented on, where appropriate.

A template has been provided to assist you in completing your submission. Using this table to submit your comments will help us with the analysis of submissions.

Submissions should be addressed to:

Animal Products
Ministry for Primary Industries

PO Box 2526

Wellington 6140; or

Email: animal.products@mpi.govt.nz

All submissions are subject to the Official Information Act 1982. Therefore if you consider that all or part of your submission is commercially sensitive or should be treated as confidential, please state this clearly when making your submission and indicate which of the grounds within the Official Information Act for withholding information you believe applies. MPI will take your request into account when determining whether or not to release information. Please note that any decision by MPI to withhold information is able to be reviewed by the Ombudsman.

Yours sincerely

[Signed]

Judy Barker
Manager Animal Products
Regulation & Assurance

**Template for Comments on the proposed amendments to the
Animal Products (Specifications for Products Intended for Human Consumption) Notice 2013**

Please use this table for making your comments for this review.

Name and title:

Organisation's name (if applicable):

Address and contact details (e.g. phone, email):

1. Please identify which clause(s) your comment(s) relates to.
2. Use a separate row(s) for each comment relating to a different clause.

[illegible]