

Response to submission received

for the consultation on the Wine Notice: Recognised Agencies and Persons

1 submission was received during the consultation period to 13 June 2014. MPI's response to this submission is summarised below.

2010 Notice References	Details	2014 Notice References	Proposed amendment for 2014 notice	Submission & MPI response
<p>Part 2 Recognised Agencies – clause 7</p>	<p>(2) The period for temporary recognition is on or before 1 July 2014</p>	<p>Part 2.1 Becoming a recognised agency – 2.1 (2)</p>	<p>(2) The period for temporary recognition is on or before 1 July 2017</p>	<p>Submission The timeframe for temporary recognition be moved to 1 July <u>2015</u> from 1 July 2014.</p> <p><i>Rationale:</i> It is important to ensure that recognised agencies are operating in a consistent and calibrated manner to maintain the ongoing credibility of the Wine Standards Management Plans (WSMP). This is best achieved by accreditation to ISO 17020 as an independent Type A inspection body. The Wine Notice has highlighted the move toward this objective for a number of years.</p> <p>MPI operates other programmes under the auspices of ISO 17020 e.g. dairy regulatory, domestic food, organics, IVA, live animal exports and this degree of accreditation has proven invaluable when programmes have been subject to overseas scrutiny both routine and in response to incidents. Failing to apply an equal regime to the WSMP leaves MPI vulnerable in the event of overseas scrutiny through the application of lesser standards to WSMP verifiers.</p>

				<p>A further extension of 1 year, coupled with the period already passed, as proposed by our submission, will give recognised agencies and their recognised persons enough time to be accredited.</p> <p>MPI Response</p> <p>Temporary recognition for agencies has been extended from 1 July 2014 to 1 July 2017. This is to allow requirements for final recognition to be considered by MPI and consulted on before being included in subsequent versions of this Notice.</p> <p>This time frame is needed for MPI to thoroughly explore ISO17020 accreditation and alternatives for presentation in further discussion papers for subsequent versions of this Notice. Final accreditation requirements would need to be consulted on publically so time needs to be given for this also. Accreditation to ISO17020 is just 1 option for final recognition.</p> <p>Time needs to also be given for agencies to obtain accreditation on the option chosen for 'final recognition' requirements. MPI also needs to ensure there are sufficient verifiers in New Zealand's key winemaking regions.</p> <p>Consideration will also be given to proposed requirements for agencies and persons under the Food Act 2014 and the possibility of aligning with these.</p>
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