**Proposed amendments to the**
**Animal Products Notice: Specifications for Products Intended for Animal Consumption**

**General issues and comments**

1. The Notice has been updated to reflect the correct names/dates of publication of some references (e.g. BMS Notice 2018), the use of acronyms for risk management programme (RMP), animal status declaration (ASD), etc.
2. Plain English has been applied, where appropriate, including making headings more meaningful, shorter sentences, active voice (e.g. ‘the operator must…..’ etc).
3. Changes are shown using track changes wherever practical. Changes to cross references have not been tracked and hyperlinks inserted where applicable.

**Forms that have been updated**

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| --- | --- |
| **Forms** | **Comment** |
| Draft ante-mortem examination declaration – petfood | General update reflecting proposed changes in the Notice.  |
| Draft farmed mammal supplier statement – petfood | Update reflecting proposed changes in section 7.3 Supply of Farmed Animals in the Notice.  |
| Draft wild mammal material supplier statement – petfood  | General update reflecting proposed changes in the Notice. |
| Draft supplier statement for supply of farmed fish  | New supplier statement form introduced as part of propose changes in the Notice. The same form is used for both animal consumption and human consumption.  |
| Draft supplier statement for supply of farmed poultry  | New supplier statement form introduced as part of propose changes in the Notice. The same form is used for both animal consumption and human consumption. |

**Abbreviations used in this document:**

|  |  |
| --- | --- |
| AP Reg | [Animal Product Regulations 2000](http://www.legislation.govt.nz/regulation/public/2000/0207/latest/DLM9546.html) |
| HC Spec  | [Animal Products Notice: Specifications for Products Intended for Human Consumption 2016](https://www.mpi.govt.nz/dmsdocument/11497-animal-products-notice-specifications-for-products-intended-for-human-consumption) |
| Poultry AM PM Spec  | [Animal Products (Specifications for the Ante-Mortem and Post-Mortem Examination of Poultry Intended for Human or Animal Consumption) Notice 2005](https://www.mpi.govt.nz/dmsdocument/2566-animal-products-specifications-for-the-ante-mortem-and-postmortem-examination-of-poultry-intended-for-human-or-animal-consumption-notice-2005) |
| Codes | Operational Codes or Codes of Practice issued under the Animal Products Act. This includes The [Operational Code: Petfood Processing](https://www.mpi.govt.nz/dmsdocument/23965-operational-code-petfood-processing).  |
| ACVM Act  | [Agricultural Compounds and Veterinary Medicines Act 1997](http://legislation.govt.nz/act/public/1997/0087/75.0/DLM414577.html)  |

**Part 1**

| **Clause**  | **Proposed Amendment**  | **Reason**  |
| --- | --- | --- |
| Amendment  | New section as this is an Amendment Notice.  |
| Background  | General summary of the changes to the Notice.  |
| Other information  | References has been made to the [AAFCO Pet Food Labelling Guide](https://www.aafco.org/Publications/Pet-Food-Labeling-Guide) and [FEDIAF Nutritional Guidelines](http://www.fediaf.org/self-regulation/nutrition.html) as useful guidelines for operators who are intended to export animal material and animal product intended for animal consumption.  |
| 1.1  | Removal of the packaging standards. To update the references to the examination tables and post-mortem disposition tables. To update references to the 2018 Ministry of Health Communicable Disease Manual.  | The changes are to reflect the technical changes proposed in the Notice. |
| 1.2 | Amended, new or deleted definitions are proposed. See below.  | Additions, deletions and changes to current definitions are proposed to better clarify, avoid confusion and to remove any doubt or align with other applicable legislation. Some of the changes are shown with ~~strikethrough~~ or yellow highlighting below.  |
| 1.3 | Reworded.  | To provide clarity when shared facilities or equipment are used for both human and animal consumption. This also aligns with the proposed HC Spec.  |

**Definitions**

| **The following definitions have been amended**  | **Reason**  |
| --- | --- |
| **~~animal product operator~~** ~~means an operator who processes animal material or product for animal consumption under a risk management programme and includes without limitation:~~* 1. ~~petfood operators other than those to whom Part 9 applies;~~
	2. ~~rendering operators;~~

~~and~~ **~~operator~~** ~~when used in this notice has a corresponding meaning~~ | Definition amended to be consistent with the HC Spec. Replaced with: **operator** or **RMP operator**, means a person who operates an animal product business that is subject to a registered risk management programme |
| **ASD** or **animal status declaration** means a declaration relating to farmed ostriches, farmed emus and farmed mammals other than pigs in a form approved by the Director-General | ASDs are referred to in the Notice and needs to be defined. This definition has been taken from the HC Spec. |
| **approved supplier** means a person who is assessed by an ~~animal product~~ operator under clause 3.16(3) as competent in accordance with clause 7.11 to supply killed wild mammals ~~rabbits, hares, wallabies, possums, goats or deer~~ | Summarise the list of animals to ‘mammals’ for more species of wild mammals to be included. Definition of ‘wild mammals’ has been added in.  |
| **commercially sterilised/commercial sterilisation** means the condition achieved by application of heat, sufficient alone or in combination with other appropriate treatments to render the product free of microorganisms capable of growing under normal non-refrigerated conditions in which the product is likely to be held during distribution and storage | These new definitions explains the terms and align with the proposed HC Spec.  |
| **critical measurement** means a measurement of a parameter that is identified in an RMP as critical for the suitability for processing or fitness for intended purpose of animal material, animal product or associated things | This new definition explains the term and aligns with the proposed HC Spec.  |
| **document** (verb) means to include in writing e.g. procedures for an RMP**documented procedure** means a written, printed or electronic description of a process or system that is followed by the operator | These new definitions clarify what is meant for ‘document’ for Part 9: Programmes and Record Keeping – note definition for ‘documented procedure’ and ‘programme’.These definitions align with the proposed HC Spec. |
| **farmed animals** include farmed mammals, farmed ratites (such as emus and ostriches), and farmed poultry **farmed poultry** includes chicken, turkeys, ducks, pheasants, quail, geese, pigeons, partridges, guinea fowl and other game birds, but excludes ratites, such as emus and ostriches | Alignment of classifications with HC Spec and Poultry AM PM Spec.  |
| **generally fit and healthy** means that an animal displays signs or behaviour of being ~~reasonably~~ bright and alert and does not display signs or behaviour of being moribund or ~~behaviour or signs that would suggest the animal to be~~ infected with disease that would exclude it from being fit for purpose for processing ~~as animal consumption~~  | Plain English update.  |
| **GPS** (global positioning system) is a system for determining positions on the Earth’s surface**GPS data** in relation to hunting, means electronically generated data that includes:* 1. the date of hunting; and
	2. the waypoints; and
	3. in the case of ground hunting trips, the GPS co-ordinates in NZTM2000 and time at both the commencement and the completion of hunting; and
	4. in the case of helicopter operations, the GPS co-ordinates in NZTM2000, altitude and time, taken at a maximum of 10-second intervals for the duration of the flight during which the hunting occurred
 | These new definitions explain the terms and have been taken from the HC Spec.  |
| **lot** or **batch** meansa quantity of animal material or animal product that has been produced and handled under uniform conditions within a limited period of time | This definition from the Food Standards Code has been added in. |
| **low-acid commercially sterilised product** means:1. other than an alcoholic beverage, where any component has a pH value greater than 4.6 after heat processing, and a water activity (aw) greater than 0.85, but does not include animal product in a hermetically sealed container that is required to be stored under refrigeration; and
2. is processed and packed in accordance with good manufacturing practice; and
3. is packed in clean or sterilised containers that are hermetically sealed; and
4. is processed by heat to ensure preservation, whether before or after being sealed in a container
5. ~~any animal product, other than an alcoholic beverage, where any component has a pH value greater than 4.6 after heat processing, and a water activity greater than 0.85; but~~
6. ~~does not include animal product in hermetically sealed containers that is required to be stored under refrigeration~~
 | This new definition replaces ‘low -acid product’ and has been amended to cover more than just canned product. This definition aligns with the proposed HC Spec. |
| **maximum permissible level (MPL)** means the maximum permissible level at which a substance may be present in animal material or animal product as specified in the current edition of the Animal Products Notice Contaminant Specifications 2016 ~~Animal Products (Contaminant Specifications) Notice 2008, as that notice may be modified or replaced under section 167 of the Act~~**maximum residue limit (MRL)** means, in relation to a residue, the maximum permissible level of that residue as specified in the current edition of the Food Notice Maximum Residue Levels for Agricultural Compounds 2018 ~~New Zealand (Maximum Residue Limits of Agricultural Compounds) Food Standards 2013, as that standard may be modified or replaced under section 11C of the Food Act 1981 (or the equivalent provision of the Food Act 2014 on commencement of that provision)~~ | Amended definition to include the latest editions of the Notices. |
| **meat** means all parts of an animal that are intended for, or have been judged as fit for animal consumption (e.g. offal)  | This definition clarifies the meaning of this term and is from the proposed HC Spec has been added in.Clarification that offal is included under the definition.  |
| **NAIT** means the National Animal Identification and Tracing system | New definition to improve clarity for the use of this acronym.This definition aligns with the proposed HC Spec.  |
| **non-complying product** meansany product or input that fails to comply with requirements in this Notice | New definition to improve clarity for the use of this acronym.This definition aligns with the proposed HC Spec.  |
| **NZQA** means New Zealand Qualifications Authority**NZTM2000** means New Zealand Transverse Mercator 2000**NTU** means nephelometric turbidity unit | New definitions to improve clarity for the use of these acronyms. Theses definitions align with the HC Spec.  |
| **on-farm slaughter** means the slaughter of a farmed animal on the animal supplier’s farm, but excludes:* 1. homekill; and
	2. the slaughter of any farmed animal undertaken by a mobile slaughter operator
 | This definition from the Operational Code: Petfood Processing has been added in. |
| **operator verification** means the application of methods, procedures, tests and other checks by an operator to validate the RMP and to confirm the ongoing:* 1. compliance of the RMP with the legislative requirements; and
	2. compliance of the operation with RMP as written; and
	3. applicability of the RMP to the operation;

Note: this forms part of confirmation as described in section 17 (3)(f) of the Act | This definition has been included for 3.28 Operator Verification which aligns with the proposed HC Spec.  |
| **personnel** includes owners, directors, staff, visitors and contractors | New definition to improve clarity for the use of this term. This definition aligns with the proposed HC Spec. |
| **~~petfood~~** ~~means animal product intended for consumption by pets~~  | This definition has been removed to improve clarity on the catergorisation of raw animal material as either minimal risk raw material, medium risk raw material or high risk raw material.  |
| **preservation temperature** in relation to particular refrigerated animal material or animal product, means the range of temperatures specified in regulations or notices made under the Act or otherwise as specified by the consignor, at which the animal material and animal product’s fitness for intended purpose is preserved | New definition to clarify the use of this term and aligns with other Notices.This definition aligns with the proposed HC Spec.  |
| **RMP** stands for risk management programme and has the meaning given by section 12, and, except in Part 2, is to be taken to refer to a registered risk management programme  | New definition to improve clarity for the use of this term. |
| **sanitise** means the application of an approved maintenance compound or physical agent (e.g. steam or compressed air or water blasting or a combination of these), with the intention of reducing microbial contamination to a level that would avoid the creation of a hazard ~~or maintenance compound, which is either an approved maintenance compound or an alternative maintenance compound within the scope of clause 3.14 (2), to minimise microbial contamination~~ | This definition aligns with the proposed HC Spec. |
| **suitably skilled person** means a person who in the opinion of the operator is skilled in a particular activity or task through training, experience or qualifications | New definition to improve clarity for the use of this term. |
| **supplier** means the owner or person in charge of the animals other than the person solely engaged in facilitating their transfer (such as a transport operator or purchasing agent). A saleyard operator may be a supplier ~~in relation to the supply of animals, means the owner or person in charge of animals who supplies these animals to the animal product operator, other than a person solely engaged in facilitating the transfer of animals such as a transport firm or purchasing agent, and includes a salesyard operator~~**supplier statement** means a statement in the form and manner approved by the Director-General which is signed by a supplier to confirm that certain requirements of these specifications have been met, and includes electronic supplier statements for farmed animals* 1. ~~in respect of farmed animals, the:~~
		1. ~~Animal Status Declaration; or (if applicable)~~
		2. ~~Farmed Mammal Supplier Statement - Petfood~~
	2. ~~in respect of killed wild rabbits, hares, wallabies, possums, goats or deer means the Wild Mammal Material Supplier Statement – Petfood;~~

~~which are signed by a supplier or occupier of premises to affirm that the requirements of these specifications are met~~  | Updated for plain English and aligns with the HC Spec. |
| **topographical** **map** means a map to a standard 1:50 000 scale | New definition to improve the clarity of this term. This definition aligns with the HC Spec.  |
| **~~transport operator~~** ~~means any person or business that engages in the transport of animal material or product between places or premises within New Zealand and includes courier operations and subcontractors who are used intermittently~~ | Definition removed to minimise confusion.  |
| **transportation unit** means a container, or a compartment, part of a vehicle, or vessel (includes a road vehicle, aircraft, railway wagon, ship, shipping container, bulk tank or trailer) used in the transport of animal material or product ~~includes vehicles, aircraft, railway wagons, ships, shipping containers, bulk bins, bulk tanks, trailers and any other form of transport used in the transport of animal material or product~~ | New definition to improve the clarity of this term. This definition aligns with the HC Spec. |
| **wild mammals** including but not limited to rabbits, hares, wallabies, possums, pigs, goats and deer | New definition to improve clarity for the use of this term. |
| **young calf** or **bobby calf** means* 1. a bovine that has not had milk (or milk replacer) permanently removed from its diet;
	2. is up to 14 days of age and
	3. it has been separated from its mother
 | New definitions to clarify the use of this term and align with other Notices and the Animal Welfare Act.  |

**Part 3 and onwards**

| **Part**  | **Clause**  | **Proposed Amendment**  | **Reason**  |
| --- | --- | --- | --- |
| Categorisation of raw material  | 2.2(1)  | Amend bullet point (c) to specify farmed animals.  | Add clarification to which animals this bullet point applies to and the new definition for farmed animals (refer to 1.2 Definitions).  |
| Operator requirements: design and construction | 3.1(2)  | Added clarification that this Part does not apply to further (petfood) processors but they are encouraged to meet these requirements.  |
| 3.2(1) and (2)  | This section has been reworded so the focus is on sanitary design.  | This aligns with the HC Spec.  |
| Facilities and equipment | 3.3 (6)  | Clauses 3.3(6) and (7) have been merged into 1 clause.  | The proposed changes are to improve the clarity of requirements and to be more outcome focussed.This aligns with the proposed HC Spec. |
| Water | 3.5 - 3.12  | Streamline the requirements relating to water. | The proposed changes are to improve the clarity of requirements for water and to be more outcome focussed.  |
| 3.5(5)  | Any ice must be stored and handled to maintain its suitability.  | This aligns with the proposed HC Spec.  |
| 3.11(2)  | To remove the requirement for water samplers to be trained by a recognised laboratory | This allows for the water samplers to be trained e.g. in-house and it would be up to the operator to provide evidence accordingly.This aligns with the proposed HC Spec.  |
| Compressed air | 3.14  | Added guidance box referencing the ISO standard.  | The proposed changes are to make the requirements more outcome focussed.This aligns with the proposed HC Spec. |
| Additives, processing aids, vitamins, minerals and other nutrients | New section 3.15 | Added requirement to ensure these compounds are not a source of contamination. Added guidance box referring to the ACVM Act requirements and other standards.  | This aligns with the HC Spec and ACVM Act.  |
| Maintenance of premises, equipment and essential services | New section 3.16 | Added requirements around maintenance of premises, equipment and essential services. Added guidance box to give examples of ‘associated things’. | The inclusion of these clauses expands on AP Reg 11 and includes a scheduled maintenance programme and ‘unscheduled’ maintenance. These clauses should provide more specificity for operators on what MPI expects and thus reduce non-compliances in this area. This aligns with the proposed HC Spec.  |
| Storage of animal material, animal products or associated things | 3.17 | Rewording the title of the clause. Added requirements around storage of animal material, animal products or associated things.  | This aligns with the proposed HC Spec.  |
| Waste management | New section3.18  | Added clarification on requirements around managing waste.  | To clarify expectations for best practice and harmonises with the Codes. Waste covers more than just for animals requiring post-mortem and preventing being mistaken for fraudulent release. Guidance on waste streams should help operators identify any hazards who use waste from a process as an input.This aligns with the proposed HC Spec.  |
| Use of approved maintenance compounds | 3.19  | Added clarification on requirements around use of approved maintenance compounds.  | The proposed changes are to improve the clarity around how approved maintenance compounds should be managed and used e.g. choosing the appropriate maintenance compound, minimising contamination, etc. This aligns with the HC Spec.  |
| Cleaning and sanitation | 3.20  | Added clarification on requirements around cleaning and sanitation. Added guidance box referring to the RMP Operator Resource Toolkit.  | New clause on how cleaning and sanitation must be managed. The inclusion of this clause expands on AP Reg 11 and to harmonise with the Codes.This aligns with the proposed HC Spec. |
| Health of personnel | 3.21 | Amending this Part: * removal of the information relating to the Health Act 1956; and
* recognising the changes in Ministry of Health Communicable Disease Control Manual e.g. more illnesses mentioned in Appendix 2 which means the notice doesn’t need to repeat these

Guidance box on how to navigate Ministry of Health’s website to find the manual.  | Updated content to align with changes in Ministry of Health Communicable Disease Control Manual Appendix 2 i.e. more exclusion criteria has been included. [http://www.health.govt.nz/system/files/documents/publications/cd-manual-appendix-2- dec17.pdf](http://www.health.govt.nz/system/files/documents/publications/cd-manual-appendix-2-%20dec17.pdf) This aligns with the proposed HC Spec. |
| Competency of personnel  | 3.22  | Removed bullet point (3)(b) Post-mortem examination of wild mammals must be conducted by a qualified post-mortem examiner. Consolidating the requirements for approved suppliers. Amend ‘low-acid canned products’ to ‘low-acid commercially sterilised products’ (refer to 1.2 Definitions).Added clarification on a rendering process to be confirmed as valid by a competent person or suitably skilled person. Added guidance on competency requirements for ante-mortem and/or post-mortem examination of farmed poultry for processing for animal consumption.  | Ensure that all key personnel are competent to perform their required tasks.Ensure post-mortem examiners of wild mammals have the appropriate competencies. ‘Commercial sterilisation’ better captures the outcome rather than limiting to ‘canned’. Expectation of this clause has been misinterpreted at times and this will improve clarity.Added reference to Schedule 2 to cover which qualifications these competent persons will need. This aligns with the Poultry AM PM Spec.  |
| Skills maintenance of personnel and supervision | 3.23 | Streamline the Notice requirements wherever possible and introduces the ‘skills maintenance programme’ (refer to 1.2 Definition).  | This aligns with the proposed HC Spec.  |
| Calibration of critical measuring equipment | 3.24 | This ensures that a suitably skilled person or suitably skilled contractor that undertakes the calibration(s).Criteria in clause (2) can be subjective, thus the proposal is to include the criteria as guidance. This aligns with the proposed HC Spec. |
| Packaging  | 3.25 | Removed the requirements for international standards for packaging and introduced the need for procedures for managing packaging. Inserted new clauses on managing packaging. | Recent reviews show that the intake of chemicals from plastics is well below maximum safety limits, see MPI webpage on [Plastic Packaging](https://www.mpi.govt.nz/food-safety/food-safety-for-consumers/whats-in-our-food-2/chemicals-and-food/plastic-packaging/). The packaging standards have been inserted into a guidance box. New clauses have been introduced on minimising contamination both from packaging and to packaging to reduce any risk to animal material or animal product.This aligns with the proposed HC Spec. |
| Pest control | New section 3.26  | New Part that covers requirements for pest control (AP Reg 11). New guidance box referencing the RMP Operator Resource Toolkit. | To clarify expectations for best practice and to harmonise with the Codes. This aligns with the proposed HC Spec. |
| Non-complying product | New section 3.27  | New Part that covers requirements for non-complying product (APA 17 (2) (ba) & (c)). New guidance box referencing recall guidance and the RMP Operator Resource Toolkit. | To clarify expectations for best practice and to harmonise with the Codes. This aligns with the proposed HC Spec. |
| Operator verification | New section3.29  | New Part that covers requirements for operator verification (APA 17 (2) (b)). New guidance box referencing the RMP Operator Resource Toolkit.  | To clarify expectations for best practice and to harmonise with the Codes. This aligns with the proposed HC Spec. |
| Identification and traceability | 4.2 | Guidance boxes on ACVM Act requirements around labelling.  |
| 4.2(1)  | Allow the use of other languages on the label pending Overseas Market Access Requirements (OMARs). | To clarify expectations on the use of different languages on labels of exported products as part of OMARs.  |
| 4.2(3)  | A new provision has been inserted to allow for changes to labelling or documentation after release from the RMP premises as long as it is under controlled conditions. | Amending labelling or accompanying documentation may not always be practical at the originating premises e.g. product may have been moved to another location e.g. store.This aligns with the proposed HC Spec. |
| 4.3  | Consolidating of existing requirements.  | This aligns with the proposed HC Spec. |
| 4.5(2)  | Allow information to be provided on accompanying documentation instead of labelling transportation outers.  | To ensure there is a comparative labelling requirement for outer transportation unit labels.This aligns with the proposed HC Spec. |
| 4.6 | Guidance box on ACVM Act requirements for bulk product.  |
| Documented programme and record keeping  | 5.2  | Definitions developed for ‘document’ and ‘programme’ – refer to 1.2 Definitions. Guidance box added to cover record keeping requirements under ACVM Act.  | This amplifies the requirements already defined in the Animal Products (Risk Management Programme Specifications) Notice 2008 and aligns with the proposed HC Spec.  |
| 5.3 | New clauses requiring traceability (AP Reg 18, 19).New guidance box covering raw animal material for pharmaceutical and/or technical use.  | To clarify expectations for best practice and to harmonise with the Codes. This aligns with the proposed HC Spec.Guidance box information on raw animal material for pharmaceutical and/or technical use is copied across from [Industry Standard 7: Byproducts](https://www.mpi.govt.nz/dmsdocument/21787-industry-standard-7-byproducts).  |
| Supply of animal material for animal consumption  | 7.2(3)  | Supplier to notify the operator at least 24 hours before presenting the animal for primary processing. | This aligns with the HC Spec. |
| New clause 7.2(5)  | A new provision allowing use of Mycobacterium antigen vaccines to be exempt from approval. | This aligns with the HC Spec. |
| 7.3  | New part for supply of farmed animals focuses on the animal material that can be supplied as minimal risk raw material, medium risk raw material and high risk raw material. This adds clarification on what animal material can be processed into raw petfood.Added guidance box on NAIT requirements for those suppliers and operators dealing with deer and cattle. Added requirement for supplier statements to accompany farmed animals that may have died in the field. 7.3(5) align with HC Spec.  | Previous withholding period of 60 days is not sufficient to manage all agricultural compounds and veterinary medicines. Some of these compounds have withholding period longer than 60 days.  |
| 7.4 Additional supplier requirements for supply of farmed animals for export processing  | Removed.  | These requirements has been incorporated into 7.3.  |
| 7.4 Supplier statement for farmed animals  | New clause on information required on supplier statements for bobby calves. Added guidance that ASDs can be used.  | To clarify expectations for best practice and harmonises with the Codes.  |
| 7.5 Supply and handling of farmed mammals killed on-farm | Summarise all requirements for on-farm slaughter in one section (7.7 Handling and transportation removed). Added guidance box to reference the Code for conditions for on-farm slaughter for humane reasons.  | To Harmonise with the Codes.  |
| 7.6 | New section on supplier statement requirements for farmed poultry. Guidance box on where to find the supplier statement for farmed poultry.  | To Harmonise with the Codes and align with the HC Spec.  |
| 7.7 | New section on supplier statement requirements for farmed fish (other than bivalve molluscan shellfish). Guidance box on where to find the supplier statement for farmed fish.  | To Harmonise with the Codes and align with the HC Spec. |
| 7.8  | New requirements for supply of farmed rabbits.  | This aligns with the HC Spec.  |
| 7.9 | New requirements for supply of deer velvet  | This aligns with the HC Spec. Allows for traceability of deer velvet uses for making animal product for animal consumption.  |
| 7.10 | Guidance box that certified suppliers under the HC Spec can also supply killed wild mammals, game estate mammals and farmed mammals that have gone feral to primary processors processing for animal consumption.  |
| 7.13  | Consolidation of existing requirements. | Harmonises with the Codes and align with the proposed HC Spec.  |
| 7.13(6) and (7)  | Wild possums and wild deer can be procured from vector risk areas of bovine tuberculosis (TB), however they must be deemed medium risk material. If the animal material is examined by a post-mortem examiner with HC Spec post-mortem qualifications, they animal material may be deemed minimal risk raw material if post-mortem examination is passed. Added guidance box to clarify ‘vector risk areas’ and ‘vector free areas’.  | Current requirements are too restrictive. The proposed new requirement are outcome-based to ensure operators have post-mortem examiners with the appropriate qualification pending where they are sourcing wild possums or wild deer. Guidance box added to explain vector risk areas.  |
| 7.14 -7.19 | Consolidation of existing requirements.  | To harmonise with the Codes and align with the proposed HC Spec. |
| 7.20(1)  | Align with the deep meat temperature chilling requirements in the RMP template for Micro abattoir. Extended the time allowed to reach the deep meat temperature.  | To harmonise with the Codes. |
| Primary processing operations  | 8.2(9) and (10)  | Consolidation of operator requirements for wild mammals.  | To harmonise with relevant Codes and to align with the proposed HC Spec.  |
| New section 8.4  | New clause for assessment of wild animal material prior to commencing processing (other than initial storage).  | This aligns with the HC Spec.  |
| 8.6 (2)  | New clause for slaughter to be performed at a rate which bodies can be accepted for dressing. Guidance box to refer operators to Animal Welfare requirements.  | Harmonise with relevant Codes and align with the proposed HC Spec. |
| 8.7(4) and (5)  | New clause for managing dropped product. New clause for monitoring performances.  | To harmonise with relevant Codes and to align with the proposed HC Spec. |
| 8.8(1)  | Consolidation of requirements that all animal material (except for deer velvet and fish) must undergo post-mortem examination.Updated references to the examination procedures tables and disposition table.  | To harmonise with relevant Codes and align with the HC Spec.Update to the current references.  |
| Remove 8.8(5)  | Requirement has been combined with 8.7(4).  | Consolidation of requirements.  |
| New clause 8.12(2)  | Operator to ensure any risks (e.g. marine biotoxins) associated with processing bivalve molluscan shellfish, pāua, kina, crabs, rock lobsters and eels for animal consumption.  |
| New section 8.13 Reception of deer velvet and deer antler  | Requirements for the operator to check any deer velvet they are processing.  | This aligns with the HC Spec.  |
| Further (petfood) processors | Remove 9.4(2), 9.4(5) and 9.6(1)  | Remove purpose of listing further (petfood) processors and the information shown on the list.  | Align with general content of Notices.  |
| 9.3 Guidance box  | To explain what a ‘regulated source’ is.  |
| Rendering | 10.3  | Amend the clause to reflect the title of the section. Previous 10.3(1) has been split into 2 clauses for further clarification. New clause 10.3(3) added to ensure the rendering process is confirmed as valid.  | Clarification of requirements for medium risk material.  |
| New clauses 10.5 (2) and (3)  | New clauses copied over from OMAR 02-018. Additional guidance from the OMAR is covered in the guidance box.  | Consolidation of good operating requirements for rendering operations.  |
| Process control | New clause 11.4(2)  | Operator to ensure there is adequate separation of products to ensure minimal cross-contamination and truth in labelling.  | Ensure that operators are managing potential cross-contamination between raw and heat treated products.  |
| Thermal processing of low-acid commercially sterilised products  | 11.5 (1)  | Clarification of requirements on thermal processing of low-acid commercially sterilised products.  | This aligns with the proposed HC Spec.  |
| Ruminant Processing  | Remove 11.7(3)  | Operators can use the same equipment to process ruminant and non-ruminant protein, though, provided 11.7(4) is met.  | This aligns with Biosecurity (Ruminant Protein) Regulations 1999.  |
| Thyroid tissue  | New section 11.8 | Thyroid tissue can only be salvaged for pharmaceutical use.  | This aligns with the proposed HC Spec.  |
| Transport  | 12.4 | Harmonising transport operational requirements  | To harmonise with relevant Codes and align with the proposed HC Spec. |
| 12.4(3)  | Clarification that transportation process must not be used as a cooling step.  | Harmonise with relevant Codes and align with the proposed HC Spec. |
| Schedule 1  | Ongoing Water Monitoring  | Reflect changes in clause 3.11(2) that water samplers do not need to be trained by a recognised laboratory. | This allows for the water samplers to be trained e.g. in-house and it would be up to the RMP operator to provide evidence accordingly.This aligns with the proposed HC Spec.  |
| Schedule 2 | AM and PM examiners of mammals for animal consumption  | Updated to the New Zealand Certificate in Meat Products (Animal Product Examination) L3 Pet food Post-mortem with an optional strand in Pet food Ante-mortem. New clause (5) covering the unit standards required from the certificate.  |
| Competent person for rendering  | Specify the qualifications required for a competent person on rendering process as specified by clause 3.22(3) (d).  |
| Approved suppliers | To harmonise with relevant Codes. |