



Submissions template for proposed amendments to the Animal Products Notice: Production, Supply and Processing

*Please use this table for your comments and submit to animal.products@mpi.govt.nz by **5:00 pm Friday, 29 September 2023**.*

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1. Please identify which Notice, Part(s) and Clause(s) your comment(s) relates to.
2. Use a separate row(s) for each individual comment relating to a different clause.
3. If you are commenting on more than one Notice, please use a separate submission template.

Animal Products Notice: Production, Supply and Processing

| 1. Part | 2. Clause | 3. Comment | 4. Proposed amendment |
|---------|-----------|--|--|
| K1.4 | a) – e) | Training options are currently restricted to AsureQuality for sections a) – e) and NZQA for sections d) – e). There should be provision for other training providers to future proof this section. | For each section a) – e) revise wording as follows: “...provided by AsureQuality or other certified training providers , or knowledge of...” |



| 1. Part | 2. Clause | 3. Comment | 4. Proposed amendment |
|---------|---------------------|--|---|
| | | <p>No reconsideration processes have been included in this notice for situations where the operator does not agree with the decision made by the verifier.</p> <p>Section 96 of the Animal Products Regulations 2021 has a process for animal product businesses subject to verification to seek reconsideration of a verification outcome.</p> | <p>Add a section allowing for reconsideration based on the reconsideration provision in section 96 of the Animal Products Regulations 2021.</p> |
| M1.2 | (4) Table 17 | Agree with the verification steps | No change |
| M1.3 | (3) | Agree | No change |
| M1.3 | Table 18 Line 11 | Agree that honey stores should be able to start at a higher verification step due to the lower risks involved. | No change |
| M1.3 | Table 18 Line 12 | Agree that stores used for honey for export with an official assurance should initially be verification step 6 (six monthly) with a ceiling of verification step 7 (12 monthly). MPI officials have told us that these stores should be able to move immediately to verification step 7. The notice in its current form says that they should initially be on step 6 and that the ceiling is step 7. The current wording is not explicit that they can immediately move to step 7. | Clarify that stores used for honey for export with an official assurance can immediately move to verification step 7. |



| 1. Part | 2. Clause | 3. Comment | 4. Proposed amendment |
|---------|-----------|---|--|
| M1.5 | (3) | <p>The draft notice currently states that ‘In every case, the verifier or verifying agency may move an animal product business to a higher step only after considering: a) the risks and issues identified from the outcome of the most recent verification; and b) the animal product business’s compliance history (for instance, with its RMP, regulated control scheme, or relevant export-related requirements); and c) that, where the outcomes of verifications have consistently been acceptable, a higher step should be determined unless there is good reason not to’.</p> <p>The words ‘every’ and ‘may’ (highlighted above) leave a lot of discretion in the hands of the verifier without any process or appeal protections.</p> <p>MPI officials have promised that operators with a clear in season audit would move automatically to level 7 and have twelve months to fulfil any transitional requirements noted during the audit and set out in the verification outcomes document.</p> <p>The way the draft notice is currently drafted, the notice does not do what MPI officials have promised.</p> | <p>Use stronger wording and make it clearer that the intent is to move businesses to a higher step unless there is a good reason not to.</p> <p>Suggested wording:</p> <p>In every case, the verifier or verifying agency may move an animal product business to a higher step after considering a) the risks and issues identified from the outcome of the most recent verification; and b) the animal product business’s compliance history (for instance, with its RMP, regulated control scheme, or relevant export-related requirements).</p> <p>W; and c) that, where the outcomes of verifications have consistently been acceptable, businesses should be moved to a higher step should be determined unless there is good reason not to.</p> <p>The terms ‘consistently’ and ‘acceptable’ need to be defined clearly. For example, consistently could be defined as two (or three) years of all audit requirements being met.</p> |