



# AP Bulletin

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## Ostrich and emu processor pioneers introduction of RMPs

**It is perhaps fitting that the first land-based facility in New Zealand to have its Risk Management Programme (RMP) signed off under the Animal Products Act (APA) should be a plant processing a range of 'new wave' meat products.**

Venison Packers in Feilding is now slaughtering deer, ostrich and emu at the same plant, using RMPs developed under Part 2 of the APA. By mid August the first 80 birds had been processed, with production hoped to build to a peak capacity of 150 birds a day.

The expansion of slaughtering facilities at the Feilding plant highlights the flexibility available under the APA. Under the former Meat Act and Game Regulations, it was not possible for alternative animal types to be processed at the same facility, but that is all changing.

The accreditation of the plant for export processing of ratites (ostrich and emu) also relieves a serious processing backlog in the North Island for the fledgling industry. Until now, the only export processing plant was in Gore – transport from the North Island would have added up to \$120 per bird to production costs. Transporting birds such a long distance would also raise animal welfare issues.

Ross Davies of Corporate Logistics in Palmerston North was the evaluator for the Venison Packers' Risk Management Programmes. As Chair of the Ostrich and Emu Standards Council (OESC), Ross had a special interest in Venison Packers' move to expand into ratite processing.

He says developing and evaluating the RMPs was very much a learning process for all concerned, including MAF. "The good thing about the new Act is that it allows a proposed RMP to include suggested modifications to be made once the programme is implemented. It's a pragmatic but safe approach and it places the responsibility on the operator."

Ross says that because the systems are untested, the initial accreditation is conditional on validation data being supplied by the processor. "This is required to make sure all is in order and working the way it was designed."

### A growth industry

While ostrich and emu are never likely to supplant sheep and beef as mainstays of the meat industry, they're filling an important niche and provide New Zealand farmers with another diversification option. In Europe, North America and Asia there is a growing demand for alternative meat species, a trend that's been accelerated by consumer fears about BSE and other diseases.

Ratites can generally be farmed behind conventional deer fencing and appear to run happily with other farm animals such as cattle and deer. Although they require some supplementary feed, they also graze pasture.

As the industry matures, growers are starting to specialise in breeding or finishing and production is swinging away from flock building to producing slaughter animals. Birds are grown to about 11 to 12 months before slaughter, but as farming techniques improve, birds may be brought through even younger.

Ostrich are unique in that their hide is as valuable if not moreso, than their meat. The plumes are another valuable byproduct, bringing the total potential return from a single bird in the order of \$700 to \$800. With a breeding pair able to produce up to 15 live chicks a year, the industry has strong growth potential.

There have actually been two RMPs developed for the plant, to cover the different species. First a plan was developed for the venison processing side of the business. This was necessary to move into the APA environment and allow Venpackers to trial an ostrich kill. As venison processing was already happening under the Game Regulations, and using a HACCP-based system, this was fairly straightforward. The existing HACCP and support systems were rolled over, with most of the evaluators' attention focused on truth in labelling, wholesomeness and the format of the RMP itself.

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AP Bulletin is produced quarterly by the MAF Food Assurance Authority's Animal Products Group. The newsletter is of special interest to those involved in processing, transport and exporting of meat and seafood. It contains regular updates on new standards, implementation of legislation, consultation, international agreements, new policies, notifications and information on key contacts within MAF.

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**MAF**  
**Food**

“While it was straightforward, there was still some work for them to do to get it right,” says Ross. The evaluation started with a desktop audit of the RMP, followed up by a site visit to match the plan with the facilities.

“We, MAF and Venison Packers all learned a great deal from this process about interpretation of the specifications for developing an RMP. There are still some areas of uncertainty, but the process worked and we were happy to sign off on the plan.

Once the venison processing was moved out from the Game Regulations, it became possible to process different species within the same facility.

Then came the RMP for ratite processing. As this was new territory for all concerned, there was much more involved.

There are no major food safety or processing issues peculiar to the big birds with the possible exception of feather removal. This is done ‘dry’ in a segregated area with positive air pressure to minimise contamination.

The science basis for RMPs is paramount and already proving its worth, says Ross.

“Information gathered from literature on bacteriological contamination from ratites during processing showed that the rates were likely to be quite low compared with other animals. The validation data we’ve got back from the plant so far suggests that this is indeed the case – the rates are extremely low.

“As we build up validation data and Venison Packers gains further experience, the RMP can be further refined.”

Ross explains that this was the first land based RMP to be signed off under the APA (an RMP for a fishing boat was also signed off around the same time). “We’re all still on a learning curve, but the process is definitely working,” he says.



## New Zealand standards meet interim approval from USDA

MAF has negotiated acceptance of an interim standard for exported ratite products to the United States.

Until April, ratites (ostrich and emu) had been lumped in with other ‘exotic’ species under the aegis of the United States Food and Drug Administration. In April this all changed and ratites are now covered by the USDA Poultry Products Inspection Act. Sheep and cattle products on the other hand are the responsibility of the USDA’s Food Safety Inspection Service.

John Lee of the MAF Food Animal Products Group says the USDA has accepted New Zealand’s Ostrich and Emu Processing Standard 5 and export certification for ostrich. This is an interim measure during the transition to the full implementation of the Animal Products Act.

He says the hope is that the USDA will accept the equivalence of New Zealand’s export standards for ratites at the end of the interim period. In the meantime, USDA inspectors currently on an auditing trip to Australia will take the opportunity to visit New Zealand and look at slaughter facilities in this country.

## Working party for dairy product integration under APA

**Planning for the integration of dairy products into the Animal Products Act (APA) is moving along with the convening of an industry working party to look at the issues. Representatives from the dairy industry have been brought up to date on the APA and discussed with MAF how dairy products will fit under the new regime.**

Susan Bowler, Project Manager (MAF Policy), says a number of issues have emerged, which will need to be worked through.

“For dairy products, the definitions of primary processing need careful thought because this will have implications for the way risk management programmes (RMPs) are written,” Susan explains. “To provide some guidance the working party is looking at where product safety programmes (PSPs) under the dairy regulations have been applied now.”

Another issue is the rules covering sale of raw (i.e. unprocessed) milk. “Under the Food Act it is permitted to sell up to 5 litres of raw milk. MAF is asking the dairy industry to think about whether these sales should be allowed to continue. If the answer’s yes, then we need to find a way to accommodate and control these sales under the APA.

“There’s no intention to stop farmers taking raw milk from the vat for their own consumption – this question relates only to sales of raw milk.”

Susan says the industry working group members will now consult their own people before coming back to MAF. “It’s not MAF’s only form of consultation, but it is a very useful forum,” she says.

Changes to the APA required to accommodate dairy products are expected to be referred to the primary production select committee before the end of the year, with legislation enacted by mid-2002.



## Plenty of long-term work for RMP evaluators

**At least one group of food safety professionals could gain significant market advantages under the new food processing regime, according to Victor Walker, Project Manager for the implementation of the Animal Products Act.**

Independent evaluators are set to play a key role as the implementation of the new Animal Products Act shifts into high gear over the next year.

Under the Act, virtually all processors of animal products will be required to have a risk management programme (RMP) designed, validated and then evaluated. Once evaluated it is able to be submitted to MAF Food for assessment and registration.

### Independent evaluator required

The evaluation of the risk management programme will have to be done by an independent evaluator – someone accredited by MAF on the basis of their understanding of the principles underpinning the new system.

Victor Walker says these new evaluators will have a lot of ongoing work as a result of this system and those who get in early will gain obvious market advantages.

He says many in the food processing sector have the mistaken impression that the role of a risk management programme evaluator is a short term set-up job under the new Act.

“On the contrary, we see significant ongoing work. All companies with risk management programmes based on existing HACCP plans will need them to be fully evaluated after the initial registration period. Also any major amendment to a risk management programme will require that programme to be re-evaluated.”

“Independent evaluators are set to play a key role”

Another wrong impression, he says, is that some potential evaluators believe they will not be able to become involved in the verification side of the new regime.

This is a misunderstanding. While some constraint is necessary to prevent a conflict of interest, the policy relates only to the individual person, and what they can do – it does not relate to agencies.

“Evaluators can be risk management programme verifiers as well, on the basis that they meet the verifier requirements.

“To prevent a conflict of interest, the only risk management programmes a verifier would not be able to verify are the ones (including those on the same site) they have evaluated or designed in the past 2-year period.”

Victor Walker says the risk management concept – which seeks to define outcomes rather than imposing a prescriptive approach to food safety – is the way of the future. Evaluation will be an integral part of that future.

Evaluators can be accredited in a generic sense or they may seek to have specific endorsements in areas such as the slaughter and dressing of mammals, egg processing, biologicals, rendering – to name a few. This specialisation may well attract demand from the industries involved.

Details on how to apply for accreditation as a risk management programme evaluator are on the MAF website [www.maf.govt.nz/animalproducts/](http://www.maf.govt.nz/animalproducts/)

For more information contact: Lisa Hill, Animal Products Group, MAF, PO Box 2526, Wellington. email [Hilll@maf.govt.nz](mailto:Hilll@maf.govt.nz)

## Operators must be directly involved in RMP development

**Don't just sit back and let a consultant develop your risk management programme (RMP) for you, and don't expect the evaluator to tidy up the RMP for you either. Neither has the essential knowledge of your business to do this on their own.**

The operator of a food business must be directly involved in the development of an RMP, says Victor Walker, Project Manager (APA Implementation).

“The Animal Products Act requires operators to take direct ownership and responsibility for the safety programme that guides their business operation.

“While there is a role for a consultant to help an operator develop an RMP, only the operator can give it meaning. That is because only they know the crucial information that will make the programme work: the ingredients they use, processes, hazard controls and the like.”

Victor says some RMPs have been developed and submitted for evaluation without the operator's direct involvement. In some cases the operators have not read the programme before it was submitted.

“This is totally unacceptable and very unwise,” Victor says. “The RMP has the force of law. If an operator is in breach of an RMP, they have committed an offence. It makes sense to take ownership of the RMP and be aware of the legal responsibilities you've assumed.

“RMPs are there to protect consumers and protect our trade access. They're not just a piece of paper to fulfil some bureaucratic requirement.”

## RMP Applications Help Desk

Do I need a RMP?

What is required for a RMP?

How do I progress a RMP application?



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Bryan's role is to help industry by providing information and direction on risk management programmes under the Animal Products Act. He does not design or evaluate RMPs.

## Judy Barker: Programme Manager, Risk Management Programmes

**Judy Barker and her seven colleagues in the Risk Management Programme (RMP) Group are starting to see the first trickle of RMPs coming in for approval as Part 2 of the Animal Products Act begins to kick in.**

The group set the standards and were involved in developing the manual for animal products businesses to set up their RMPs. Although the concept of RMPs was breaking new ground, Judy says that the HACCP model that underpins the new Act provided a good framework.

“Mind you, it’s one thing to develop a system in theory and another to apply it in practice,” she admits. “A number of issues have already come up, and we are amending the RMP manual to deal with them. They’re not serious issues – rather a question of communicating more clearly.”

Judy says the RMP Group has tapped into the food industry and technical expertise throughout the MAF Animal Products Group. “There’s a great depth of experience within MAF, and we’ve made sure it’s been applied to these changes.”

### Assessment of evaluators

The group is also responsible for the standards that the independent evaluators of risk management programmes have to meet in order to be accredited under the Act. This included the development of an interim evaluation pack for evaluators and a guide to assist evaluators. The group is responsible for carrying out the assessment of evaluators for accreditation.

The group is also responsible for the development of specific standards for meat and game and for the administration of the National Microbiological Database.

As well as setting the standards for RMPs, Judy’s group is responsible for approving the submitted programmes once they’ve been through an independent evaluation. She says the first of the RMPs coming through

are for new businesses that have been set up under the new Animal Products Act, and therefore need an approved RMP to get started. Also fast off the block are existing animal products businesses changing their product lines and requiring approval to do so (see article on Venison Packers on page 1 of this issue).

Judy also wears a trade access hat within the Animal Products Group. Her territory includes the Russian Federation, Eastern Europe and Scandinavian and European countries outside the EU. She says many of these countries still have fairly prescriptive importing regulations, although some are moving to adopt some EU standards as their own.

A typical access issue emerged in June this year, with a Russian government insistence on an inspection in New Zealand by one of their own vets of export consignments of beef trimmings. “We’re working through that issue now and hoping to reach a position where each consignment does not require an inspection at this end,” Judy says.

### Deskbound

Judy has a degree in Food Technology and joined MAF 10 years ago after working in the Ministry of Health – also in the area of food standards. While more deskbound in Wellington than she’d like to be, she keeps in touch with industry issues through her association with the Meat Industry and Venison Industry Standards Councils.

As a young graduate, Judy contributed to the brain drain only temporarily when she did the obligatory OE. This included a stint in the Engineering Services Section of the BBC’s External Services in London.

“It wasn’t much related to food technology, but they seemed to like science graduates there,” Judy explains.



Judy Barker.

### New Staff

After more than 10 years in the front line of the food industry, **Gail Mustor** admits that moving to MAF’s head office was a bit of a culture shock. Gail joined the Animal Products Group in April this year, taking the position of National Adviser Microbiology. In this role, Gail is working with Kylie Noble and Roger Cook on the revision of the National Microbiological Database (NMD) in line with the implementation of the Animal Products Act.

Gail graduated with a BSc in Microbiology in 1987. She spent a year at Alpine Dairy Products in South Canterbury before moving to the brewing industry in 1990, working for DB at its plant in Washdyke, Timaru. Gail says the brewing industry has led the way in many respects in areas such as benchmarking and quality assurance.

Her next move in 1996 was to the Alliance Group’s Pukeuri Plant at Oamaru – incidentally the area where the first ever export consignment of refrigerated meat from New Zealand was processed. Gail was laboratory and technical manager at the Alliance plant, looking after everything from vermin control to statistical analysis of chilled lamb data.



Gail Mustor.

Spending many hours a day in front of a PC has been a big change from her meat industry job, where her ‘office’ was literally the entire plant.

## E-Cert steps offshore

**On 4 June Canada became the first overseas country to hook up to E-Cert, which is now an integral part of the export assurance system between our two countries.**

E-Cert is still complemented by paper documentation for exports to Canada, as it requires a legislative change in that country to transfer completely to electronic certification. However, E-Cert is still helping speed up and streamline trade documentation.

E-Cert Project Manager Ashley Mudford says one or two modifications were required to make E-Cert compatible with the Canadian end, but these have generally been resolved. "Computers tend to see things in black and white," Ashley explains. "They are very unforgiving if what they receive doesn't match what they're expecting."

Talks are also well advanced with United States authorities on E-Cert. Ashley says that there is a proposal for a pilot scheme to be established first, and when the issues are ironed out E-Cert then successively phased in over a wider area. United States authorities are also showing interest in using E-Cert themselves, and there have been some preliminary talks about how we can work together.

Talks are also underway with a number of Middle Eastern, Asian and European governments on their accessing E-Cert documentation. Ashley says that there is considerable and growing worldwide interest in the E-cert regime.

### Dairy on line

While E-Cert gains a foothold offshore, the system continues to grow and improve. The first stage of dairy export electronic certification went live on August 13<sup>th</sup> – it is now possible for some companies to create dairy export certificates for some countries on line. The number of companies and countries is expected to grow over the next months. The next phase, due for completion in mid 2002, is to automate parts of the dairy verification functions through E-Cert.

E-cert user training programmes are currently being developed with the seafood industry. There are two programmes – one each for E-cert users and company coordinators – which will become part of the New Zealand Qualifications Authority framework. The company coordinator is a new role to help streamline the information and communication between MAF and each company which is expected to be phased in over the next period.

MAF is continuing to work with Customs to try to align E-Cert with their systems. Ashley says there are synergies in two areas: helping reduce the opportunities for fraudulent use of export certification, and also helping businesses reduce compliance costs by streamlining export certification requirements.

On the operational front, E-Cert has continued to perform well. Availability has been virtually 100 percent throughout the past several months, and the overall volumes of transactions and users continue to climb steadily.

One less than welcome statistic has been the percentage of certificates that require resubmission. This stood at 60 percent in July – well up from the less than 40 percent in August/September last year. Resubmissions increase people's workload as well as increasing the workload on the servers which could lead to their needing to be upgraded earlier than projected.

Ashley says users have just been surveyed to find out why the resubmissions are happening at such a high rate. He suspects live documents are being created to make draft export certificates at too early a stage, and then being rejected by the verification authority. However, the results of the survey will help to find ways to address the problem.

"We're encouraging people to create an off-line document by making a batch file. That way it can be adjusted before it's submitted, which will save time all round."

E-Cert information, including how to create batch files, is available through the Animal Products E-cert website on <http://www.maf.govt.nz/ecert/animal-products/>



Ashley Mudford.

Married with two adult children, Gail is enjoying the stimulation of Wellington after years in the relatively quiet environment of small-town South Canterbury and North Otago. While not pondering the finer points of microbiological data, Gail – who plays the flute – indulges her love of music.

**Rosalene Foo** joined the hard-working APA Implementation team earlier this year as PA to Victor Walker. Before coming to MAF, Rosalene was with the International Business Council and before that the Tourism Industry Association. In these positions she had a hands-on role organising conferences trade fairs and familiarisation tours for visiting delegations.

The meat and seafood industries come as a complete contrast, but Rosalene is enjoying getting to know the sector.

Rosalene claims she's too busy for much in the way of pastimes outside the work environment, although she and her 10-year-old daughter are making the time to study Mandarin at Victoria University. A third-generation Chinese New Zealander, Rosalene is already fluent in Cantonese, and is finding both languages useful, especially for travel.

"It's nice to know you can understand and be understood," she says.



Rosalene Foo.

## BSE update: NZ keeping one step ahead

**A joint WHO/FAO/OIE mid-year meeting of 150 experts from around the world has responded to rising concerns about the spread of BSE by stating that the disease should be treated as an international issue.**

While the international technical consultation made some far-reaching recommendations, they also warned against taking irrational measures, concluding that all risk management measures must be science based.

Although New Zealand's cattle population is currently recognised as BSE-free, there is no room for complacency, and MAF's Animal Products Group is taking a strongly proactive approach to growing international concerns about the spread of BSE and its human equivalent.



Director Tony Zohrab says one measure that's being taken to strengthen the scientific base to our export assurance programme is a trade mitigation strategy.

### A small investment

"The OIE recommendation is that we should take 300 cattle brain samples for BSE testing each year. We want to improve on that, and we're asking industry to increase this number to 2000 samples per year,"

Tony says.

"The direct cost for this across the whole industry is about \$160,000 a year, but compared to the financial impact of a change in our BSE status through inadequate scientific data, this is a very small investment."

Verification Authority staff will take up to 1000 samples a year at slaughter premises, from older cattle and cattle showing neurological signs pre-slaughter. The balance of the samples will be taken from animals that have died on farm. In this way, the strategy targets the most at-risk animals.

The tests use the recently EU-approved prionic method.

Tony points out that this sampling is in addition to the routine exotic disease surveillance work done by veterinarians sending in samples for analysis to the National Centre for Disease Investigation.

Testing material from rendered animals is also being stepped up to ensure that ruminant protein doesn't end up in places where it shouldn't be – for example in animal feed. Tony says AgResearch has been contracted to provide the calibration testing for this work.

### Risk assessments to be reviewed

In a separate development, the EU has announced that all risk assessments for BSE done in third countries, including New Zealand, are to be reviewed.

"We've been asked to submit a dossier by January 2002," Tony says. "There won't be any significant changes from what we've submitted before, and at this stage we're confident that our status won't change."

"Nonetheless, MAF is giving the work high priority. If we fail to deliver the dossier, our status defaults to more restrictive EU rules on meat imports, so there's a strong incentive to provide the data they're seeking."

Tony says our current favourable BSE status will continue until the resubmitted risk assessment is evaluated in Europe. "That could take six months or more. In the meantime, our trade is unaffected."

## USFDA shellfish audit gives thumbs up to New Zealand industry

**The most recent United States FDA audit of New Zealand's shellfish sanitation programme has drawn very positive comments from the evaluators and a strong vote of confidence in the way MAF and the industry work together.**

The audits have been carried out regularly since 1980 and in recent years have been done every other year.

In their report the evaluators noted that MAF and the New Zealand shellfish industry share an exceptional understanding of HACCP requirements.

"The overall compliance of the New Zealand shellfish processing facilities must be credited to the diligence of the MAF administrators and inspectors coupled with outstanding cooperation by the New Zealand shellfish industry," the report says.

The two evaluators were here in March and April, visiting seven randomly selected growing areas and 10 processing facilities.

Dorothy-Jean McCoubrey, a seafood specialist with the MAF Verification Authority, says the evaluation included a file audit of the all our records

associated with the shellfish industry, and then visits to shellfish harvesting areas and processing premises.

Of course no evaluation will ever turn up a 100 percent result and various programme deficiencies were noted. However, the audit report noted that: "The programme deficiencies noted during this evaluation were not serious in nature and corrective measures should not be difficult."

Deficiencies noted in processing plants involved areas such as documentation, tagging, storage to avoid cross contamination, and improvements in construction. For growing areas, attention focused on continuing flesh cleansing studies, water sampling and the proximity of marinas or moored vessels.

The report also noted that deficiencies noted during the previous (1999) audit had been addressed well.

The report concluded that: "In general, FDA is pleased to report that the New Zealand Shellfish Sanitation Programme is in substantial compliance with National Shellfish Sanitation Programme requirements in all phases of shellfish harvesting and processing."

## Oyster bar

New Zealand Pacific oyster exports were implicated in an outbreak of a mild but widespread type of food poisoning in Hong Kong recently.

**Caused by a Norwalk-type virus, the outbreak prompted Hong Kong authorities to impose extremely stringent restrictions on oysters from the North Island.**



This had a domino effect throughout Asia, with many other countries following suit and threatening this small but valuable aquaculture export trade. The initial measures included a requirement for tests for the virus in every export consignment both in

New Zealand and Hong Kong, with additional tests for *E. Coli* and *Salmonella*.

Tests for the Norwalk-type virus are very expensive, and would have threatened the viability of the export trade.

MAF officials visited their Hong Kong counterparts in July and successfully negotiated a more realistic testing programme. The Hong Kong authorities will now test the first three New Zealand consignments for Norwalk-type virus and hold these until negative tests are confirmed. A further three consignments will then be tested; if these are also clear the testing will lapse and the previous regime will apply. New Zealand has also agreed to carry out *E.Coli* testing of oyster consignments on a quarterly basis.

MAF Director of Animal Products Tony Zohrab says the negotiations were satisfactory all round, and illustrate the value of a sensible, science-based approach to food safety standards. ~

## USDA audit raises issues for export premises

**Excessive urine spillage and use of rodenticides in food areas are two of the more pressing issues revealed in the most recent audit of New Zealand meat export premises, packhouses and laboratories by the USDA's Food Safety and Inspection Service. The audits are generally carried out every one to two years.**

Dr Douglas Parks of the FSIS recently completed a month-long audit involving site inspections at nine meat export premises and paper audits of 14 packhouses and laboratories. Six of the export premises were judged as acceptable; the other three were acceptable conditional on a re-review next year and increased inspection at the US border.

Urine spillage associated with inverted dressing was found to be frequent and excessive in some places. Neil Kiddey of MAF's Compliance Group says use of inverted dressing is becoming more widespread, so industry will need to look closely at this problem.

Another problem highlighted in the audit was the use of rodenticides in food support areas. "It's been standard practice to use rodenticides in food support areas using secure bait stations, so this needs attention," Neil says.

"The USDA would prefer that monitoring only for rodents is carried out in these areas, using chew baits and sticky pads. If rodents are detected the preferred method is to trap and remove them. It's not unreasonable to be concerned about what happens to poisoned rodents in food support areas."

The Animal Products Group has made a commitment to examine the standard for rodent monitoring and control.

Other issues raised in the audit included:

- Faecal contamination on cooling floors, in chillers, and in the pre-trim areas of boning rooms.
- The methods used in the random selection of carcasses for microbiological sampling.
- Preventative actions not being recorded in HACCP and Standard Sanitary Operating Procedures.
- The use of terms such as "100% compliance with job description" as a Critical Limit in a HACCP programme when this cannot be objectively measured.
- Some equivalence issues that are the subject of further discussion and/or negotiation.



*Rodent monitoring and control was one area that attracted comment in the audit.*

Neil says the draft audit report has not yet been received by MAF Food and the final document will be posted on the MAF website within a few months. ~

### Mayday!

The 1 May deadline for a large number of registered animal products exporters and listed homekill and recreational catch service providers to renew their registrations or listings came and went with no glitches, reports National Manager Operations, Peter Fairless.

"We got the expected rush in the weeks and days leading up to the deadline, and we had the extra staff resources to cope," Peter says. "We dealt with nearly 1200 applications in a two-month period. It was hectic at the time, but things are back to normal now."

Peter says he's satisfied all 'stragglers' have been rounded up and those who didn't renew have chosen not to. "There are various reasons for this – usually it's just because a business has changed direction and they're no longer involved in exporting or homekill services.

"There was certainly plenty of notice and reminders provided. No-one could say they didn't re-register or re-list because they hadn't heard about the deadline." ~

## Middle East update

**Trade access negotiations have made good progress during the most recent round of discussions. In this update we look at developments in Iran and Saudi Arabia.**

### Iran

The form of a Memorandum of Understanding (MOU) between New Zealand and Iran has been agreed and will be signed once the Persian language translation has been ratified. The MOU is part of a suite of conditions that were imposed on New Zealand so that existing arrangements for the export of meat, dairy, fish, wool and skins and hides could be retained.

The MOU provides an opportunity to develop a closer degree of technical cooperation between the two countries and a greater acceptance by the Iran Veterinary Organisation (IVO) of New Zealand's food safety systems and the integrity of the assurances provided.

The MOU provides for a range of outcomes which will enhance trade access, including:

- MAF and its Iran counterpart, the IVO, each agreed to allow the other to audit the control systems used by their controlling authorities.
- IVO, New Zealand domiciled consignment-based inspections will cease once the MOU takes effect.

“The relationship with Saudi officials is developing well”

- Agreement that existing New Zealand export certificates for wool, hides and skins, fish, meat and dairy products will apply until the MOU comes into force and new schedules are agreed.
- The MOU will include an additional schedule covering areas of trade and trade protocols (e.g. electronic certification) not yet in place. For example, Iran is very keen to develop an export trade to New Zealand in fish products.

### Saudi Arabia

Food safety concerns prompted by the escalating BSE situation in Europe prompted Saudi Arabian officials to introduce stringent meat import requirements earlier this year. This caused considerable confusion and delays with shipments in transit.

However, through swift action by MAF and New Zealand embassy officials a pragmatic and workable approach was negotiated. The Director-General of the Saudi Laboratories Quality Control Department, Dr Hamad Al-Awfy, agreed an interim arrangement for shipments in transit until new export certificate endorsements, approved by him, came into effect during May.

Another important agreement reached was that consignments of New Zealand meat to Saudi Arabia could be transhipped through 'safe' ports such as Singapore, provided containers remain sealed.

The relationship with Saudi officials is developing well, and there is a clear appreciation of New Zealand's regulatory control systems and product quality, says MAF Market Access Counsellor Neil Armitage. “We are looking towards a more formal arrangement with the Saudi Arabian Government in the form of a Memorandum of Understanding,” Neil says.

A visit to Saudi Arabia in April and May this year included meetings with port officials, who showed strong interest in New Zealand's electronic certification systems and our regulatory control systems in general.

Since the May visit, additional import conditions have been brought into effect due to the inconsistencies in the regulations and the systems that interpret and apply these conditions. The Saudi Arabia conditions for importation of meat are still confusing, with a degree of uncertainty about consignments passing the port of entry inspection procedures.

## Fallow venison trade protected

**Exports of New Zealand Fallow venison to California have been spared a lengthy hiatus thanks to the intervention of MAF's Veterinary Counsellor in Washington.**

An officer of the California Department of Food and Agriculture Department had given an interpretation of California State legislation which effectively prohibited the import of venison sourced from Fallow deer unless the California Department of Food and Agriculture had undertaken an equivalence determination of New Zealand inspection law and specifications. This would have been a lengthy process.

The Counsellor Veterinary Services in Washington was able to negotiate with senior veterinarians in the Department and get an over-riding interpretation agreed which allows the trade to continue.



## Bobby boost

New Zealand's good record for bobby veal exports – no violations of chemical residue limits have been reported for the past six years – has paid dividends.

The USDA has advised MAF that the required sampling rate for bobby veal consignments has been reduced from 600 a year (about 60 percent of consignments exported) to 95 consignments this year.

While many of the issues raised by New Zealand about the sampling rates for residue testing are still to be addressed by the USDA, this reduction in sampling of bobby veal represents a significant gain for exporters.