



Submission to the Ministry for Primary Industries

Review of Specifications for Products Intended for Human Consumption

27th May 2019

1. Seafood New Zealand Limited welcomes the opportunity to submit on the review of the Animal Products Notice: Specifications for Products Intended for Human Consumption.
2. Seafood New Zealand is a professional organisation delivering industry-good services for the wider benefit of the seafood industry. The Seafood Standards Council, an official committee of the Seafood New Zealand board, plays a leading role in developing and presenting the seafood industry's response on legislative and regulatory proposals affecting the industry in the animal products and food safety space.

Specific Comments

We wish to provide the following comments on the proposals.

3. Clause 16.2 (1)

It is proposed to include the following new clause:

The supplier of live fish, in addition to clauses 11.3 Supply of Farmed Animals, Including Live Possums and 11.4 Supplier Statements for Farmed Animals, must ensure that fish are identified to allow for traceability to the supplier.

It is not clear what would constitute acceptable identification. Live fish are often transported in bulk containers (with or without seawater) and/or are not able to be easily labelled. It is assumed that identification can be provided in accompanying documentation, but this needs to be made explicit to avoid confusion.

4. Clause 16.2 (4)

This clause refers to itself. I think it should refer to 16.2 (5).

*The supplier of farmed fish must provide the primary processor with a supplier statement that complies with **16.2 (4)** on the presentation of the fish for primary processing.*

5. Clause 16.2 (5) f)

This clause doesn't read very well – missing the word 'has'?

*whether any fish (**has**) been subjected to chilling or freezing from the time of harvesting to the time of dispatch to the processing premises; and*

6. Clause 19.13

It is assumed that fish should be excluded from all clauses included in 19.13, and not just clause 19.13 (1) – by specifically excluding fish from clause 19.13 (1), it infers that the other clauses do apply to fish, which they clearly shouldn't (we don't dress on the floor or have hides and pelts etc).

It is suggested that you add a full exclusion at 19.13 for fish or remove the exclusion from clause 19.13 (1) altogether.

7. Clause 19.14 (1) a)

This clause requires the operator (at the point of handling and processing) to ensure that the live fish were free from signs of illness or disease immediately prior to harvesting. The primary processor is not able to do that at the point of processing.

Either the clause should be the operator is to ensure that the live fish are free from signs of illness or disease immediately prior to processing or alternatively, it is suggested that this requirement is already covered by clauses 11.4 and 16.2 (5), with the provision of the supplier statements.

*a) the live fish were free from signs **or** (of?) illness or disease immediately prior to harvesting; and*

8. Schedule 3 Fish handling and hygiene competencies

This needs to be updated – it is requiring all of the unit standards from b) to g); and that is not necessary, they are acceptable competency options, some of the unit standard titles also need to be updated to reflect the latest version. It should read:

Fish handling and hygiene

(1) The NZQA qualifications for persons involved with fish handling or hygiene activities are:

a) either:

i) 5331: Handle seafood product; or

ii) 15344: Demonstrate knowledge of handling, and handle bivalve molluscan shellfish product;

or

iii) 31493: Demonstrate knowledge of handling practices, and produce seafood product fit for its intended purpose;

and

b) either:

i) 5332: Demonstrate knowledge of and use hygienic work practices while working with seafood; or

ii) 28630: Apply hygiene and food safety requirements to own work area in a primary products food processing operation

and

c) either:

i) 6212: Demonstrate knowledge of contamination, and clean and sanitise a seafood operation;
or

ii) 31496: Demonstrate knowledge of cleaning and sanitation, and clean and sanitise a seafood operation work area

Yours sincerely



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