

RECOMMENDED CHANGES TO DRAFT STANDARD

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	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center; padding: 5px;">Closing date for comment</td> <td style="width: 50%; text-align: center; padding: 5px;">Date of your comments</td> </tr> <tr> <td style="width: 50%; text-align: center; padding: 5px;">17 February 2006</td> <td style="width: 50%;"></td> </tr> </table>	Closing date for comment	Date of your comments	17 February 2006	
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<p>DR DZ6116 Committee: P6116</p> <p>Title: Safe application of electricity in the meat processing industry.</p>					

Introduction

1. The Meat Industry Association of New Zealand Incorporated (MIA) is a voluntary trade association representing New Zealand meat processors, marketers and exporters. It is an Incorporated Society (owned by members) that represents companies supplying the majority of New Zealand sheepmeat exports and all beef exports, producing 17 per cent of our nation's exports by value (30 percent of New Zealand's primary sector export revenue) and earned export revenue of \$5.3 billion in the year ending April 2005.

2. MIA member companies operate approximately 80 processing plants dispersed throughout the country. The plants slaughter and process approximately 25 million lambs, 3.8 million sheep and 4.5 million cattle and calves each year. Ninety percent of this production is processed into value-added products. Approximately 750,000 tonnes or 85% of the production is exported to overseas destinations. Our affiliate members add to the depth of expertise available from the membership, with representation throughout the meat supply chain, including road and rail transport, shipping lines, ports, packaging firms, specialist product exporters, research and technology.

3. The Association advocates on behalf of its members and provides advice on economic, trade policy, market access, employment relations, business compliance costs and technical and regulatory issues facing the industry, with a particular focus on:
 - Food safety trends and developments in importing countries
 - Economic and trade aspects of market access to key overseas markets
 - Major public policy proposals that could impact on industry operations

4. The MIA is also the interface between the meat industry and government (i.e., it is the consultative body referred to in various New Zealand statutes, such as the Meat Board Act 2004, Meat Act 1981 and the Animal Products Act 1999).
5. The Association's mission is to:
 - Provide a forum for consideration of industry-wide commercial, human resource, marketing, and sanitary and zoosanitary issues; and
 - Provide the means of formulating a collective view on issues of industry wide interest, and of conveying that position to government, departments of state, trade bodies, and other appropriate external agencies and organisations.
6. A list of MIA members is attached as Appendix I.

SPECIFIC COMMENT

Clause/ Para/ Figure/ Table No	Page No	Recommended Changes and Reason <i>Exact wording of recommended changes should be given</i>
1.2	6	<p>Page 6, clause 1.2 states <i>"This Standard is intended to deal with both new and existing installations where this equipment is intended to be installed or is installed. The requirements for inspection shall be applied to all electrical equipment and installations irrespective of age and date of installation."</i></p> <p>MIA contends this standard should not be applied retrospectively to existing installations which have been inspected and deemed safe. These are already operational with extensive existing safety systems in place which are both effective and appropriate. Facilities installed prior to the availability of current technology would need extensive capital investment but would not increase the level of protection.</p> <p>New wording: This standard is intended to deal with new installations, and existing installations which have not been inspected and deemed safe. It is not intended to apply to existing approved installations.</p>
1.3	6	<p>In Class A the two definitions appear to be the same</p> <p>New wording: An appliance in which for individual or continuous pulsed waveforms $I^2 \times \text{pulse duration is less than } 48 \times 10^{-3}$</p> <p>(Where I (current) is calculated as stimulation voltage / 500 ohms (resistance of human in contact with the circuit))</p>
3.1.7	15	<p>Clause 3.1.7 states <i>"In areas where animal stunning and conditioning is carried out at voltages exceeding 6V a.c or 15V ripple-free d.c. signs shall be erected to indicate that no work shall be undertaken on an animal or carcase while electricity is applied to it. These signs shall meet the requirements of 3.2.1."</i></p> <p>Consistent with the MIA view on ensuring the new standards are not applied retrospectively to existing inspected and approved installations, it is submitted that existing practices that are deemed safe in the context of existing approved installations, should be specifically excluded from complying</p>

Clause/ Para/ Figure/ Table No	Page No	<p style="text-align: center;">Recommended Changes and Reason <i>Exact wording of recommended changes should be given</i></p>
		<p>with this clause.</p> <p>New wording: “This clause does not apply to existing inspected and approved installations.” should be added to the end of Clause 3.1.7</p>
3.1.8	15	<p>A note should be added to this clause</p> <p>The operation of automated defibrillator equipment would be carried out only by suitably qualified personnel.</p>
3.5.4	17	<p>This clause appears superfluous assuming Clause 3.5.2 is included in the standard.</p>
4.6	22-25	<p>There is no testing requirement or procedure for protective gloves in this section. The P6116 Committee should consider whether such testing should be included in Table 2, p23.</p>

Appendix 1

LIST OF MIA MEMBERS AND AFFILIATE MEMBERS (YEAR COMMENCING 1 JULY 2005)

Members	Head Office Location
Advance Marketing Ltd	Auckland
AFFCO New Zealand Ltd	Hamilton
Alliance Group Ltd	Invercargill
ANZCO Foods Ltd	Wellington
ANZCO Green Island Ltd (ANZCO group)	Dunedin
ANZPAC Foods Ltd	Auckland
Auckland Meat Processors Ltd	Auckland
Ballande New Zealand Ltd	Auckland
Bernard Matthews New Zealand Ltd	Waipukurau
Blue Sky Meats (NZ) Ltd	Invercargill
<i>Brookland (NZ) Ltd (in receivership)</i>	<i>Auckland</i>
Canterbury Meat Packers Ltd (ANZCO group)	Ashburton
Columbia Exports Ltd	Auckland
Crown Marketing Ltd (ANZCO group)	Wellington
Crusader Meats New Zealand Ltd	Benneydale
Dairy Meats NZ Ltd (AFFCO group)	Auckland
Davmet New Zealand Ltd	Napier
Fern Ridge Ltd	Napier
Frasertown Meat Company Ltd	Auckland
Garra International Ltd	Christchurch
Glovers Foods Ltd	Auckland
Greenlea Premier Meats Ltd	Hamilton
Harrier Exports Ltd	Auckland
Horizon Meats New Zealand Ltd (wholly owned subsidiary of Blue Sky Meats (NZ) Ltd)	Auckland
Lamb Packers Feilding Ltd (wholly owned subsidiary of Bernard Matthews NZ Ltd)	Waipukurau
Land Meat (NZ) Ltd (AFFCO group)	Hastings
Lanexco Ltd	Tauranga
Lowe Corporation Ltd	Hastings
Mathias International (Mathias Meats NZ Ltd)	Auckland
Pilot (NZ) Ltd	Christchurch
Primary Producers Co-operative Society Ltd (PPCS)	Dunedin
Progressive Gisborne Ltd (wholly owned subsidiary of Bernard Matthews NZ Ltd)	Waipukurau
Progressive Meats Ltd	Hastings
Rakaia River Meats Ltd	Rakaia
Riverlands Ltd (ANZCO group)	Eltham
South Pacific Meats Ltd	Invercargill
Tara Exports Ltd	Auckland
Taylor Preston Ltd	Wellington
Te Kuiti Meat Processors Ltd	Te Kuiti
Towers Thompson (New Zealand) Ltd	Christchurch
Universal Beef Packers Ltd (UBP)	Te Kuiti
Wallace Corporation Ltd	Waitoa, Waikato

Affiliate Members	Head Office Location
AgResearch-MIRINZ Centre	Hamilton
Aon New Zealand Limited	Wellington
Australia-New Zealand Direct Line (ANZDL)/Contship Containerlines (Divisions of CP Ships UK Ltd)	Auckland
Carter Holt Harvey, Packaging	Auckland
CentrePort Wellington	Wellington
Energy for Industry (ex Meridian Solutions)	Wellington
Hamburg-Sud New Zealand Ltd	Auckland
Hapag Lloyd (New Zealand) Ltd	Auckland
Maersk New Zealand Ltd	Auckland
New Zealand Natural Casing Association Inc	Napier
Oceanic Navigation Ltd	Auckland
P&O NedLloyd Ltd	Wellington
Port of Napier	Napier
Port Otago Ltd	Port Chalmers
Port Taranaki Ltd (previously Westgate Transport Ltd)	New Plymouth
ProAnd Ltd (Meatek Ltd)	Fielding
Rissington Breedline Ltd	Napier
Thompson Clarke Shipping Pty Ltd (ANZ Marketing Representative for the Port of Los Angeles)	Australia
Toll NZ Consolidated Ltd	Auckland
Vero Marine Insurance	Auckland