



Silver Fern Farms Limited  
Head Office  
283 Princes Street  
PO Box 941, Dunedin 9054  
New Zealand

TEL: +64 3 379 6900  
FAX: +64 3 344 1656  
[www.silverfernfarms.com](http://www.silverfernfarms.com)

## **Grass Fed Beef Program**

### **Silver Fern Farms**

**Animal Production Claims: Grass Fed, No Antibiotics, No Added Hormones, No Genetically Engineered Ingredients, Minimally Processed**

**Animal Raising Assurances: Humane Animal Treatment, Feedlot-free**

### **SUBSTANTIATION DOCUMENTATION**

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**Date: 30 September 2014**

#### **Introduction:**

This document relates to single ingredient beef products supplied by Silver Fern Farms Ltd.

The beef product relates to a range of primal and sub-primal boneless cuts, in refrigerated and frozen forms. The products are intended for further processing and packaging, prior to their distribution and public sale. All beef sourced are derived from cattle that have been slaughtered and processed by Silver Fern Farms Ltd, Dunedin, New Zealand

#### **Background:**

##### **1. Cattle Production in New Zealand**

**The New Zealand cattle industry is based on almost exclusively grass fed production systems.** Nearly all cattle are therefore raised on open pastures and are based on broad acreage free range principles – cattle have access to wander and graze freely.

Beef cattle raised on farms are not confined to pens or barns in New Zealand. Cattle may be held in yards for minimal periods of time for husbandry purposes such as animal health checks.

This production method and free range nature of cattle production dictates the virtual non-requirement for antibiotic-use; it does not form part of the feeding regime and their use is solely in the isolated cases of therapeutic reasons; whereby they are prescribed and/or administered by a veterinarian for diseased or injured animals.

Within this cattle environment, Silver Fern Farms sources cattle and/or segregates carcasses from its co-op of farmers that meet the specific claim requirements of the Grass Fed Beef Program. This is administered through the NAIT and ASD Tracing and Declaration systems that form the backbone of the National cattle industry, as per below:



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## 2. NAIT: National Animal Identification and Tracing System

NAIT requirements for cattle are the same for every farmer and include: breeding, finishing, dairy grazing, calf rearing, and private sales.

As part of the program all cattle are legally required to be EID tagged (Electronic Identification) and all movements, beginning at animal birth, from farm-to-farm and to processing plants are recorded on the National Animal Identification & Tracing (NAIT) database.

Further Information on NAIT is here: <http://www.nait.co.nz>

## 3. ASD: Animal Status Declaration Requirements

These declarations are completed by every farmer in the Silver Fern Farms program, as required by law. The purpose of the ASD is to transfer key information about every animal, or group of animals, to the next person in charge of the animals, and ultimately to the processor. It is developed based on the understanding that practices on lifestyle blocks and farms impact on the safety and suitability of animals for processing and on the resulting animal products' eligibility for trade. Knowledge of these practices is essential for the New Zealand export trade and as such are strictly adhered to for the Beef program.

See APPENDIX for an example of the Animal Status Declaration Form

### The Silver Fern Farms Program for Label Integrity for Beef

#### **Claim 1: Grass Fed & Finished**

The Silver Fern Farms co-op of farmers supply beef that meets the requirement of the New Zealand definition of Grass Fed as per Animal Status Declaration document.

Pasture (Grass) fed means that the animals have been raised under normal New Zealand farming conditions with year round access to grass (e.g. hay, silage, lucerne, feed crops or other grazed or conserved forages) and other supplementary feeds (including manufacturing feeds, provided that you have a statement from the manufacturer that the feed does not contain animal protein or animal fat, other than dairy). You must keep the manufacturers' declaration. Where animals have been fed on a feed pad or feedlot other than for short term periods (e.g. only as supplementary feed immediately prior to slaughter) then they would not be 'pasture fed' because of not having year-round access to grass.

*Grass (Forage) Fed Marketing Claim Standard (October 16, 2007, Federal Register Notice (72 FR 58631)) - PDF*

**The Animal Status Declarations (ASD) Qu. 3.0 enforces this claim:**

***Qu 3.2: Have any of these animals been fed ANYTHING OTHER than milk or pasture (see definition of "pasture fed") in their lifetime?***





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**Any producers indicating a “yes” response to this question are segregated from the Grass Fed Beef program.**

### **Claim 2: No Antibiotics**

#### **Cattle Sourcing:**

Silver Fern Farms sources cattle from grass fed environment as per the Animal Status Declaration.

#### **Antibiotics in Feed:**

In this grass fed production system, there is also NO use of antibiotics in feed sources.

#### **Antibiotics for Sick Animals:**

Licensed animal remedies in New Zealand include antibiotics, and for beef these can be either prescribed by a veterinary practitioner after a physical consultation or purchased at a licensed veterinary practice over the counter.

The production method and free range nature of cattle production dictates the virtual non-requirement for antibiotic-use; it does not form part of the feeding regime and their use is solely in the isolated cases of therapeutic reasons.

### **No Antibiotics in Silver Fern Farms Grass Feed Beef**

When a remedy is administered to an animal there is a period of time, called a withholding period, within which the animals may not be slaughtered for human consumption. **After this period has elapsed, the regulator has determined that there will be no chemical residues left in the animals system and the meat is safe to be slaughtered and consumed.**

All stock slaughtered by Silver Fern Farms are accompanied by the aforementioned Animal Status Declaration (ASD). This is a legal document which confirms the status of animals presented for slaughter and includes whether or not they are within the withholding time outlined for any remedies.

**Animals within a withholding period for any treatment are not processed at Silver Fern Farms.** Adherence of suppliers to this withholding period of quarantine is randomly monitored by the New Zealand National Residue Monitoring Programme. This operates over the entire New Zealand Meat industry and is implemented and verified ongoing by the New Zealand Ministry for Primary Industries (MPI).

### **Claim 3: No Added Hormones**

The application of Hormonal Growth Promotants (HGP's) to cattle in New Zealand is subject to strict regulatory control as outlined in the Animal Products (Regulated Control Scheme – Hormone Growth Promotants) Notice 2009. This notice outlines



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the mechanisms for the use and management of HGP's administered to animals, and the handling and identification of HGP implanted animals and animal products derived from treated animals.

Silver Fern Farms Limited has implemented a documented HGP control program at all beef sites to ensure that HGP treated cattle and their derived products, are identified and processed separately to products from non HGP treated animals. These programs are subjected to regular internal verification by company technical staff, and also independently verified by the New Zealand Ministry for Primary Industries.

Using this control program, all beef products produced for Grass Feed Beef are taken from the HGP-free identified and segregated production.

**The Animal Status Declarations (ASD) Qu. 5.1 enforces this claim:**

***Qu 5.1: Have any of these cattle been treated with hormonal growth promotant in their lifetime?***

**Any producers indicating a "yes" response to this question are segregated from the Grass Feed Beef program. Additionally, every animal has their ear tagged scanned and compared against data from the HGP Treatment Database to confirm the status of each animal; any animal scanning positive is removed.**

**Claim 4: No Genetically Engineered Ingredients:**

New Zealand's policy regarding seed (i.e. the originating input if any, for grass) has been released by the Ministry for Primary Industries (NZ) as follows:

- i. **No GM seeds have been approved for release into the New Zealand environment. The law does not permit unapproved GM grains or seeds to be knowingly imported or planted.** If GM seeds are detected prior to import, the consignment will not be allowed into New Zealand.
- ii. There are strict penalties under the Hazardous Substances and New Organisms Act (1996) for introducing new organisms (including GM organisms) into New Zealand without approval.

The full, detailed GM Policy for New Zealand is here:  
<http://www.biosecurity.govt.nz/regs/imports/plants/gmo>

**Claim 5: Minimally Processed:**

Silver Fern Farms beef product from a range of primal and sub-primal boneless cuts, in refrigerated and frozen forms is minimally processed. For the purpose of this document, this includes but is not limited to: boning and cutting, trimming, packaging and reducing to preservation temperature (chilling or freezing). None of these procedures fundamentally alters the product.



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## Additional Animal Raising Assurances for Grass Fed Brands

### Humane Animal Treatment

Silver Fern Farms fully abides by the New Zealand Animal Welfare Act 1999 and associated codes of welfare which ensures the humane treatment of animals from the farm of origin through to the processing plant.

The Animal Welfare Act and associated codes are comprehensive rules regarding animal husbandry and handling, which includes:

- 1) Care of Animals
- 2) Prohibits certain types of conduct towards animals
- 3) The export of animals
- 4) Establishes two Ministerial advisory committees:
  - a. National Animal Welfare Advisory Committee (NAWAC); and
  - b. National Animal Ethics Advisory Committee (NAEAC)

Full details on the Act and associated codes can be found here:  
<http://www.biosecurity.govt.nz/regs/animal-welfare/stds/codes>

**All Export certifications confirm that all New Zealand legislation including Animal Welfare requirements have been complied with**

### Feedlot-free

The producers for the Grass Fed beef program must abide by the New Zealand definition of "Pasture Fed", dictating the requirement "**cattle must have year round access to grass**": and thereby eliminating the ability to be held in feedlots without being declared on the ASD and subsequently excluded from the Grass Fed beef program.

Please contact: Grant Howie, Silver Fern Farms:

Email: [grant.howie@silverfernfarms.co.nz](mailto:grant.howie@silverfernfarms.co.nz)

Direct Tel: +64 274 339332

**Karen Parker**

**Technical Development Co-ordinator**



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## Animal Status Declaration

**Declaration:** I am the person in charge of these animals and I declare that I have read and understand the requirements for this ASD and that the information that follows is true and accurate.

<b>Signature</b> (person in charge)		<b>Address animals moved from</b> (Rapid Number, Road and Town/District)		<b>AHB herd no. or LIC MINDA code</b> (cattle and deer only)	
<b>Name</b> (person in charge)		<b>Owner's postal address</b> (if different from above)		<b>NAIT no.</b>	
<b>Owner/Trade name</b> (if different from person in charge)				<b>Phone</b>	
				<b>Fax</b>	
				<b>Email</b>	
				<b>Date</b> / /	

<b>Stock type</b>	Steer	Heifer	Cow	Bull	Lamb	Sheep	Deer	Other
<b>Tallies</b>								

**Description** (e.g. breed, age, IQ, etc)

**Destination** (e.g. name and location of processor, saleyard or farm destination)

### 1.0 Withholding periods – all animals (see note 1 of the requirements)

1.1 Are any of these animals within the withholding period of any treatment?

yes

no

1.2 If Yes, state the product name, method of treatment and dates applied

(NB: these animals are NOT eligible for slaughter for human consumption until outside the withholding periods)

Product name	Method of treatment	Date used
		/ /
		/ /

### 2.0 Animal history – all animals (see note 2 of the requirements)

2.1 Were all of these animals born on your property?

yes

no

2.2 Were any of these animals imported into New Zealand?

yes

no

2.3 Are any of these animals from either a MPI surveillance listed property or under MPI movement control for residues or any purpose other than TB?

yes

no

### 3.0 Animal feeding – cattle, sheep, lambs, goats, deer, alpacas, llamas (see note 3 of the requirements)

3.1 Have any of these animals been fed ruminant protein in their lifetime?

yes

no

3.2 Have any of these animals been fed ANYTHING OTHER than milk or pasture (see description of 'Pasture fed') in their lifetime?

yes

no

### 4.0 Johne's Disease vaccination – where applicable (see note 4 of the requirements)

4.1 Have any of these animals been vaccinated against Johne's disease in their lifetime?

yes

no

### 5.0 HGP treatment – cattle (see note 5 of the requirements)

5.1 Have any of these cattle been treated with a hormonal growth promotant in their lifetime?

yes

no

5.2 If Yes, how many of these cattle have been treated with a hormonal growth promotant in their lifetime?

**Number**

### 6.0 TB Declaration – cattle, deer (see note 6 of the requirements)

6.1 What is the TB status of these animals? Enter status and index number

**Status**

**Number**

6.2 Have any of these animals been tested while under your management?

yes

no

6.3 What is the **date** of the last TB test for **these animals** and was TB detected?

**Date** / /

yes

no

6.4 What is the **date** of the last TB test for the **whole herd** and was TB detected?

**Date** / /

yes

no

6.5 Is the herd under TB movement control? (If Yes, a permit is required unless going direct to slaughter)

yes

no

6.6 Are these animals being moved from a property within a Movement Control Area?

yes

no

6.7 If Yes, have these animals been tested within 60 days prior to this movement?

yes

no

(The 60 day test is not required if the animals are going direct to slaughter)

6.8 Does the herd from which these animals are being moved include cattle or deer which have been introduced from a herd of lower TB status within the last three years?

yes

no

I understand the obligations under the Animal Welfare Act of persons in charge of animals to ensure that their physical, health and behavioural needs are met in accordance with the minimum standards defined in Codes of Welfare under the Act

### 7.0 Additional information (see note 7 of the requirements)

**HAVE YOU SIGNED THIS FORM AT THE TOP LEFT?**



**You must supply an ASD when animals are moved from your property and get one for all animals you receive.**



## Requirements for the Animal Status Declaration

### Purpose of the Animal Status Declaration

Practices on the farm impact on the suitability of animals for processing and on animal products' eligibility for trade. The purpose of the Animal Status Declaration (ASD) is to transfer key information about an animal, or group of animals, to the next person in charge, or the processor. For the processor, the information on the ASD is vital for guiding ante-mortem and post-mortem examination, and for determining export eligibility and certification. The ASD also incorporates the TB questions required by the Animal Health Board under the Biosecurity National Bovine Tuberculosis Pest Management Strategy Order 1998.

### Privacy Act Statement

The Privacy Act 1993 provides rights of access to, and correction of, personal information held in readily retrievable form. The information is held by the receiver of the ASD.

### Who is to complete and sign the Animal Status Declaration?

The ASD is to be completed by a person in charge of the animals who has the knowledge and authority to answer all the applicable questions. The person in charge of the animals could be the owner, farm manager or saleyard operator, but does NOT include transport operators. However, transport operators are required to transfer the ASD accompanying the animals being moved.

### Guidelines for completing the Animal Status Declaration

The ASD MUST be completed for all consignments of cattle (except bobby calves going to slaughter), buffalo, deer, sheep, lambs, goats, alpacas, llamas, horses, ostriches, and emus sent for processing.

In addition, the ASD MUST be completed for all:

- movements of sheep, lambs, goats, ostriches and emus sent from one property or saleyard to another property or saleyard where there is a different person in charge of the animals; and
- movements of cattle (including calves) and deer

Saleyards operators are to complete a new ASD or, where there is no change to the status of animals, the saleyard operator may use a clear photocopy of the ASD received with the animals. Where photocopies are used, the titles must be altered to match the departing mobs and the ASD MUST be countersigned by the saleyard operator as being true and accurate and tally changes initiated. Alternatively, it is acceptable for the sales docket which accurately states the number of animals purchased to be attached to a copy of the incoming ASD. Where there is change to the status of animals at the saleyard, a new ASD must be completed.

### Notes

The ASD is a mandated form under the Animal Products Act 1999. No additional commercial information is to be added to the form.

**'NAIT no.'** is the unique number which identifies the Person in Charge of Animals (PICA) with respect to their registered NAIT location. You will obtain a NAIT number when you register with NAIT on [www.nait.co.nz](http://www.nait.co.nz). It is compulsory for all PICA of NAIT animals to have a NAIT number. The inclusion of your NAIT number on this form is recommended.

**'AHB herd no. or LIC MINDA code (cattle and deer only)** is the Animal Health Board herd number or MINDA participant code or CRV Ambred code of the herd from which the cattle or deer are being moved.

The box **'Address animals moved from'** is the physical address of the property from which the animals are being moved. Please include the name of the road and if available, the Rapid Number.

Where the animals' description will not fit in the space provided, the additional information box (question 7.0) may be used. Then, if necessary, an additional piece of paper that is signed by the person in charge and attached to the ASD could be used.

The box **'Destination'** is to be completed to the best of your knowledge; for example provide the processor's company name and plant location, or the saleyard name and location, or address of the destination farm.

### 1. Withholding periods – all animals

You need only detail any treatments which remain within the withholding period. **If you do not know** the withholding period, the following defaults apply –

- 91 days (3 months) for cattle, deer, sheep, goats, alpacas, and llamas;
- 63 days for horses, ostriches and emus.

Calves for rearing: If the dam was within a meat withholding period at the time of birth of the calf, or if the calf has been fed milk from a dam within a milk withholding period of any animal treatment, or the calf itself has been treated, then enter details of the treatment in this section when the calf is within a withholding period.

Animals grazing in vineyards: There is a recommendation to withhold from slaughter or sale all animals used for leaf-plucking for at least 6 months from either the time of the last known spray or from when the animals were removed from the vines, whichever is earlier.

### 2. Animal history – all animals

Movement Control: the ASD question 2.3 must be ticked 'Yes' when animals are under any movement control imposed by MPI.

### 3. Animal feeding

Under the Biosecurity (Ruminant Protein) Regulations 1999 it is an offence to feed ruminant protein in any form, composition or admixture to ruminants. Ruminant protein means protein derived from ruminant tissue including blood but excluding dairy product. Ruminant refers to cattle (including buffalo), calves, deer, sheep, lambs, goats, alpacas and llamas.

**Pasture fed** means that the animals have been raised under normal New Zealand farming conditions with year round access to grass (e.g. hay, silage, lucerne, feed crops or other grazed or conserved forages) and other supplementary feeds (including manufacturing feeds, provided that you have a statement from the manufacturer that the feed does not contain animal protein or animal fat, other than dairy). You must keep the manufacturers' declaration. Where animals have been fed on a feed pad or feedlot other than for short term periods (e.g. only as supplementary feed immediately prior to slaughter) then they would not be 'pasture fed' because of not having year-round access to grass.

**If you do not know** if an animal has been 'pasture fed' you must tick the 'Yes' box.

### 4. John's Disease vaccination

The ASD must be ticked 'Yes' when any of the animals have been vaccinated with John's disease vaccination or you believe a previous owner may have vaccinated them.

### 5. Hormonal Growth Promotants (HGP)

HGPs may only be used under veterinary supervision. **If you do not know** whether the cattle have been treated with HGPs you must tick the 'Yes' box, and put 'Unknown' in the number box.

### 6. Bovine Tuberculosis (TB) Declaration

The TB status to be declared is the TB status currently assigned to the herd by the Animal Health Board, the agency responsible for implementing the TBfree New Zealand Programme.

Special movement conditions apply to herds with an infected (I) status and to some herds with a Suspended (S) status. If you have received a legal notice restricting the movement of your herd, refer to the conditions contained within that notice prior to moving your stock.

If you move stock without a completed ASD or without the correct pre-movement test, you may be prosecuted and the stock may be redirected back to your property.

If you are uncertain how to complete this declaration or you do not know your herd's TB status or whether the herd is located within a Movement Control Area (risk area) contact **0800 482 4636** prior to moving stock.

### 7. Any further information

This box enables other important information to be given by the person completing the ASD, for example identifying that the animals are experimental animals.

### Animal welfare

The Animal Welfare Act creates obligations to alleviate pain or distress of ill or injured animals. A veterinary declaration of fitness to transport is required for any ill or injured animals. Further information and Codes of Welfare are available at the MAF website ([www.maf.govt.nz](http://www.maf.govt.nz)) by searching 'Animal Welfare'.

### Records

The person in charge who completed and signed the ASD must keep a copy of the completed ASD for 1 year.

The person in charge who received the animals must keep the ASD received for the period that the animals are kept and then for an additional year.

Processing companies must keep the signed ASD (and any faxed changes) for 4 years from receipt.

### Use of the ASD

- When it is provided, the signed ASD form must accompany the animals sent from the property. In the case of electronic transfer – the ASD must be present at the receiving property when the animals arrive.
- If animals arrive at a property without an accompanying ASD or the receipt of an electronic ASD, then the animals must be separated from all other stock and held until a completed and signed ASD is received OR the animals must be returned to the supplier.
- Scanned (and emailed), or faxed copies of any changes to the ASD are acceptable.

### Warning

It is an offence under the Animal Products Act 1999 to falsify, alter or misrepresent any declaration required by this Act, with the intent to deceive or for the purposes of obtaining any material benefit or avoiding any material detriment.

It is an offence under the Biosecurity Act 1993 to: 1) Move cattle or deer aged 30 days or more unless accompanied by a completed TB declaration; 2) Move cattle or deer aged 90 days or more from a risk area to a place outside that risk area or within any risk area from its herd of origin or the place of establishment at which the animal is being kept to a place other than the place occupied by the owner or person in charge of the cattle or deer, unless it has undergone within 60 days prior to the date of movement, a negative test for bovine tuberculosis; 3) Make a declaration that is false or misleading.

It is an offence under the Biosecurity (Ruminant Protein) Regulations 1999 to allow ruminants to be fed ruminant protein.

It is an offence under the Biosecurity (Animal Identification Systems) Regulations 1999 to move cattle and deer over 30 days of age from the herd of origin or place where the animals are kept unless identified in accordance with these regulations.

