



Review of Submissions

Draft Import Health Standard for Pig Meat and Pig Meat Products from Australia

Draft Risk Management Proposal for Pig Meat and Pig Meat Products from Australia

[Document Date]

REVIEW OF SUBMISSIONS

Pig Meat and Pig Meat Products from Australia

[Document Date]

Approved for general release

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1 Introduction

The draft import health standard for the importation into New Zealand of Pig Meat and Pig Meat Products from Australia was notified for consultation on 19 December 2019.

The Ministry for Primary Industries (MPI) received submissions from the following:

Australian Government, Department of Agriculture, Water and Environment	7 January 2020
New Zealand Food and Grocery Council, Katherine Rich	21 January 2020
McCain Foods (Australia) Pty Ltd, Daniel Sutton	21 January 2020

This document summarises the issues raised in the submissions, and presents the MPI response to each.

1.1 Acronyms Used in the Document

MPI	Ministry for Primary Industries	NZFGC	New Zealand Food and Grocery Council
IHS	Import Health Standard	TTMRA	Trans-Tasman Mutual Recognition Arrangement
DAWE	Department of Agriculture, Water and Environment		

2 Summary of Amendments

As a result of comments made, the following is a summary of amendments to be made to the *Pig Meat and Pig Meat Products from Australia*.

Copies of all external stakeholder submissions in their entirety are presented in Appendix 1.

2.1 Clause 1.3 Requirements for clearance

Clause 1.3(2)(b): Included requirement for packaging for third country pork products.

Clause 1.3(2)(e): Amended wording to allow an official letter instead of veterinary certification.

Guidance box: Included for clarification around clearance of processed pork products (canned/retorted and products containing less than 5% pork) under the IHS *Specified Animal Products* (provisional issue 14 May 2020).

2.2 Clause 1.4 Third country pig meat products

Clause 1.4: Amended to include the requirements for third country pig meat products rather than as a definition in Schedule 2 of the IHS.

2.3 Clause 1.5 Import permit information

Clause 1.5(2): Removed as not relevant to IHS.

2.4 Clause 1.6 The documentation that must accompany goods

Clause 1.6(2)(d)(i): Amended wording to allow endorsement of the official letter by an Authorised Officer of the Australian Competent Authority rather than an official veterinarian.

Clause 1.6.2(1)(d): Amended wording to allow an official letter endorsed by an Authorised Officer the Australian Competent Authority instead of veterinary certificate.

2.5 Clause 2.1 PRRS virus

Clause 2.1(1)(b): Included curing conditions for PRRS virus.

2.6 Schedule 2 – Definitions

Updated definitions for official letter, third country pig meat products and released from biosecurity control.

2.7 Schedule 3 – Model official letter

Removed the model veterinary certificate and replaced with an official letter.

3 Review of Submissions

3.1 Australian Government, Department of Agriculture, Water and Environment

3.1.1 TTMRA

Trans-Tasman Mutual Recognition Arrangement (TTMRA) is to remove regulatory barriers to the movement of goods and service providers between Australia and New Zealand (NZ), and to thereby facilitate trade between the two countries and to enhance the international competitiveness of Australian and NZ enterprises, increase the level of transparency in trading arrangements, encourage innovation and reduce compliance costs for business. From bilateral discussions, Australia understands the measures proposed by NZ have been put in place to meet NZ's legal obligations and that no food safety or biosecurity risks are being identified for third country pig products imported into Australia and exported to NZ. Noting this, Australia requests the introduction of these measures should not be more trade restrictive than necessary to meet relevant objective/s in accordance with the provisions of the WTO SPS agreement. As such, we seek the NZMPI's consideration of the following specific comments and to review alternative documentation for the export of third country pig products from Australia.

MPI Response

MPI agrees with the principles of the TTMRA, and recognises that Australia and New Zealand's food safety frameworks are harmonised under this Agreement. Similarly, biosecurity equivalence is recognised for some animal products of Australian origin, including pig meat and pig meat products. This is reflected in the fact that New Zealand does not require veterinary certification for these products.

See section 3.1.1 below for discussion of third country pork.

3.1.1 Alternative to veterinary certification

Australia encourages NZ to consider alternatives to a Veterinary Certificate noting that the introduction of the new measures has not been driven by biosecurity or food safety risks. Australia has strict import controls for imported pork products.

1. Australia only accepts pig products from a selection of countries which have been individually assessed to comply with Australia's import requirements. These countries include: Canada, Denmark, Finland, Republic of Ireland, Netherlands, NZ, Sweden, United Kingdom (Great Britain and Northern Ireland), United States, Spain (dry cured only) and Italy (dry cured only).
2. Post entry requirements for all uncooked pig product imported into Australia require product to be processed by heating to a minimum core temperature for a specified time before being released from biosecurity control. For importing countries that are accepted by Australia, the minimum core temperature and time parameters are equal to what is transcribed in Section 2.1 of NZ's IHS. The same treatment is also applied to imported pork products which are cooked prior to export to Australia.
3. Australia requires all processors that receive imported pig meat to comply with Approved Arrangements for 3.2 – Imported pig meat processing Requirements. Approved Arrangements (AA) allow operators to manage biosecurity risks and/or perform the documentary assessment of goods in accordance with departmental requirements, using their own sites, facilities, equipment and people, and without constant supervision by the department and with compliance monitoring or auditing. AAs deliver confidence to NZ that all third country pig product must comply with the Australian Biosecurity Act 2015, and therefore is traceable to original health certificate raised by the country of origin.

Given the purpose of the IHS and noting the tight import controls Australia has, Australia believes an Official Veterinarian is not necessary and therefore requests NZ to consider alternatives to a Veterinary Certificate.

MPI Response

Considering the information provided by DAWE, MPI agrees that Australia's import conditions for cooked and cured pork are equivalent to New Zealand's. The list of source countries for third country pig meat and pig meat products from Australia are limited to Canada, European Union (EU) and United States of America (USA). These countries can export pig meat and pig meat products to New Zealand *directly* based on country or zone freedom from specified diseases in the relevant IHSS, and processing (i.e. cooking or curing) in relation to porcine respiratory and reproductive syndrome (PRRS) virus.

This reflects the current situation which may change going forward (e.g. if Australia allows imported pork from additional countries). We view certification as assurance that New Zealand's requirements will continue to be met, especially as there is a strong expectation for transparency and traceability of pork.

In the case of the EU, the number of EU Member States that can export pork to Australia is fewer than for New Zealand. Under EU legislation, only pig meat and pig meat products that are eligible for intra-Community trade can be exported to countries such as Australia and New Zealand. As such, if Australia were to allow imports from other EU Member States, these Member States would also be eligible to export to New Zealand.

We recognise that health attestations may be achieved by alternative means such as an official letter provided by DAWE to accompany each consignment. A model of the official letter for third country pork products has been included in Schedule 3 of the IHS.

The official letter confirms that third country pork products have been imported from Canada, the EU or USA, and released from biosecurity control (i.e. given biosecurity clearance) in Australia, and has been cooked or cured to meet New Zealand's PRRS requirements. However, the specific time/temperature and curing conditions for PRRS will not be outlined in the letter (see 3.1.2 for further discussion). The letter also contains the relevant information related to the consignment (e.g. product description, import permit number, etc).

3.1.2 Attestations for PRRS processing

Noting the above import controls in Australia, requirements for minimum core temperature and time parameters are equivalent to the specified requirements listed in Part 2 for Porcine reproductive and respiratory syndrome virus. Australia requests recognition that its importing requirements already meet the requirements that are outlined in Part 2 rather than listing these specifically in the IHS. The following wording is proposed to replace the table under Part 2:

Australian import requirements for the import of pork products from third countries meet New Zealand's biosecurity and food safety requirements.

MPI Response

Australia's cooking and curing requirements for third country pork products are equivalent to the PRRS requirements specified in Part 2 of the IHS. MPI agrees that specific time/temperature and curing declarations for PRRS are not needed in the official letter. The following statement will be included in Schedule 3 – Model official letter:

Australian import requirements for the import of pork products from third countries meet New Zealand's biosecurity requirements. Third country pork products have been cooked or cured to meet New Zealand's import requirements for porcine reproductive and respiratory syndrome virus.

The PRRS requirements for third country pork will not be removed from Part 2 of the IHS.

Retaining Part 2 of the IHS allows MPI to be notified by DAWE if there are changes to requirements as the third country pork would no longer meet the relevant IHSs.

3.2 New Zealand Food and Grocery Council

3.2.1 Support for third country pork products

Inclusion therefore of the existing provisions for third country trade is strongly supported, not the least for accessibility to these provisions being greatly enhanced through co-location in a single document

Similarly, inclusion of the PRRS risk mitigation measures in the IHS are supported for the purposes of accessibility and protection.

NZFGC is pleased to see the provisions for third country pig meat products include the option that they be cooked or cured. Much of the use by manufacturers in New Zealand of pork is cooked or cured such as in pizzas and the like. As well, pork features in small amounts in a range of spices and condiments manufactured in or imported into New Zealand. The third country provisions are therefore a vital element for inclusion.

MPI Response

Noted.

3.2.2 Clearance of specified third country pork products

We note there is no cross-reference or mention of the threshold provision contained in the Specified foods for human consumption containing animal products (EDIPROIC.ALL) that if a product contains less than 5% meat (bacon) and can meet clause 2.21 of the above IHS, it is eligible for biosecurity clearance. We consider that for completeness and usability, even a footnote to this effect would be very helpful

MPI Response

The clause regarding products containing less than 5% meat in the IHS *Specified Foods for Human Consumption Containing Animal Products* (EDIPROIC.ALL, dated 19 December 2019) has been amended, and the new import requirements can be found in the IHS *Specified Animal Products* (SPECPROD.ALL, provisional issue).

A guidance box will be included under clause 1.3 (requirements for clearance) under the IHS MEAPORIC.AUS to note that third country canned/retorted pork products and processed products containing less than 5% pork from Australia are eligible for importation under the IHS *Specified Animal Products*.

3.3 McCain Foods

3.3.1 Meeting import requirements

McCain Foods assembles and exports prepared frozen meals (dinners and pizza) which contain pork. These pork components may have originated from outside Australia and we work closely with our local suppliers to ensure quality, safety and traceability. Based on the document review it is McCain's understanding that we can assure that all requirements outlined in the draft standard are currently being met in terms of source and treatment of pork.

With implementation of the IHS, McCain will work with relevant stakeholders to ensure that the appropriate documentation is requested and supplied as outlined.

MPI Response

Noted.

4 Appendix 1: Copies of Submissions

Place copies of submissions in Arial Narrow font size 11 where possible with same name and in same order as responses.

4.1 Australian Government, Department of Agriculture, Water and Environment



Australian Government

Comments from the Australian Government to New Zealand on the *Import Health Standard: Pig Meat and Pig Meat Products from Australia (G/SPS/N/NZL/614)*.

The Australian Government welcomes the opportunity to provide formal comments on the *Import Health Standard: Pig Meat and Pig Meat Products from Australia (G/SPS/N/NZL/614)* (herein referred to as the IHS). The Australian Government thanks the New Zealand Ministry for Primary Industries (NZMPI) for their notification through the World Trade Organization (WTO) and also thanks the NZMPI for considering its comments on the draft IHS.

General comments

Australia notes the objective under the Trans-Tasman Mutual Recognition Arrangement (TTMRA) is to remove regulatory barriers to the movement of goods and service providers between Australia and New Zealand (NZ), and to thereby facilitate trade between the two countries and to enhance the international competitiveness of Australian and NZ enterprises, increase the level of transparency in trading arrangements, encourage innovation and reduce compliance costs for business. From bilateral discussions, Australia understands the measures proposed by NZ have been put in place to meet NZ's legal obligations and that no food safety or biosecurity risks are being identified for third country pig products imported into Australia and exported to NZ. Noting this, Australia requests the introduction of these measures should not be more trade restrictive than necessary to meet relevant objective/s in accordance with the provisions of the WTO SPS agreement. As such, we seek the NZMPI's consideration of the following specific comments and to review alternative documentation for the export of third country pig products from Australia.

Specific comments

Section 1.3, 1.6.2 and 2.1:

Australia encourages NZ to consider alternatives to a Veterinary Certificate noting that the introduction of the new measures has not been driven by biosecurity or food safety risks. Australia has strict import controls for imported pork products, a summary of which is as follows; as:

1. Australia only accepts pig products from a selection of countries which have been individually assessed to comply with Australia's import requirements. These countries include: Canada, Denmark, Finland, Republic of Ireland, Netherlands, NZ, Sweden, United Kingdom (Great Britain and Northern Ireland), United States, Spain (dry cured only) and Italy (dry cured only).
2. Post entry requirements for all uncooked pig product imported into Australia require product to be processed by heating to a minimum core temperature for a specified time before being released from biosecurity control. For importing countries that are accepted by Australia, the minimum core temperature and time parameters are equal to what is transcribed in Section 2.1 of NZ's IHS. The same treatment is also applied to imported pork products which are cooked prior to export to Australia.
3. Australia requires all processors that receive imported pig meat to comply with [Approved Arrangements for 3.2 – Imported pig meat processing Requirements](#). Approved Arrangements (AA) allow operators to manage biosecurity risks and/or perform the documentary assessment of goods in accordance with departmental requirements, using their own sites, facilities, equipment and people, and without constant supervision by the department and with compliance monitoring or auditing. AAs deliver confidence to NZ that all third country pig product must comply with the *Australian Biosecurity Act 2015*, and therefore is traceable to original health certificate raised by the country of origin.

Given the purpose of the IHS and noting the tight import controls Australia has, Australia believes an Official Veterinarian is not necessary and therefore requests NZ to consider alternatives to a Veterinary Certificate. Australia would welcome the opportunity to discuss alternatives and work collaboratively to develop an option that suits both countries in order to continue to improve the competitiveness of Australian and New Zealand enterprises on an international scale. Further information on these options can be provided via teleconference outside these comments.

Part 2:

Noting the above import controls in Australia, requirements for minimum core temperature and time parameters are equivalent to the specified requirements listed in Part 2 for Porcine reproductive and respiratory syndrome virus. Australia requests recognition that its importing requirements already meet the requirements that are outlined in Part 2 rather than listing these specifically in the IHS. The following wording is proposed to replace the table under Part 2:

Australian import requirements for the import of pork products from third countries meet New Zealand's biosecurity and food safety requirements.

Conclusion

Australia appreciates NZ's consideration of the points raised in this submission and welcomes the opportunity to discuss and collaborate on the application of NZ's IHS.

4.2 New Zealand Food and Grocery Council



21 January 2020

Animal Trade (Imports)
Ministry for Primary Industries
PO Box 2526
WELLINGTON 6140

Email: animal.imports@mpi.govt.nz

Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the *Risk Management Proposal: Pig meat and pig meat products from Australia – MEAPORIC.AUS*.

Yours sincerely

A handwritten signature in black ink that reads "Katherine Rich".

Katherine Rich
Chief Executive

99-105 Customhouse Quay, Wellington, PO Box 25-420, Wellington 6146, NEW ZEALAND



***Risk Management Proposal: Pig meat and
pig meat products from Australia –
MEAPORIC.AUS***

**Submission by the New Zealand Food & Grocery
Council**

21 January 2020

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council ("NZFGC") welcomes the opportunity to comment on the *Risk Management Proposal: Pig meat and pig meat products from Australia – MEAPORIC.AUS*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

COMMENTS

3. NZFGC understands that the rationale for the draft import health standard (IHS) is threefold, to:
 - update the format of the IHS;
 - add provisions relating to third country pig meat products "namely products that are processed in Australia using imported pig meat or pig meat product"; and
 - add provisions relating specifically to porcine respiratory and reproductive syndrome (PRRS).
4. According to MFAT, Australia is New Zealand's largest trading partner overall (goods and services). While any two way trade in pig meat is very small, with the expansion of African swine fever (ASF) throughout Asia this may change for New Zealand producers but also highlights the significance of biosecurity measures for New Zealand. The situation is even more dire in Australia with its close proximity to ASF outbreaks in East Timor, Indonesia the Philippines and extensively in South East Asia coupled with the loss of animals due to the fires in Nov 2019 to Jan 2020.
5. As noted by Pork New Zealand, pork is the world's most consumed meat and with only 95 commercial companies operating (Annual Report, Pork New Zealand, 2018), it is not surprising that more than 25 countries exported over 50 million kilograms of pork to New Zealand in 2017, making up almost 60 per cent of the pork products consumed in New Zealand.
6. Inclusion therefore of the existing provisions for third country trade is strongly supported, not the least for accessibility to these provisions being greatly enhanced through co-location in a single document.
7. Similarly, inclusion of the PRRS risk mitigation measures in the IHS are supported for the purposes of accessibility and protection.
8. NZFGC is pleased to see the provisions for third country pig meat products include the option that they be cooked or cured. Much of the use by manufacturers in New Zealand of pork is cooked or cured such as in pizzas and the like. As well, pork features in small amounts in a range of spices and condiments manufactured in or imported into New Zealand. The third country provisions are therefore a vital element for inclusion.

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9. We note there is no cross-reference or mention of the threshold provision contained in the *Specified foods for human consumption containing animal products* (EDIPROIC.ALL) that if a product contains less than 5% meat (bacon) and can meet clause 2.21 of the above IHS, it is eligible for biosecurity clearance. We consider that for completeness and usability, even a footnote to this effect would be very helpful.

4.3 McCain Foods



McCain Foods (Aust) Pty Ltd

1059 Ring Road, Mitchell Park Vic 3355
Phone: +61 (03) 5338 0200

January 21, 2020

To Whom It May Concern,

On the basis of review of the 2 documents under consult:

Consultation documents

[Import Health Standard: Pig Meat and Pig Meat Products from Australia](#) [PDF, 688 KB]

[Risk management proposal: Pig meat and pig meat products from Australia](#) [PDF, 363 KB]

McCain Foods is fully aligned to the requirements of both the Import Health Standard (IHS) and the Risk Management Proposal and support its implementation.

McCain Foods assembles and exports prepared frozen meals (dinners and pizza) which contain pork. These pork components may have originated from outside Australia and we work closely with our local suppliers to ensure quality, safety and traceability. Based on the document review it is McCain's understanding that we can assure that all requirements outlined in the draft standard are currently being met in terms of source and treatment of pork.

With implementation of the IHS, McCain will work with relevant stakeholders to ensure that the appropriate documentation is requested and supplied as outlined.

Kind Regards

A handwritten signature in black ink, appearing to read "Daniel Sutton", is written over a light blue rectangular background.

Daniel Sutton
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