



Risk Management Proposal

Amendment to Import Health Standard for
Specified Foods for Human Consumption
Containing Animal Products

EDIPROIC.ALL

30 June 2015

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Contents

Page

1	Purpose	1
2	Background	1
3	Objective	1
4	Recommendations for identified risk items	1
4.1	Private consignments of cured meat updated in March and June of 2015	1
4.2	Private consignments of dairy products and products containing dairy ingredients that are not shelf-stable – updated in March and June of 2015	2
4.3	Consignments of mayonnaise and salad dressings containing egg	2
4.4	Commercially manufactured mooncakes containing whole egg	2
4.5	Muscle protein powders containing dairy and/or egg ingredients updated in June of 2015	3
4.6	Pork crackling	4
4.7	Products that contain more than 5% and less than 21% egg ingredients	5
4.8	Private consignments of meat and meat products from specified countries updated in March of 2015	5
4.9	Confectionery, bread, biscuits, cakes, crackers and puddings containing dairy or egg ingredients updated in June of 2015	5
4.10	Private Consignments of tea bags containing honey updated in March of 2015	5
4.11	Private consignments of bee products updated in March and June of 2015	6
4.12	Beeswax and beeswax products added in March of 2015	6
4.13	Processed foods and beverages containing bee products added in March of 2015	6
4.14	Dietary supplements and medical preparations containing bee products added in March of 2015 and updated in June of 2015	6
4.15	Honey of New Zealand origin added in March of 2015 and updated in June of 2015	7

1 Purpose

- (1) The purpose of this document is to:
 - a) Show how options for the management of some potential risk items have been assessed; and
 - b) Provide recommendations for amended import requirements in the 2014 *Import Health Standard (IHS) for Specified Foods for Human Consumption Containing Animal Products* (the 2014 IHS); and
 - c) Describe amended import requirements in the 2015 revised *Import Health Standard for Specified Foods for Human Consumption Containing Animal Products* (the 2015 IHS).

2 Background

- (1) Amendments are made to import health standards as required to reflect changes in biosecurity needs and products being imported into New Zealand. The 2010 *IHS for Specified Foods for Human Consumption Containing Animal Products*, EDIPROIC.ALL (the 2010 IHS). <http://www.mpi.govt.nz/document-vault/1921> was amended in August 2014. Minor revisions have been made in October 2014 and in March 2015 following appropriate risk decisions on specified foods for human consumption.
- (2) Further clarification of border queries has resulted in development of the June 2015 IHS. The risk management decisions that are new since the 2014 IHS are marked in this document as 'updated in 2015', and those that are new since the March 2014 IHS are marked as 'updated in June of 2015'.
- (3) All risk decisions in this document are derived from rapid risk assessments conducted at MPI or changes in international trade processes for each specific item listed below.

3 Objective

- (1) The objective for amending the 2010 IHS and now the March 2015 IHS is to effectively manage biosecurity risks associated with the import of specified foods for human consumption containing animal products, consistent with New Zealand's domestic legislation and international obligations.
- (2) This IHS is being re-issued for the third time since August 2014. All changes are in response to urgent issues with the border or our trading partners, and clarifying the terminology used in this IHS. Clauses that have been changed since the 2014 IHS are indicated below.

4 Recommendations for identified risk items

- (1) Rapid risk assessments were conducted for a number of specified risk items included in the 2014 IHS EDIPROIC.ALL. These and subsequent changes made to facilitate trade in the March and June 2015 IHSs are summarised below.

4.1 Private consignments of cured meat updated in March and June of 2015

- (1) Private consignments of dried cured meat manufactured in FMD-free countries in accordance with the MPI *List of FMD-Free Countries and Zones* could be imported in the 2014 IHS provided all of the following requirements were met:
 - a) The product is shelf-stable.
 - b) The total weight of the consignment is 1 kilogram or less.
- (2) This has been updated in the 2015 IHS to delete the requirement that the product is shelf-stable, and to delete the word "dried" from the clause definition. The risk decision received in response to multiple border queries on this clause is that 1 kg of cured meat manufactured in FMD-free countries, whether or not shelf-stable or dried, is safe from FMD risk. Packaging does not affect the risk profile of this small amount of meat.
- (3) The OIE definition of 'cured meat' was added to the HIS in August 2014. That is, meat that has been subjected to any treatment irreversibly modifying its organoleptic and physicochemical characteristics. This does not include frozen meat, chilled meat, minced meat or mechanically recovered meat.

- (4) In June 2015, the definition of cured meat was changed again to the following: “Meat that has been subjected to any treatment such as salting, pickling, drying or smoking. This does not include frozen meat, chilled meat, minced meat or mechanically recovered meat.”

4.2 Private consignments of dairy products and products containing dairy ingredients that are not shelf-stable – updated in March and June of 2015

- (1) Private consignments of dairy products that are not shelf-stable were eligible for importation under the 2014 IHS, provided all the following requirements were met:
- a) The product is commercially prepared and packaged.
 - b) The product is in its original sealed packaging on arrival.
 - c) The product is not for biological or microbiological analysis.
 - d) The total weight of the consignment is two (2) kilograms or less.
- (2) This has been changed in the 2015 IHS to delete the requirement that the product is commercially prepared and packaged, and that the product is in its original sealed packaging on arrival. The risk decision, made in response to multiple border queries on this clause, was that the FMD risk is the same with or without the packaging. As stated in the previous RMP, a 2 kg piece of cheese is vastly inadequate to provide an infectious dose of FMD.
- (3) The words “made up” have been deleted from the description of dairy-based infant formula, and a reference to clause 2.19 has been added to indicate the clause for protein powders containing both egg albumin and dairy protein, in June of 2015.

4.3 Consignments of mayonnaise and salad dressings containing egg

- (1) In the 2010 IHS EDIPROIC.ALL, commercially prepared mayonnaise and salad dressing containing egg may be imported from Australia, the European Union, Japan and the USA provided:
- a) The product is shelf-stable.
 - b) The product is commercially prepared and packaged.
 - c) The product is in its original sealed packaging on arrival.
 - d) The country of origin is identifiable from the packaging.
- (2) Pasteurisation of egg products and the acidic pH of mayonnaise/salad dressing are likely to reduce the titre of pathogens within this commodity. However, some residual pathogens are likely to remain. Limiting the amount imported for human consumption is an additional risk management measure which will further reduce the animal biosecurity exposure risk to an acceptably low level.

4.3.1 Recommendation

- (1) It is proposed that consignments of mayonnaise and salad dressing containing egg may be imported in the 2014 IHS EDIPROIC.ALL provided all of the following requirements are met:
- a) The product is shelf-stable.
 - b) The product is commercially prepared and packaged.
 - c) The product is in its original sealed packaging on arrival.
 - d) The total weight of the consignment:
 - i) Is unlimited for products originating from Australia, Canada, the European Union, Japan or the United States; or
 - ii) For products originating from all other countries is 1 kilogram or less.

4.4 Commercially manufactured mooncakes containing whole egg

- (1) Mooncakes are commercially imported into New Zealand under the 2010 IHS EDIPROIC.ALL, which permits biosecurity clearance to be given to commercially manufactured mooncakes provided that:
- a) The product is shelf-stable.
 - b) The product does not contain any meat and/or meat product fillings.
 - c) The product is commercially prepared and packaged.
 - d) The product is in its original sealed packaging on arrival.

- e) The product must be accompanied by a manufacturer's declaration stating that the product reached a core temperature greater than 60° C for no less than 3.5 minutes.
- (2) However, private consignments without manufacturer's declarations are arriving at the border either accompanying passengers or sent as gifts.
- (3) Once cooked, mooncakes do not require refrigeration and can be considered a shelf stable product.
- (4) Mooncakes are a seasonal product associated with the Mid-Autumn Festival in September/October each year. The quantity imported over an entire year is expected to be low. Mooncakes can be viewed as a 'ceremonial' product with sentimental value and are therefore unlikely to be wasted or discarded, making it highly unlikely that the products would be either intentionally or inadvertently fed to birds.
- (5) The combination of the heat treatment applied, low quantities being imported due to their seasonal nature and the low probability of mooncakes containing egg being fed to birds, reduce the risk presented by egg mooncakes to an acceptably low level.

4.4.1 Recommendation

- (1) It is proposed that private consignments (up to 10 kilograms) of commercially prepared and packaged mooncakes containing egg may be imported without requiring a manufacturer's declaration in the 2014 IHS EDIPROIC.ALL, provided that the following are met:
 - a) The product is shelf-stable.
 - b) The product is commercially prepared and packaged.
 - c) The product is in its original sealed packaging on arrival.
 - d) The product does not contain any meat or meat product fillings.
 - e) The product:
 - i) Must be accompanied by a manufacturer's declaration stating that the product reached a core temperature greater than 60° C for no less than 3.5 minutes for commercial consignments; or
 - ii) Private consignments are limited to 10 kilograms and do not require a manufacturer's declaration.

4.5 Muscle protein powders containing dairy and/or egg ingredients updated in June of 2015

- (1) Private consignments of muscle protein powders containing dairy and egg products from Australia, Canada, European Union and the USA may be given biosecurity clearance under the 2010 IHS EDIPROIC.ALL, provided the following requirements are met:
 - a) The product is shelf stable.
 - b) The product is commercially packaged and prepared.
 - c) The product is in its original sealed packaging on arrival.
 - d) The country of origin is identifiable from the packaging.
 - e) The total weight of the consignment is 20 kilograms or less.
- (2) This has previously been compared to clause 7.16 in the 2010 EDIPROIC.ALL that allows biosecurity clearance of cake, pudding, sauce and baking mixtures containing dairy and/or egg ingredients from any country provided all the following requirements are met:
 - a) The product is shelf-stable.
 - b) The product is commercially prepared and packaged.
 - c) The product is in its original sealed packaging on arrival.
- (3) This comparison/combination of clauses has led to the previous decision that protein powder from any country and of commercial quantity can be released, provided it is shelf stable, and commercially prepared and packaged.
- (4) Dairy (whey) powder, which is the main ingredient in whey muscle protein powder, is exposed to a sufficient time temperature regime (pasteurisation) that pathogens of concern are likely to be inactivated. In the very unlikely event that calves or pigs were exposed to pasteurised whey powder from animals infected

with FMDV, they would have to consume at least 20 times more than the animal can physically consume to receive an infectious dose.

- (5) The amount of egg powder (whole egg or egg albumen) present in whey muscle protein powder is generally low, but egg albumen is the main ingredient in egg muscle protein powders. As discussed in the IRA for egg powders¹, during manufacture whole egg powder is heated for at least 3.5 minutes at 60° C and egg albumen is heated for at least 7 days at 54.4° C. An additional heat treatment step, however, is applied to all types of egg powders during the spray drying process and this usually involves an inlet temperature of 155° C to 175° C and outlet temperature of 70° C to 80° C. This would be expected to further reduce the titre of any residual virus. It is expected that most muscle protein powders will be directly consumed by humans and very little wastage should be produced as this product is shelf stable and of high value.
- (6) Due to the various heat treatments applied to dairy ingredients and the lack of an exposure pathway for egg powders, the biosecurity risk associated with muscle protein powders is considered to be very low.

4.5.1 Recommendation

- (1) It is proposed that muscle protein powders containing dairy and/or egg products can continue to be imported into New Zealand from *all countries* provided the following requirements are met:
- (2) Muscle protein powders containing dairy and/or egg ingredients may be imported from any country providing the following requirements are met:
 - a) The product is shelf-stable, and either
 - b) The product is:
 - i) Commercially prepared and packaged; and in its original sealed packaging on arrival; or
 - ii) Less than 1 kilogram dry weight.
- (3) In June of 2015, the above clause was updated to the following:

Muscle protein powders containing dairy and/or egg ingredients may be imported from any country provided the product is:

- a) Shelf-stable; or
- b) A private consignment of no more than 1 kilogram dry weight

4.6 Pork crackling

- (1) Private consignments of commercially prepared pork crackling entered New Zealand under the 2010 IHS EDIPROIC.ALL, provided that:
 - a) The product is shelf-stable.
 - b) The product is commercially prepared and packaged.
 - c) The product is in its original sealed packaging on arrival.
- (2) Commercial consignments require a manufacturer's declaration which shows retort to the processing standard Fo3.
- (3) Private consignments of pork crackling are likely to be imported in low volumes. Due to the heat treatment applied during the commercial manufacturing process it is unlikely that an infectious agent would be introduced into New Zealand by this commodity.

4.6.1 Recommendation

- (1) It is proposed that private consignments of commercially prepared pork crackling should continue to be permitted importation into New Zealand under the 2014 IHS EDIPROIC.ALL without a manufacturer's declaration.

¹ Import Risk Analysis: Egg powders from all countries, MAF Biosecurity Publication October 21, 2008 (28 pp)
<http://www.biosecurity.govt.nz/files/regis/imports/risk/egg-powder-ra.pdf>

4.7 Products that contain more than 5% and less than 21% egg ingredients

- (1) Under the 2010 EDIPROIC.ALL, products containing egg in quantities greater than 5% are not eligible for clearance.
- (2) As discussed in the [Import Risk Analysis: Egg Powders from All Countries, 21 October 2008](#), sufficient heat treatment has been demonstrated to destroy risk organisms including avian influenza virus and Newcastle disease virus. Angara disease has likewise been shown to be heat labile at sufficient times and temperatures.

4.7.1 Recommendation

- (1) It is proposed that products containing pasteurised egg in quantities greater than 5% and less than 21% may be given clearance provided that the following requirements are met:
 - a) The product(s) must be accompanied by a manufacturer's declaration specifying that at any stage of the manufacturing process, the eggs must have undergone a minimum heat treatment of:
 - i 60° Celsius for no less than 1 hour, or
 - ii 80° Celsius for no less than 10 minutes, or
 - iii 100° Celsius for no less than 5 minutes.

4.8 Private consignments of meat and meat products from specified countries updated in March of 2015

- (1) Private consignments of meat and meat products that are not shelf-stable from specified countries were allowed in the 2014 IHS, provided all the following requirements were met:
 - a) The product is commercially prepared and packaged.
 - b) The product is in its original sealed packaging on arrival.
 - c) The country of origin is identifiable from the packaging.
 - d) The total weight of the consignment is 20 kilograms or less.
- (2) This was changed in the March 2015 IHS as follows:
 - a) The country of manufacture, rather than the country of origin, is required to determine consignment eligibility. MPI has rationalized that one of the factors considered when determining a country is free from FMD is that they apply the same restrictions as New Zealand for imported meat. Therefore, meat manufactured in FMD-free countries is considered FMD-free.
 - b) Switzerland and Norway have been added to the column for the European Union.

4.9 Confectionery, bread, biscuits, cakes, crackers and puddings containing dairy or egg ingredients updated in June of 2015

- (1) This clause in Ediproic.all was affected by the amendment of the definition of shelf-stable in March 2015, with the new definition excluding home-baking as it specifies that the product must be commercially prepared and packaged and is in its original sealed packaging. While this remains relevant for commercial imports, the clause is being amended to allow private consignments of home baking.
- (2) In June 2015 this was remedied by maintaining the definition of shelf-stable for commercial goods, and indicating that private consignments could be cleared regardless of packaging, as follows:
 - a) shelf-stable (see 2.15 for mooncakes); or
 - b) a private consignment

4.10 Private Consignments of tea bags containing honey updated in March of 2015

- (1) Private consignments of teabags containing honey were eligible for importation in the 2014 IHS, provided:
 - a) The product is commercially prepared and packaged.
 - b) The product is in its original sealed packaging on arrival.
 - c) A maximum of one box (50 servings or less) per passenger is imported.

- (2) This was updated in the March 2015 IHS by adding it to the new clause 2.26, for processed foods and beverages containing bee products.

4.11 Private consignments of bee products updated in March and June of 2015

- (1) Private consignments of bee products considered to present negligible risk were added to the 2015 IHS for maximum ease of clearing passengers and mail using this IHS in March 2015. The conditions for clearing private consignments of bee products were previously in the IHS for Specified Processed Bee Product (2006) and have been transferred largely unchanged as listed below in 4.12 – 4.15.

4.12 Beeswax and beeswax products added in March of 2015

- (1) Private consignments of beeswax items may be imported provided:
- a) The product is not foundation beeswax or any other product associated with the beekeeping industry; and
 - b) The beeswax product is commercially manufactured.

Guidance for sections 2.24 – 2.27

- Commercial consignments of these products are covered in the [IHS: Specified Processed Bee Products](#).
- Didgeridoos with natural beeswax coating and mouthpieces are not risk items.

4.13 Processed foods and beverages containing bee products added in March of 2015

- (1) Private consignments of dry tea bags containing honey powder may be imported from any country provided all of the following requirements are met:
- a) The product is shelf stable.
 - b) A maximum of one box (50 servings or less) per passenger is imported.
- (2) The following products are allowed for private consignments only, with a maximum weight per passenger or per consignment of 10 kilograms. Beverages are limited to a maximum of three bottles per passenger or per consignment:
- a) Shelf-stable baked, boiled or fried foods containing honey, propolis, bee pollen and/or royal jelly.
 - b) Other processed composite foods and beverages containing bee products:
 - i) Nougat; or
 - ii) Commercially prepared and bottled beverage containing at least 20% alcohol according to the label; or
 - iii) Commercially prepared and bottled honey mead or energy drinks.

4.14 Dietary supplements and medical preparations containing bee products added in March of 2015 and updated in June of 2015

- (1) Private consignments of dietary supplements and medical preparations containing honey, pollen, bee larvae and royal jelly in shelf-ready packaging may be imported provided the bee product is:
- a) Encapsulated (completely covered by an edible substance such as gelatine or wax that does not contain sugar, fruit, honey, pollen or royal jelly) and packaged in shelf-ready packages for direct retail sale, limited to one kilogram per consignment or passenger; or
 - b) A commercially manufactured and packaged throat spray or elixir (limit twelve bottles per person); or
 - c) A dermatological preparation containing bee products, limited to one kilogram per consignment or passenger.

- (2) In June of 2015 this clause was amended to add propolis to the list of bee products included in private consignments of dietary supplements and medical preparations.

4.15 Honey of New Zealand origin added in March of 2015 and updated in June of 2015

- (1) Private consignments of honey of New Zealand origin may be imported provided all of the following requirements are true:
- a) The product must be commercially prepared and packaged.
 - b) The product must be within its original sealed packaging on arrival.
 - c) The country of origin (New Zealand) must be clearly identifiable on the packaging.
 - d) The product must be accompanied by a sales receipt from the duty free shop.
- (2) In June 2015, the above conditions for private consignments of New Zealand honey were revised in accordance with border procedures for clearing New Zealand origin honey in the passenger pathway, to the following:
- a) The product must be commercially prepared and packaged.
 - b) The product must be within its original sealed packaging on arrival.
 - c) The country of origin (New Zealand) must be clearly identifiable on the packaging.
 - d) The total weight of the honey is limited to 2 kilograms.