



# Review of Submissions

Transitional Facility Standard for Animal Products

**22 June 2016**

**Ministry for Primary Industries**

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**Regulation and Assurance Branch**

**REVIEW OF SUBMISSIONS**

Transitional Facilities for Animal Products

May 2016

Approved for general release

**Howard Pharo**  
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Ministry for Primary Industries

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# 1 Introduction

The draft transitional facility standard for animal products was notified for consultation on 11 June 2015. Submissions closed for public consultation on 16 July 2015.

The transitional facility standard will provide the building, maintenance and operating requirements for the processing of uncleared animal products. Uncleared animal products must meet the processing measures in the relevant import health standard in order to receive biosecurity clearance.

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

New Zealand Pork Industry Board 14 July 2015

Premier Beehive 9 July 2015

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	BACC	Biosecurity Authority Clearance Certificate
IRA	Import Risk Analysis	Act	Biosecurity Act of 1993
TF	Transitional facility	PBNZ	Premier Beehive New Zealand
IHS	Import health standard	CRC	Consumer ready cuts of pork
NZ PIB	New Zealand Pork Industry Board		

## 2 Summary of Amendments

As a result of comments made, the following is a summary of amendments to be made to the transitional facility standard for animal products received by MPI during the consultation period.

### 2.1 Transitional Facility Amendments

- Product inventory Clause 3.4(3): MPI will remove 'amount of product being imported', 'cut type' and 'number and weights of batches being released'.
- Product inventory Clause 3.4(3): MPI will add 'total weight of product being released'.

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

### 2.2 Other Amendments

The following changes have been made to the transitional facility standard. These changes are the result of MPI's own further consideration of the standard.

- Clause 2.2(1)(b) and (c): MPI will combine (b) and (c), and clarify that sealed and washable surfaces will assist in cleaning and decontamination.
- Guidance 2.2(1) Transitional facility premises: MPI will include clarification regarding the unloading/devanning area; specifically, these areas will need to meet the requirements of MPI *Standard for General Transitional Facilities for Uncleared Risk Goods*. MPI will also clarify that facilities holding animal products will need to be approved to MPI *Standard for General Transitional Facilities for Uncleared Risk Goods*.
- Guidance 2.2(2) Transitional facility premises: MPI will include clarification regarding the site plan or map, emphasising that transitional facility boundaries should be clearly identified and the map should be easily readable.
- Clause 2.3 Signage: MPI will move to Part 3 clause 3.12.
- Clause 3.1(3) Operating manual: MPI will add the statement, 'The operator must ensure that the procedures set out in the operating manual are followed.'
- Guidance 3.1 Operating manual: MPI will remove reference to example of an operating manual.
- Clause 3.4(3) Product inventory: MPI will remove requirement of the operator to provide an inventory report for CRC under the direct pathway as this information is recorded by MPI on arrival of the consignment to New Zealand.
- Guidance 3.6 Waste disposal: MPI will add guidance for incineration and rendering.
- Guidance 3.13 Internal audit and quality assurance systems review: MPI will remove reference to example of an internal audit checklist.
- Schedule 2 Definitions: MPI will include a definition for rendering.

## 3 Review of Submissions

### 3.1 New Zealand Pork Industry Board

#### 3.1.1 Section 3.1(3)(e)(iv) [currently Section 3.1(6)(e)(iii)]: Thawing (for commodities like pork and salmon)

We believe the water from thawing should be specifically included within Section 3.6 to ensure that evidence for the effectiveness of treatment / disposal is verified and documented. It may be the intention to cover it within Section 3.6, but we believe it should be explicit.

In addition, we would be grateful to understand more clearly what is required by Section 3.6 (3). In particular, the range of methods acceptable to MPI for disposing of all liquid waste (not only water from thawing, but also wash water and any other liquid waste), plus the evidence including verification for the effectiveness of treatment to meet the broad standard set out in the import health standards: All liquid waste must be disposed of through a municipal waste water management system, or a method approved by MAFBNZ.

#### **MPI Response:**

The *Transitional Facility for Animal Products* is written to enable processing of a range of different animal products. In some facility standards water treatment is specifically covered, as water is a primary waste product (e.g. *Transitional Facility for Ornamental Fish and Marine Invertebrates*). This is not the case for animal products.

Using pork as the example, water from the facility is comprised of a very small amount of thaw water, diluted by vast volumes of cleaning water used in the facility's operations. As well as being heavily diluted, the thaw water will also be treated at a municipal treatment system. Thus, MPI considers that water from a pork processing facility poses negligible risk.

It is noted that MPI responded to NZ PIB's concerns over drip loss in the review of submissions for the draft import health standard for pig meat and pig meat products (dated March 2009). This assessed the risk of thaw water from released pork (not in a transitional facility) as being negligible.

*The response to 4.1.66 discusses the findings of Cano et al (2007)<sup>1</sup> on infection from meat juice. MAF considers that inactivation of virus present in a "soaker pad" would be expected to be similar to the inactivation of virus in imported meat. The fragility of the PRRS virus was discussed in Section 3.4.2 of the import risk analysis.*

*Furthermore, the risk associated with packaging should be viewed within the context of the many steps of risk reduction described in key statement 1 of the review of submissions on the import risk analysis. MAF is not aware of any reason to suppose that virus survival will be greater in soaker pads than in meat, and soaker pads would seem less likely to be fed to pigs than meat scraps. MAF considers the risk of PRRS transmission associated with the other indirect pathways noted here to be negligible, in the absence of direct supporting evidence.*

#### 3.1.2 Section 3.4(1)(a): Product inventory

This Section requires the inventory to cover the 'nature and quantity of the goods received': what level of detail is expected to be provided? If this product has been received via the direct route and directed to a transitional facility for further verification, is it the cut type (s) that need/s to be noted in the inventory? Would this level of detail be recorded by the accompanying biosecurity authorisation or BACC in all cases?

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<sup>1</sup> Cano JP, Murtaugh MP, Dee SA. (2007) Evaluation of the survival of porcine reproductive and respiratory syndrome virus in non-processed pig meat. *Veterinary Record* 160(26), 907-8.

**MPI Response:**

A description of the 'nature of the goods' varies with the commodity (e.g. fibre, meat). With regards to pork, the 'nature of the goods' in Section 3.4(1)(a) specifies the cut type (e.g. loins, bellies, etc). For consumer ready cuts (CRC) of pork being imported under the direct pathway and subject to verification by MPI, the CRC does not need to be recorded in the transitional facility's inventory. A record of CRC under the direct pathway is maintained by MPI border staff. The details related to CRC which includes nature and quantity of the product is noted on the Biosecurity Authority Clearance Certificate (BACC) and associated import documentation (e.g. veterinary certificate).

**3.1.3 Section 3.4(3): Product inventory**

We have some questions / require clarification to be sure that the TF standard, amended as proposed, will clearly establish the volume of pig meat released in consumer ready form. These are:

- amount of product being imported: does this refer to the total amount of product being imported, or the amount to produce CRC? Surely the total amount of product being imported and delivered to a particular transitional facility is known from the zoosanitary certification? If so, then we are unsure of the value of re-establishing the total amount of product imported. If it is the amount to produce CRC, will the transitional facility always plan in advance the precise end use of imported product?

**MPI Response:**

MPI proposes the following changes to Section 3.4(3) which will establish the quantity of CRC released under the indirect pathway:

- On reflection, MPI recognises that Sections 3.4(3)(b) and (c), the 'amount of product being imported' and 'cut type', respectively, are already noted on the BACC and import documentation. These descriptions will be removed from Section 3.4(3) as the requirement under Section 3.4(3)(e) to include the BACC will adequately note this information.
- Section 3.4(3)(d) which requests the 'number and weights of batches being released' will be replaced with 'total weight of product being released'. MPI considers this to most accurately reflect CRC released under the indirect pathway.
- MPI will remove the requirement for a monthly transitional facility inventory report for CRC under the direct pathway as these records are maintained by MPI border staff.

**3.1.4 Section 3.4(3): Product inventory**

Cut type: is this simply a list of cut types contained (direct pathway) or produced (indirect pathway)? It is unclear to us if the specific cut type or range of cuts is /are specified on the BACC (biosecurity authority / clearance certificate) issued for the direct pathway released without inspection; or on the biosecurity authorisation to move the CRC to a transitional facility for inspection. Is it intended that the specific cut type is reported on by number and weight of batches being released for CRC prepared under the indirect pathway?

**MPI Response:**

As mentioned above, the description or 'cut type' for CRC imported through the direct pathway is noted on the BACC and import documentation.

As proposed above, the 'number and weight of batches being released' will be removed and replaced with 'total weight of product being released'. The 'cut type' used to process the CRC under the indirect pathway will be noted on the BACC. The type of product being released may be a part of the transitional facility's inventory; however, this information will not be requested by MPI as part of the CRC requirement.

### 3.1.5 Section 3.4: Product inventory

We would be grateful if MPI would provide a practical demonstration of the inventory required and how it will be reported.

**MPI Response:**

Each transitional facility has a unique inventory system; consequently, the inventory report submitted to MPI may vary between facilities. Section 3.4(3) specifies the minimum information required from transitional facilities processing CRC which will include the following:

- Inspection step the facility is on.
- Total weight of product being released.
- BACC the products are received or moved under.

MPI is unable to provide an example of a transitional facility's inventory report as this information is commercially sensitive.

### 3.1.6 Further clarification

Given our concern to monitor and measure the total volume of pig meat released into New Zealand as CRC, we would like MPI's confirmation that it has in place a robust process to monitor and report on the volume of CRC released via the direct pathway. Would it be possible for MPI to also provide a practical demonstration of this process and how it is monitored.

**MPI Response:**

MPI maintains a robust and accurate report of CRC imported under the direct pathway. On arrival to New Zealand, consignments of CRC are recorded into a spreadsheet which includes the date of inspection, country of origin, cut type, quantity, importer name and BACC.

Depending on a country's inspection step, the CRC may be selected for verification whereby it is directed to a transitional facility approved for this purpose. CRC not subject to inspection is given clearance if the import documentation meets the requirements of the import health standard.

## 3.2 Premier Beehive

### 3.2.1 Guidance 3.6: Waste disposal

Waste for treatment or disposal might include shipping material (e.g. contaminated pallets, shipping container), contaminated packaging (i.e. packaging that has been in contact with uncleared animal product), trim, by-product and liquid.

I believe MPI have got the waste stream management wrong – I base this on the following

Current requirement of plastic packaging (carton liner) treatment requires verified heat treatment within a certified transitional facility – the current allowance of raw (uncooked) pork of no more than 3kg in weight (CRC) being available to retailers in greater quantities appears a contradiction in standards. These retailers are not "transitional facilities" and not subject to any regulation to manage this risk.

**MPI Response:**

Pig meat and pig meat products that meet the requirements of the IHS in the exporting country are eligible for biosecurity clearance on arrival to New Zealand. The risks associated with these products have been managed through cooking, curing, or preparation as consumer ready cuts of pork (direct pathway) prior to import and the products (including the packaging) are not subject to further biosecurity measures (i.e. packaging can be disposed of in general rubbish). Therefore, these retailers/importers are not required to have approved transitional facilities.



Alternatively, pig meat and pig meat products being directed to a transitional facility in New Zealand for further processing are subject to the requirements in the IHS which includes biosecurity measures for waste material (e.g. contaminated packaging).

### **3.2.2 Section 3.6(1): Waste disposal**

Deep burial for plastic waste is still referenced within the IHS as an option for all packaging material, why are we then required to send this to a "certified transitional facility" at additional cost to our business (PBNZ expects this to be within the vicinity of \$55k for FY 2015).

#### **MPI Response:**

The pig meat and pig meat products IHS specifies that waste which has not been processed per the IHS must be disposed as outlined (e.g. deep burial) in a transitional facility. MPI acknowledges that the use of headings in the IHS to convey the requirement that waste must be treated or disposed of at a transitional facility may not be interpreted correctly by an operator. However, section 25 of the Biosecurity Act 1993 defines goods to be cleared for entry into New Zealand and clearly states that uncleared goods may only be moved to another transitional facility, containment facility, biosecurity control area or be exported.

### **3.2.3 Section 3.6: Waste disposal**

Have MPI assessed the risk to the NZ pig herd from previous processes of deep burial what was there finding and what caused them to make the change to current heat treatment.

#### **MPI Response:**

Please see responses to 3.2.1 and 3.2.2.

### **3.2.4 Section 3.6: Waste disposal**

Can we PBNZ investigate the possibility of heat treating on site all plastic packaging to avoid this cost?

#### **MPI Response:**

Biosecurity waste may be treated on site as long as the treatment or disposal meets the requirements of the IHS.

### **3.2.5 Section 3.3: Receipt and movement of uncleared animal products**

Recent e-mail correspondence with MPI, indicates that there is likely to be a requirement for a transfer request to MPI for the movement of packaging material from qualifying "un-cleared animal product" this would create a significant impact on our business – Currently we would process around 20 – 30,000kg per day this is a mixture up to 6 different cuts of pork a day and sometimes from up to 8 different suppliers, therefore a container may move through our plant within a couple of days or sometimes up to a month. The process of managing this and multiple transfers, let alone the process of verifying each movement and reconciliation of all would be a large administration effort. And for what benefit?

#### **MPI Response:**

Section 25 of the Act states that uncleared goods may leave the facility or area if an inspector authorises their movement to another transitional facility, biosecurity control area or containment facility. MPI acknowledges the concerns expressed by PBNZ and is investigating options for multiple movement authorisations approved for a six monthly to annual basis. The transitional facility operator would be responsible for maintaining the records for the transferred products which would be verified by MPI during the transitional facility's annual inspection.

## 4 Appendix 1: Copies of Submissions

### 4.1 New Zealand Pork Industry Board

14 July 2015

Animal Imports: Transitional Facilities for Animal Products Consultation Animal and Animal Products Directorate  
Regulation and Assurance Branch

Ministry for Primary Industries

PO Box 2526 Wellington New Zealand

Via email: animalimports@mpi.govt.nz

Dear Sirs

#### **Transitional Facilities for Animal Products (MPI-STD-ANIPRODS)**

##### **1.0 NZPork**

NZPork (the operating name for the New Zealand Pork Industry Board) is a statutory industry good body tasked to act in the interests of pig farmers to achieve sustainable returns, within the context of the industry making a contribution to the New Zealand economy.

The health status of New Zealand's pig herd is world class. Maintaining this health status is a key focus of NZPork for the animal health, welfare and productivity benefit it confers. With the strong support of New Zealand's commercial pig farmers, NZPork has entered into a government –industry agreement (GIA) with MPI to partner with MPI to better manage the sector's biosecurity.

##### **2.0 Reason for submission**

In December 2013 new import health standards were activated, permitting the release into New Zealand of 'consumer – ready cuts' (CRC) of pork from PRRS- infected countries. Where such cuts meet certain specifications (up to 3 kg in weight, major lymph nodes removed, no head or neck tissue, no mince) they are permitted to be released into New Zealand with no treatment to inactivate the PRRS virus, despite recognition that infectious virus may be present in such cuts.

PRRS is one of the New Zealand pork industry's identified priority diseases. It is a disease that may be transmitted by feeding infected pig meat to pigs. Management of waste feeding to pigs outside of the commercial industry is not fully controlled in New Zealand despite regulations.

CRC may be released into New Zealand by either of 2 pathways:

- the direct pathway whereby such cuts are prepared in the country of origin according to the requirements of the import health standard, verified by that country's competent authority and therefore accepted for direct release into New Zealand subject to possible further verification;
- the indirect pathway whereby product that does not meet the definition of CRC is transferred to a transitional facility that has a MPI-approved process for CRC preparation, and processed into such cuts for release. These may be subject to further verification.

There are a number of reasons why NZPork is particularly concerned to ensure that the CRC pathway is effectively managed and accurately monitored, importantly measuring volumes of CRC. This is because:

- infectious virus is acknowledged to be present in CRC from PRRS infected countries although to date there is uncertainty about the level;
- the risk model on which the import health standards permitting the release of CRC was based contains a number of assumptions and estimates. The proportion of imported pig meat, the proportion of imported pigmeat

sold in consumer ready form (CRC), and the sequence of parameters that determines the extent of viral persistence after slaughter are identified as the variables most influential on the risk;

- CRC is a novel process not widely used for biosecurity risk management purposes.

Therefore we are vitally interested to ensure that both the standards and modus operandi pertaining to the release of imported pig meat are effectively controlled, and there is the capability to identify, monitor and report on the volume of risk product released into New Zealand – a capability which has been lacking to date.

### 3.0 Submission

#### **Section 3.1 (3) e iv): Thawing (for commodities like pork and salmon)**

We believe the water from thawing should be specifically included within Section 3.6 to ensure that evidence for the effectiveness of treatment / disposal is verified and documented. It may be the intention to cover it within Section 3.6, but we believe it should be explicit.

In addition, we would be grateful to understand more clearly what is required by Section 3.6 (3). In particular, the range of methods acceptable to MPI for disposing of all liquid waste (not only water from thawing, but also wash water and any other liquid waste), plus the evidence including verification for the effectiveness of treatment to meet the broad standard set out in the import health standards: *All liquid waste must be disposed of through a municipal waste water management system, or a method approved by MAFBNZ.*

#### **Section 3.4: Product Inventory**

We are very pleased to see this proposed change, the purpose of which is to monitor and measure the volume of pig meat released in consumer ready form.

##### Section 3.4 (1) a)

This Section requires the inventory to cover the 'nature and quantity of the goods received': what level of detail is expected to be provided? If this product has been received via the direct route and directed to a transitional facility for further verification, is it the cut type (s) that need/s to be noted in the inventory? Would this level of detail be recorded by the accompanying biosecurity authorisation or BACC in all cases?

##### Section 3.4 (3)

We have some questions / require clarification to be sure that the TF standard, amended as proposed, will clearly establish the volume of pig meat released in consumer ready form. These are:

- amount of product being imported: does this refer to the total amount of product being imported, or the amount to produce CRC? Surely the total amount of product being imported and delivered to a particular transitional facility is known from the zoosanitary certification? If so, then we are unsure of the value of re-establishing the total amount of product imported. If it is the amount to produce CRC, will the transitional facility always plan in advance the precise end use of imported product?

- cut type: is this simply a list of cut types contained (direct pathway) or produced (indirect pathway)? It is unclear to us if the specific cut type or range of cuts is /are specified on the BACC (biosecurity authority / clearance certificate) issued for the direct pathway released without inspection; or on the biosecurity authorisation to move the CRC to a transitional facility for inspection. Is it intended that the specific cut type is reported on by number and weight of batches being released for CRC prepared under the indirect pathway?

We would be grateful if MPI would provide a practical demonstration of the inventory required and how it will be reported.

#### **Further clarification required**

Given our concern to monitor and measure the total volume of pig meat released into New Zealand as CRC, we would like MPI's confirmation that it has in place a robust process to monitor and report on the volume of CRC released via the direct pathway. Would it be possible for MPI to also provide a practical demonstration of this process and how it is monitored.

Thank you for the opportunity to submit. We look forward to clarification around the points we have raised.

Kind regards

Frances Clement  
Policy and Issues Manager

## 4.2 Premier Beehive

Dear Sir/Madam

I wish to make a submission in respect to section 3 "operational Requirements" - "3.6 Waste disposal"  
Guidance statement 3.6 states

- *Waste for treatment or disposal might include shipping material (e.g. contaminated pallets, shipping container), contaminated packaging (i.e. packaging that has been in contact with uncleared animal product), trim, by-product and liquid.*

I believe MPI have got the waste stream management wrong – I base this on the following

1. Current requirement of plastic packaging (carton liner) treatment requires verified heat treatment within a certified transitional facility – the current allowance of raw (uncooked) pork of no more than 3kg in weight (CRC) being available to retailers in greater quantities appears a contradiction in standards. These retailers are not "transitional facilities" and not subject to any regulation to manage this risk.
2. Deep burial for plastic waste is still referenced within the IHS as an option for all packaging material, why are we then required to send this to a "certified transitional facility" at additional cost to our business (PBNZ expects this to be within the vicinity of \$55k for FY 2015)
3. Recent e-mail correspondence with MPI, indicates that there is likely to be a requirement for a transfer request to MPI for the movement of packaging material from qualifying "un-cleared animal product" this would create a significant impact on our business – Currently we would process around 20 – 30,000kg per day this is a mixture up to 6 different cuts of pork a day and sometimes from up to 8 different suppliers, therefore a container may move through our plant within a couple of days or sometimes up to a month. The process of managing this and multiple transfers, let alone the process of verifying each movement and reconciliation of all would be a large administration effort. And for what benefit?

### Questions

1. Have MPI assessed the risk to the NZ pig herd from previous processes of deep burial what was there finding and what caused them to make the change to current heat treatment.
2. Can we PBNZ investigate the possibility of heat treating on site all plastic packaging to avoid this cost.

Kind regards

Laurence Kent  
Operator/Factory Manager  
Premier Beehive NZ Ltd