



Review of Submissions

Draft Supplementary Import Risk Analysis: Sausage Casings of Bovine and Porcine Origin

Draft Risk Management Proposal for Natural Sausage Casings

Draft Import Health Standard for Natural Sausage Casings

Draft Guidance Document for Natural Sausage Casings

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Ministry for Primary Industries

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Regulation & Assurance

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Approved for general release

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1 Introduction

The draft Import Health Standard (IHS) for Natural Sausage Casings was notified for consultation on 15 July 2015.

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

- (1) International Natural Sausage Casing Association International Committee on Trade Regulation
September 2015

This document summarises the issue raised in the submission, and presents the MPI response.

1.1 Acronyms Used in the Document

MPI	Ministry for Primary Industries		
IRA	Import Risk Analysis		
IHS	Import Health Standard		
BSE	Bovine spongiform encephalopathy		

2 Summary of Amendments

As a result of comments made, the following is a summary of amendments to be made to the draft *Import Health Standard: Natural Sausage Casings*.

2.1 Commodity definition

- (1) The commodity definition in the draft Import Risk Analyses (IRA) and draft IHS specifically defined the anatomic portions of the intestinal tract that can be used for producing sausage casings.
- (2) In May 2016, the OIE General Session officially adopted a definition of sausage casings, which is broader than the commodity definitions in the Import Risk Analyses for sausage casings: ***Casings means intestines and bladders that, after cleaning, have been processed by tissue scraping, defatting and washing, and have been treated with salt.***
- (3) The risk analysis team reassessed the risks associated with natural sausage casings using the OIE definition. The only additional risk identified was bovine spongiform encephalitis (BSE) in the distal ileum of cattle. See *Sausage casing commodity definition amendment memo* (12 May 2016), Appendix 1, Risk Management Proposal.
- (4) Subsequently the draft IHS was revised using the OIE definition, and measures were added for BSE in natural sausage casings derived from cattle.

2.2 Revocation deleted

- (1) Initially the draft IHS was intended to replace all existing IHSs for natural sausage casings. However, the existing IHSs have different commodity definitions and requirements than the draft IHS.
- (2) The intent of the new IHS is to facilitate new trade while managing any associated biosecurity risks. There is no intent or reason to limit existing trade with established trading partners where biosecurity risk is already managed through processing requirements and government certification of country freedom from relevant animal diseases.
- (3) Therefore the *Import Health Standard for Porcine Sausage Casings for Human Consumption from Canada and the USA* (MEACASIC.ALL), *Import Health Standard for Sausage Casings for Human Consumption from Australia* (MEACASIC.AUS), and *Import Health Standard for Natural Casings (Porcine/Ovine/Caprine) for Human Consumption from the European Union* (MEACASIC.EU) **will not be revoked** at this time.

2.3 Other changes

- (1) Links have been updated.
- (2) "Room temperature" was replaced with "a temperature of greater than 12°C" to remove any ambiguity in the requirements. This was adapted from the *Code* recommendations for sausages in the Foot and Mouth Disease chapter.
- (3) The model manufacturer's declaration has been removed, as the Veterinary Certificate includes all required certification.

A copy of the external stakeholder submission in its entirety is presented in Appendix 1.

3 Review of Submissions

3.1 International Natural Sausage Casing Association International Committee on Trade Regulation

The draft IRA and IHS define natural sausage casings from sheep as the submucosal layer of the small intestines. This submission points out that this definition will exclude existing trade in sheep bungs (caecums) imported from Australia.

MPI Response

Biosecurity risk associated with imported sheep caecums from Australia has been adequately managed based on the health status of sheep from Australia and the requirements in the *Import Health Standard for Sausage Casings for Human Consumption from Australia* (MEACASIC.AUS). Based on historic and current trade in live sheep, sheep germplasm and sheep products from Australia, there is no reason to stop trade in sheep caecums from Australia.

While the new commodity definition would not exclude sheep caecums, the existing *Import Health Standard for Sausage Casings for Human Consumption from Australia* (MEACASIC.AUS) will not be revoked in order to facilitate on-going trade in sausage casings with Australia.

Appendix 1 - Copies of Submissions

International Natural Sausage Casing Association International Committee on Trade Regulation

Further comment from INSCA on the New Zealand draft Import Health Standard for the Importation of Natural Casings

The draft Import Health Standard refers to the importation of: the submucosal layer of the small intestines of Sheep and Goats. As this stands it would exclude the importation of sheep bungs (caecums), of which there is an existing trade from Australia.

A better definition would be the importation of the submucosal layer of the small and large intestines of Sheep and Goats.

INSCA thanks you for the opportunity to make this further comment.