



Review of Submissions

Draft Import Health Standard: Semen from Zoo Asian Elephants

Draft Risk Management Proposal: Semen from Zoo Asian Elephants

22 March 2017

Ministry for Primary Industries

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Regulation & Assurance

REVIEW OF SUBMISSIONS

Draft Import Health Standard: Semen from Zoo Asian Elephants
Draft Risk Management Proposal: Semen from Zoo Asian Elephants

2017

Approved for general release

Howard Pharo
Manager Import and Export Animals
Ministry for Primary Industries

Contents

- 1 Introduction 1**
- 1.1 Acronyms Used in the Document 1
- 2 Summary of Amendments 2**
- 3 Internal Submissions 3**
- 4 Review of Submissions 4**
- 4.1 Nita Harding, DairyNZ 4
- 5 Appendix 1: Copies of Submissions 5**
- 5.1 Nita Harding, DairyNZ 5

1 Introduction

The draft import health standard for the importation into New Zealand of semen from Zoo Asian elephants was notified for consultation on 15 December 2016.

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

1. Nita Harding, Dairy NZ 25 January 2017

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		
IRA	Import Risk Analysis		

2 Summary of Amendments

As a result of comments made, no amendments were made to the *Import Health Standard for Semen from Zoo Asian Elephants*

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

3 Internal Submissions

According to MPI process an internal review period is available to staff of MPI to comment and recommend changes prior to public consultation on an import health standard. All changes to the IHS were made prior to consultation.

4 Review of Submissions

4.1 Nita Harding, DairyNZ

4.1.1 Do semen donors need to have been resident in a zoo or wildlife facility since birth?

MPI Response

The requirement in the Import Health Standard for Zoo Asian Elephants from Sri Lanka and Australia for elephants to have been resident in a zoo or wildlife facility since birth is not a biosecurity requirement, and so has not been carried over into the semen IHS.

4.1.2 The draft IHS does not state it is a generic IHS. Dairy NZ considers further risk assessment is required prior to the export of semen from other countries to New Zealand.

MPI Response

The IHS only includes elephant semen from Australia. Further risk assessment would be required to expand the IHS to cover elephant semen from any other country, and the documents (draft risk analysis and IHS) would be consulted at that time.

5 Appendix 1: Copies of Submissions

5.1 Nita Harding, DairyNZ



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25 January 2017

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DairyNZ submission on:

- **Draft Risk Management Proposal: RMP Semen from Zoo Asian Elephants**
- **Draft Import Health Standard: Semen from Zoo Asian Elephants**

Introduction

1. DairyNZ is the industry good organisation representing New Zealand's dairy farmers. Funded by a levy on milksolids and through government investment, our purpose is to secure and enhance the profitability, sustainability and competitiveness of New Zealand dairy farming. We deliver value to farmers through leadership, influencing, investing, partnering with other organisations and through our own strategic capability. Our work includes research and development to create on-farm practical tools, leading on-farm adoption of best practice farming, promoting careers in dairying and advocating for farmers with central and regional government.
2. DairyNZ has looked at these consultation documents from the perspective of the overall management of animal health for the livestock industries in New Zealand.
3. The dairy industry in New Zealand is a major exporter of milk products. Arrival of an exotic disease would not only impact on the health and productivity of the national dairy herd, but in all likelihood, would have serious ramifications for the industry's ability to export milk products. Annual export revenue for New Zealand from dairy products has ranged from \$12.2 to \$17 billion dollars over the last five years (June ended years), and this has accounted for 26-34% of New Zealand's merchandise trade annually (29% average on last five seasons). Loss of dairy export revenue would have a very significant impact on the country's economy.

Comments on these consultation documents

4. DairyNZ has reviewed these documents and is of the view that the import of semen from zoo Asian elephants from Australia, under the conditions specified in the draft IHS, does not pose an unacceptable risk to the dairy industry in New Zealand. We have considered the risk of bringing diseases into New Zealand from Australia that



we do not currently have, and can be transmitted in semen, and consider this to be low risk. In addition, the amount of semen likely to be imported is very limited, and it will be used on a very small number of animals who are kept in containment facilities where contact with any livestock is unlikely.

5. As a point of clarification, section 1.5 Zoo facility requirements, states that: semen donors must be resident in an Australian zoo or wildlife park that is registered by a Competent Authority. Does this mean that the donors must have been resident in such a facility since birth, as is required for the import of elephants from Australia?
6. There is no mention in the draft document that this is a generic IHS that will be used as a starting point for negotiations to import zoo Asian semen from any other country. DairyNZ's view is that further risk assessment must occur if a request is received from any other country to export such semen to New Zealand.

Thank you for the opportunity to comment on these consultation documents.

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