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Dears Sirs

PROVISIONAL IMPORT HEALTH STANDARD FOR PIG SEMEN FROM CANADA OR THE UNITED STATES OF AMERICA dated: October 2017 (released October 27, 2017)

NZPork has consulted with pork industry stakeholders to form an opinion on the suitability of provisions in the import health standard (IHS) described above to effectively manage the risk of introducing exotic pathogens into New Zealand through the importation of pig semen. During their consultation with the industry, NZPork also communicated on several occasions by telephone, email, and in person to MPI staff to become more familiar with the proposed changes to the IHS and exchange views and information on the matter. As a matter of course, these discussions covered both the proposed changes to this IHS, and also to planned changes to the 'generic' IHS for Pig Semen (pigsemen.gen) that is also currently under review by MPI.

NZPork will not be requesting an Independent Review of the provisionally released IHS (pigsemen.gen) as it includes some improvements around mitigation of the risk of PRRS virus being introduced through importation of semen. However, NZPork does have concerns about several aspects of the provisional IHS that also carry-over to the generic IHS for Pig Semen. NZPork reserves its position in respect of its right to request an Independent Review of the generic IHS for Pig Semen in respect of these concerns.

NZPork's concerns regarding the provisional IHS are set out below. When the new provisional generic IHS for pig semen is released, NZPork will review the generic standard and a determination will be made as to the merits of requesting an Independent Review of the generic standard at that time.

Our concerns related to the provisional Import Health Standard for Pig Semen from Canada or the United States of America include:

- 1) Consistent with normal industry practices in Canada and the USA, NZPork supports a requirement for laboratory testing of boars +/- semen for PRRS virus or exposure, post-collection. While the commodity of interest to New Zealand is frozen pig semen (in contrast to fresh pig semen, the commodity most commonly traded within North America), normal industry practice in North America is frequent on-going testing of donor boars +/- semen at the time of collection or shortly thereafter. This practice is a critical measure to minimise the likelihood and extent of PRRS introduction to downstream breeding herds via semen. NZPork has provided MPI with published and lay information supporting this position.

Yet the prior requirement for post-collection laboratory testing has been removed in the provisional IHS.

Despite being the most biosecure and intensively monitored compartment of a pig industry, North American studs consistently, though infrequently, become infected with PRRS, generally through unknown mechanisms. Give the speed and scale at which semen is distributed from typically large studs in North America, these incursions can produce large and very expensive outbreaks of the disease in downstream breeding herds.

NZPork believes it is inappropriate to design standards for international trade in pig semen that are less restrictive than those currently considered 'normal practice' by the industries in North America. This is particularly relevant when New Zealand remains one of very few PRRS-free countries in the world.

- 2) Notably the post-collection holding period has been retained in the provisional IHS, but without any requirement for laboratory testing of the donor boars. Though these donor boars are to be watched for the appearance of clinical signs of disease during this period, no testing is required. Adult boars, in otherwise good-health, may not develop significant signs of disease (especially PRRS) such as 'reproductive failure' or 'respiratory disease' symptoms post-infection with the virus; regardless, neither group of clinical signs is pathognomonic for PRRS and could easily be overlooked, or perhaps ignored as simply an occurrence of a less significant disease not warranting any diagnostic investigation.

We look forward to the provisional release of the generic IHS for pig semen in the near future, and as indicated above, will review the standard and consider whether to request an Independent Review of that standard at that time.

Yours sincerely



Ian Carter
NZPork Chair