



Risk Management Proposal

Personal Consignments Animal Products

PERSONAL.ALL

[Document Date]

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1 Purpose

The purpose of this document is to:

- (1) Show the risk management decisions for the Import Health Standard (IHS) for Personal Consignments Animal Products.

2 Background

- (1) Personal consignments of animal products can be imported through a number of pathways including:
 - a) Goods accompanying international passengers.
 - b) Personal effects in cargo.
 - c) International mail items.
- (2) The IHS Personal Consignments Animal Products (PERSONAL.ALL) has been drafted as a single IHS containing import requirements for personal consignments of animal products, to facilitate the consistent implementation of import requirements for personal consignments.
- (3) The import requirements in the IHS PERSONAL.ALL are either:
 - a) Derived from existing requirements contained in the below IHSs. Many of these existing requirements are for processed animal products, and have been in place for many years.
 - i) [*IHS: Animal Fibre, ANIFIBRE.GEN*](#), 25 September 2014.
 - ii) [*IHS: Cooked Fish from all Countries, FISCOOIC.ALL*](#), 11 May 2004.
 - iii) [*IHS: Egg Products, EGGPRODS.GEN*](#), 23 January 2018.
 - iv) [*IHS: Fish Food and Fish Bait from all Countries, FISFOOIC.ALL*](#), 2 December 2011.
 - v) [*IHS: Marine Fisheries Products for Human Consumption from all Countries, FISMARIC.ALL*](#), 6 October 2008.
 - vi) [*IHS: Honey and Propolis from Pitcarin Island, BEEHONIC.PIT*](#), 23 August 1999.
 - vii) [*IHS: Ornamental Animal Products from All Countries, INETROIC.ALL*](#), 22 November 2013.
 - viii) [*IHS: Preserved Animal Specimens from All Countries, INESPEIC.ALL*](#), 11 May 2004.
 - ix) [*IHS: Salmonids for Human Consumption from Australia, FISSALIC.AUS*](#), 16 August 2000.
 - x) [*IHS: Salmonids for Human Consumption from Specified Countries, FISSALIC.SPE*](#), 28 June 2004.
 - xi) [*IHS: Specified Animal Products and Biologicals from All Countries, INEPROIC.ALL*](#), 8 June 2011.
 - xii) [*IHS: Specified Foods for Human Consumption Containing Animal Products, EDIPROIC.ALL*](#), 30 June 2015.
 - xiii) [*IHS: Specified Processed Bee Products, BEEPROIC.ALL*](#), 13 November 2006.
 - b) Newly added animal products. Their risk recommendations are presented in this Risk Management Proposal (RMP).
- (4) For existing requirements that have been previously consulted, refer to the following RMPs:
 - a) [*Amendments to Import Health Standard for Specified Foods for Human Consumption Containing Animal Products, EDIPROIC.ALL*](#), 28 January 2014.
 - b) [*Amendments to Import Health Standard for Specified Foods for Human Consumption Containing Animal Products, EDIPROIC.ALL*](#), 30 June 2015.
- (5) Some existing requirements have been amended to improve clarity. Where weight restrictions were absent in some existing requirements, they have been added to distinguish personal consignments from commercial consignments.
- (6) MPI risk advice or RMPs that support new risk decisions in this IHS are as follows:
 - a) [*Import Risk Analysis: Meat and Meat Products from Ruminants and Pigs*](#), February 2014.
 - b) [*Rapid Risk Assessment \(RRA\): Formalin/Alcohol Preserved Molluscs containing Pearls*](#), June 2018.
 - c) [*RRA: Miscellaneous Egg Products for Human Consumption*](#), March 2016.

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- d) [RMP for Processed Egg Products, EGGPRODS.GEN](#).
 - e) *Technical Advice: the Biosecurity Risk of Insect-based Products Intended for Consumption by Humans and Animals*, September 2015.
 - f) *Technical Advice: Consumer-Ready Aquatic Animal Products for Human Consumption*, September 2018.

3 Objective

- (1) The objective for creating the IHS Personal Consignments Animal Products is to effectively manage biosecurity risks associated with the import of personal consignments containing animal products, consistent with New Zealand's domestic legislation and international obligations.

4 Recommendations for Food for Human Consumption Containing Animal Products

4.1 Aquatic animal products

- (1) The *Technical Advice: Consumer-ready Aquatic Animal Products for Human Consumption* (September 2018; referred as TA 2018 hereafter) defines "consumer-ready aquatic animal products" as:

"An aquatic animal product that is ready for the end user to cook or consume without the need for it to be subjected to processes that may lead to generation of waste. Further, the product is commercially prepared and packaged in a facility that complies with relevant national standards of the exporting country for processing of aquatic animal products. Aquatic animal products in consumer-ready form may be in packaging suitable for sale to end users through retail trade, or they may be in packaging suitable for sale to, or use by businesses in the food service sector."
- (2) The TA 2018 assessed that the quantity of waste materials generated by consumer-ready aquatic animal products following domestic consumption is likely to be minimal. The TA 2018 further determined that most of the domestic waste is likely to be directed to landfill, which is unlikely to present a viable pathway for the introduction of pathogenic organisms and for them to subsequently establish and maintain infection. The technical advice concluded that the likelihood of a susceptible fish receiving an infectious dose of an exotic pathogen as a result of discarded food scraps was negligible.
- (3) Based on the conclusion in the TA 2018, personal imports of aquatic animal products are unlikely to pose any risk to New Zealand given the restriction on the quantities (see below) that will be permitted for each personal consignment, and the value which importers attach to the products that leads to minimal waste generation.
- (4) While the TA 2018 has not specified a value for weight restriction on personal imports of consumer-ready aquatic animal products, this RMP considers a weight restriction of 20 kilograms of the commodity from Pacific Island countries to be practical for the high volume of personal imports from Pacific Island countries and yet acceptable in achieving minimal waste generation; whereas a weight restriction of 10 kilograms of the commodity from countries other than Pacific Island countries is considered to be acceptable.
- (5) Aquatic animal products as personal imports are required to be consumer-ready, in accordance with the scope and definition of the TA 2018. Exception will be given to those from Pacific Island countries as biosecurity risk associated with imports of aquatic animal products from Pacific Island is considered to be negligible given they are usually harvested from the wild (as opposed to being aqua-cultured) that poses minimal risk to New Zealand. Although it is generally understood that the term 'product' implies non-viability, some Crustaceans such as crabs may be brought in live, and hence, the proposed requirements will specify aquatic animal products to be non-viable.
- (6) CTOd 2014 111 determines that palolo worms (*Palola viridis*) in any form may be imported from any country provided the total weight of the consignment is 10 kilograms or less. This commodity will be incorporated into the *IHS PERSONAL.ALL*.

4.1.1 Recommendation

- (7) The RMP proposes that personal consignments of aquatic animal products (including Crustaceans, Echinodermata, any fish, jellyfish, molluscs, tunicates, and their products) may be imported:
 - a) From Pacific Island countries¹ in any form provided the following requirements are met:
 - i) The aquatic animal product is non-viable.
 - ii) The total weight is 20 kilograms or less.
 - b) From all other countries provided the following requirements are met:
 - i) The total weight of the aquatic animal product is 10 kilograms or less; and
 - ii) The product is consumer-ready, or the product is unprocessed fish with gut removed.
- (8) The RMP proposes that personal consignments of salmonid and salmonid products that do not meet recommendation 4.1(7) b) may be imported provided the following requirements are met:
 - a) The product originates from Australia, Canada, the EU, Norway, and the USA.
 - b) The product has its head, gills and gut removed.
 - c) The total weight of the consignment is 20 kilograms or less.
- (9) The RMP proposes that personal consignments of palolo worms (*Palola viridis*) in any form may be imported from any country provided the total weight of the consignment is 10 kilograms or less.

4.2 Egg Products

4.2.1 Hard-boiled whole chicken eggs

- (1) Hard-boiled whole chicken eggs, including those contained in sandwiches and salads, are frequently brought into New Zealand's border by passengers travelling on cruise ships. MPI Border Clearance has asked the Animal Imports team to assess the risk associated with imports of hard-boiled whole chicken eggs as personal consignments.
- (2) The RRA: *Miscellaneous Egg Products for Human Consumption* (RRA 2016) assessed the effectiveness of pasteurisation at 60°C for 3.5 minutes of non-shelf-stable egg products containing up to 100% egg in inactivating pathogens that are exotic to New Zealand and likely to be associated with eggs.
- (3) This RMP assumes that hard-boiled whole chicken eggs that are thoroughly cooked have effectively met the pasteurisation parameters as defined in the RRA 2016.
- (4) The RRA 2016 concluded that all identified pathogens can be inactivated by the pasteurisation process, except fowl adenovirus type 4, the viral agent that causes Angara disease.
- (5) Birds that are known to be affected by Angara disease are broiler chickens and layer chickens. Angara disease could only infect birds in New Zealand if they were exposed to food containing egg. According to information obtained from MPI Border Services, most of the hard-boiled whole chicken eggs are imported in small quantities by cruise ship passengers disembarking at New Zealand metropolitan ports. It is highly unlikely for broiler chickens or layer chickens, which are kept in suburban or rural New Zealand, to come into contact with any hard-boiled whole chicken egg waste produced by cruise ship passengers. This RMP thus concludes that personal consignments of hard-boiled whole chicken eggs do not pose a risk relating to Angara disease to New Zealand.

4.2.2 Recommendation

- (6) The RMP proposes that personal consignments of hard-boiled whole chicken eggs that are thoroughly cooked may be imported from any country.

¹ For the purpose of the IHS, Pacific Island countries are Include American Samoa, Cook Islands, Federated States of Micronesia (Mariana Islands, Caroline Islands, Marshall Islands, Kiribati and Nauru), Fiji, French Polynesia, Niue, Norfolk Island, Pitcairn Island, Republic of Belau (Palau Islands), Solomon Islands, Tokelau, Tonga, Tuvalu, Vanuatu, Wallis & Fortuna, Western Samoa.

4.2.3 Mayonnaise and salad dressings containing egg ingredients

- (1) Clause 2.16 of the *IHS EDIPROIC.ALL* has the requirements for personal consignments of mayonnaise and salad dressings containing egg ingredients, which may be imported provided all of the following requirements are met:
 - a) The product is shelf-stable.
 - b) The total weight of the consignment can either be:
 - i) Unlimited for products originating from Australia, Canada, the European Union, Japan or the United States; or
 - ii) One kilogram or less for products originating from all other countries.
- (2) The *IHS EGGPRODS.GEN* has the requirements for mayonnaise and salad dressings containing no more than 10% egg, which may be imported provided they are shelf-stable and that the percentage egg is stated on the product label or an accompanying manufacturer's declaration.
- (3) A risk management decision for the commodity can be found in the *RMP EGGPRODS.GEN*.

4.2.4 Recommendation

- (4) The RMP proposes that a weight limit of 1 kilogram is applied to mayonnaise and salad dressings containing egg ingredients from Australia, Canada, the European Union, Japan or the United States so as to distinguish personal consignments from commercial consignments.
- (5) The RMP proposes that requirements for mayonnaise and salad dressings containing no more than 10% egg should align with the *IHS EGGPRODS.GEN*, i.e. personal consignments of mayonnaise and salad dressings containing egg ingredients may be imported from any country provided the following requirements are met:
 - a) The product does not require refrigeration before the package is opened.
 - b) The product is commercially manufactured and packaged.
 - c) The package has not been opened or broken.
 - d) The egg ingredient is 10% or less as stated on the product label.
 - e) The total weight of the consignment is 1 kilogram or less.

4.3 Insect and arachnid based products

- (1) Insect and arachnid based products, such as insect contained in hard candy and cricket flour, are frequently brought into New Zealand's border by international travellers. MPI Border Clearance has asked the MPI Animal Imports team to assess the risk associated with imports of insect as personal consignments.
- (2) MPI risk advice concluded that insect products intended for human or animal consumption pose a very low biosecurity risk to New Zealand if:
 - a) The commodity contains insects that were reared in a commercial environment using a formulated insect diet and standard hygienic insect rearing techniques; and
 - b) The commodity is not produced from insects that are wild caught; and
 - c) The insects or commodities are either heat or cold treated (for the purposes of cooking or preservation).
- (3) The risk advice concludes that most commercial insect food producers are registered with the US Food and Drug Administration, utilise the principles of Hazard Analysis Critical Control Point (HACCP), follow Good Manufacturing Practices (GMP), or comply with a combination of the above three systems. Commercial manufacturing therefore gives New Zealand an acceptable level of protection against biosecurity risks. The risk advice also states that transmission of plant pathogens can only occur when the insect is alive.
- (4) While the scope of the risk advice includes only insect based products, arachnid based products that follow harvesting and processing steps similar to those described in the risk advice are considered to pose

a very low biosecurity risk to New Zealand, and thus the risk advice is extrapolated to arachnid based products.

4.3.1 Recommendation

- (5) The RMP proposes that insect and arachnid based products may be imported from any country provided all the following requirements are met:
 - a) The product does not require refrigeration before the package is opened.
 - b) The product is commercially manufactured and packaged.
 - c) The package has not been opened or broken.
 - d) The product does not contain viable insects and arachnids.
 - e) The total weight of the consignment is 500 grams or less.

4.4 Meat and meat products

4.4.1 Cured meat

- (1) The *IHS EDIPROIC.ALL* has requirements for personal consignments of cured meat products manufactured in FMD-free countries (refer to the OIE list of FMD-Free Countries), which may be imported provided all of the following requirements are met:
 - a) The product is manufactured in an FMD-free country (country of manufacture must be clearly stated on the package label).
 - b) The total weight of the consignment is 1 kilogram or less.
- (2) The requirements do not have specific measures for African swine fever (ASF) and classical swine fever (CSF) for personal consignments of cured pig meat products. MPI has a risk assessment concluding that the exposure pathway is negligible due to cured pig meat products being high-value consumer-ready products with little waste generated, and thus the products are not likely to be fed to backyard pigs.
- (3) Given the international spread of ASF, MPI has undertaken a review of personal consignments of cured pig meats. Unlike commercial consignments of pig meat which are sourced from ASF-free countries, regions or zones, personal consignments have previously been permitted from any FMD-free country.
- (4) MPI has considered the following risk mitigation measures for cured pig meat products:
 - a) Heat treatment: *MPI Import Risk Analysis for Meat and Meat Products from Ruminants and Pigs* advises that thermal inactivation of ASF virus and CSF virus occurs at internal temperature of 69°C and 70°C respectively. The USDA recommends normal cooking for pork to achieve a minimum internal temperature 63°C to 71°C (https://www.fsis.usda.gov/wps/portal/food-safety-education/get-answers/food-safety-fact-sheets/meat-preparation/fresh-pork-from-farm-to-table/CT_Index).
 - b) Curing: typical processes are fermentation at 5-26°C for two to five days (achieving pH 4.7-5.8) followed by ripening at 14 °C for 2-4 weeks. These typical curing conditions are unlikely to inactivate ASF and CSF virus (the 2018 OIE *Terrestrial Code* Article 15.1.22. and *Terrestrial Code* Article 15.2.23. respectively notes curing times of at least 6 months for ASF virus, and 126-313 days for CSF virus depending on the cured product type).
 - c) Imports from countries that are free from FMD, ASF and CSF: risks of these diseases are mitigated if the cured pig meat products are manufactured and packaged in countries free from these diseases. Basing on the OIE's FMD and CSF official disease status, and ASF disease data reported by OIE member countries to the OIE, a list of countries that are FMD-, ASF- and CSF-free will be provided in the guidance box contained in the IHS to facilitate implementation of the disease freedom requirement. MPI will update this list as disease situation changes.
- (5) Regarding risk mitigation measures 4.4.1(4) a) & b), while cured pig meat products that are cooked or cured in accordance with international recommendations do not pose biosecurity risks to New Zealand, verification of achievement of sufficient cooking or curing is impractical for personal consignments.
- (6) Jerky is a commonly imported cured pig meat product. Notwithstanding point 4.4.1(5), due to the high level of processing that is inherent to jerky manufacturing, MPI proposes that personal consignments of pig

meat jerky from countries that are FMD-free are eligible for import. This risk mitigation approach is also consistent with the import conditions of other countries with a similar biosecurity status to New Zealand.

- (7) Risk mitigation measure described in 4.4.1(4) c) is thus appropriate for cured pig meat products other than jerky.
- (8) As FMD does not affect poultry, the FMD requirement does not need to apply.
- (9) In consistent with 2014 MPI risk assessment on dried cured meats, cured meat products are required to be shelf-stable, i.e. they do not require refrigeration before the package is opened, they are commercially manufactured and packaged, and their package has not been opened or broken.

4.4.2 Recommendation

- (10) The RMP proposes three sub-categories of cured meat: ruminant, pig, and poultry. Import requirements for the three sub-categories are as follows.
- (11) Personal consignments of cured ruminant meat products may be imported provided the following requirements are met:
 - a) The product does not require refrigeration before the package is opened.
 - b) The product is commercially manufactured and packaged in an FMD-free country.
 - c) The country of manufacture must be clearly stated on the package label.
 - d) The total weight of the consignment is 1 kilogram or less.
- (12) Personal consignments of cured pig meat products may be imported provided either:
 - a) The product is jerky; and
 - i) The product does not require refrigeration before the package is opened.
 - ii) The product is commercially manufactured and packaged in an FMD-free country.
 - iii) The country of manufacture must be clearly stated on the package label.
 - iv) The total weight of the consignment is 1 kilogram or less; or
 - b) The product is not a jerky; and
 - i) The product does not require refrigeration before the package is opened
 - ii) The product is commercially manufactured and packaged in an ASF-, CSF- and FMD- free country; and
 - iii) The country of manufacture must be clearly stated on the package label; and
 - iv) The total weight of the consignment is 1 kilogram or less.
- (13) Personal consignments of cured poultry meat products may be imported provided the following requirements are met:
 - a) The product does not require refrigeration before the package is opened.
 - b) The product is commercially manufactured and packaged.
 - c) The package has not been opened or broken.
 - d) The total weight of the consignment is 1 kilogram or less.

4.4.3 Meat floss

- (1) The *IHS EDIPROIC.ALL* has included a long-standing ability for the import of animal product-based floss. Meat floss is a more suitable title to describe the commodity.
- (2) Meat floss is produced from meat which is heat treated by stewing and dry cooking. This cooking process allows meat to be shredded finely, which is an indicator that the meat has been heat treated for a prolonged period, sufficient to mitigate risk organisms of concern.

4.4.4 Recommendation

- (3) The RMP proposes that the commodity title is changed from 'animal product-based floss' to 'meat floss', and a weight limit of 1 kilogram is set to distinguish personal consignments from commercial consignments.

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- (4) The RMP proposes personal consignments of meat floss may be imported from any country provided the following requirements are met:
- a) The product does not require refrigeration before the package is opened.
 - b) The product is commercially manufactured and packaged.
 - c) The package has not been opened or broken.
 - d) The product is very finely shredded and has no identifiable meat pieces.
 - e) The total weight of the consignment is 1 kilogram or less.

4.4.5 Meat and meat products from specified countries (consulted in *RMP EDIPROIC.ALL*, 30 June 2015)

- (1) The *IHS EDIPROIC.ALL* has the requirements for personal consignments of meat and meat products.
- (2) Switzerland is free from the porcine disease Porcine Reproductive and Respiratory Syndrome.

4.4.6 Recommendation

- (3) The RMP proposes that personal consignments of pork from Switzerland are eligible for biosecurity clearance. The amended list of countries permitted therefore becomes Finland, Sweden and Switzerland.

4.5 Microorganisms and enzymes used in food

- (1) Personal consignments of microorganisms used in food, or products containing or derived from microorganisms used in food (e.g. probiotics, brewers yeast, baker's yeast, etc.), are currently eligible for import under the Chief Technical Officer direction (CTOd) 2016 063, which contains a list of non-genetically modified organisms deemed to be present in New Zealand by the Environmental Protection Authority (EPA) under the Hazardous Substances and New Organisms (HSNO) Act.
- (2) In addition to the microorganisms listed in the CTOd 2016 063, the following microorganisms are also deemed to be present in New Zealand by EPA under the HSNO Act: *Aspergillus niger*, *Aspergillus oryzae*, *Clostridium butyricum*, and *Saccharomyces pastorianus*.

4.5.1 Recommendation

- (3) The RMP proposes that non-genetically modified microorganisms that are deemed to be present in New Zealand by the Environmental Protection Authority (EPA) under the Hazardous Substances and New Organisms (HSNO) Act, and are not unwanted organisms under the Biosecurity Act 1993 are eligible for importation into New Zealand. As such, the list of microorganisms from the CTOd 2016 063, and the microorganisms: *Aspergillus niger*, *Aspergillus oryzae*, *Clostridium butyricum*, and *Saccharomyces pastorianus*, are incorporated into the IHS as guidance information.
- (4) Thus, the RMP proposes that personal consignments of microorganisms, or products containing or derived from microorganisms, may be imported provided the following requirements are met:
 - a) The product is commercially manufactured and packaged; and
 - b) The microorganisms:
 - i) Have been deemed to be present in New Zealand by the Environmental Protection Authority (EPA) under the Hazardous Substances and New Organisms (HSNO) Act; and
 - ii) Are not unwanted organisms under the Biosecurity Act 1993; and
 - iii) Are not genetically modified.

(see guidance in the IHS for a list of eligible microorganisms)

5 Recommendation for Non-Food Goods Containing Animal Products

5.1 Therapeutic products for human use

- (1) Therapeutic products for human use are currently eligible for importation under the *IHSs EDIPROIC.ALL, INEPROIC.ALL, INESPEIC.ALL* and *BEEPROIC.ALL*.
- (2) Cordyceps is a commodity commonly imported as a personal consignment. Non-viable cordyceps that is visibly clean is eligible for biosecurity clearance.

5.1.1 Recommendation

- (3) The RMP proposes that the following commodities from the *IHSs EDIPROIC.ALL, INEPROIC.ALL, INESPEIC.ALL* and *BEEPROIC.ALL* are incorporated into the *IHS PERSONAL.ALL* under the commodity 'therapeutic products for human use', which includes dietary supplements, health supplements, Chinese and oriental medicines, and homeopathic remedies:
 - a) Beverages containing an animal (including vertebrates and invertebrates) or animal tissues preserved in alcohol.
 - b) Cordyceps.
 - c) Surgical implants.
 - d) Dietary supplements and medical preparations containing bee products.
- (4) The RMP proposes that the scope of medical preparations containing bee products to be extended from throat spray and elixir to include other types of medical preparations such as antibiotic ointments, breath sprays, cough syrups, healing creams, medicated plasters, toothpaste, and throat lozenges. The wording 'throat spray and elixir' is thus replaced by 'medical preparations'. A list of examples of medical preparations is given as guidance in the IHS. The unit of maximum quantity permissible is amended accordingly from "bottles" to "packages".
- (5) Considering the above, the RMP proposes that personal consignments of therapeutic products for human use (including dietary supplements, health supplements, Chinese and oriental medicines, and homeopathic remedies) from any country may be imported provided:
 - a) The product is commercially manufactured and packaged; and
 - b) The packaging does not indicate that the product is intended for animal use; or it indicates that the product is intended for human use; and
 - c) If the product is:
 - i) A beverage containing an animal (including vertebrates and invertebrates) or animal tissues preserved in alcohol, the animal or animal tissues are non-viable.
 - ii) Cordyceps, it is non-viable and free from visible contamination.
 - iii) A surgical implant, the packaging identifies that the product is sterile.
 - d) If the product is a dietary supplement or medical preparation containing bee products, it must be:
 - i) A dietary supplement that:
 - 1) Is commercially manufactured; and
 - 2) Is in packaging that clearly indicates that the total amount of honey, bee pollen and/royal jelly is no more than 2% of the totally product weight; or
 - ii) An encapsulated (completely covered by an edible substance such as gelatine or wax that does not contain sugar, fruit, honey, pollen, propolis or royal jelly) dietary supplement that:
 - 1) Is in consumer-ready packages; and
 - 2) Is 1 kilogram or less per consignment; or
 - iii) A dermatological preparation that is 1 kilogram or less per consignment; or
 - iv) A refined bee venom product that:

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- 1) Does not contain honey, pollen or royal jelly; and
 - 2) Is commercially manufactured and packaged; or
- v) A refined propolis product that:
- 1) Does not contain honey, pollen or royal jelly; and
 - 2) Is in consumer-ready packages; or
- vi) A medical preparation not listed above, and is 12 packages or less per consignment.

5.2 Non-viable animal products or specimens

- (1) Preserved molluscs with cultured pearls are commonly imported as personal consignments. The MPI Rapid Risk Assessment: Formalin/alcohol preserved molluscs containing pearls (June 2018) defines the commodity as whole (shell-on) pearl molluscs (including clams, oysters, mussels and abalone) initially fixed in formalin (4%-10%), which is then either preserved in industrial-grade alcohol, or in a mixture of formalin/alcohol. They are individually vacuum packaged in sealed plastic bags.
- (2) The rapid risk assessment estimated that the duration from formalin fixation, to subsequent storage and transport, to 'shucking' and subsequent disposal would be at least 5 days (120 hours), which is greater than the time required (at least 24 hours) for full formalin penetration and fixation of biological tissues. The rapid risk assessment thus concluded that any mollusc pathogens are unlikely to remain viable. Preservation alone, without further treatment of the commodity, is thus considered sufficient in addressing biosecurity concerns with the importation.
- (3) Verification of concentration of formalin is impractical for personal consignments. As import quantity is relatively small for personal consignments, MPI accepts that as long as the product is preserved in formalin, biosecurity risk is sufficiently mitigated.

5.2.1 Recommendation

- (4) The RMP proposes that personal consignments of preserved marine or fresh waters molluscs, including clams, oysters, mussels and abalone, may be imported from any country provided they are fixed in formalin.

6 Recommendations for Products that Contain Animal Products for Animal Use

6.1 Food for companion animals

- (1) Shelf-stable food for companion animals presents negligible risks due to the heat treatment they are subjected to during the manufacturing process. They are eligible for biosecurity clearance under current IHSs.
- (2) Some food products for companion animals contain probiotic microorganisms. To be eligible for biosecurity clearance, they must be deemed to be present in New Zealand by the Environmental Protection Authority (EPA) under the Hazardous Substances and New Organisms (HSNO) Act, must not be unwanted organisms under the Biosecurity Act 1993, and must not be genetically modified.
- (3) MPI's Agricultural Compound and Veterinary Medicines (ACVM) Group has an internal document containing weight limits for the following personal consignments of oral nutritional compounds (according to the ACVM Regulations 2001, oral nutritional compound means a substance ingested by an animal as feed, or a nutritional preparation intended for oral administration to an animal to achieve a nutritional benefit):
 - a) Dry dog food – 20 kg
 - b) Dry cat food – 10 kg
 - c) Canned cat and dog food – 3 kg
 - d) Pet treats, chews, etc. – 6 bags or pouches
 - e) Fish food 500 g
 - f) Bird, rabbit and guinea pig food – 3 kg
 - g) Vitamin/mineral supplements:
 - i) Tablets – 2 units
 - ii) Powder – 1 kg
 - iii) Solution – 1 L
- (4) Food for companion animals may contain viable seeds. This risk can be mitigated when the product meets import requirements for processed animal feed of plant origin.

6.1.1 Recommendation

- (5) The RMP proposes that weight limits for vitamin/mineral supplements in the *IHS PERSONAL.ALL* align with the ACVM internal document; for all other food for companion animals, the weight limit is set at 5 kilograms. This proposed change will be harmonised with the ACVM internal document.
- (6) The RMP proposes that personal consignments of food for companion animals containing animal products of any species from any country may be imported provided the following requirements are met:
 - a) The product does not require refrigeration before the package is opened.
 - b) The product is commercially manufactured and packaged.
 - c) The package has not been opened or broken.
 - d) The product is labelled as for animal consumption.
 - e) The product is in its original sealed packaging on arrival.
 - f) The total weight of the consignment is
 - i) 2 units or less for vitamin/mineral tablets; or
 - ii) 1 kilogram or less for vitamin/mineral powder; or
 - iii) 1 litre or less for vitamin/mineral solution; or
 - iv) 5 kilograms or less for all other food for companion animals.
 - g) If the product contains viable microorganisms, the microorganisms:
 - i) Have been deemed to be present in New Zealand by the Environmental Protection Authority (EPA) under the Hazardous Substances and New Organisms (HSNO) Act; and

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- ii) Are not unwanted organisms under the Biosecurity Act 1993; and
 - iii) Are not genetically modified.

(See guidance in the IHS for a list of eligible microorganisms)

- h) If the product contains seeds, it must meet import requirements for processed animal feed of plant origin.

6.2 Veterinary medicines accompanying imported animals

- (1) Veterinary medicines containing animal products accompanying imported animals from any country are eligible for biosecurity clearance.