



Ref: CTO 2014 042[G]

Fish: Fish for Human Consumption

CTO direction to biosecurity inspectors for the clearance of fish for human consumption

Pursuant to section 27(1)(d)(iii) of the Biosecurity Act 1993 I, Vicki Melville, Manager Animal Imports, Ministry for Primary Industries (under delegated authority), give the following direction for fish for human consumption to be given clearance in accordance with the following measures, different from those in the applicable *Import Health Standard for the Importation into New Zealand of Cooked Fish from all Countries (FISCOOIC.ALL; 11 May 2004)*:

Clause 7: Eligibility

A. Private consignments of fish for human consumption may be imported from any country without documentation provided all of the following requirements are met:

- 1) The product comprises non-salmonid fish.
- 2) The product is shelf-stable.
- 3) The product is commercially packaged for direct retail sale.
- 4) The product is in its original sealed packaging on arrival.
- 5) The consignment does not exceed 10 kg per passenger.

B. Commercial consignments of cooked fish for human consumption may be imported from any country provided they are accompanied by:

- 1) A manufacturer's declaration stating that the product has been subjected to a retort process of Fo3 or greater;

or

- 2) A zoosanitary certification as per Part D of the import health standard.

For private consignments, the nature of the non-compliance with the requirements in the applicable import health standard is that the fish may not comply with the eligibility requirements in Clauses 7.1 to 7.4 of the current import health standard in that they may not be:

1. Cooked in the way the term "cooked" is commonly understood (Clause 7.1 requirement);
2. Heat treated at a minimum core temperature of 85 degrees Celsius for at least 15 minutes (Clause 7.2 requirement);
3. Accompanied by a Zoosanitary Certification as per Section 9 of the import health standard (Clause 7.2 requirement);
4. In hermetically sealed containers (Clause 7.3 requirement).

For commercial consignments in hermetically sealed containers, the nature of the non-compliance with the requirements in the applicable import health standard is that the fish will not require the zoosanitary certification as prescribed in Part D of the standard.

For private consignments, the reason for directing clearance is that the biosecurity risks associated with this CTO direction have been assessed and will be effectively managed. A risk analysis done by the Science and Risk Assessment Directorate has determined that fish, irrespective of its manufacturing process, would not be a biosecurity risk to New Zealand if it is shelf-stable and commercially packaged for direct retail sale. As the import is limited to 10kg per passenger, the quantities of waste in New Zealand are likely to be extremely small that the likelihood of the product entering the aquatic environment in sufficient quantities to represent an infectious dose will be low to negligible. Consequently, the requirement for manufacturer's declaration or zoosanitary certification has not been applied.

For commercial consignments in hermetically sealed containers, the reason for directing clearance is that the biosecurity risks associated with this CTO direction have been assessed and will be effectively managed. The Fo3 process fish in hermetically sealed containers are subjected to a much higher heat treatment standard than the 85°C/15 minutes heat treatment the import health standard requires. Moreover, fish in retorted containers are allowed importation under another import health standard without zoosanitary certification. Consequently, the requirement for zoosanitary certification for this category of fish has not been applied.

The following note in the import health standard is deleted:

Note: For hermetically sealed shelf stable products, i.e. products not required to be kept under refrigeration, refer to the import health standard for specified products for human consumption containing dairy products, eggs or meat - EDIPROIC.ALL

The deemed deletion of the above paragraph means that commercial consignments of fish for human consumption must be assessed and considered for clearance under Clause 7.2 of this Chief Technical Officer Direction and not under the EDIPROIC.ALL standard.

This direction takes effect from the date of signing and continues in effect until amended or revoked.