



Review of Submissions

Draft Import Health Standard for Egg Products

EGGPRODS.GEN

[Document Date]

Regulation & Assurance

REVIEW OF SUBMISSIONS

Import Health Standard: Egg Products

[Document Date]

Approved for general release

Howard Pharo

Manager Import and Export Animals
Ministry for Primary Industries

Contact for further information
Ministry for Primary Industries (MPI)
Regulation & Assurance Branch
Animal Imports
PO Box 2526
Wellington 6140

Email: animal.imports@mpi.govt.nz

Contents

| | | |
|----------|---|----------|
| 1 | Introduction | 3 |
| 1.1 | Acronyms Used in the Document | 3 |
| 2 | Summary of Amendments | 4 |
| 2.1 | Clause 2.1 Specified shelf-stable products containing egg | 4 |
| 2.2 | Clause 2.4.2 Shelf-stable spray-dried egg albumen powder/crystals | 4 |
| 2.3 | Clause 3.1 Angara disease | 4 |
| 3 | Internal Submissions | 6 |
| 4 | Review of Submissions | 7 |
| 4.1 | New Zealand Food & Grocery Council, Carole Inkster | 7 |
| 4.2 | Unilever Australasia, Melanie McPherson | 7 |
| 4.3 | People's Republic of China | 7 |
| 5 | Appendix 1: Copies of Submissions | 8 |
| 5.1 | New Zealand Food & Grocery Council, Carole Inkster | 8 |
| 5.2 | Unilever Australasia, Melanie McPherson | 8 |
| 5.3 | People's Republic of China | 9 |

1 Introduction

The draft Import Health Standard: Egg Products was notified for consultation on 1 February 2019

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

| | |
|--|------------------|
| New Zealand Food & Grocery Council, Carole Inkster | 19 February 2019 |
| Unilever Australasia, Melanie McPherson | 2 April 2019 |
| People's Republic of China | 7 June 2019 |

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 | | |
| MPI-STD-TVTL | MPI Approved Diagnostic Tests, Vaccines, Treatments and Post-arrival Testing Laboratories for Animal Import Health Standards | | |

2 Summary of Amendments

As a result of comments made, the following is a summary of amendments to be made to the *Import Health Standard: Egg Products*.

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

2.1 Clause 2.1 Specified shelf-stable products containing egg

The following additional clause has been added:

2.1(1)(c) Cake, pudding, sauce or baking mixtures containing dairy or egg ingredients may be imported from any country provided the product is shelf-stable.

The following amendment has been made for alkalised eggs:

2.1(1)(g) Alkalised duck or chicken eggs (also known as 'pidan', 'Century', 'preserved egg', '100 year old eggs', 'thousand year egg', or 'millennium egg') must be accompanied by a manufacturer's declaration stating that the eggs have been transformed in an alkaline salt to a pH of 10 or higher in the final preserved egg product.

2.2 Clause 2.4.2 Shelf-stable spray-dried egg albumen powder/crystals

The heat treatments suitable for the inactivation of avian influenza viruses present in eggs and egg products in OIE Code chapter on avian influenza have been updated since the IRA 2008. Previously, when egg albumen powder could not be certified as coming from a high pathogenicity avian influenza free country, zone, or compartment the minimum heat treatment was 54.4°C for 21.38 days. New research data on pasteurisation of dried egg white to inactivate avian influenza virus was based on experiments conducted by the OIE Collaborating Centre for Research on Emerging Avian Diseases. Based on the outcome of this research the OIE Code chapter amended the heat treatment to 54.4°C for 50.4 hours.

According to the IRA 2008, 54.4°C for at least 7 days is the minimum heat treatment required for egg albumen powder that manages the other identified risk organisms for this commodity. As the amended Code option of 54.4°C for 50.4 hours is less than the required minimum heat treatment in the IRA, 54.4°C for at least 7 days can be considered the minimum heat treatment required for egg albumen powder whether it is from a country, zone, or compartment free from high pathogenicity avian influenza or not. Only egg albumen powders with certification free from Angara disease can use these heat treatments. All heat treatment options have been combined into a single clause as follows:

The Competent Authority has certified the eggs were derived from a country, zone or compartment where Angara disease has not been recognised, and the product has reached a core temperature of:

- a) at least 54.4°C for at least 7 days; or
- b) at least 60°C for at least 10 days; or
- c) at least 67°C for at least 20 hours;

2.3 Clause 3.1 Angara disease

The IRA 2008 included a third option for Angara disease which had not been previously included in the final IHS. The third option is included as follows:

The egg products originated from flocks that have been tested prior to the first egg collection and then at least 6 monthly thereafter, with negative results for Angara disease. Tests must be approved by MPI and listed in the document *MPI-STD-TVTL*.

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. No internal submissions was received after the internal review deadline. The recommendations as a result of these submissions are summarised in Section 2.

4 Review of Submissions

4.1 New Zealand Food & Grocery Council, Carole Inkster

4.1.1 Omission of products from IHS Egg Products

The current requirements in the IHS for Specified Foods for Human Consumption Containing Animal Products for cake, pudding, sauce, or baking mixtures containing egg ingredients have not been included in the IHS for Egg Products. Has this been omitted by mistake?

MPI Response

After review, it has been found that this was an accidental omission. This requirement will be added in to the IHS Egg Products.

4.2 Unilever Australasia, Melanie McPherson

4.2.1 Omission of products from IHS Egg Products

It has been noted with concern that the Consultation Paper has omitted the current permission for sauces. The current permission for sauces includes products such as shelf stable béarnaise, hollandaise and aioli sauces.

The Consultation Paper makes no reference to this omission and it appears that there has been no overt intention to delete this permission. Should this deletion remain in the final Import Health Standard, this could potentially result in the inability of manufacturers to import these sauces into New Zealand.

MPI Response

See response for 4.1.

4.3 People's Republic of China

4.3.1 Alkalised duck or chicken eggs

The requirement for alkalised duck or chicken eggs is that they must be accompanied by a manufacturer's declaration stating that the eggs must have been transformed in an alkaline salt to a pH of 10-12 during the curing process. Its main purpose must be controlling the safety of such food by emphasizing the alkalised curing condition. The pH of current curing liquid of preserved eggs, however, is generally over 12 to meet the demands in food safety. China therefore suggests that New Zealand revise this requirement into: "...to a pH over 10..." or "...to a pH over 9 of final preserved egg products", which can not only meet the requirements in food safety, but also be more applicable for the needs of the alkalinity of curing liquid during the production process.

MPI Response

The wording in the IHS is meant to refer to the pH of the egg and not the curing liquid. MPI will amend the wording similar to what has been suggested to provide clarification.

5 Appendix 1: Copies of Submissions

5.1 New Zealand Food & Grocery Council, Carole Inkster

Hi Janessa

You might just have a look at the query I have. One of our members is reviewing the papers that were released by MPI earlier this month on the **Draft import health standard for importing egg products**, that includes a Risk Management Proposal, as well as an Import Health Standard *for consultation*.

They have a copy of the current IHS for **Specified Foods for Human Consumption Containing Animal Products EDIPROIC.ALL**, 15 January 2019. This version includes reference, and permission, for the importation :-

2.15 Cake, pudding, sauce or baking mixtures containing dairy or egg ingredients

(1) Cake, pudding, sauce or baking mixtures containing dairy or egg ingredients may be imported from any country provided the product is shelf-stable

The company has taken this provision to include Béarnaise and aoli sauces, that are shelf stable.

However, in the latest draft set of documents, they can find no reference or permission for sauces. It does provide permission for mayonnaise with less than 21% egg.

They wonder whether these sauces have been omitted by mistake? Alternatively, is the definition of 'mayonnaise' intended to cover these types of products?

There are proposed requirements for treating egg present in 'Other foods' with more than 5% egg, but the proposed cooking times and temperatures, are not at all suitable for these sauces. Such processing would not be necessary for shelf stable, manufactured products of this nature.

Your views would be most welcome. And 10am would be great if there is any residual commentary.

Thanks very much.

Kind regards

Carole

5.2 Unilever Australasia, Melanie McPherson

Unilever Australasia is an international manufacturer and marketer of food, beverage, home and personal care products and a market leader in a number of categories in Australia. Our well known Food, Refreshment and FoodSolutions brands include Continental, Streets, Lipton, Bushell's, Weis, T2 and Knorr. Our products are used every day by millions of people around the world.

Currently, Unilever is importing egg products through our FoodSolutions brands, for use in restaurants, cafés and meal preparation in hospitals and other such group facilities.

Consultation Paper

Unilever welcomes the clarity provided by this proposed revisions for the permissions for the importation of Egg Products in the Import Health Standard (HIS) and has no concerns with the majority of the proposal and amendments.

However, it has been noted with concern that the Consultation Paper has omitted the current permission for sauces. The current permission for sauces includes products such as shelf stable béarnaise, hollandaise and aioli sauces.

The Consultation Paper makes no reference to this omission and it appears that there has been no overt intention to delete this permission. Should this deletion remain in the final Import Health Standard, this could potentially result in the inability of manufacturers to import these sauces into New Zealand.

Unilever understands the importance of animal health and welfare, however no benefit to animal health has been identified or discussed within this Consultation Paper. Unilever is not aware of any animal health concerns that would arise from the importation of these shelf stable products.

Unilever Australasia is therefore requesting that the current permission be re-instated, as a matter of urgency.

Current Permission

Currently, the HIS allows for sauces. The current HIS includes the current permissions, for “sauces” that are shelf stable, to be imported into New Zealand -

2.15 Cake, pudding, sauce or baking mixtures containing dairy or egg ingredients

(1) Cake, pudding, sauce or baking mixtures containing dairy or egg ingredients may be imported from any country provided the product is shelf-stable

There is no discussion or explanation within the consultation paper, to justify, or in any manner explain, why this permission has been removed. No technological safety reason has been mentioned or discussed, to justify removing this permission.

Sauces such as hollandaise, béarnaise and aioli are shelf stable, and have a history of safe use for consumers and animal health, alike.

Shelf stable, manufactured products such as hollandaise, béarnaise and aioli sauces meet the safety requirements for inclusion in the list of “Specified Shelf Stable products containing egg” and as such Unilever Australasia is therefore requesting that permission for these products be reinstated.

Thank you for your consideration of this submission.

Melanie McPherson

Regulatory Specialist - Foods

Unilever Australasia

5.3 People’s Republic of China

The Chinese government appreciates New Zealand notifying “Import Health Standard for egg products” (G/SPS/N/NZL/585) through WTO Secretariat. After careful research, China would like to make the following comments:

The notification requires that, “Alkalised duck or chicken eggs (also known as...’preserved egg’...) must be accompanied by a manufacturer’s declaration stating that i) The eggs must have been transformed in an alkaline salt to a pH of 10-12 during the curing process. Its main purpose must be controlling the safety of such food by emphasizing the alkalinised curing condition. The pH of current curing liquid of preserved eggs, however, is generally over 12 to meet the demands in food safety. China therefore suggests that New Zealand revise this requirement into: “...to a pH over 10...” or “...to a pH over 9 of final preserved egg products”, which can not only meet the requirements in food safety, but also be more applicable for the needs of the alkalinity of curing liquid during the production process.