

## **Risk Management Proposal**

# Personal Consignments of Animal Products

PERSONAL.ALL

15 November 2022

## Disclaimer

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## Contents

1	Purpose	3
2	Background	3
3	Objective	4
4	Updates4.115 November 2022 – IHS amendment4.213 October 2021 – IHS amendment4.320 Dec 2019 – urgent amendment4.419 Dec 2019 – IHS issued	<b>4</b> 4 9 9
5	<ul> <li>Recommendations for Goods Containing Animal Products for Human Consumption</li> <li>5.1 Aquatic animal products</li> <li>5.2 Egg Products</li> <li>5.3 Insect and arachnid-based food products</li> <li>5.4 Meat and meat products</li> <li>5.5 Microorganisms and enzymes used in food</li> </ul>	<b>10</b> 10 10 11 12 14
6	<ul> <li>Recommendation for Non-Food Goods Containing Animal Products</li> <li>6.1 Animal fibre</li> <li>6.2 Non-viable animal specimens</li> <li>6.3 Therapeutic products for human use</li> </ul>	<b>15</b> 15 15 16
7	<ul> <li>Recommendations for Goods Containing Animal Products for Animal Consumption and Other Uses</li> <li>7.1 Foods for companion animals</li> <li>7.2 Veterinary medicines accompanying imported animals</li> </ul>	<b>nd</b> <b>17</b> 17 18

## 1 Purpose

The purpose of this document is to:

(1) Show the risk management decisions for the *Import Health Standard (IHS): Personal Consignments of 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 of Animal Products (PERSONAL.ALL)* has been drafted as a single IHS containing import requirements for personal consignments of animal products or goods containing animal products, to facilitate the consistent implementation of import requirements for personal consignments.
- (3) The import requirements in the IHS PERSONAL.ALL include those that are either:
  - a) Derived from existing requirements contained in the below IHSs. Note that 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: Egg Products, EGGPRODS.GEN, 23 January 2018.
    - iii) IHS: Fish Food and Fish Bait from all Countries, FISFOOIC.ALL, 2 December 2011.
    - iv) IHS: Honey and Propolis from Pitcarin Island, BEEHONIC.PIT, 23 August 1999.
    - v) IHS: Preserved Animal Specimens from All Countries, INESPEIC.ALL, 11 May 2004.
    - vi) IHS: Shelf-Stable Petfoods Containing Animal Products, PETFODIC.ALL, 3 November 2014.
    - vii) <u>IHS: Specified Animal Products and Biologicals from All Countries</u>, INEPROIC.ALL, 8 June 2011.
    - viii) <u>IHS: Specified Foods for Human Consumption Containing Animal Products</u>, EDIPROIC.ALL, 30 June 2015.
    - ix) IHS: Specified Processed Bee Products, BEEPROIC.ALL, 13 November 2006.
  - b) Newly added animal products, for which, 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) <u>Amendments to Import Health Standard: Specified Foods for Human Consumption Containing</u> <u>Animal Products</u>, EDIPROIC.ALL, 28 January 2014.
  - b) <u>Amendments to Import Health Standard: Specified Foods for Human Consumption Containing</u> <u>Animal Products</u>, EDIPROIC.ALL, 30 June 2015.
- (5) Some existing requirements have been amended to improve clarity. Where weight restrictions were absent, they have been added to distinguish personal consignments from commercial consignments.
- (6) MPI risk advice or RMPs that support new risk management 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) <u>Rapid Risk Assessment: Miscellaneous Egg Products for Human Consumption</u>, March 2016.
  - d) <u>Risk Management Proposal for Processed Egg Products</u>, EGGPRODS.GEN.
  - e) Technical Advice: the Biosecurity Risk of Insect-based Products Intended for Consumption by Humans and Animals, September 2015 (see clause 4.3 of this RMP).

## 3 Objective

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

## 4 Updates

(1) Updates may either supplement or override previous clauses in the recommendation sections of this RMP, or provide further information to relevant commodities.

## 4.1 15 November 2022 – IHS amendment

#### 4.1.1 New section for aquatic animal products

- (1) Personal consignments of aquatic animal products have been able to be imported into New Zealand under several IHSs, which were revoked on the 11<sup>th</sup> November 2022 by the <u>IHS: Aquatic Animal Products</u>. These IHSs are:
  - a) Import Health Standard for the Importation of Marine Fisheries Products for Human Consumption from All Countries, FISMARIC.ALL; 6 October 2008
  - b) Import Health Standard for the Importation into New Zealand of Salmonids for Human Consumption from Australia, FISSALIC.AUS; 16 August 2000.
  - c) Import Health Standard for the Importation into New Zealand of Salmonids for Human Consumption from Specified Countries, FISSALIC.SPE; 28 June 2004
- (2) MPI has reviewed the import requirements for personal consignments of aquatic animal products. They can be categorised as follows:
  - a) Aquatic animal products derived from annelids (marine only), crustaceans, echinoderms, jellyfish, molluscs (shell off), non-salmonid fish and tunicates.
  - b) Aquatic animal products for private functions.
  - c) Salmonid fish products.
- (3) For aquatic animal products derived from annelids (marine only), crustaceans, echinoderms, jellyfish, molluscs (shell off), non-salmonid fish and tunicates, risk can be mitigated when they are non-viable and imported as a personal consignment under a specified weight limit.
- (4) Considering MPI operational and MPI food safety requirements, the RMP proposes that the total weight of bivalve molluscan shellfish (BMS) is not more than 5 kilograms, and the combined total weight of aquatic animal products derived from annelids (marine only), crustaceans, echinoderms, jellyfish, molluscs (shell off), non-salmonid fish and tunicates is not more than 20 kilograms.
- (5) Recognising that there is a long-standing pathway for travellers to bring in personal consignments of aquatic animal products from Pacific Island countries for private functions (e.g. weddings, ceremonial events), these products are valued for human consumption and thus produce minimal waste, and certification might not be possible for some commodities, the RMP proposes that aquatic animal products for private functions are risk-assessed on an individual basis. Import will be enabled through the import permit pathway.
- (6) For personal salmonid fish products, import requirements remain unchanged at 20 kilograms of headed, gilled, and gutted fish from specified countries.

## 4.2 13 October 2021 – IHS amendment

#### 4.2.1 Section 1.5 'The documentation that must accompany goods' has been amended

(1) The section has been amended to reflect the new commodities that have been added to the IHS.

#### 4.2.2 Retitling of Part 3 and Part 4 of the IHS

(1) Part 3 and Part 4 have been retitled as 'Specified Requirements for Goods Containing Animal Products for Animal Consumption' and 'Specified Requirements for Goods Containing Animal Products for Other Uses', with the appropriate commodities placed under them.

## 4.2.3 Processed foods containing no more than 2% honey, bee pollen, and/or royal jelly (clause 2.2.2 of the IHS)

- (1) MPI Border Clearance Services has submitted to the Animal Imports team several queries regarding whether processed foods containing beeswax and propolis are eligible for importation.
- (2) According to current commercial import rules in the *IHS BEEPROIC.ALL*, the amount of beeswax and propolis in imported processed food is not regulated and so does not need to be restricted to 2%. Guidance has been provided in the IHS to clarify this.

#### 4.2.4 Dietary protein supplements containing dairy and/or egg (clause 2.5.3 of the IHS)

- (1) MPI has become aware that individuals have been importing multiple 1kg consignments of the commodity as unaccompanied goods (e.g. mail items) to meet their dietary and nutritional needs, causing a significant increase of work for the MPI Target Evaluation Team.
- (2) Import data indicates that these consignments are for personal consumption, not for retail sale.
- (3) The Animal Imports team assessed that an increase in the weight limit from 1kg to 10kg for unaccompanied personal consignments of dietary protein supplements containing dairy and/or egg products would not increase biosecurity risk.
- (4) The weight limit for accompanied personal consignments of the commodity remains unchanged at 1kg, also at the request of Border Operations staff. This is to manage the workload associated with clearing passengers and their belongings at ports of arrival.

#### 4.2.5 Gelatine and gelatine products (clause 2.8 of the IHS)

(1) To enhance readability, the provision for gelatine and gelatine products has been separated out from the heading "meat and meat products", and become a standalone heading. Import requirements remain unchanged.

#### 4.2.6 Insect and arachnid-based food products (excluding bee products) (clause 2.9 of the IHS)

(1) Bee products are not eligible under the provision for 'insect and arachnid-based food products'. The wording 'excluding bee products' has been added to the provision title.

## 4.2.7 Amending the commodity title 'Animal product-based flavours or stock' to 'processed foods containing meat-based ingredients' (clause 2.10.2 of the IHS)

(1) The commodity title 'Animal product-based flavours or stock' has been amended to 'Processed foods containing meat-based ingredients', which describes the commodity better and is in line with the <u>IHS</u> <u>SPECPROD.ALL</u>. Meat-based ingredients include broth, concentrate, meat extract, rendered fat, flavours, stock or tallow.

#### 4.2.8 Brexit (clause 2.10.5 of the IHS)

(1) Due to Brexit, the United Kingdom has been included under the provisions for 'meat and meat products from specified countries' and 'velvet antler from cervine animals'. Import requirements of these products from the United Kingdom remain unchanged.

## 4.2.9 Microorganisms used in food and food for companion animals (clause 2.11 and 3.3 of the IHS)

(1) Instead of providing a guidance list, which would necessitate constant updates of the guidance box in the IHS, the EPA's 'List of microbes present in New Zealand' and the 'Official New Zealand Pest Register'

have been referred to in the guidance box respectively for clause 2.10 'microorganisms used in food' and clause 4.3 'food for companion animals'. Since the EPA only lists microorganisms that are not genetically modified, the requirement that "the microorganisms are not genetically modified" does not need to be repeated in the IHS and has been removed under clause 2.10 and 4.3 of the IHS.

#### 4.2.10 Foods for companion animals (clause 3.3 of the IHS)

- (1) Cured chicken meat products are excluded under the provision for 'cured meat products', as explained in clause 5.4.2(5) of this RMP. Similarly, cured chicken meat products are excluded under the commodity 'foods for companion animals'.
- (2) See also 4.1.17 of this RMP for further changes relating to foods for companion animals.

#### 4.2.11 Cosmetics containing bee products (clause 4.1 of the IHS)

- (1) Personal consignments of cosmetics containing honey, pollen or royal jelly have historically been eligible for importation. Some of these cosmetics also contain beeswax and propolis.
- (2) When the cosmetics are commercially manufactured and packaged, personal consignments of cosmetics containing bee products are eligible for importation.
- (3) A definition for bee products, which is defined as any product derived from honey bees (*Apis mellifera*) including bee pollen, bee venom, beeswax, honey, propolis and royal jelly, has been added to *Schedule 2 Definitions* of the IHS.

#### 4.2.12 Hides and skins (clause 4.3 of the IHS)

- (1) Existing import provisions for personal consignments of processed hides and skins and irradiated hides and skins from the <u>IHS INETROIC.ALL</u> have been reviewed and incorporated into the IHS with the following amendments to improve clarity and to align with current operational practice.
  - a) The current requirement for personal consignments of processed hides and skins and irradiated hides and skins in <u>IHS INETROIC.ALL</u> requires the commodities to be accompanied by a veterinary certificate. However, most of these personal goods are non-compliant on arrival as importers are not able to obtain a veterinary certificate. MPI previously allowed onshore treatment of irradiation but this treatment is no longer available from treatment providers. More recently, the onshore formalin fumigation facility in Auckland has also closed. As personal imports of these commodities carry very low risk and there is not a viable risk pathway, manufacturer's declarations, as well as veterinary certificates, will be accepted for these commodities.
  - b) For processed hides and skins derived from pigs, the pH value of the pickling process has been amended from less than 4 to less than 3. This aligns with the <u>IHS HIDESKIN.ALL</u>. For a detailed discussion, refer to <u>RMP HIDESKIN.ALL</u>.
- (2) Similarly, existing import provisions for personal consignments of dried or salted hides and skins from the <u>IHS INETROIC.ALL</u> have been reviewed. The existing requirements are as follows:
  - a) All imported consignments of dried or salted game trophy hides and skins must be free of extraneous organic material, pest infestation, and evidence of decay on arrival, and accompanied by a veterinary certificate verifying that they have been:
    - i) dried, dry or wet salted, for at least 14 days if originating from a country or zone free from FMD (as per the MPI List of FMD Free Countries/Zones); or
      - 1) dry or wet salted with salt containing 2% sodium carbonate for at least 28 days if originating from a country or zone not free from FMD; and
    - ii) sourced from an area currently free from any outbreaks/epidemics of anthrax; or
      - 1) treated to deactivate anthrax in accordance with the OIE Code.
- (3) The requirements in clause 4.1.12(2) of this RMP have been reviewed against the <u>IHS HIDESKIN.ALL</u>, which contains import requirements for commercial consignments of dried or salted hides and skins. The <u>IHS HIDESKIN.ALL</u> has two additional requirements:

- a) The dried or salted hides and skins must be accompanied by a veterinary certificate stating that "the salted or dried hides and skins originate from animals that have been slaughtered in a government licensed processing establishment under the direct supervision of an official veterinarian, subjected to ante-mortem and post-mortem inspection, and certified as fit for human consumption".
- b) The dried or salted hides and skins must be further processed (liming and/or pickling) at an MPIapproved transitional facility on arrival.
- (4) The *IHS PERSONAL.ALL* will adopt the existing import requirements for personal consignments of salted or dried hides and skins from the *IHS INETROIC.ALL*, without the additional requirements as described in 4.1.12(3). The reasons for this approach are as follows:
  - a) Personal imports of salted or dried hides and skins represent a negligible risk when compared to commercial imports as import volume is very low and the goods are restricted to personal use without domestic sale and distribution.
  - b) The two significant diseases of concern to New Zealand anthrax and FMD are sufficiently managed by veterinary certification requirements in the <u>IHS INETROIC.ALL</u>.
  - c) While liming and pickling is a common industrial process for commercial production of hides and skins, there is no transitional facility available for processing small quantities of personal consignments. The requirement for liming and/or pickling at a transitional facility for personal imports would be impractical to implement.
- (5) Notwithstanding the approach described in clause 4.1.12(4), the veterinary certification statements for anthrax and FMD will be amended to align with the <u>IHS HIDESKIN.ALL</u> to enhance clarity regarding certification and applicable animal species. For a detailed discussion, refer to <u>RMP HIDESKIN.ALL</u>.
- (6) Many treatment facilities have been closed [see 4.1.12 (1)a)] so there may not be options available for non-compliant salted or dried hides and skins. Guidance will be added to alert importers that there may not be treatment options for non-compliant consignments.

#### 4.2.13Non-viable animal specimens - microscope slides of animal tissue (clause 4.4 of the IHS)

- (1) Microscope slides of animal tissue (including bacteria and protozoa) fixed onto microscope slides under glass coverslips is an existing provision in the *IHS for Nonviable Animal Specimens from All Countries,* <u>IHS INESPEIC.ALL</u>. This provision will be added into the *IHS PERSONAL.ALL*.
- (2) When reviewing this provision, Animal Imports assessed that animal tissues fixed onto microscope slides under coverslips made of any material do not represent a biosecurity risk. The description of 'coverslip' without specifying glass is thus added.

#### 4.2.14 Specified items of animal origin (clause 4.5 of the IHS)

- (1) The title 'commercially manufactured items' has been amended to 'specified items of animal origin', which contains sub-provisions for commercially manufactured specified items of animal origin, and all other specified items of animal origin that may not be deemed commercially manufactured.
- (2) Goldbeater's skin is a shelf-stable, commercially manufactured item made of the outer membrane of the intestine of cattle. It is highly processed and is neither used for human nor animal consumption. Biosecurity risk of personal consignments of goldbeater's skin is negligible, and the product is eligible for importation.
- (3) Existing import provisions for personal consignments of commercially manufactured items containing feathers such as down jackets, duvets, quilts, pillows, etc from the <u>IHS PERSONAL.ALL</u> have been reviewed. These items are required to be visibly free from contamination, but visible inspection cannot be completed without destroying the items. As feathers in commercially manufactured items are always washed and cleaned, the requirement to be visibly free from contamination requirement can be removed.
- (4) Existing import provisions for personal consignments of ornamental products from clause 3.1 of the <u>IHS</u> <u>INETROIC.ALL</u>, and those for animal fibre (e.g. ruminant fibre, feathers, horse tails) from the IHS <u>PERSONAL.ALL</u>, have been reviewed. These provisions are grouped and added to the appropriate subprovisions under 'specified items of animal origin' of the <u>IHS PERSONAL.ALL</u>. This enhances operational clarity for MPI inspectors. Import requirements remain unchanged, except for personal consignments of game trophy skulls, horns, hooves, antlers, bones, tusks, claws, and teeth (see below).

- (5) Existing import provisions for personal consignments of game trophy skulls, horns, hooves, antlers, bones, tusks, claws, and teeth are as follows:
  - a) All imported consignments of game trophy skulls, horns, hooves, antlers, bones, tusks, claws, and teeth must be:
    - i) mounted; or
    - ii) professionally cleaned and processed to a high standard of whiteness; or
    - iii) accompanied by a manufacturer's declaration verifying that they have been boiled at a minimum of 100°C for at least 30 minutes, and packaged immediately after treatment in a manner so as to ensure that there is no subsequent contamination with untreated goods of a similar nature; or
  - b) All imported consignments of unmounted game trophy skulls, horns, hooves, antlers, bones, tusks, claws, and teeth must free of extraneous organic material, pest infestation, and evidence of decay on arrival.
- (6) Operationally, all game trophies are inspected on arrival to ensure they are clean and free from visible contamination. If they are found non-compliant, i.e. contaminated, they may either be treated onshore in accordance with <u>MPI-ABTRT</u>, reshipped or destroyed. The requirements as described in 4.1.14(5) of the RMP are therefore redundant and have been removed. The heat treatment of boiling at a minimum of 100°C for at least 30 minutes will remain for treatment of non-compliant consignments.
- (7) Beaks are also a commonly imported game trophy commodity and have been added to the list of game trophies. Thus, the reviewed requirements are as follows:
  - a) Personal consignments of antlers, beaks, bones, claws, hooves, horns, skulls, teeth, and tusks (either mounted or unmounted) may be imported from any country provided they are clean and free from visible contamination.

## 4.2.15Dietary supplements and medical preparations containing bee products for human use (clause 4.6 of the IHS)

- (1) MPI Border Clearance Services has submitted to the Animal Imports team several queries regarding whether dietary supplements for human use containing beeswax and propolis are eligible for importation.
- (2) According to current commercial import rules in the *IHS BEEPROIC.ALL*, the amount of beeswax and propolis in imported dietary supplements for human use is not regulated and so does not need to be restricted to 2%. Guidance has been provided in the IHS to clarify this.
- (3) In addition, a weight limit of 1kg has been added to both refined bee venom products and refined propolis products. Due to the weight restriction, consumer-ready packaging is implied and thus, the wording 'commercially manufactured and packaged', instead of 'consumer-ready packaged', will be adopted for both commodities for clarity and consistency.

#### 4.2.16 Veterinary medicines accompanying imported animals (clause 4.7 of the IHS)

(1) This provision is not intended for vaccines. An exclusion has been added to the IHS.

## 4.2.17 Definition of bee products, finished game trophy, fully tanned leather and leather goods, new organism, quality manager and ornamental products of animal origin.

(1) The definitions have been added.

#### 4.2.18 Definition of Products of Porcine Origin (applicable to food for companion animals)

- (1) Considering clause 7.1.6 of this RMP, canned pig products will also be excluded.
- (2) This exclusion, along with the exclusion of pig ears, pig rawhide chews, pig trotters, pig liver treats or other similar whole parts of a pig under the definition of 'Products of Porcine Origin, have been incorporated into the provision for 'foods for companion animals' in the body of the IHS.
- (3) The definition for 'Products of Porcine Origin (applicable to food for companion animals)' has therefore been removed.

#### 4.2.19 Definition of Visible Contamination

(1) The definition has been reviewed in conjunction with that in the <u>IHS INETROIC.ALL.</u> As a result, 'adherent fat, muscle, sinew, extraneous organic material and evidence of decay' have been added to the definition.

#### 4.2.20 Guidance throughout the IHS updated

- (1) Guidance information has been added to a number of clauses throughout the IHS to enhance operational clarity for MPI inspectors.
- (2) A veterinary certificate template for processed hides and skins, irradiated hides and skins, and dried or salted hides and skins, has been added to *Schedule 3* of the IHS to facilitate importers to meet requirements of the IHS.

### 4.3 20 Dec 2019 – urgent amendment

- (1) Subsequent to the final issue of the *IHS PERSONAL.ALL*, 19 December 2019, the IHS was amended to stop imports of the following commodities that contain pork and pork products:
  - a) Canned/retorted animal products.
  - b) Meat floss.
  - c) Pork crackling.
  - d) Meat and meat products of New Zealand origin.
  - e) Foods for companion animals.
- (2) The following commodities are not affected:
  - a) Animal product-based flavours or stock.
  - b) Products containing less than 5% meat ingredients.
- (3) The requirement 'the product does not contain animal product of porcine origin' was added to the provisions for canned/retorted animal products, meat floss, and meat and meat products of New Zealand origin. The provision for pork crackling was removed entirely. The requirement 'the product is not a pig product' was added to the provision for foods for companion animals (see clause 7.1.6 of this RMP for more details).
- (4) This amendment was necessary due to the continuously changing global situation for African swine fever (ASF). After stopping imports of personal consignments of cured pig meat products from all countries (effective on 15 January 2019), and personal consignments of pig meat and pig meat products from Australia, Finland and Sweden (effective on 20 September 2019), MPI has decided to take an even more cautious approach by stopping imports of personal consignments of five processed animal products that contain pork and pork products from all countries, as described in clause 4.2(1) of this RMP. This change also aligns with the public messaging to travellers which is 'Don't bring pork into NZ'.

## 4.4 19 Dec 2019 - IHS issued

- (1) On 3 October 2019, MPI issued the provisional <u>IHS for Personal Consignments of Animal Products</u>. New Zealand Beekeeping Incorporated submitted an independent review request under Section 24 of the Biosecurity Act 1993. Concerns were raised around the biosecurity controls in Pacific Island countries.
- (2) In response to the submitter's concerns, MPI has removed from the provisional IHS the clauses relating to personal consignments of honey and propolis from Pacific Island countries, and retained them in the existing <u>IHS for Specified Processed Bee Products</u>, BEEPROIC.ALL, 13 November 2006.
- (3) The new IHS was issued on 19 December 2019.

## 5 Recommendations for Goods Containing Animal Products for Human Consumption

## 5.1 Aquatic animal products

- (1) Palolo worms (*Palola viridis*) are commonly imported into New Zealand as a personal consignment from Pacific Island Countries.
- (2) Biosecurity risks associated with personal imports of palolo worms are likely to be negligible given that:
  - a) palolo worms require sub-tropical/tropical waters;
  - b) environmental exposure would most likely occur via household grey-water effluent;
  - c) palolo worms products would be used for human consumption only and not disposed of directly to the marine environment;
  - d) limited volumes in personal consignments will be imported, which will not result in industrial-scale discharges.

#### Recommendation

(3) 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.

## 5.2 Egg Products

#### 5.2.1 Hard-boiled chicken eggs

- (1) Hard-boiled chicken eggs, including whole hard-boiled chicken eggs and cooked chicken egg pieces contained in sandwiches and salads, are frequently brought off cruise ships for human consumption. MPI Border Clearance Services has asked the Animal Imports team to assess the risk associated with imports of hard-boiled chicken eggs as personal consignments.
- (2) The *RRA: Miscellaneous Egg Products for Human Consumption* (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.
- (3) Birds that are known to be affected by Angara disease are broiler chickens and layer chickens. Angara disease could only infect them if they were exposed to egg products containing the viral agent. According to information obtained from MPI Border Clearance 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 that 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) The RRA 2016 also concluded that pasteurisation at 60°C for 3.5 minutes of non-shelf-stable egg products containing up to 100% egg is effective in inactivating pathogens that are exotic to New Zealand and likely to be associated with eggs.
- (5) 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.
- (6) Commercial kitchens on cruise ships are likely to maintain a reasonably high level of food safety control to ensure whole chicken eggs are thoroughly cooked in preparing hard-boiled whole chicken eggs. Hard-boiled whole chicken eggs, with or without shell, from cruise ships are therefore deemed as safe.
- (7) For whole chicken eggs that are not from cruise ships, inspection that involves shell removal or slicing into eggs as a method to establish whether they are thoroughly cooked may be impractical.

(8) Notwithstanding 5.2.1 (7), chicken eggs that have been reduced to pieces and that are in food items such as sandwiches or salads can be readily inspected to determine thorough cooking.

#### Recommendation

- (9) The RMP proposes that personal consignments of hard-boiled chicken eggs may be imported from any country provided:
  - a) The product is from cruise ships; or
  - b) The product has been reduced into pieces in food items.

#### 5.2.2 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 20% 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*.

#### Recommendation

- (4) The RMP proposes that a weight limit of 1 kilogram is applied to mayonnaise and salad dressings containing egg ingredients from all countries to distinguish personal consignments from commercial consignments.
- (5) The RMP proposes that requirements for mayonnaise and salad dressings to 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 20% or less as stated on the product label.
  - e) The total weight of the consignment is 1 kilogram or less.

## 5.3 Insect and arachnid-based food products

- (1) Insect and arachnid-based food products, such as insect contained in hard candy and cricket flour, are frequently brought into New Zealand by international travellers. MPI Border Clearance Services 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 food products, arachnid based food 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 food products.

#### Recommendation

- (5) The RMP proposes that insect and arachnid-based food 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.

### 5.4 Meat and meat products

#### 5.4.1 Alligator and crocodile meat and meat products

- (1) The *IHS: EDIPROIC.ALL* has the requirements for personal consignments of alligator and crocodile meat and meat products.
- (2) The weight limit for the commodity has historically been 20kg. Consistent with other personal consignment commodities, MPI has reviewed the 20kg weight limit and assessed a weight limit of 3kg as appropriate for personal consignments of the commodity.

#### Recommendation

(3) The RMP proposes that the weight limit is reduced from 20kg to 3kg.

#### 5.4.2 Cured meat

- (1) The IHS: EDIPROIC.ALL has requirements for personal consignments of cured meat products manufactured in FMD (foot and mouth disease) -free countries (refer to the <u>OIE List of FMD-free Member</u> <u>Countries</u>), 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 risk assessment on dried cured meat (March 2014) concluded 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 import requirements for 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 been permitted from any FMD-free country.
- (4) Considering the uncertainty around the on-going international spread of ASF, MPI will take a precautionary approach and stop imports of personal consignments of cured pig meat products from any

country. This approach will be adopted for as long as necessary, with the view that provisions for personal consignments of cured pig meat products may be reintroduced to the IHS based on MPI's review of the ASF situation in the future.

- (5) As FMD does not affect poultry, the FMD requirement does not need to apply to cured poultry meat products. However, curing is not effective in mitigating the risk of infectious bursal disease virus, which causes disease only in chicken (*Gallus gallus*), and therefore, cured chicken meat products are not eligible for import into New Zealand.
- (6) Consistent with the MPI risk assessment on dried cured meats (March 2014), personal consignments of 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.

#### Recommendation

- (7) The RMP proposes two sub-categories of cured meat: ruminant and poultry. Import requirements for the two sub-categories are as follows.
- (8) 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 officially recognised by the OIE.
  - c) The country of manufacture must be clearly stated on the packaging.
  - d) The package has not been opened or broken.
  - e) The total weight of the consignment is 1 kilogram or less.
- (9) Personal consignments of cured poultry (excluding chicken) meat products 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 total weight of the consignment is 1 kilogram or less.

#### 5.4.3 Meat floss

- (1) The IHS: EDIPROIC.ALL provides a long-standing ability for the import of animal product-based floss.
- (2) Meat floss is a more suitable title to describe what is intended to.
- (3) 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.

#### Recommendation

- (4) 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.
- (5) 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 contain animal product of porcine origin (relates to update 4.2 of this RMP).
  - b) The product does not require refrigeration before the package is opened.
  - c) The product is commercially manufactured and packaged.
  - d) The package has not been opened or broken.
  - e) The product is very finely shredded and has no identifiable meat pieces.
  - f) The total weight of the consignment is 1 kilogram or less.

## 5.4.4 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) Considering the uncertainty around the on-going international spread of ASF, on 20 September 2019, MPI took a precautionary approach by urgently amending the *IHS EDIPROIC.ALL* to stop imports of personal consignments of pig meat and pig meat products from existing specified countries: Australia, Finland and Sweden. This approach will be adopted for as long as necessary, with the view that provisions for personal consignments of pig meat and pig meat products may be reintroduced to the IHS based on MPI's review of ASF situation in the future
- (3) The weight limit for the commodity has historically been 20kg. Consistent with other personal consignment commodities, MPI has reviewed the 20kg weight limit and assessed a weight limit of 3kg as appropriate for personal consignments of the commodity.

#### Recommendation

- (4) The RMP proposes that personal consignments of pig meat and pig meat products continue to be disallowed from Australia, Finland and Sweden.
- (5) The RMP proposes that the weight limit is reduced from 20kg to 3kg.

### 5.5 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 east, baker's yeast, etc.), are currently eligible for import under the Chief Technical Officer direction (CTOd) 2016 063, which contains a list of nongenetically 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.*

#### 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)

## 6 Recommendation for Non-Food Goods Containing Animal Products

### 6.1 Animal fibre

- (1) The *IHS: ANIFIBRE.GEN* has the requirements for personal consignments of animal fibre from specified ruminants (sheep, goats, yaks, camels, alpacas, and llamas of the suborder Ruminantia, order Artiodactyla), which may be imported provided the animal fibre:
  - a) has been washed; and
  - b) spun into yarn; and
  - c) free from visible contamination on inspection; and
  - d) is less than 20 kilograms.
- (2) The scope of animal species and the requirement "spun into yarn" are not relevant to risk mitigation when risk can be effectively managed by 5.1(1) a), c) and d).
- (3) The weight limit for the commodity has historically been 20kg. Consistent with other personal consignment commodities, MPI has reviewed the 20kg weight limit and assessed a weight limit of 3kg as appropriate for personal consignments of the commodity.

#### Recommendation

- (4) The RMP proposes personal consignments of animal fibre from specified ruminants may be imported provided the following requirements are met:
  - a) The product is washed.
  - b) The product is free from visible contamination.
  - c) The total weight of the consignment is 3 kilograms or less.

## 6.2 Non-viable animal 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 bivalve and gastropod molluscs (including clams, oysters, mussels and abalone) initially fixed in 4% to 10% formalin, which is then either preserved in industrial-grade alcohol, or in a formalin-alcohol solution. They are individually vacuum packaged in sealed plastic bags.
- (2) Formalin fixation requires at least 24 hours to fully penetrate and fix biological tissues. The rapid risk assessment estimated that the time interval from formalin fixation to subsequent storage and transport of the commodity in formalin or formalin-alcohol solution, to "shucking" and eventual disposal would be at least 5 days (120 hours). 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 risk associated with its 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.

#### 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.

## 6.3 Therapeutic products for human use

- (1) Therapeutic products for human use, which includes dietary supplements, health supplements, Chinese and oriental medicines, and homeopathic remedies, 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 personal consignments. Non-viable cordyceps that is visibly clean is eligible for biosecurity clearance.

#### 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':
  - 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 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 is commercially manufactured and is less than 1 kg; and
      - 1) Is in packaging that clearly indicates that the total amount of honey, bee pollen and/or royal jelly is no more than 2% of the total product weight; or
      - Is encapsulated (completely covered by an edible substance such as gelatine or wax that does not contain sugar, fruit, honey, pollen, propolis or royal jelly) and packaged for direct retail sale.
    - ii) A dermatological preparation that is 1 kilogram or less per consignment; or
    - iii) A refined bee venom product that:
      - 1) Does not contain honey, pollen or royal jelly; and
      - 2) Is commercially manufactured and packaged; or
    - iv) A refined propolis product that:
      - 1) Does not contain honey, pollen or royal jelly; and
      - 2) Is in consumer-ready packages; or
    - v) A medical preparation not listed above, and is 12 packages or less per consignment.

## 7 Recommendations for Goods Containing Animal Products for Animal Consumption and Other Uses

### 7.1 Foods for companion animals

- (1) Shelf-stable foods for companion animals present negligible risk due to the heat treatment they have undergone during the manufacturing process. They are eligible for biosecurity clearance under the *IHS: PETFODIC.ALL*.
- (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) Foods 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.

#### 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. The ACVM internal document will harmonise with this proposed change.
- (6) Regarding the update in clause 4.2 of this RMP, MPI proposes to remove pig products from foods for companion animals. For the purpose of ASF mitigation for this commodity, pig products are defined in Schedule 2 of the IHS as pig ears, pig rawhide chews, pig trotters, pig liver treats and other similar whole parts of a pig, and do not include kibble/biscuits. The latter products are excluded as they have undergone manufacturing processes (e.g. heat treatment, extrusion) that are sufficient to inactivate ASF virus.
- (7) The RMP proposes that personal consignments of foods for companion animals containing animal products of any species from any country may be imported provided the following requirements are met:
  - a) The product is not a pig product (relates to update 4.2 of this RMP).
  - b) The product does not require refrigeration before the package is opened.
  - c) The product is commercially manufactured and packaged.
  - d) The package has not been opened or broken.
  - e) The product is labelled as for animal consumption.
  - f) The total weight of the consignment is
    - i) 2 packets 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 foods 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
  - 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)

## 7.2 Veterinary medicines accompanying imported animals

- (1) Veterinary medicines containing animal products accompanying imported animals from any country are eligible for biosecurity clearance.
- (2) Other requirements under the Agricultural Compounds and Veterinary Medicines Act 1997 (AVCM Act) may apply. Guidance on ACVM Act requirements is provided in the *IHS: PERSONAL.ALL.*