



Review of Submissions

Draft Import Health Standard for Pig Meat and Pig Meat Products from Australia

Draft Risk Management Proposal for Pig Meat and Pig Meat Products from Australia

30 July 2020

REVIEW OF SUBMISSIONS

Pig Meat and Pig Meat Products from Australia

30 July 2020

Approved for general release

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1 Introduction

The draft import health standard for the importation into New Zealand of Pig Meat and Pig Meat Products from Australia was notified for consultation on 19 December 2019.

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

First consultation

Australian Government, Department of Agriculture, Water and Environment	7 January 2020
New Zealand Food and Grocery Council, Katherine Rich	21 January 2020
McCain Foods (Australia) Pty Ltd, Daniel Sutton	21 January 2020

A second consultation was notified (from 20 May to 4 June 2020) due to an increase in scope of third-country pork products and a change in the type of official assurance from the Australian Competent Authority.

Second consultation

Australian Government, Department of Agriculture, Water and Environment (late submission, extension agreed with MPI)	17 June 2020
New Zealand Food and Grocery Council, Katherine Rich (late submission, extension agreed with MPI)	8 June 2020
New Zealand Pork, Frances Clement	4 June 2020

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	NZFGC	New Zealand Food and Grocery Council
IHS	Import Health Standard	TTMRA	Trans-Tasman Mutual Recognition Arrangement
DAWE	Department of Agriculture, Water and Environment		

2 Summary of Amendments

As a result of comments made, the following is a summary of amendments to be made to the *Pig Meat and Pig Meat Products from Australia*.

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

2.1 Clause 1.3 Requirements for clearance

Clause 1.3(2)(b): Included requirement for packaging for third country pork products.

Clause 1.3(2)(e): Amended wording to allow an official letter instead of veterinary certification.

Guidance box: Included for clarification around clearance of processed pork products (canned/retorted and products containing less than 5% pork) under the IHS *Specified Animal Products* (provisional issue 14 May 2020).

2.2 Clause 1.4 Third country pig meat products

Clause 1.4: Amended to include the requirements for third country pig meat products rather than as a definition in Schedule 2 of the IHS.

2.3 Clause 1.5 Import permit information

Clause 1.5(2): Removed as not relevant to IHS.

2.4 Clause 1.6 The documentation that must accompany goods

Clause 1.6(2)(d)(i): Amended wording to allow endorsement of the official letter by an Authorised Officer of the Australian Competent Authority rather than an official veterinarian.

Clause 1.6.2(1)(d): Amended wording to allow an official letter endorsed by an Authorised Officer of the Australian Competent Authority instead of veterinary certificate.

2.5 Clause 2.1 PRRS virus

Clause 2.1(1)(b): Included curing conditions for PRRS virus. [*Note: this clause was removed from the IHS after second consultation of the draft IHS as third country cured pork products will need further consideration.*]

2.6 Schedule 2 – Definitions

Updated definitions for official letter, third country pig meat products and released from biosecurity control.

Definition for authorised officer has been added. The definition for released from biosecurity control in Australia has been amended. [*Note: Updated after second consultation of the draft IHS.*]

2.7 Schedule 3 – Model official letter

Removed the model veterinary certificate and replaced with an official letter.

Amended attestations on official letter for clarity. [*Note: Updated after second consultation of the IHS.*]

3 Review of Submissions First Consultation

3.1 Australian Government, Department of Agriculture, Water and Environment

3.1.1 TTMRA

Trans-Tasman Mutual Recognition Arrangement (TTMRA) is to remove regulatory barriers to the movement of goods and service providers between Australia and New Zealand (NZ), and to thereby facilitate trade between the two countries and to enhance the international competitiveness of Australian and NZ enterprises, increase the level of transparency in trading arrangements, encourage innovation and reduce compliance costs for business. From bilateral discussions, Australia understands the measures proposed by NZ have been put in place to meet NZ's legal obligations and that no food safety or biosecurity risks are being identified for third country pig products imported into Australia and exported to NZ. Noting this, Australia requests the introduction of these measures should not be more trade restrictive than necessary to meet relevant objective/s in accordance with the provisions of the WTO SPS agreement. As such, we seek the NZMPI's consideration of the following specific comments and to review alternative documentation for the export of third country pig products from Australia.

MPI Response

MPI agrees with the principles of the TTMRA, and recognises that Australia and New Zealand's food safety frameworks are harmonised under this Agreement. Similarly, biosecurity equivalence is recognised for some animal products of Australian origin, including pig meat and pig meat products. This is reflected in the fact that New Zealand does not require veterinary certification for these products.

See section 3.1.1 below for discussion of third country pork.

3.1.1 Alternative to veterinary certification

Australia encourages NZ to consider alternatives to a Veterinary Certificate noting that the introduction of the new measures has not been driven by biosecurity or food safety risks. Australia has strict import controls for imported pork products.

1. Australia only accepts pig products from a selection of countries which have been individually assessed to comply with Australia's import requirements. These countries include: Canada, Denmark, Finland, Republic of Ireland, Netherlands, NZ, Sweden, United Kingdom (Great Britain and Northern Ireland), United States, Spain (dry cured only) and Italy (dry cured only).
2. Post entry requirements for all uncooked pig product imported into Australia require product to be processed by heating to a minimum core temperature for a specified time before being released from biosecurity control. For importing countries that are accepted by Australia, the minimum core temperature and time parameters are equal to what is transcribed in Section 2.1 of NZ's IHS. The same treatment is also applied to imported pork products which are cooked prior to export to Australia.
3. Australia requires all processors that receive imported pig meat to comply with Approved Arrangements for 3.2 – Imported pig meat processing Requirements. Approved Arrangements (AA) allow operators to manage biosecurity risks and/or perform the documentary assessment of goods in accordance with departmental requirements, using their own sites, facilities, equipment and people, and without constant supervision by the department and with compliance monitoring or auditing. AAs deliver confidence to NZ that all third country pig product must comply with the Australian Biosecurity Act 2015, and therefore is traceable to original health certificate raised by the country of origin.

Given the purpose of the IHS and noting the tight import controls Australia has, Australia believes an Official Veterinarian is not necessary and therefore requests NZ to consider alternatives to a Veterinary Certificate.

MPI Response

Considering the information provided by DAWE, MPI agrees that Australia's import conditions for cooked pork are equivalent to New Zealand's. The list of source countries for third country pig meat and pig meat products from Australia are limited to Canada, European Union (EU) and United States of America (USA). These countries can export pig meat and pig meat products to New Zealand *directly* based on country or zone freedom from specified diseases in the relevant IHSs, and processing (i.e. cooking or curing) in relation to porcine respiratory and reproductive syndrome (PRRS) virus.

This reflects the current situation which may change going forward (e.g. if Australia allows imported pork from additional countries). We view certification as assurance that New Zealand's requirements will continue to be met, especially as there is a strong expectation for transparency and traceability of pork.

In the case of the EU, the number of EU Member States that can export pork to Australia is fewer than for New Zealand. Under EU legislation, only pig meat and pig meat products that are eligible for intra-Community trade can be exported to countries such as Australia and New Zealand. As such, if Australia were to allow imports from other EU Member States, these Member States would also be eligible to export to New Zealand.

We recognise that health attestations may be achieved by alternative means such as an official letter provided by DAWE to accompany each consignment. A model of the official letter for third country pork products has been included in Schedule 3 of the IHS.

The official letter confirms that third country pork products have been imported from Canada, the EU or USA, and released from biosecurity control (i.e. given biosecurity clearance) in Australia, and have been cooked to meet New Zealand's PRRS requirements. However, the specific time/temperature conditions for PRRS will not be outlined in the letter (see 3.1.2 for further discussion). The letter also contains the relevant information related to the consignment (e.g. product description, import permit number, etc).

3.1.2 Attestations for PRRS processing

Noting the above import controls in Australia, requirements for minimum core temperature and time parameters are equivalent to the specified requirements listed in Part 2 for Porcine reproductive and respiratory syndrome virus. Australia requests recognition that its importing requirements already meet the requirements that are outlined in Part 2 rather than listing these specifically in the IHS. The following wording is proposed to replace the table under Part 2:

Australian import requirements for the import of pork products from third countries meet New Zealand's biosecurity and food safety requirements.

MPI Response

Australia's cooking requirements for third country pork products are equivalent to the PRRS requirements specified in Part 2 of the IHS. MPI agrees that specific time/temperature declarations for PRRS are not needed in the official letter. The following statement will be included in Schedule 3 – Model official letter:

Australian import requirements for the import of pork products from third countries meet New Zealand's biosecurity requirements. Third country pork products have been cooked to meet New Zealand's import requirements for porcine reproductive and respiratory syndrome virus. [Note this statement has been amended following further discussion with DAWE – see 4.1.4 below.]

The PRRS requirements for third country pork will not be removed from Part 2 of the IHS.

Retaining Part 2 of the IHS allows MPI to be notified by DAWE if there are changes to requirements as the third country pork would no longer meet the relevant IHSs.

3.2 New Zealand Food and Grocery Council

3.2.1 Support for third country pork products

Inclusion therefore of the existing provisions for third country trade is strongly supported, not the least for accessibility to these provisions being greatly enhanced through co-location in a single document

Similarly, inclusion of the PRRS risk mitigation measures in the IHS are supported for the purposes of accessibility and protection.

NZFGC is pleased to see the provisions for third country pig meat products include the option that they be cooked or cured. Much of the use by manufacturers in New Zealand of pork is cooked or cured such as in pizzas and the like. As well, pork features in small amounts in a range of spices and condiments manufactured in or imported into New Zealand. The third country provisions are therefore a vital element for inclusion.

MPI Response

Noted.

3.2.2 Clearance of specified third country pork products

We note there is no cross-reference or mention of the threshold provision contained in the Specified foods for human consumption containing animal products (EDIPROIC.ALL) that if a product contains less than 5% meat (bacon) and can meet clause 2.21 of the above IHS, it is eligible for biosecurity clearance. We consider that for completeness and usability, even a footnote to this effect would be very helpful

MPI Response

The clause regarding products containing less than 5% meat in the IHS *Specified Foods for Human Consumption Containing Animal Products* (EDIPROIC.ALL, dated 19 December 2019) has been amended, and the new import requirements can be found in the IHS *Specified Animal Products* (SPECPROD.ALL, provisional issue 14 May 2020).

A guidance box will be included under clause 1.3 (requirements for clearance) under the IHS MEAPORIC.AUS to note that third country canned/retorted pork products and processed products containing less than 5% pork from Australia are eligible for importation under the IHS *Specified Animal Products*.

3.3 McCain Foods

3.3.1 Meeting import requirements

McCain Foods assembles and exports prepared frozen meals (dinners and pizza) which contain pork. These pork components may have originated from outside Australia and we work closely with our local suppliers to ensure quality, safety and traceability. Based on the document review it is McCain's understanding that we can assure that all requirements outlined in the draft standard are currently being met in terms of source and treatment of pork.

With implementation of the IHS, McCain will work with relevant stakeholders to ensure that the appropriate documentation is requested and supplied as outlined.

MPI Response

Noted.

4 Review of Submissions Second Consultation

4.1 Australian Government, Department of Agriculture, Water and Environment

4.1.1 Definition for 'released from biosecurity control' and 'imported'

As requested by NZMPI, the department provides the following definitions for NZMPI information:

The term "biosecurity clearance" as outlined in standard 1.3

The term Biosecurity Clearance is not one that the department uses, and it is not referred to within the Biosecurity Act 2015 (Australia).

Biosecurity Clearance refers to a direction that is allocated to a particular consignment once a biosecurity officer has deemed the contents of the consignment to meet import conditions.

Despite this term not being referred to within the Biosecurity Act 2015 (Australia), the department would propose to NZMPI that the term "biosecurity clearance" refers to goods released from biosecurity control and enter Australian territory – in line with the below definition. The department seeks agreement from NZMPI on this term.

The use/meaning of "imported" as outlined in standard 1.4

Under the Biosecurity Act 2015 (Australia), imported goods are goods brought into Australian Territory on an aircraft, vessel or other conveyance that has entered Australian territory from outside Australian territory. This excludes goods unloaded for temporary purposes only (for example, to unload other goods).

In this instance, the goods will need to have been imported into Australia and released from biosecurity control.

The definition of "Released from Biosecurity Control" as outlined in Schedule 2

s119 of the Biosecurity Act 2015 (Australia) states that goods brought into Australian territory are subject to biosecurity control and remain subject to biosecurity control until they are released under Division 10. The act of releasing goods from biosecurity control occurs after an assessment of goods against import conditions has taken place. Goods are released from biosecurity control once a biosecurity officer or biosecurity industry participant send notice of release to the person in charge of goods and enters Australia, the goods are destroyed, or the goods are re-exported from Australian territory.

MPI Response

MPI has revised the definition for 'released from biosecurity control' to refer to the relevant section in the Biosecurity Act 2015 (Australia) applicable to third country pork products being exported to New Zealand.

'Released from biosecurity control in Australia' means goods that have entered Australian territory from outside Australian territory, and have been released from biosecurity control in accordance with section 162(1)(a) or (b) of the Biosecurity Act 2015 (Australia).

4.1.2 Definition for 'authorised officer'

As defined in the Export Control Act 1982 (Australia), an Authorised officer means a person appointed under section 20 to be an authorised officer. Section 20 states:

The Secretary may, by instrument signed by the Secretary, appoint a person, or persons included in a class of persons, to be an authorised officer or authorised officers, as the case may be, for the purpose of:

(a) the exercise by that person or those persons of the powers of an authorised officer under this Act or of such of those powers as are specified in the instrument; or

(b) the performance by that person or those persons of the functions of an authorised officer under this Act or of such of those functions as are specified in the instrument.

MPI Response

See response 4.2.1 for definition of Authorised Officer.

4.1.3 Cured pork products

The curing procedures outlined within this section do not align with Australia's import curing requirements for dry-cured pig meat. Australia's requirements are a set of processes/procedures that are adhered to rather than a particular final characteristic. It is also important to note, Australia regularly conducts equivalence assessments for dry-cured pig meat imports to allow alternative curing procedures. Therefore to minimise the impact on trade, the department, in consultation with industry, would like to propose either;

a) adding a statement to the IHS which would facilitate the import of cured meat products treated by other methods approved by MPI on a case-by-case basis, other than those outlined in 2.1 b). This could be achieved by adding the following statement to 2.1 b);

iv) treated by other curing procedures approved by MPI prior to import on application

OR

b) the complete removal of cured products from the IHS.

If the implementation of option a) would delay the finalisation of the IHS, the department's strong preference is to remove cured product from the IHS entirely, given the small trade and need to quickly resume trade in other imported pork products. Once the initial IHS is completed and trade resumed for other imported pork products, the department would be happy to work with MPI to incorporate cured products at a later date.

Further information for Australia's import requirements for pig meat products can be provided if necessary.

MPI Response

Equivalence is provided for in the draft IHS already (see Introduction and clause 1.5 of the IHS). However, to ensure that the attestations in the official letter for cured products are not misinterpreted, MPI agrees it may be better to remove third country cured pork products at this time as this would delay the finalisation of the IHS (Note: this does not affect Australian origin cured pork products).

As suggested by Australia, MPI would welcome the opportunity to work with DAWE to incorporate third country cured pork products at a later date.

4.1.4 Schedule 3 - model official letter

1. Australian import requirements for imported pork product are complex and varied for each importing country which makes statements of equivalence complicated. Therefore, the department requests NZMPI consider alternatives to the original attestation to make the requirements Authorised Officers are signing off on clearer, as follows (strikethrough indicates removal, red font indicates inclusion):

*This letter describes the third country pork product that has been imported by <insert company name and address>, and released from biosecurity control in Australia. ~~Australian import requirements for the import of pork products from third countries meet New Zealand's biosecurity requirements.~~ **Australia's minimum cooking requirements for imported pig products meet the requirements outlined in section 2.1 of New Zealand's Import Health Standard: Pig Meat and Pig Meat Products from Australia.** ~~Third country pork products have been cooked or cured to meet New Zealand's import requirements for porcine reproductive and respiratory syndrome virus.~~*

2. The department, in consultation with industry, would like to propose the follow changes to the model certificate to clearly demonstrate multiple countries of origin can be in the same consignment.

*The imported component of this product was imported on <insert day month year> and originated from <insert applicable country/countries: Canada, European Union, **and/or** United States of America>. The details of the consignment are as follows:*

Product description and quantity (kg):

Import permit number:

Establishment number of Australian facility (if applicable):

3. The department would also like to encourage clarity for the sentence, "The details of the consignment are as follows". Consider including a description to clarify that it is referring to the Australian imported pork consignment or the final product being exported to NZ.

MPI Response

MPI agrees with the proposed changes excepting the removal of: 'Australian import requirements for the import of pork products from third countries meet New Zealand's biosecurity requirements'. Although not explicit, this attestation covers diseases (e.g. foot and mouth disease, African swine fever, etc.) in which Australia and New Zealand currently accept disease freedom from the country of origin. MPI recognises that this may change going forward (e.g. if there is an exotic disease incursion in the country of origin which would affect that country's disease status, and Australia negotiates arrangements inconsistent with New Zealand's IHS for the country of origin).

MPI proposes the following in the official letter:

*This letter describes the third country pork product that has been imported by <insert company name and address>, and released from biosecurity control in Australia. Australian import requirements for the import of pork products from third countries meet New Zealand's biosecurity requirements **outlined within the Import Health Standard: Pig Meat and Pig Meat Products from Australia.** Australia's minimum cooking requirements for imported pork products meet the requirements outlined in section 2.1 of New Zealand's Import Health Standard: Pig Meat and Pig Meat Products from Australia. [Note the text in **bold** was suggested in further email correspondence by DAWE to make it clearer for their Authorised Officers to sign the letter.]*

The imported component of this product was imported on <insert day month year> and originated from <insert applicable country/countries: Canada, European Union and/or United States of America>. The details of the final pork product being exported to New Zealand are as follows:

4.2 New Zealand Pork

4.2.1 Documentation

We recognise that third country pig meat products are defined and limited to source countries that may provide pig meat direct to New Zealand based on those countries' pig disease status and risk management measures for PRRS.

NZPork reviewed but did not submit on the December 2019 draft import health standard. However there are two substantive changes in the May 2020 draft: one is the inclusion of cured product and the other is the removal of the official certification requirement for pig meat and pig meat products sourced from third countries.

We do not believe the relaxation in the May 2020 draft of the import health standard, from the provision of official veterinary certification in the December 2019 draft for third country pig meat, is appropriate. If such pig meat is imported directly into New Zealand, then official veterinary certification is required.

We are aware that under the Trans-Tasman Mutual Recognition Arrangement (TTMRA) which seeks to facilitate trade between Australia and New Zealand, pig meat of Australian origin does not require official certification for import into New Zealand. Similarly specific meats exported from New Zealand to Australia do not require official certification although New Zealand pig meat does.

The proposed change would remove the requirement for certification of third country pig meat, and only enquire 'endorsement' by an authorised officer of the Australian Competent Authority. There is no detail provided as to what qualifies an officer for endorsement, or the inspection and audit requirements around endorsement.

MPI Response

An Authorised Officer is a person appointed by the Governmental Authority of Australia to perform functions related to the Export Control Act 1982 (Australia) including issuing a government certificate.

Schedule 2 – Definitions of the IHS will be updated to reflect this description.

Also see MPI response 4.2.2 and 4.3.2.

4.2.2 Request for certification by official veterinarian

We note that Australia's Department of Agriculture, Water and Environment Australia requires all processors that receive imported pig meat to comply with Approved Arrangements for 3.2 - Imported pig meat processing requirements:

Thus pig meat being sent to New Zealand from third countries via Australia is feasibly exported from facilities that receive, handle, process, handle waste including biosecurity risk waste, and distribute pig meat, with no outgoing official veterinary certification.

Furthermore, we are particularly concerned around the Model Official Letter for proof of origin for trade of third country pig meat from Australia to New Zealand which only requires sign off as:

As a representative of the Department of Agriculture, Water and Environment, I confirm to the best of my knowledge the above is true and correct. (Emphasis is added by us.)

The proposed change has the effect of New Zealand relying on Australia to be the biosecurity check point for pig meat imported into New Zealand from third countries (as defined) via Australia. We do not agree with this proposal and request that certification by an official veterinarian is required, as per the December 2019 draft, and as required for all pig meat directly imported into New Zealand from all countries other than Australia.

MPI Response

Other third country animal products, such as dairy and retorted meat, can already be imported from Australia without onward certification by an official veterinarian. In these circumstances, Australia acts as a 'biosecurity check point' prior to these products being exported to New Zealand.

The submission's main issue is the appropriateness of the documentation provided by Australia. MPI considers that both a veterinary certificate and official letter are an **official assurance** from DAWE confirming that third country pork products have been legally imported into Australia and released from biosecurity control.

This means that third country pork products have been sourced from Canada, EU and/or USA, and the pork product has been cooked per the IHS. Because of this MPI considers there are no additional biosecurity risks to New Zealand from third country pork products from Australia.

4.2.3 Reciprocal arrangements

If New Zealand is prepared to accept non-certified pig meat via Australia from third countries which are lesser health status than New Zealand (in respect of PRRS), then we would expect that Australia would accept pig meat from New Zealand without certification, if accompanied by an 'endorsement' from New Zealand's competent authority (MPI).

We also note that New Zealand's current OMAR to Australia (October 2019) states:

MPI continues to negotiate requirements for the export of imported pork meat products to Australia.

We request that 2-way access of pig meat from third countries is considered as a package, both under the TTMRA.

MPI Response

It should be emphasised again that Australia, as a trusted and long-time trade partner to New Zealand, is providing an **official assurance** that third country pork products originate from Canada, EU and/or USA, and have been cooked as per the IHS.

Under the principles of TTMRA, MPI considers that Australia's biosecurity system manages the risk associated with imported pork, and includes import controls such as an import permit for pork, equivalent import requirements and Approved Arrangements which are similar to New Zealand's [Transitional Facility for Animal Products](#). The close engagement between the Veterinary Authorities in New Zealand and Australia ensures that any changes to Australia's animal health status (e.g. an exotic disease outbreak) would be notified to New Zealand immediately.

The ideal outcome is to achieve reciprocal arrangements for New Zealand animal products (including third country pork). MPI will continue to advocate for reciprocal biosecurity arrangements under TTMRA; however, these broader discussions will likely take time to resolve and should not impede the progress of this IHS.

4.3 New Zealand Food and Grocery Council

NZFGC understands that the rationale for the draft import health standard (IHS) has not changed since the consultation in January 2020 but that further clarity around expectations of third country products, and an expansion of those products, clearing import requirements for entry to Australia and then being exported to New Zealand was necessary.

Inclusion of the provisions for third country products, including the expanded provisions, is strongly supported.

NZFGC is pleased to see the provisions for third country pig meat products include the option that they be cooked or cured or further processed. Much of the use by manufacturers in New Zealand of pork is cooked or cured such as in hamburgers, pizzas and the like. As well, pork features in small amounts in a range of spices and condiments manufactured in or imported into New Zealand.

Australia, with a population of 25.5m, has the population to justify large quantities of specialty food imports and New Zealand can leverage this import demand with re-export of smaller quantities for New Zealand. We also recognise that there seems no reason that specialty products such as Prosciutto di Parma (Parma ham) from Italy or Jamon Serrano (described as a national treasure in Spain) should be available in Australia and not New Zealand.

However, while we have a strong interest in all the third country provisions and see them as important for inclusion in order to maintain a world class consumer experience, our main interest is to ensure that raw imported pig meat from the likes of the USA that is then processed (cooked or cured) in Australia can be exported to New Zealand.

Our view is that all third country pork and pig meat imports to Australia and cleared by Australian Customs should be available for re-export to New Zealand. However, if an expanded selection of ready-to-eat third country products was to delay implementation of the IHS in its entirety, then we would support the removal of these products from the IHS at this time. If that was to occur, we would be very supportive of their inclusion in the IHS at some later time.

MPI Response

Noted.

5 Appendix 1: Copies of Submissions First Consultation

5.1 Australian Government, Department of Agriculture, Water and Environment



Australian Government

Comments from the Australian Government to New Zealand on the *Import Health Standard: Pig Meat and Pig Meat Products from Australia (G/SPS/N/NZL/614)*.

The Australian Government welcomes the opportunity to provide formal comments on the *Import Health Standard: Pig Meat and Pig Meat Products from Australia (G/SPS/N/NZL/614)* (herein referred to as the IHS). The Australian Government thanks the New Zealand Ministry for Primary Industries (NZMPI) for their notification through the World Trade Organization (WTO) and also thanks the NZMPI for considering its comments on the draft IHS.

General comments

Australia notes the objective under the Trans-Tasman Mutual Recognition Arrangement (TTMRA) is to remove regulatory barriers to the movement of goods and service providers between Australia and New Zealand (NZ), and to thereby facilitate trade between the two countries and to enhance the international competitiveness of Australian and NZ enterprises, increase the level of transparency in trading arrangements, encourage innovation and reduce compliance costs for business. From bilateral discussions, Australia understands the measures proposed by NZ have been put in place to meet NZ's legal obligations and that no food safety or biosecurity risks are being identified for third country pig products imported into Australia and exported to NZ. Noting this, Australia requests the introduction of these measures should not be more trade restrictive than necessary to meet relevant objective/s in accordance with the provisions of the WTO SPS agreement. As such, we seek the NZMPI's consideration of the following specific comments and to review alternative documentation for the export of third country pig products from Australia.

Specific comments

Section 1.3, 1.6.2 and 2.1:

Australia encourages NZ to consider alternatives to a Veterinary Certificate noting that the introduction of the new measures has not been driven by biosecurity or food safety risks.

Australia has strict import controls for imported pork products, a summary of which is as follows; as:

1. Australia only accepts pig products from a selection of countries which have been individually assessed to comply with Australia's import requirements. These countries include: Canada, Denmark, Finland, Republic of Ireland, Netherlands, NZ, Sweden, United Kingdom (Great Britain and Northern Ireland), United States, Spain (dry cured only) and Italy (dry cured only).
2. Post entry requirements for all uncooked pig product imported into Australia require product to be processed by heating to a minimum core temperature for a specified time before being released from biosecurity control. For importing countries that are accepted by Australia, the minimum core temperature and time parameters are equal to what is transcribed in Section 2.1 of NZ's IHS. The same treatment is also applied to imported pork products which are cooked prior to export to Australia.
3. Australia requires all processors that receive imported pig meat to comply with [Approved Arrangements for 3.2 – Imported pig meat processing Requirements](#). Approved Arrangements (AA) allow operators to manage biosecurity risks and/or perform the documentary assessment of goods in accordance with departmental requirements, using their own sites, facilities, equipment and people, and without constant supervision by the department and with compliance monitoring or auditing. AAs deliver confidence to NZ that all third country pig product must comply with the *Australian Biosecurity Act 2015*, and therefore is traceable to original health certificate raised by the country of origin.

Given the purpose of the IHS and noting the tight import controls Australia has, Australia believes an Official Veterinarian is not necessary and therefore requests NZ to consider alternatives to a Veterinary Certificate. Australia would welcome the opportunity to discuss alternatives and work collaboratively to develop an option that suits both countries in order to continue to improve the competitiveness of Australian and New Zealand enterprises on an international scale. Further information on these options can be provided via teleconference outside these comments.

Part 2:

Noting the above import controls in Australia, requirements for minimum core temperature and time parameters are equivalent to the specified requirements listed in Part 2 for Porcine reproductive and respiratory syndrome virus. Australia requests recognition that its importing requirements already meet the requirements that are outlined in Part 2 rather than listing these specifically in the IHS. The following wording is proposed to replace the table under Part 2:

Australian import requirements for the import of pork products from third countries meet New Zealand's biosecurity and food safety requirements.

Conclusion

Australia appreciates NZ's consideration of the points raised in this submission and welcomes the opportunity to discuss and collaborate on the application of NZ's IHS.

5.2 New Zealand Food and Grocery Council



21 January 2020

Animal Trade (Imports)
Ministry for Primary Industries
PO Box 2526
WELLINGTON 6140

Email: animal.imports@mpi.govt.nz

Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the *Risk Management Proposal: Pig meat and pig meat products from Australia – MEAPORIC.AUS*.

Yours sincerely

A handwritten signature in black ink that reads "Katherine Rich". The signature is written in a cursive style with a horizontal line underneath.

Katherine Rich
Chief Executive

99-105 Customhouse Quay, Wellington, PO Box 25-420, Wellington 6146, NEW ZEALAND



***Risk Management Proposal: Pig meat and
pig meat products from Australia –
MEAPORIC.AUS***

**Submission by the New Zealand Food & Grocery
Council**

21 January 2020

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council ("NZFGC") welcomes the opportunity to comment on the *Risk Management Proposal: Pig meat and pig meat products from Australia – MEAPORIC.AUS*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

COMMENTS

3. NZFGC understands that the rationale for the draft import health standard (IHS) is threefold, to:
 - update the format of the IHS;
 - add provisions relating to third country pig meat products "namely products that are processed in Australia using imported pig meat or pig meat product"; and
 - add provisions relating specifically to porcine respiratory and reproductive syndrome (PRRS).
4. According to MFAT, Australia is New Zealand's largest trading partner overall (goods and services). While any two way trade in pig meat is very small, with the expansion of African swine fever (ASF) throughout Asia this may change for New Zealand producers but also highlights the significance of biosecurity measures for New Zealand. The situation is even more dire in Australia with its close proximity to ASF outbreaks in East Timor, Indonesia the Philippines and extensively in South East Asia coupled with the loss of animals due to the fires in Nov 2019 to Jan 2020.
5. As noted by Pork New Zealand, pork is the world's most consumed meat and with only 95 commercial companies operating (Annual Report, Pork New Zealand, 2018), it is not surprising that more than 25 countries exported over 50 million kilograms of pork to New Zealand in 2017, making up almost 60 per cent of the pork products consumed in New Zealand.
6. Inclusion therefore of the existing provisions for third country trade is strongly supported, not the least for accessibility to these provisions being greatly enhanced through co-location in a single document.
7. Similarly, inclusion of the PRRS risk mitigation measures in the IHS are supported for the purposes of accessibility and protection.
8. NZFGC is pleased to see the provisions for third country pig meat products include the option that they be cooked or cured. Much of the use by manufacturers in New Zealand of pork is cooked or cured such as in pizzas and the like. As well, pork features in small amounts in a range of spices and condiments manufactured in or imported into New Zealand. The third country provisions are therefore a vital element for inclusion.

-
9. We note there is no cross-reference or mention of the threshold provision contained in the *Specified foods for human consumption containing animal products* (EDIPROIC.ALL) that if a product contains less than 5% meat (bacon) and can meet clause 2.21 of the above IHS, it is eligible for biosecurity clearance. We consider that for completeness and usability, even a footnote to this effect would be very helpful.

5.3 McCain Foods



McCain Foods (Aust) Pty Ltd

1059 Ring Road, Mitchell Park Vic 3355
Phone: +61 (03) 5338 0200

January 21, 2020

To Whom It May Concern,

On the basis of review of the 2 documents under consult:

Consultation documents

[Import Health Standard: Pig Meat and Pig Meat Products from Australia](#) [PDF, 688 KB]

[Risk management proposal: Pig meat and pig meat products from Australia](#) [PDF, 363 KB]

McCain Foods is fully aligned to the requirements of both the Import Health Standard (IHS) and the Risk Management Proposal and support its implementation.

McCain Foods assembles and exports prepared frozen meals (dinners and pizza) which contain pork. These pork components may have originated from outside Australia and we work closely with our local suppliers to ensure quality, safety and traceability. Based on the document review it is McCain's understanding that we can assure that all requirements outlined in the draft standard are currently being met in terms of source and treatment of pork.

With implementation of the IHS, McCain will work with relevant stakeholders to ensure that the appropriate documentation is requested and supplied as outlined.

Kind Regards

A handwritten signature in black ink, appearing to be "Daniel Sutton", written over a light blue rectangular background.

Daniel Sutton
R&D Director McCain Foods ANZ
+61 35338 0438
+61 429954482

6 Appendix 2: Copies of Submissions Second Consultation

6.1 Australian Government, Department of Agriculture, Water and Environment



Australian Government

Comments to New Zealand on the amended *Import Health Standard: Pig Meat and Pig Meat Products from Australia* (previously notified under G/SPS/N/NZL/614).

The Department of Agriculture, Water and the Environment welcomes the opportunity to provide comments on the amended *Import Health Standard: Pig Meat and Pig Meat Products from Australia* (herein referred to as the IHS) released on 20 May 2020. The department appreciates the cooperation from New Zealand Ministry for Primary Industries (NZMPI) for this issue that is important to the Australia meat industry. The department provides the following comments for NZMPI's consideration when finalising the standard.

Specific comments

Section 1.3 and 1.4 - definitions:

As requested by NZMPI, the department provides the following definitions for NZMPI information:

The term “biosecurity clearance” as outlined in standard 1.3

The term Biosecurity Clearance is not one that the department uses, and it is not referred to within the *Biosecurity Act 2015*.

Biosecurity Clearance refers to a direction that is allocated to a particular consignment once a biosecurity officer has deemed the contents of the consignment to meet import conditions.

Despite this term not being referred to within the *Biosecurity Act 2015*, the department would propose to NZMPI that the term “biosecurity clearance” refers to goods released from biosecurity control and enter Australian territory – in line with the below definition. The department seeks agreement from NZMPI on this term.

The use/meaning of “imported” as outlined in standard 1.4

Under the *Biosecurity Act 2015*, imported goods are goods brought into Australian Territory on an aircraft, vessel or other conveyance that has entered Australian territory from outside Australian territory. This excludes goods unloaded for temporary purposes only (for example, to unload other goods).

In this instance, the goods will need to have been imported into Australia and released from biosecurity control.

The definition of “Released from Biosecurity Control” as outlined in Schedule 2

s119 of the *Biosecurity Act 2015* states that goods brought into Australian territory are subject to biosecurity control and remain subject to biosecurity control until they are released under Division 10. The act of releasing goods from biosecurity control occurs after an assessment of goods against import conditions has taken place. Goods are released from biosecurity control once a biosecurity officer or biosecurity industry participant send notice of release to the person in charge of goods and enters Australia, the goods are destroyed, or the goods are re-exported from Australian territory.

Biosecurity control relates to the control/power that biosecurity officers have under s119 of the *Biosecurity Act 2015*, where they can keep goods contained until a decision is made as to whether or not the goods meet import conditions and therefore will pose no/low biosecurity risk.

The definition of “authorised officer”

As defined in the *Export Control Act 1989*, an Authorised officer means a person appointed under section 20 to be an authorised officer. Section 20 states:

The Secretary may, by instrument signed by the Secretary, appoint a person, or persons included in a class of persons, to be an authorised officer or authorised officers, as the case may be, for the purpose of:

(a) the exercise by that person or those persons of the powers of an authorised officer under this Act or of such of those powers as are specified in the instrument; or

(b) the performance by that person or those persons of the functions of an authorised officer under this Act or of such of those functions as are specified in the instrument.

Section 2.1 b)

The curing procedures outlined within this section do not align with Australia’s import curing requirements for dry-cured pig meat. Australia’s requirements are a set of processes/procedures that are adhered to rather than a particular final characteristic. It is also important to note, Australia regularly conducts equivalence assessments for dry-cured pig meat imports to allow alternative curing procedures. Therefore to minimise the impact on trade, the department, in consultation with industry, would like to propose either;

a) adding a statement to the IHS which would facilitate the import of cured meat products treated by other methods approved by MPI on a case-by-case basis, other than those outlined in 2.1 b). This could be achieved by adding the following statement to 2.1 b);

iv) treated by other curing procedures approved by MPI prior to import on application

OR

b) the complete removal of cured products from the IHS.

If the implementation of option a) would delay the finalisation of the IHS, the department's strong preference is to remove cured product from the IHS entirely, given the small trade and need to quickly resume trade in other imported pork products. Once the initial IHS is completed and trade resumed for other imported pork products, the department would be happy to work with MPI to incorporate cured products at a later date.

Further information for Australia's import requirements for pig meat products can be provided if necessary.

Schedule 3 – Model official letter

1. Australian import requirements for imported pork product are complex and varied for each importing country which makes statements of equivalence complicated. Therefore, the department requests NZMPI consider alternatives to the original attestation to make the requirements Authorised Officers are signing off on clearer, as follows (strikethrough indicates removal, red font indicates inclusion):

*This letter describes the third country pork product that has been imported by <insert company name and address>, and released from biosecurity control in Australia. ~~Australian import requirements for the import of pork products from third countries meet New Zealand's biosecurity requirements.~~ **Australia's minimum cooking requirements for imported pig products meet the requirements outlined in section 2.1 of New Zealand's Import Health Standard: Pig Meat and Pig Meat Products from Australia.** ~~Third country pork products have been cooked or cured to meet New Zealand's import requirements for porcine reproductive and respiratory syndrome virus.~~*

2. The department, in consultation with industry, would like to propose the follow changes to the model certificate to clearly demonstrate multiple countries of origin can be in the same consignment.

*The imported component of this product was imported on <insert day month year> and originated from <insert applicable country/countries: Canada, European Union, **and/or** United States of America>. The details of the consignment are as follows:*

Product description and quantity (kg):

Import permit number:

Establishment number of Australian facility (if applicable):

3. The department would also like to encourage clarity for the sentence, “*The details of the consignment are as follows*”. Consider including a description to clarify that it is referring to the Australian imported pork consignment or the final product being exported to NZ.

The department appreciates NZ’s consideration of the points raised and welcomes the opportunity to discuss NZ’s IHS further as required.

6.2 New Zealand Food and Grocery Council



8 June 2020

Animal Trade (Imports)
Ministry for Primary Industries
PO Box 2526
WELLINGTON 6140

Email: animal.imports@mpi.govt.nz

Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the second consultation concerning *Risk Management Proposal: Pig meat and pig meat products from Australia – MEAPORIC.AUS, 20 May 2020*.

Yours sincerely

A handwritten signature in black ink that reads "Katherine Rich". The signature is fluid and cursive, with a horizontal line underneath the name.

Katherine Rich
Chief Executive

99-105 Customhouse Quay, Wellington, PO Box 25-420, Wellington 6146, NEW ZEALAND



***Risk Management Proposal: Pig meat and
pig meat products from Australia –
MEAPORIC.AUS 20 May 2020***

**Submission by the New Zealand Food & Grocery
Council**

8 June 2020

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council ("NZFGC") welcomes the opportunity to comment on the *Risk Management Proposal: Pig meat and pig meat products from Australia – MEAPORIC.AUS, 20 May 2020*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

COMMENTS

3. NZFGC recognises this submission is late but would appreciate it being taken into account. We have been unable to finalise the submission until now due to the activity surrounding the prospect of an impending move to Level 1 under the Covid-19 arrangements.
4. NZFGC understands that the rationale for the draft import health standard (IHS) has not changed since the consultation in January 2020 but that further clarity around expectations of third country products, and an expansion of those products, clearing import requirements for entry to Australia and then being exported to New Zealand was necessary.
5. Inclusion of the provisions for third country products, including the expanded provisions, is strongly supported.
6. NZFGC is pleased to see the provisions for third country pig meat products include the option that they be cooked or cured or further processed. Much of the use by manufacturers in New Zealand of pork is cooked or cured such as in hamburgers, pizzas and the like. As well, pork features in small amounts in a range of spices and condiments manufactured in or imported into New Zealand.
7. It is important to note that the size of the New Zealand population, while favouring Covid-19 control, acts against us at times in the import of specialty products because the quantities we require are very small by global standards. For example, the cities of Madrid and Barcelona both have populations greater than New Zealand.
8. Australia, with a population of 25.5m, has the population to justify large quantities of specialty food imports and New Zealand can leverage this import demand with re-export of smaller quantities for New Zealand. We also recognise that there seems no reason that specialty products such as Prosciutto di Parma (Parma ham) from Italy or Jamon Serrano (described as a national treasure in Spain) should be available in Australia and not New Zealand.
9. However, while we have a strong interest in all the third country provisions and see them as important for inclusion in order to maintain a world class consumer experience, our main interest is to ensure that raw imported pig meat from the likes of the USA that is then processed (cooked or cured) in Australia can be exported to New Zealand.
10. Our view is that all third country pork and pig meat imports to Australia and cleared by Australian Customs should be available for re-export to New Zealand. However, if an expanded selection of ready-to-eat third country products was to delay implementation of

the IHS in its entirety, then we would support the removal of these products from the IHS at this time. If that was to occur, we would be very supportive of their inclusion in the IHS at some later time.

6.3 New Zealand Pork



PO Box 20-176
Bishopdale
CHRISTCHURCH 8543

Animal Imports
Ministry for Primary Industries
PO Box 2526
WELLINGTON 6140

Dear Animal Imports team

Import Health Standard - Pig Meat and Pig Meat Products from Australia

New Zealand pig farming sector

This submission is made by NZPork, the farmer-funded statutory body whose statutory object is set out in the Pork Industry Board Act 1997 (section 5) as follows:

The object of the Board is to help in the attainment, in the interests of pig farmers, of the best possible net ongoing returns for New Zealand pigs, pork products, and co-products.

In pursuing its object, the Board must have regard to the desirability of the pork industry's making the best possible net ongoing contribution to the New Zealand economy.

Pig farming is a relatively niche livestock sector in New Zealand. There are around 100 commercial pig farms. Compared internationally, the sector is distinguished by New Zealand's world leading animal welfare standards. The sector has fully embraced this position and NZPork has developed and implemented the independently managed PigCare™ programme to provide an assurance of welfare to the supply chain including New Zealand consumers. PigCare™ now spans the commercial pig farming sector. No other livestock sector in New Zealand has a whole-of-sector animal welfare assurance programme. Alongside the sector's animal welfare focus is its commitment to responsible environmental practice to underpin its sustainable position in the New Zealand farming landscape.

Importantly, the New Zealand pig herd has a world class herd health status which is highly cherished by the sector. Herd health status is the sector's key competitive advantage due to the productivity benefits this status confers, along with the perceptual benefits of animal health and welfare to support the sector's *Born and Raised in New Zealand* positioning.

Pig meat in the New Zealand marketplace

For the calendar year 2019, the New Zealand pig farming sector slaughtered 620,000 pigs, producing a total of 43,000 tonnes (carcass weight equivalent). During the 2019 year, 52,360 tonnes of pig meat were imported, providing 71,648 tonnes of pig meat (carcass weight equivalent). Imports were sourced from 27 countries including Australia.

Biosecurity risk to the New Zealand pig herd from imported pig meat

Infected pig meat, if fed to pigs, is a major pathway for infecting pigs with a wide range of diseases currently exotic to New Zealand, including Porcine Reproductive and Respiratory Syndrome (PRRS), African Swine Fever (ASF), Classical Swine Fever (CSF) and Foot and Mouth Disease (FMD). In New Zealand the Biosecurity (Meat and Food Waste for Pigs) Regulations 2005 require food waste that contains meat or may have come in contact with meat to be heated to 100°C for one hour before feeding it to pigs. The effectiveness of these regulations depends on the level of compliance, by all owners of pigs including the large numbers of non-commercial pig owners (backyard, lifestyle, and farms of other species). New Zealand has no register of numbers or location of non-commercial pig owners, but an update of AgriBase™ (2019) identified 4247 properties with less than 20 pigs.

Given the very substantial quantities of imported pig meat released into New Zealand, from a very wide range of countries, plus the unknown nature, location, biosecurity habits and compliance with food waste regulations, of pig owners outside the commercial pig farming sector, it is imperative that NZPork scrutinises pig meat import health standards to ensure that New Zealand's herd health status is not put at risk. This approach is supported by the WTO's SPS agreement which recognises the entitlement of countries to put measures in place to protect the animal health status of their countries, so long as these measures are minimally trade restrictive.

Submission

We recognise that third country pig meat products are defined and limited to source countries that may provide pig meat direct to New Zealand based on those countries' pig disease status and risk management measures for PRRS.

NZPork reviewed but did not submit on the December 2019 draft import health standard. However there are two substantive changes in the May 2020 draft: one is the inclusion of cured product and the other is the removal of the official certification requirement for pig meat and pig meat products sourced from third countries.

We do not believe the relaxation in the May 2020 draft of the import health standard, from the provision of official veterinary certification in the December 2019 draft for third country pig meat, is appropriate. If such pig meat is imported directly into New Zealand, then official veterinary certification is required.

We are aware that under the Trans-Tasman Mutual Recognition Arrangement (TTMRA) which seeks to facilitate trade between Australia and New Zealand, pig meat of Australian origin does not require official certification for import into New Zealand. Similarly specific meats exported from New Zealand to Australia do not require official certification although New Zealand pig meat does.

The proposed change would remove the requirement for certification of third country pig meat, and only enquire 'endorsement' by an authorised officer of the Australian Competent Authority. There is no detail provided as to what qualifies an officer for endorsement, or the inspection and audit requirements around endorsement.

We note that Australia's Department of Agriculture, Water and Environment Australia requires all processors that receive imported pig meat to comply with Approved Arrangements for 3.2 – Imported pig meat processing Requirements:

(<https://www.agriculture.gov.au/sites/default/files/sitecollectiondocuments/biosecurity/import/arrival/approved-arrangements/3.2-requirements.pdf>)

Thus pig meat being sent to New Zealand from third countries via Australia is feasibly exported from facilities that receive, handle, process, handle waste including biosecurity risk waste, and distribute pig meat, with no outgoing official veterinary certification.

Furthermore, we are particularly concerned around the Model Official Letter for proof of origin for trade of third country pig meat from Australia to New Zealand which only requires sign off as:

*As a representative of the Department of Agriculture, Water and Environment, I confirm **to the best of my knowledge** the above is true and correct.* (Emphasis is added by us.)

The proposed change has the effect of New Zealand relying on Australia to be the biosecurity check point for pig meat imported into New Zealand from third countries (as defined) via Australia. We do not agree with this proposal and request that certification by an official veterinarian is required, as per the December 2019 draft, and as required for all pig meat directly imported into New Zealand from all countries other than Australia.

Reciprocal arrangements

If New Zealand is prepared to accept non-certified pig meat via Australia from third countries which are lesser health status than New Zealand (in respect of PRRS), then we would expect that Australia would accept pig meat from New Zealand without certification, if accompanied by an 'endorsement' from New Zealand's competent authority (MPI).

We also note that New Zealand's current OMAR to Australia (October 2019) states:

MPI continues to negotiate requirements for the export of imported pork meat products to Australia.

We request that 2-way access of pig meat from third countries is considered as a package, both under the TTMRA.

Conclusion

Thank you for the opportunity to consider this proposed change to the draft import health standard. Please contact NZPork if you require further information.

Regards



Frances Clement

Policy Manager