Ministry for Primary Industries
Manatū Ahu Matua

Risk Management Proposal

Amendment to Import Health Standard for Specified Foods for Human Consumption Containing Animal Products

EDIPROIC.GEN

16 July 2014

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1 Purpose

(1) The purpose of this document is to:

a) Show how options for the management of some potential risk items have been assessed; and
b) Provide recommendations for amended import requirements in the 2014 *Import Health Standard (IHS) for Specified Foods for Human Consumption Containing Animal Products* (the 2014 IHS).

2 Background

(1) Amendments are made to import health standards as required to reflect changes in biosecurity needs and products being imported into New Zealand. The 2010 *IHS for Specified Foods for Human Consumption Containing Animal Products*, EDIPROIC.ALL (referred to as the 2010 IHS). http://www.biosecurity.govt.nz/imports/animals/standards/ediproic.all.htm is being updated following appropriate risk decisions on specified foods for human consumption. The new IHS is being given a new shortcode, EDIPROIC.GEN.

(2) All risk decisions in this document are derived from rapid risk assessments conducted at MPI or changes in international trade processes for each specific item listed below.

3 Objective

(1) The objective for amending the 2010 IHS is to effectively manage biosecurity risks associated with the import of specified foods for human consumption containing animal products, consistent with New Zealand's domestic legislation and international obligations.

4 Recommendations for identified risk items

(1) Rapid risk assessments have recently been conducted for a number of specified risk items included in the IHS EDIPROIC.ALL. These are summarised below.

4.1 Dried Cured Meat

(1) Private consignments of commercially prepared beef jerky are currently permitted for importation from Australia, Canada, European Union, Finland , Vanuatu and USA under the 2010 IHS EDIPROIC.ALL provided:

a) The product is commercially prepared and packaged.
b) The product is in its original sealed packaging on arrival.
c) The country of origin is identifiable from the packaging.
d) The total weight of the consignment is 20 kilograms or less.

(2) Meat jerky products do not always have labelling for the country of origin for all of the meat ingredients, meaning these products cannot be cleared using this clause.

(3) Since package labelling can establish the country of manufacture, if not the country of origin of the meat ingredients, a new clause will be added to the 2014 IHS requiring that cured dried meat manufactured in FMD-free countries will be eligible for clearance. FMD-free countries have strict import regulations, like those in New Zealand, to maintain their FMD-free status. Any meat sourced in that country will also be FMD-free.

(4) Allowing only small amounts of meat from FMD-free countries is consistent with other personal consignment clauses and aligns with the Australian requirements for passenger and mail imports.

4.1.1 Recommendation

(1) It is proposed that private consignments of dried cured meat manufactured in FMD-free countries in accordance with the MPI *List of FMD-Free Countries and Zones* may be imported provided all of the following requirements are met:

a) The product is shelf-stable
b) The product is commercially prepared and packaged.
c) The product is in its original sealed packaging on arrival.
d) The product is manufactured in an FMD-free country (country of manufacture must be clearly stated on the package label).
e) The total weight of the consignment is 1 kilogram or less.

4.2 Dairy Products

(1) Private consignments of non-shelf stable dairy products and products containing dairy ingredients are permitted from specified countries under the 2010 IHS EDIPROIC.ALL provided:

a) The product is commercially prepared and packaged.
b) The product is in its original sealed packaging on arrival.
c) The country of origin is identifiable from the packaging.
d) The total weight of the consignment is 20 kilograms or less.

(2) The majority of commercially prepared dairy products are subjected to pasteurisation (72º C for 15 seconds). Pasteurisation has been shown to eliminate virtually all pathogens and reduce virus titres. The most notable virus that can be transmitted in milk is foot and mouth disease virus (FMDV). After pasteurisation, the titre of FMDV is reduced to such a level that the biosecurity risk can be considered negligible.

(3) A small proportion of dairy products contain raw (un-pasteurised) milk which could possibly transmit pathogens of concern. The European Union only permits the trade in raw milk cheese after it has been aged for 60 days to help mitigate the risk of spreading FMDV. Since the manufacturing process is unlikely to inactivate FMDV in raw milk products and dairy products to be consumed by susceptible species, additional risk management measures are required.

(4) For dairy products that are not adequately heat treated the most practical measure that will still allow importation of genuine private consignments to occur while also reducing the biosecurity risk to an acceptable level is to place limits on the quantity permitted for importation. This limit will reduce the likelihood of a dairy product being fed directly to animals and also simultaneously reduce the amount of wastage, as the product is more likely to be highly valued due to its scarcity (e.g. specialty cheeses). At present up to 20 kilograms of dairy products may be imported from specified countries, and if this was reduced (2 kilograms is suggested), dairy products from all countries could be permitted for importation.

(5) As the manufacturing process may not mitigate the biosecurity risk, a lower import weight restriction (2 kilograms) is proposed to reduce the animal biosecurity risk to an acceptable level whilst allowing private importation of dairy products to occur irrespective of the country of origin.

(6) Concern has also been raised within MPI that this standard should not be used for the importation of products that contain live microorganisms such as yoghurt or raw milk, that are intended as samples for industry or laboratory use. The 2014 standard will clarify that import for these uses is not possible under this standard.

4.2.1 Recommendation

(1) It is proposed that *private consignments* of non-shelf stable dairy products and products containing dairy ingredients may be imported into New Zealand provided all the following requirements are met:

a) The product is commercially prepared and packaged.
b) The product is in its original sealed packaging on arrival.
c) The product is not for biological or microbiological analysis.
d) The total weight of the consignment is two (2) kilograms or less.

4.3 Mayonnaise and Salad Dressings Containing Egg

(1) In the 2010 IHS EDIPROIC.ALL, commercially prepared mayonnaise and salad dressing containing egg may be imported from Australia, the European Union, Japan and the USA provided:

a) The product is shelf-stable.

b) The product is commercially prepared and packaged.
c) The product is in its original sealed packaging on arrival.
d) The county of origin is identifiable from the packaging.

(2) Pasteurisation of egg products and the acidic pH of mayonnaise/salad dressing are likely to reduce the titre of pathogens within this commodity. However, some residual pathogens are likely to remain. Limiting the amount imported for human consumption is an additional risk management measure which will further reduce the animal biosecurity exposure risk to an acceptably low level.

4.3.1 Recommendation

(1) It is proposed that consignments of mayonnaise and salad dressing containing egg may be imported in the 2014 IHS EDIPROIC.GEN provided all of the following requirements are met:

a) The product is shelf-stable.
b) The product is commercially prepared and packaged.
c) The product is in its original sealed packaging on arrival.
d) The total weight of the consignment:

i) Is unlimited for products originating from Australia, Canada, the European Union, Japan or the United States; or
ii) For products originating from all other countries is 1 kilogram or less.

4.4 Mooncakes

(1) Mooncakes are commercially imported into New Zealand under the 2010 IHS EDIPROIC.ALL, which permits biosecurity clearance to be given to commercially manufactured mooncakes provided that:

a) The product is shelf-stable.
b) The product does not contain any meat and/or meat product fillings.
c) The product is commercially prepared and packaged.
d) The product is in its original sealed packaging on arrival.
e) The product must be accompanied by a manufacturer's declaration stating that the product reached a core temperature greater than 60º C for no less than 3.5 minutes.

(2) However, private consignments without manufacturer's declarations are arriving at the border either accompanying passengers or sent as gifts.

(3) Once cooked, mooncakes do not require refrigeration and can be considered a shelf stable product.

(4) Mooncakes are a seasonal product associated with the Mid-Autumn Festival in September/October each year. The quantity imported over an entire year is expected to be low. Mooncakes can be viewed as a 'ceremonial' product with sentimental value and are therefore unlikely to be wasted or discarded, making it highly unlikely that the products would be either intentionally or inadvertently fed to birds.

(5) The combination of the heat treatment applied, low quantities being imported due to their seasonal nature and the low probability of mooncakes containing egg being fed to birds, reduce the risk presented by egg mooncakes to an acceptably low level.

4.4.1 Recommendation

(1) It is proposed that private consignments (up to 10 kilograms) of commercially prepared and packaged mooncakes containing egg may be imported without requiring a manufacturer's declaration in the 2014 IHS EDIPROIC.GEN, provided that the following are met:

a) The product is shelf-stable.
b) The product is commercially prepared and packaged.
c) The product is in its original sealed packaging on arrival.
d) The product does not contain any meat or meat product fillings.
e) The product:

i) Must be accompanied by a manufacturer's declaration stating that the product reached a core temperature greater than 60º C for no less than 3.5 minutes for commercial consignments; or

ii) Private consignments are limited to 10 kilograms and do not require a manufacturer's declaration.

4.5 Muscle Protein Powders

(1) Private consignments of muscle protein powders containing dairy and egg products from Australia, Canada, European Union and the USA may be given biosecurity clearance under the 2010 IHS EDIPROIC.ALL, provided the following requirements are met:

a) The product is shelf stable.
b) The product is commercially packaged and prepared.
c) The product is in its original sealed packaging on arrival.
d) The country of origin is identifiable from the packaging.
e) The total weight of the consignment is 20 kilograms or less.

(2) This has previously been compared to clause 7.16 in the 2010 EDIPROIC.ALL that allows biosecurity clearance of cake, pudding, sauce and baking mixtures containing dairy and/or egg ingredients from any country provided all the following requirements are met:

a) The product is shelf-stable.
b) The product is commercially prepared and packaged.
c) The product is in its original sealed packaging on arrival.

(3) This comparison/combination of clauses has led to the previous decision that protein powder from any country and of commercial quantity can be released, provided it is shelf stable, and commercially prepared and packaged.

(4) Dairy (whey) powder, which is the main ingredient in whey muscle protein powder, is exposed to a sufficient time temperature regime (pasteurisation) that pathogens of concern are likely to be inactivated. In the very unlikely event that calves or pigs were exposed to pasteurised whey powder from animals infected with FMDV, they would have to consume at least 20 times more than the animal can physically consume to receive an infectious dose.

(5) The amount of egg powder (whole egg or egg albumen) present in whey muscle protein powder is generally low, but egg albumen is the main ingredient in egg muscle protein powders. As discussed in the IRA for egg powders[1], during manufacture whole egg powder is heated for at least 3.5 minutes at 60º C and egg albumen is heated for at least 7 days at 54.4º C. An additional heat treatment step, however, is applied to all types of egg powders during the spray drying process and this usually involves an inlet temperature of 155º C to 175º C and outlet temperature of 70º C to 80º C. This would be expected to further reduce the titre of any residual virus. It is expected that most muscle protein powders will be directly consumed by humans and very little wastage should be produced as this product is shelf stable and of high value.

(6) Due to the various heat treatments applied to dairy ingredients and the lack of an exposure pathway for egg powders, the biosecurity risk associated with muscle protein powders is considered to be very low.

4.5.1 Recommendation

(1) It is proposed that muscle protein powders containing dairy and/or egg products can continue to be imported into New Zealand from *all countries* provided the following requirements are met:

(2) Muscle protein powders containing dairy and/or egg ingredients may be imported from any country providing the following requirements are met:

a) The product is shelf-stable, and either
b) The product is:

i) Commercially prepared and packaged; and in its original sealed packaging on arrival; or
ii) Less than 1 kilogram dry weight.

[1] Import Risk Analysis: Egg powders from all countries, MAF Biosecurity Publication October 21, 2008 (28 pp) http://www.biosecurity.govt.nz/files/regs/imports/risk/egg-powder-ra.pdf

4.6 Pork Crackling

(1) Private consignments of commercially prepared pork crackling currently enter New Zealand under the 2010 IHS EDIPROIC.ALL, provided that:

a) The product is shelf-stable.
b) The product is commercially prepared and packaged.
c) The product is in its original sealed packaging on arrival.

(2) Commercial consignments require a manufacturer's declaration which shows retort to the processing standard Fo3.

(3) Private consignments of pork crackling are likely to be imported in low volumes. Due to the heat treatment applied during the commercial manufacturing process it is unlikely that an infectious agent would be introduced into New Zealand by this commodity.

4.6.1 Recommendation

(1) It is proposed that private consignments of commercially prepared pork crackling should continue to be permitted importation into New Zealand under the 2014 IHS EDIPROIC.GEN without a manufacturer's declaration.

4.7 Products Containing Egg Ingredients

(1) Under the 2010 EDIPROIC.ALL, products containing egg in quantities greater than 5% are not eligible for clearance.

(2) As discussed in the *Import Risk Analysis: Egg Powders from All Countries, 21 October 2008*, sufficient heat treatment has been demonstrated to destroy risk organisms including avian influenza virus and Newcastle disease virus. Angara disease has likewise been shown to be heat labile at sufficient times and temperatures.

4.7.1 Recommendation

(1) It is proposed that products containing pasteurised egg in quantities greater than 5% and less than 21% may be given clearance provided that the following requirements are met:

a) The product(s) must be accompanied by a manufacturer's declaration specifying that at any stage of the manufacturing process, the eggs must have undergone a minimum heat treatment of:

i 60º Celsius for no less than 1 hour, or
ii 80º Celsius for no less than 10 minutes, or
iii 100º Celsius for no less than 5 minutes.

4.8 Private Consignments of Meat and Meat Products from Specified Countries

(1) Private consignments of specified meat and meat products from specified countries may be given biosecurity clearance under the 2010 IHS EDIPROIC.ALL.

(2) Passengers are allowed to bring in meat from countries with an IHS for importing that particular meat. A number of changes have been made to this table as a result of reviewing the IHSs.

4.8.1 Recommendation

(1) It is proposed that this table reflect our existing IHSs for meat imports in the 2014 IHS EDIPROIC.GEN, for the meat products already listed.

4.9 Private Consignments of Tea Bags Containing Honey

(1) Commercial consignments of teabags containing honey may be imported into New Zealand under the *IHS for Specified Processed Bee Products* (BEEPROIC.ALL), which permits biosecurity clearance be given for commercially manufactured teabags containing honey provided that:

a) The product must be commercially prepared and packaged; and

b) The product must be; either

i Accompanied by a manufacturer's declaration certifying that the product contains less than 2% honey; or
ii Accompanied by a permit to import.

(2) The concentration of honey in commercially manufactured tea bags in personal consignments is likely to be similar to that of teabags which are permitted to be imported for commercial sale (≤ 2%). This, combined with the low quantities being proposed for private importation makes it unlikely that this commodity will be discarded without being used. The exposure pathway for bees in New Zealand can therefore be assessed as negligible.

4.9.1 Recommendation

(1) It is proposed that private consignments of tea bags containing honey may be given biosecurity clearance in the 2014 IHS EDIPROIC.GEN provided:

a) The product is commercially prepared and packaged.
b) The product is in its original sealed packaging on arrival.
c) A maximum of one box (50 servings or less) per passenger is imported.