



27 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: Import Health Standard: Shelf-stable Petfoods Containing Animal Products – PETFODIC.ALL.***

Yours sincerely

Katherine Rich
Chief Executive



***Risk Management Proposal: Import Health
Standard: Shelf-stable Petfoods
Containing Animal Products –
PETFODIC.ALL***

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

27 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: Import Health Standard: Shelf-stable Petfoods Containing Animal Products – PETFODIC.ALL.***
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 to:
 - Address the global spread of African swine fever (ASF)
 - Amend provisions requiring certification that imported pet food has been processed as required.
4. According to the OIE (the World Organisation for Animal Health), ASF is a severe viral disease affecting pigs (domestic and wild) that has been reported in Africa, Asia, Europe, South America and the Caribbean. ASF is limited to pigs and geographically located in countries/regions that have declared infection to the OIE. New Zealand is free of ASF as are Australia, Canada, the USA, Japan, Switzerland and Israel.
5. ASF has a severe impact on production of pig meat. While the use of pig meat produced in New Zealand is primarily for human consumption and worthy of protection from a disease that could seriously impact production, there could be a flow on effect to our exports of pet food.
6. New Zealand is a net exporter of pet food with an estimated 90 and 95% of petfood manufactured in New Zealand exported. According to the 2014 Coriolis report, *Investment opportunities in the New Zealand petfood industry*, New Zealand has a “vibrant petfood industry with strong comparative advantage” through having a strong supply of safe raw materials. This coupled with growing international demand for petfood has driven growth in the sector in New Zealand and this too is worth protecting. Nonetheless we also import, perhaps more plant/grain-based products as well as different brands to provide consumer choice.
7. MPI has not stated the volume of New Zealand pet food imports, nor the percentage of such products that might contain pork. As a result, it is not clear what the impact of the risk measure will be on such imports. In any case, a blanket certification requirement is proposed for ALL imported pet food containing animal products. The proposed certification will be required to attest to the level of processing of the prospective pet food imports.
8. It is possible that overseas country pet food manufacturers draw on a variety of animal product sources in producing canned or baked pet food since the main driver is a source of protein. A blanket certification provision is therefore likely to be the most efficient risk measure to take to address the prospect of ASF spreading to New Zealand through pet food.

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9. Certification required to accompany pet food imports that contain animal products will need to attest that, in the processing of the pet foods:
- a specific retorting level has been reached in the processing of the import – MPI states that ASF will be inactivated at an Fo value of 3.00 (the Fo value is a measure of the “sterilising value” of a process, that is, the time required at a temperature of 121°C to reduce microbial numbers by the same amount as the actual process being considered) (clause 7.3); or
 - a specific time/temperature has been met for baked pet foods (clause 7.6).
10. Noting the data gaps that limit the assessment of the impact, but also noting the extent of exporting pet food that New Zealand engages in, the proposed measures are supported in order to best address the potential spread of the ASF disease.