



8 June 2020

Animal Trade (Imports)
Ministry for Primary Industries
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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

Katherine Rich
Chief Executive



***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 increasing the commodity scope of third country pork products that clear import requirements for entry to Australia and then being exported to New Zealand is now proposed. The IHS also proposes a change in the type of assurance from the Australian Competent Authority (an official letter instead of veterinary certificate).
5. Inclusion of both these provisions relating to third country products, including the expanded provisions and the simplified assurance (letter not veterinary certificate), is strongly supported.
6. We note that in the January 2020 consultation, the draft IHS allowed only pork products manufactured or further processed in Australia using imported pig meat. We were strongly supportive of that arrangement.
7. Under the proposed amendment, any pig meat or pig meat product that is eligible for import directly to New Zealand, but has first been imported and released from biosecurity control (as in it's been given biosecurity clearance) in Australia, is proposed to be eligible for importation into New Zealand.
8. NZFGC remains supportive of provisions for third country pig meat products including 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.
9. We also support the expanded product range. 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.
10. 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) that could be imported direct to New Zealand should be available in Australia and not New Zealand simply because of population size of Australia dictating quantity of supply.

11. 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 for those in New Zealand, 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.
12. In relation to an assurance that the third-country pork products have met the requirements of the IHS by being provided with an official letter from the Competent Authority of Australia rather than a veterinary certificate is a refreshing move to simplify regulatory requirements whilst maintaining control overall. We are strongly supportive of this proposal and consider there to be no additional risk involved if the same product could otherwise be imported direct to New Zealand could a supplier of very small quantities be found.
13. 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.