

## **Review of submissions on the Draft for Amendment of the Import Health Standard for Importation into New Zealand of Processed Animal Feeds of Plant Origin - Submission Received on the dated 6 April 2009**

The draft proposed amendments of the import health standard (IHS) for Importation into New Zealand of Processed Animal Feeds of Plant Origin was notified for public consultation on the MAF Biosecurity New Zealand (MAFBNZ) website on 6 April 2009.

The following submission was received:

NZ Feed Manufacturer's Association dated 27 April 2009

This document records the submission made and where necessary how the points have been addressed by MAFBNZ. The submission is reproduced in normal text and MAFBNZ responses are recorded in *italics*.

NZ FEED MANUFACTURERS ASSOCIATION (Inc)

Proposed amendments to the Import Health Standard for the Importation into New Zealand of Processed Animal Feeds of Plant Origin

The New Zealand Feed Manufacturers Association (NZFMA), contactable at the above address, represents almost all of the livestock feed manufacturing companies in New Zealand, with NZFMA members producing in excess of 80% of livestock feed produced in New Zealand. Having reviewed the proposed changes to the Import Health Standard noted above, the NZFMA subsequently notes the following points.

### Section 2.3 General Information

Bullet point 7 of this section states "Any tallow in multiple ingredient stock feeds for ruminant animals must be not more than 0.15% by weight of insoluble impurities". This should read "Any tallow in multiple ingredient stock feeds for ruminant animals must contain ~~be~~ not more than 0.15% by weight of insoluble impurities".

*MAFBNZ Response. A Minor wording change has been made, with the clause now reading "Any tallow in multiple ingredient stock feeds for ruminant animals must not comprise more than 0.15% by weight of insoluble impurities".*

### Section 3.2.3 Fumigation Treatment

Industry notes the proposed changes to this section and does not oppose these changes.

### Section 4.2.2 Bulk product in shipping containers

It is unclear from the proposed IHS and accompanying explanation whether MAF is proposing that

- a) for all consignments, 2 of the first 5 containers and subsequently every 1 in 5 containers are inspected (i.e. in a consignment of 25 containers, 6 containers would be inspected) unless a contaminant were detected; or
- b) for all consignments, 2 of the first 5 containers are inspected (i.e. in a consignment of 25 containers 2 containers are inspected) unless a contaminant were detected. If a contaminant were detected in either of the two containers inspected, then additional inspection of every 1 in 5 containers is proposed.; or

Although the document explaining the proposed changes suggests that should contaminants be detected inspection will be increased to every container, this does not appear to be stated in the draft import health standard.

Industry acknowledges and understands the need to increase sampling and inspection of ships containers. However, industry notes that should additional inspection be required, additional co-ordination of inspectors and transport operators would be required and could add significant to cost to the importation of processed products used in animal feeds.

Industry therefore seeks further discussion with Biosecurity New Zealand in order to achieve an outcome which would ensure that New Zealand's fauna and flora are protected whilst at the same time ensuring that prohibitive costs are not imposed on those animal production industries which use imported plant products as a component in animal feeds.

*MAFBNZ Response.*

*The proposal is as in scenario a) i.e. in a consignment of 25 containers, 6 containers would be inspected) unless a contaminant were detected. If contaminants are detected in any of these containers, then every container in the consignment will be inspected, unless the importer agrees to have them all fumigated. This was implied previously in the standard, with the sentence "If the first two containers sampled are free of contamination, the remaining containers of the same consignment need not be inspected." And it has been an internal practice in use since the standard was issued. The sentence will be again included, this time reading "If the chosen containers sampled are free of contamination, the remaining containers of the same consignment need not be inspected."*

*MAFBNZ accepts that there will be additional costs associated with increased inspection of containers, but considers the extra inspection necessary and justified in view of the levels of pest contamination occasionally experienced.*

#### Section 4.2.3 Products in bags

Industry notes that the proposed changes to this section and does not oppose these changes.

#### Sections 7.3, 7.4 and 7.5

The first paragraph of these sections states "these products must be labelled in accordance with Sections 13 and 14 of the Biosecurity (Ruminant Protein) Regulations, and labelled with the notice "Suitable for feeding to ruminant animals". Industry suggests that this should read "these products must be labelled in accordance with Sections 13 and 14 of the Biosecurity (Ruminant Protein) Regulations, ~~and labelled with the notice "Suitable for feeding to ruminant animals"~~", as the ruminant protein regulations do not require all feeds to be labelled "Suitable for feeding to ruminant animals.

*MAF Biosecurity New Zealand response: The labelling requirements have been reworded in these sections to: "These products must be labelled in accordance with the Biosecurity (Ruminant Protein) Regulations. Any feed that may be fed lawfully to ruminants must be labelled in accordance with section 13(1) and 14 of the regulations (web site added).*

#### Section 7.3.1 Trade samples

Industry notes this addition to the import health standard.

#### Section 7.7.2 Dried Seaweed ground to a powder for use as a feed additive

Industry notes and accepts the proposed changes to this section.