

**REVIEW OF SUBMISSIONS ON:**

**DRAFT IMPORT HEALTH STANDARD FOR TURKEY MEAT AND TURKEY  
MEAT PRODUCTS FROM THE UNITED KINGDOM**

Biosecurity New Zealand  
Ministry of Agriculture and Forestry  
Wellington  
New Zealand

September 2009

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Biosecurity New Zealand

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TURKEY MEAT PRODUCTS FROM THE UNITED KINGDOM**

September 2009

Approved for general release

Matthew Stone  
Animal Imports Exports Group Manager  
Biosecurity New Zealand

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## **INTRODUCTION**

The draft import health standard for the importation into New Zealand of turkey meat and turkey meat products from the United Kingdom (UK) was notified for public consultation on 21<sup>st</sup> December 2006. Submissions closed on 21<sup>st</sup> February 2007.

Work towards reviewing submissions and issuing this standard stopped after an outbreak of avian influenza occurred in one of the UK processing plants for export to New Zealand. Work resumed following further consideration to address import requirements for turkey meat preparations based on MAF Import Risk Analysis document.

The request for market access into New Zealand for turkey meat, meat products and meat preparations was re-stated by the European Commission in March 2009. Further risk analysis work to consider risks associated with turkey meat and meat products is now underway.

During public consultation, MAFBNZ received submissions from:

The Department of Conservation (DoC)

The Poultry Industry Association of New Zealand (PIANZ) and Egg Producers Federation of New Zealand (EPF)

Department of Environment, Food and Rural Affairs (DEFRA)

This document reviews each submission in turn. Copies of submissions are presented in Appendix 1.

### **Acronyms used in the document:**

BMFL.....Bernard Matthews Foods Limited  
DEFRA.....the Department of Environment, Food and Rural Affairs (United Kingdom)  
DoC.....the New Zealand Department of Conservation  
EPF.....the Egg Producers Federation of New Zealand  
IBD(V).....infectious bursal disease (virus)  
IHS.....import health standard  
NAI.....notifiable avian influenza  
NZFSA.....New Zealand Food Safety Authority  
IRA.....import risk analysis  
PIANZ.....the Poultry Industry Association of New Zealand

## **MAFBNZ review of submissions**

### **1. The Department of Conservation (DoC)**

The DoC submission considered that “the import conditions prescribed by the ‘Risk analysis for the importation of Bernard Matthews’ turkey meat preparations from the United Kingdom’ were adequate to reduce the level of risk to an acceptable level”. However DoC noted that some import conditions as written in the IHS needed to be further explained.

**1.1.** DoC recommended that “condition 4 as written in the veterinary certificate [should] be amended to include a list of disease agents [that] the ante-mortem and post-mortem veterinary examination should check for”.

#### MAFBNZ response:

MAFBNZ noted DoC’s request. However, both ante-mortem and post-mortem examinations aim at detecting abnormal clinical signs that could be associated with any pathological condition. By providing a defined list of disease agents with typical clinical signs, there is risk to exclude some pathogens for which clinical expression may vary under different circumstances.

**1.2.** DoC requested further clarification on the requirement in the veterinary certificate that birds slaughtered for export to NZ must be processed “first of the day”. DoC enquired about the cleaning procedures in place between production batches of different health status.

#### MAFBNZ response:

MAFBNZ acknowledges DoC’s concern about processing birds of different health status at the same plant. The revised IHS will include a minimum overnight stand-down period between completion of cleaning and disinfection of the plant and start of processing turkey meat for export to New Zealand.

### **2. The Poultry Industry Association of New Zealand (PIANZ) and the Egg Producers Federation of New Zealand (EPF)**

PIANZ/EPF submission on the draft IHS was articulated around two lines of argument: firstly, industry developed some arguments in support of a complete review of the existing IRA\* on which this draft IHS was based (comments 2.1 to 2.4); and secondly industry listed some discrepancies between the existing IRA and the draft IHS (comments 2.5 to 2.12).

\* Import Risk Analysis: chicken meat and chicken meat products; Bernard Matthews Foods Ltd turkey meat preparations from the United Kingdom (1999).

**2.1.** PIANZ/EPF noted that the format used by MAF to conduct the risk analysis back in 1999 was outdated and that “the structure and content of the risk analysis would not meet the current standards for an IRA which is set by Biosecurity New Zealand.

#### MAFBNZ response:

MAFBNZ noted Industry’s comment. The risk analysis conducted by MAF was based on scientific information available at the time of writing. The IRA investigated the risk of diseases associated with the commodities under consideration in the IRA.

The structure does not affect the findings of the analysis and the recommendations made in the IRA remain valid despite being formulated in a different document structure.

**2.2.** Industry wrote that “at the time the original IRA was released, an infectious bursal disease (IBD) virus type - 1 eradication and ongoing surveillance programme to regain NZ IBD free status was implemented by the NZ Poultry Industry in consultation with MAF”. Industry expressed their concern about possible cross-reactivity between IBDV-2 (likely to be introduced via the commodities) and IBDV-1, which, they argued, could compromise the serological surveillance conducted by industry in New Zealand chicken population. PIANZ/EPF therefore “request[ed] that MAFBNZ re-evaluate the potential effect of the importation of turkey meat from the United Kingdom on the current industry-funded surveillance programme”.

MAFBNZ response:

MAFBNZ noted industry’s comments on the possibility of cross-reactivity between IBDV-1 and IBDV-2 using ELISA and gel diffusion tests.

Appendix 4 of the IRA considered the risk of New Zealand backyard poultry flocks becoming infected with IBD virus serotype 2 in the eventuality that IBDV-2 be imported with Bernard Matthews Food Limited’s turkey meat preparations from the United Kingdom. The conclusions of the quantitative assessment were that “the risk of introducing IBD serotype 2 into backyard poultry flocks would be considerably less than the risk of introduction of IBD serotype 1 in chicken meat products”, and that the risk of IBDV-2 introduction was negligible even with 50% market penetration of the BMFL turkey meat preparations.

MAFBNZ acknowledges that industry has deployed considerable means to achieve IBD freedom in New Zealand’s poultry but does not consider that the importation of the commodity will interfere with industry’s IBDV monitoring programme.

**2.3.** PIANZ/EPF commented that at the time the IRA was conducted, there was less scientific information on some diseases of significant importance such as turkey rhinotracheitis *Ornithobacterium rhinotracheale* and coronaviral infections. In this, “Industry [...] requested that the IRA be reviewed in light of the significant time lapse and advancements in the understanding of poultry health and disease since its original release [...]”.

MAFBNZ response:

MAFBNZ noted industry’s request. The IRA states that natural transmission of turkey rhinotracheitis virus has only been confirmed by direct contact and concludes that there is a negligible risk of introducing this disease in meat derived from clinically healthy birds. MAFBNZ is unaware of any new evidence which would contradict this position. Spreading by direct contact is supported by the situation in the USA where the disease is widespread in Minnesota but has not spread to other turkey-producing areas or into commercial chickens. The IRA concluded that, as spread of *O. rhinotracheale* only occurs via the respiratory route, there is negligible risk associated with meat derived from birds which have passed ante- and post-mortem inspection. MAFBNZ is unaware of any new information which suggests that *O. rhinotracheale* could be transmitted in the meat of clinically healthy birds.

Coronaviral enteritis of turkeys was ruled out in the IRA as this organism was not reported in the United Kingdom or Europe, and studies had shown that the virus was

only distributed in intestines and the bursa which were not used in the manufacture of turkey meat products. Turkey coronavirus has subsequently been detected in turkey farms in Great Britain, Italy and Brazil (Cavanagh et al, 2001, 2005; Culver et al, 2006). However, there is no evidence that this virus would be present in turkey meat or meat products which do not contain intestine, intestinal content or material from the bursa of Fabricius.

Cavanagh D et al (2001) Detection of a coronavirus from turkey poult in Europe genetically related to infectious bronchitis virus of chickens. *Avian Pathology* 30, pp 355-68.

Cavanagh D et al (2005) Coronaviruses in poultry and other birds. *Avian Pathology* 34, pp 439-48.

Culver F et al (2006) Poult enteritis and mortality syndrome in turkeys in Great Britain. *Veterinary Record* 159, pp 209-10.

**2.4.** PIANZ/EPF suggested that the OIE definitions of avian influenza and Newcastle disease given in the IRA needed to be updated in accordance with recent amendments of the *Terrestrial Animal Health Code*.

Because of the number of significant issues raised in this submission, industry requested that “MAFBNZ undertakes a complete review of the IRA and subsequently allows a further period for consultation with stakeholders”.

MAFBNZ response:

MAFBNZ noted Industry’s comments and agreed to update the OIE definitions in the revised IHS as per the most updated terms of the OIE *Terrestrial Animal Health Code*. MAFBNZ does not consider that comments 2.1 to 2.4 justify a complete review of the IRA. Further consideration on the commodities assessed in the original IRA is given in point 2.5.

**2.5.** PIANZ/EPF noted the difference between the definition of commodities in the draft IHS (*meat and meat products*) and the more restricted term used in the title of the IRA (*meat preparations*). Industry expressed its concern about “the broad scope of the IHS and ask[ed] that Biosecurity New Zealand refine the IHS in accordance with the scope of the IRA”.

MAFBNZ response:

MAFBNZ acknowledges Industry’s concern regarding the discrepancy between the definition of commodities in the IRA and in the draft IHS.

MAFBNZ points out that in the introduction of the IRA (page 83 of the IRA), it is stated that “the range of products covered by this risk analysis includes uncooked deboned turkey meat roasts and crumbed, flash-fried deboned products”. Therefore the risk analysis not only considered turkey meat preparations (falling under “crumbed, flash-fried deboned products”) but also other high value cuts defined by “uncooked deboned turkey meat roasts”.

However, in order to align the draft IHS with the original focus of the IRA (BMFL turkey meat preparations), the range of commodities eligible for import will be narrowed down to “turkey meat preparations” in the revised IHS.

**2.6.** PIANZ/EPF wrote that they were concerned that the draft IHS required neither the exporter to provide documentation proving that the eligibility requirements were met (“the meat or meat products must be derived from turkeys hatched and raised in the United Kingdom) nor the Official Veterinarian to certify on the origin of the birds. Industry also

noted the absence of requirement to certify that the flocks of origin had “not been exposed (either directly or indirectly e.g. via transport crates or movement of people) to poultry or other avian species that have not hatched in the United Kingdom”.

MAFBNZ response:

MAFBNZ noted industry’s comments and acknowledges that this information on the origin of birds should be part of the certification. The revised IHS will address this issue. However, the IHS will not require certification on the absence of exposure of the flocks of origin to “poultry or other avian species that have not hatched in the UK”. MAFBNZ considers that the zoosanitary certification provides sufficient assurance of the traceability for the flocks of origin and of the health status of these flocks.

**2.7.** PIANZ/EPF noted the absence of testing requirements to support freedom from IBD virus type 1 for the export farms from which the birds originate. Industry requested that detailed testing requirements aiming at demonstrating IBDV type-1 freedom be included in the IHS.

MAFBNZ response:

MAFBNZ noted Industry’s comment. Serological testing to demonstrate freedom from IBDV-1 in turkeys is not justified by the IRA as there is no scientific evidence for natural infection of IBDV-1 in commercially farmed turkeys, hence testing requirements for IBDV-1 in export farms are not deemed necessary.

**2.8.** PIANZ/EPF wrote that “the numbering of sub-paragraphs in Part D: Zoosanitary Certification, IV Zoosanitary Information, Veterinary Certificate is inconsistent.

MAFBNZ response:

MAFBNZ noted this inconsistency. Given that there may be some important amendments to the draft IHS, numbering of sub-paragraphs may vary across the revised document; however particular attention will be given to formatting when editing this new document.

**2.9.** PIANZ/EPF wrote that the term “routine” used for testing requirements in the Veterinary Certificate was “undefined” and needed further clarification, with at least the “frequency and level of testing” required.

MAFBNZ response:

MAFBNZ took industry’s request into account and the revised IHS will clarify the freedom requirements in the Veterinary Certificate and will no longer refer to “routine testing”.

**2.10.** PIANZ/EPF requested that the Veterinary Certificate include a requirement to conduct screening for notifiable avian influenza [NAI] in the export farms from which the birds originate, similarly to what is already required to demonstrate freedom from infection with avian paramyxovirus-1.

MAFBNZ response:

MAFBNZ noted industry's comments and will amend the revised IHS to include routine screening in the export farms for NAI.

**2.11.** PIANZ/EPF wrote that, although products for export to NZ had to be processed “first of the day”, there was no requirement “for the products to be stored separately either prior to or following packing”. Industry was also concerned that the draft IHS did not state any minimum cleaning standard requirements prior to processing the products for export to NZ. Similarly it was noted that there was no mandatory procedure to prevent any potential cross-contamination at packaging.

MAFBNZ response:

MAFBNZ acknowledged industry's comment on cross-contamination of carcasses with disease agents including NAI viruses, avian paramyxoviruses and IBDV. The revised IHS will clearly require the physical separation of the products intended for export to New Zealand from products not of equivalent health status. Processing turkey meat “first of the day” and applying clear labelling onto the final products should contribute to implement this requirement and effectively maintain this separation.

**2.12.** PIANZ/EPF commented on the requirement for Salmonella and on NZFSA risk assessment of the “potential risk to New Zealand consumers of *Salmonella* contained in imported chicken”. Industry noted that there had been “no formal opportunity for public [...] consultation on this document and requested that stakeholders be presented with the possibility to comment.

MAFBNZ response:

MAFBNZ has reconfirmed with NZFSA that a decision was made on this matter in 2006. NZFSA is a separate Government department and MAFBNZ recommends that industry should contact NZFSA for further information on that department's *Salmonella* risk assessment.

### **3. The Department of Food and Rural Affairs (DEFRA), United Kingdom**

DEFRA submitted their comments on the draft IHS with referring directly to the numbered sections of the draft IHS, which is called “protocol” in its submission.

**3.1.** DEFRA proposed that “*products originate from Bernard Matthews Ltd. establishments*” be altered to state *turkey meat production establishments*. DEFRA therefore suggested that the “certificate should be applicable to all potential exporters in the UK and other EU member States”.

MAFBNZ response:

MAFBNZ acknowledge DEFRA's request not to limit the eligibility of establishments of turkey meat origin to Bernard Matthews Ltd. establishments. The revised IHS intends to allow imports for which the turkey meat originates from a MAFBNZ approved establishment (see comment 2.6).

**3.2.** DEFRA wrote that the protocol required to demonstrate freedom from IBD1 needed to be detailed (for example by including frequency of testing, sample size and type of test).

MAFBNZ response:

MAFBNZ noted DEFRA's request. As explained in MAFBNZ response to comment 2.7, testing requirements for IBDV-1 in turkeys are not justified but measures to keep the products separated from other products not of equivalent health status will ensure absence of cross-contamination.

**3.3.** DEFRA requested that the protocol should provide a precise definition of 'establishment', and should clarify whether the entire production of an approved establishment must be dedicated for export to New Zealand or whether it can be only partially intended for export to New Zealand.

MAFBNZ response:

MAFBNZ agree to provide a more specific definition of establishment and to include a clause in the veterinary health certificate stating that the production of the establishment can be only partially intended for export for New Zealand but that all production must meet the import health requirements of the IHS or their equivalent.

**3.4.** DEFRA highlighted that Bernard Matthews routinely vaccinated their meat birds and breeders for APMV1 (avian paramyxovirus type1, causal agent of Newcastle disease). In this, DEFRA proposed that MAFBNZ authorise vaccination against Newcastle disease in the flocks of origin with for example restriction on the use live vaccines up until a certain period before slaughter.

MAFBNZ response:

MAFBNZ noted DEFRA comment. However the conclusions of the IRA do not support the use of vaccination against APMV-1.

**3.5.** DEFRA commented that "it would be useful for the protocol to specify that a 'zone' means a protection, surveillance or restriction zone as laid down in EU legislation for the control of Newcastle disease or avian influenza".

MAFBNZ response:

MAFBNZ acknowledges DEFRA's suggestion and will clearly state in the revised IHS that the establishments (production farms and processing plants) were not under any official veterinary restrictions and had no epidemiological link to an outbreak of NAI or Newcastle disease. *Zone* is used in the context of the OIE's *Terrestrial Animal Health Code* definitions.

**3.6.** The DEFRA submission stated that "it would be useful for the protocol to specify what is meant by 'routine screening' for Avian Paramyxovirus-1 (APMV-1). Reference to the ICPI infers that the screening must be by virus isolation with subsequent characterisation of any APMV-1 isolated, using the ICPI test. In practice, it is most unlikely that the virus isolation would yield virus. Therefore it would be more helpful to state, for example: *virus detection or isolation tests on flocks of origin at 95%/10% performed every 90 days, by either PCR or culture in embryonated eggs. Any positive samples should result in culture and testing by ICPI and ICPI of the tested material should give an index of no greater than 0.4.*"

MAFBNZ response:

MAFBNZ acknowledge the need to give more details in the revised version of the IHS on flock freedom from APMV-1. This will involve testing for APMV-1 in the establishment of origin. Testing protocol for APMV-1 will be submitted to MAFBNZ when approval of the establishment of origin is sought.

**3.7.** DEFRA also enquired about the requirement for the establishment of origin to conduct “routine screening” for avian paramyxoviruses other than paramyxovirus 1, implying that an haemagglutination inhibition test (HAI) would have to be run for each of the nine serotypes of avian paramyxoviruses (PMV-1 to PMV-9).

DEFRA queried whether the reference to the last 21 days prior to slaughter means that one test during the last 21 days should be sufficient to give a reasonable assurance of PMV freedom.

DEFRA also noted that the clause in the draft IHS mentioned “haemagglutination test” instead of haemagglutination inhibition test.

MAFBNZ response:

MAFBNZ noted DEFRA’s comments and will no longer refer to routine screening for avian paramyxoviruses other than paramyxovirus 1 in the revised IHS. It will instead require the official veterinarian to certify that the establishments from where the turkeys originate were free from APMV-2, 3 and 7 at time of slaughter. Test results will be left at the disposition of the certifying official veterinarian (see 3.6).

Any reference made to “haemagglutination test” will be amended to *haemagglutination inhibition test* or HAI.

**3.8.** Similarly to the previous comment, DEFRA requested clarification on “routine screening” of parent flocks to demonstrate flock freedom from *Salmonella arizonae*, *S. gallinarum* and *S. pullorum*. DEFRA highlighted the likelihood of facing false positive test results if serology was prescribed to demonstrate freedom from *Salmonella* in turkeys. A protocol for confirmatory testing in the event of positive results would therefore be necessary.

MAFBNZ response:

MAFBNZ agrees with DEFRA on the need to clarify this requirement. The revised IHS will provide further information on the testing protocol, which may include confirmatory testing in the event of positive results.

**3.9.** The DEFRA submission queries whether it is the intention to screen both the breeder flocks and the broiler flocks for *Salmonella* as this exceeds normal practice for *Salmonella* surveillance.

MAFBNZ response:

MAFBNZ noted DEFRA’s comment. Only the broiler flocks must be tested for the presence of *Salmonella*.

## **Appendix One: Copies of Submissions**

## **1. The Department of Conservation (DoC)**

Hi Sally

Thank you for the opportunity to comment on the Import Health Standard (IHS) to import turkey meat from the United Kingdom.

The Department considers that the import conditions prescribed by the 'Risk analysis for the importation of Bernard Matthews turkey meat preparations from the United Kingdom' are adequate to reduce the level of risk to an acceptable level.

The Department however considers that some conditions as written in the IHS require further explanation.

1) The Department recommends that condition four as written in the veterinary certificate be amended to include a list of disease agents the anti-mortem and post-mortem veterinary examination should check for.

2) The Department recommends that condition seven as written in the veterinary certificate be amended to include further clarification as to what is meant by 'first of the day' production and included recommended cleaning standards or procedures that are required to be met between processing meat or meat products of different health status.

I will be leaving the Department as of today therefore please direct any response on this matter Fiona Bancroft.

Asela Atapattu  
Biosecurity Technical Officer  
Department of Conservation

## **2. The Poultry Industry Association of New Zealand (PIANZ) and the Egg Producers Federation of New Zealand (EPF)**

# Poultry Industry Association of New Zealand (Inc)



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Sally Aitken  
Pre-Clearance Directorate  
Biosecurity New Zealand  
Ministry of Agriculture and Forestry  
P. O. Box 2526  
WELLINGTON

Dear Sally

## **Import Health Standard: Turkey Meat and Meat Products from the United Kingdom**

The Poultry Industry Association of New Zealand (PIANZ) and Egg Producers Federation of New Zealand (EPF) Veterinary Technical Committee has reviewed the draft Import Health Standard for Turkey Meat and Meat Products from the United Kingdom (subsequently referred to as the IHS).

The New Zealand Poultry Industry (including PIANZ and the EPF) has also reviewed the Import Risk Analysis: chicken meat and chicken meat products; Bernard Matthews Foods Ltd turkey meat preparations from the United Kingdom (subsequently referred to as the IRA) on which the IHS is based. Industry acknowledges that MAF provided an opportunity for stakeholders to comment on the original IRA released in 1996 and Industry did comment on the IRA in July 1996. However, the recent review of the IRA by the Industry has highlighted a number of areas of concern for the Industry and these are listed below:

- Although the IRA was a relatively comprehensive document for its time, the structure and content of the risk analysis would not meet the current standards for IRA which is set by Biosecurity New Zealand.
- At the time that the original IRA was released an infectious bursal disease (IBD) type 1 eradication and ongoing surveillance programmes aimed at regaining New Zealand's IBD free status had recently been implemented by the New Zealand Poultry Industry in consultation with MAF.

This IBD surveillance programme operated by the New Zealand Poultry Industry is currently one of the most extensive animal disease surveillance programmes currently in place in New Zealand.

Whilst the New Zealand Poultry Industry acknowledges the findings of in the risk analysis that “IBD 2 does not cause disease in any avian species”, the Industry is particularly concerned about the possible interference with serological testing for IBD type 1 in chicken. The industry therefore requests that MAF / Biosecurity New Zealand re-evaluate the potential effect of the importation of turkey meat from the United Kingdom on the current industry funded surveillance programme. The large increase in the number of small (less than 5 000 birds) free range layer flocks throughout New Zealand since the release of the original IRA is also particularly relevant to this review.

- Since the risk analysis was completed in 1996, a considerable amount of research on various diseases affecting poultry has been conducted and consequently we now have a better understanding of many of these diseases. Examples of these in the context of the original risk analysis are turkey rhinotracheitis *Ornithobacterium rhinotracheale*, and coronaviral infections, which although considered in the MAF 1996 Risk Analysis, were not well understood at the time. The industry therefore requests that the IRA be reviewed in light of the significant time lapse and advancements in the understanding of poultry health and disease since its original release in 1996.

In addition, amendments to the OIE definitions of both avian influenza (AI) (including both highly pathogenic notifiable avian influenza (HPNAI) and notifiable avian influenza (NAI) as well as Newcastle disease (NCD) should be considered in the revised risk analysis.

Industry therefore seeks that MAF / Biosecurity New Zealand undertakes a complete review of the IRA and subsequently allows a further period for stakeholder consultation.

Regardless of the concerns raised above and without prejudicing the Industry’s request to review the IRA for those reasons stated above, the Industry’s concerns relating to the draft IHS are stated below:

- The draft IHS is entitled “Draft Import Health Standard for Turkey Meat and Meat Products from the United Kingdom” and defines meat as “skeletal muscle of vertebrate animal species (e.g. avian, amphibian, fish, mammalian and reptilian) with naturally included or adherent tissue or bone” and meat product as “a product containing meat as an ingredient (such as meat patties, meat pies, salami or sausage), or meat that has been treated so that the cut surface of the meat no longer has the characteristics of fresh meat”.

The title of the IHS, the definitions of meat and meat products and point 7.1 and 7.2, **Section 7 (Eligibility)**, all suggest that both fresh and cooked, whole and portion turkey products can be imported into New Zealand.

In contrast the IRA, on which the IHS is based, states that the range of products covered “includes uncooked deboned turkey meat roasts and crumbed, flash-fried deboned products. The preparations include edible tissues only, that is muscle, fat and skin ...”.

The New Zealand poultry is therefore concerned about the broad scope of the IHS and asks that Biosecurity New Zealand refine the IHS in accordance with the scope of the IRA.

- The draft IHS states under Part B: Importation Procedure, **Section 7 (Eligibility)**, point 7.1 that “the meat or meat products must be derived from turkeys hatched and raised in the United Kingdom”. The New Zealand Industry is concerned that whilst this requirement is stated, there is no requirement for the Exporter to provide documentation to demonstrate that this is the case, nor is there any requirement for the Official Veterinarian to determine the validity of this claim and to provide certification. The New Zealand Poultry Industry notes with concern the recent outbreak of avian influenza (H5N1) at a Bernard Matthews Ltd. turkey farm in the United Kingdom. The industry acknowledges that there are a number of ways in which the infection could have entered the clinically infected shed. However, industry believes that demonstrates that the company’s understanding of, or implementation of, basic biosecurity measures has not been effective.

Similarly, Industry is concerned that whilst it may be possible to certify that source flocks have been hatched and raised in the United Kingdom, there is no requirement, in the IHS, to certification that the source flocks have not been exposed (either directly or indirectly e.g. via transport crates or movement of people) to poultry or other avian species which have not been hatched and raised in the United Kingdom.

- Part D: Zoosanitary Certification, **IV. Zoosanitary Information, Veterinary Certificate**, point 1 requires that Official Veterinarian to certify that “the productions originate from Bernard Matthews Ltd establishments which [are] free from infectious bursal disease virus type 1”. However, the IHS does not state what type or level of testing, if any, is required to demonstrate this freedom from IBD virus type 1. The New Zealand industry requests that MAF include detailed specifications for the testing required to demonstrate freedom.

The numbering sub-paragraphs in Part D: Zoosanitary Certification, **IV. Zoosanitary Information, Veterinary Certificate** is inconsistent.

As noted above for point 1, Part D: Zoosanitary Certification, **IV. Zoosanitary Information, Veterinary Certificate**, the requirement under point 2.1 (iii), (iv) and (v) for “routine” testing is undefined. Industry requests that further detail and clarification on the frequency and level of testing is included in the IHS.

Industry notes the requirements under point 2.1 (iii) and (iv), Part D: Zoosanitary Certification, **IV. Zoosanitary Information, Veterinary Certificate**, that the establishment is free from infection with avian paramyxovirus-1 and has routine screening for other avian paramyxoviruses. However, industry is concerned about the absence of a similar requirement to demonstrate that the establishment is free of NAI and requests that this requirement be included in the IHS.

- Industry is equally concerned that whilst point 7 of Part D: Zoosanitary Certification, **IV. Zoosanitary Information, Veterinary Certificate** requires that “the products were processed first of the day to avoid cross-contamination with turkey meat or turkey meat products of lower health status”, there is no requirement for the products to be stored separately either prior to or following packing.

Similarly, the New Zealand Poultry Industry is concerned that whilst Biosecurity New Zealand have required that any product for export is processed first of the day to avoid cross contamination and have therefore clearly identified a risk of cross contamination no minimum cleaning standards prior to “first of the day” processing have been identified or stated. The Poultry Industry further notes that any routine cleaning of the processing plant between slaughter days is likely to be carried out in order to address food safety concerns but is not designed to prevent cross contamination of carcasses with viruses such as AI, avian paramyxovirus or IBD. The industry is particularly concerned that routine processing plant cleaning methods are unlikely to destroy the IBD virus.

Industry is further concerned that there is no requirement that packaging used for any birds exported is kept free from potential cross contamination.

- The New Zealand Poultry Industry notes the requirements in the IHS, Part D: Zoosanitary Certification, **IV. Zoosanitary Information, Veterinary Certificate**, point 3, in regards to prohibition of *Salmonella* vaccination and / or freedom of source flocks.

Industry is concerned that whilst certain types of *Salmonella* (particularly *S. enteritidis* and *S.typhimurium* DT104) are not considered to pose a potential threat to the New Zealand human and or animal population due to the presence of certain serotypes and other *Salmonella* species currently present in New Zealand, it cannot be assumed that

the human and / or animal population would exhibit the same response to any newly introduced serotypes.

The industry is aware of a recent risk assessment completed by the New Zealand Food Safety Authority (NZFSA) to assess the potential risk to New Zealand consumers of any *Salmonella* contained in imported chicken. Industry is particularly concerned that although this assessment has been used as an add on to the original risk analysis carried out by Biosecurity New Zealand, there has been no formal opportunity for public or indeed stakeholder consultation on the risk assessment carried out by the NZFSA. Industry therefore requests that Industry and other stakeholders are provided with an opportunity to comment on the assessment before the findings are incorporated into the new IHS.

Please do not hesitate to contact our offices should you have any queries.

Kind regards

Michael Brooks  
**Executive Director**

### 3. DEPARTMENT OF FOOD AND RURAL AFFAIRS (DEFRA)

#### UK COMMENTS ON NEW ZEALAND PROPOSED PROTOCOL FOR IMPORT OF TURKEY MEAT

The paragraph notation follows that in the NZ [Notification to WTO, section 6](#)

1. We propose that 'Products originate from Bernard Matthews Ltd. establishments' be altered to state 'turkey meat production establishments'.

The certificate should be applicable to all potential exporters in the UK and other EU Member States.

The protocol needs to specify the basis on which freedom from IBD1 is based, i.e. frequency of testing, sample size, type of test.

3.1. The protocol should define what is meant by 'establishment'. Is it the individual shed(s) from which the meat turkeys are taken, or is it the entire farm?

3.1.(i) Bernard Matthews routinely vaccinate their meat birds and breeders for PMV1 (ND). It would be preferable to allow ND vaccination (perhaps specify that no live vaccine used within a certain period before slaughter).

3.1.(ii) It would be useful for the protocol to specify that a 'zone' means a protection, surveillance or restriction zone as laid down in EU legislation for the control of Newcastle disease or avian influenza.

3.1.(iii) It would be useful for the protocol to specify what is meant by 'routine screening'. Reference to the ICPI infers that the screening must be by virus isolation with subsequent characterisation of any APMV-1 isolated, using the ICPI test. In practice, it is most unlikely that the virus isolation would yield virus. Therefore it would be more helpful to state, for example:

'virus detection or isolation tests on flocks of origin at 95%/10% performed every 90 days, by either PCR or culture in embryonated eggs. Any positive samples should result in culture and testing by ICPI, and ICPI of the tested material should give an index of no greater than 0.4.'

3. 1.(iv). Same comments as above regarding 'routine screening'. The reference to the last 21 days prior to slaughter suggests that one test during the last 21 days should be sufficient to give a reasonable assurance of PMV freedom.

Presumably the text should state 'haemagglutination inhibition test', which uses serum from the test birds as a routine screening mechanism for freedom of infection in non vaccinated populations.

Also there are 9 serotypes of avian paramyxovirus, named APMV-1 to APMV-9. The HAI test is serotype specific, which means that it would be necessary to run nine separate tests with each serum sample. Is this really the intention of the protocol given that most of these serotypes do not affect poultry? There are no generic screening tests available that detect antibodies to all APMV's.

3. 1.(v) Same comments as above concerning definition of 'routine screening'.

Serology of turkeys for Salmonellas will often produce false positive results. There is a need to specify a procedure for confirmatory testing in the event of positive results. This could consist of a tube agglutination test of the positive or inconclusive samples, and any birds that are still inconclusive are killed for bacteriology.

Is it really the intention to screen both the breeder flocks and the broiler flocks? This exceeds normal practice for Salmonella surveillance.