

**DRAFT IMPORT HEALTH STANDARD FOR COOKED POULTRY
MEAT PRODUCTS FOR HUMAN CONSUMPTION INTO NEW ZEALAND
FROM AUSTRALIA**

REVIEW OF SUBMISSIONS

Biosecurity New Zealand
Ministry of Agriculture and Forestry
Wellington
New Zealand

26 January 2009

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Approved for general release

Matthew Stone
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Introduction

The draft import health standard for the importation into New Zealand of specified cooked poultry meat products for human consumption from Australia was notified for public consultation on 20 November 2007. Submissions initially closed on 28 January 2008 but MAF Biosecurity New Zealand (MAFBNZ) granted extensions up until 17 March 2008 for the United States Department of Agriculture and for the Department of Conservation.

Biosecurity New Zealand received the following submissions:

Name	Organisation represented	Date received
Paul Gilchrist	Luv-A-Duck Pty Ltd (Australia)	30 November 2007
Merilyn Elson	Mrs Mac's Pty Ltd (Australia)	21 January 2008
Michael Brooks	Poultry Industry Assoc. of New Zealand*	18 February 2008
Laura Scandurra	United States Department of Agriculture	5 March 2008
Leanne Perry-Meyer	Department of Conservation	17 March 2008

**also includes the Egg Producers Federation of New Zealand (EPF)*

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

List of Acronyms frequently used in the present review of submissions:

AQIS.....	Australian Quarantine and Inspection Services
DOC.....	Department of Conservation
ELISA.....	Enzyme-Linked Immuno-Sorbent Assay
IBD.....	Infectious Bursal Disease
IBDV.....	Infectious Bursal Disease Virus
IHS	Import Health Standard
MAFBNZ	Ministry of Agriculture and Forestry Biosecurity New Zealand
OIE.....	World Organisation for Animal Health
PCR.....	Polymerase Chain Reaction
PIANZ.....	Poultry Industry Association of New Zealand
TAHC.....	Terrestrial Animal Health Code (OIE)
USDA.....	United States Department of Agriculture

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Review of Submissions

1. Paul Gilchrist, Luv-A-Duck Pty Ltd

1.1. Luv-A-Duck noted that in Appendix Two of the Import Health Standard (IHS), chlorine was still checked at drinker line level despite earlier comments advising that this procedure did not make either practical or scientific sense. Luv-A-Duck suggested that samples for testing should be collected at the header tank instead.

MAFBNZ response:

MAFBNZ acknowledges previous comments from Luv-A-Duck regarding testing of chlorine level and understands that testing directly at the drinker line level may not be significant in the particular configuration of Luv-A-Duck's export farms that use deep underground water. As previously indicated by Luv-A-Duck, testing at upper levels of the water supply system, including header tanks, should be considered in the compartment's biosecurity plan (please see the OIE Terrestrial Animal Health Code 2008, chapters on compartmentalisation). However further testing downstream at the drinker line level would confirm homogeneity of chlorine levels of water supplied to the birds in the compartment. Please note that the revised version of the IHS no longer includes appendices and that those details will need to be specified in the biosecurity plan.

1.2 Luv-A-Duck pointed at clause 7.5 of Appendix Two of the IHS and restated that stocking density and multiple pick-up were not relevant in the case of a compartment. Although the Luv-A-Duck export farm applying for compartmentalisation was not concerned by stocking export birds and multiple pick-up, Luv-A-Duck suggested that the birds for the export batch should be confined to a single pick-up.

MAFBNZ response:

MAFBNZ notes Luv-A-Duck's suggestion for a single pick-up of birds intended for export to New Zealand. Please note that the revised version of the IHS no longer includes appendices and that those details will need to be specified in the biosecurity plan.

1.3 Luv-A-Duck noted that "or litter" should be added after "feed" in the second line of the clause 8.5 of the Appendix Two (p15) and "a" should be inserted after "there must be" in the second line of the clause 12.1 (p16) of the Appendix Two.

MAFBNZ response:

Please note that the revised version of the IHS no longer includes appendices and that those details will need to be specified in the biosecurity plan.

2. Merilyn Elson, Mrs Mac's Pty Ltd, Australia

2.1 Mrs Mac's claimed that, since ducks were sub-clinical carriers of IBDV and since low pathogenic strains of IBDV were endemic in Australia, it seemed difficult for the company to find suppliers with IBDV-free flocks.

In addition, Mrs Mac's questioned the IHS requirements for processing poultry meat, and stated that even though their own procedure differed from the IHS, it would be unlikely

that IBDV “could survive this rigorous process”. Mrs Mac’s then challenged the significance of the risk of infecting live poultry with pies made from poultry meat contaminated with residual IBDV.

MAFBNZ response:

MAFBNZ assures that the IHS minimal requirements for processing poultry meat are in agreement with the relevant MAFBNZ Import Risk Analysis on cooked duck meat ¹, including with the risk of exposure of the commodities to New Zealand avian population. Given that IBDV is highly resistant to heat treatment ^{1,2} and given the heat parameters used for commercial poultry meat products, cooking alone is not considered sufficient to guarantee the absence of the virus in the commodities. Compartment’s freedom was retained as the risk management option for IBDV while cooking at the temperatures indicated in the IHS will contribute to manage the risk of other unwanted organisms being present in the products.

¹ Import Risk Analysis: Cooked duck (*Anas platyrhynchos*) meat from Australia (2006).

² Mandeville WF, Cook FK and Jackwood DJ. 2000. Heat lability of five strains of Infectious Bursal Disease virus. *Poultry Science* 79: 838-42.

2.2 Mrs Mac’s wrote: “It would appear that there has been no real easing of restrictions in the new draft import standard. Technical barriers to trade to protect industry from fair competition should be avoided wherever possible.

As an alternative we investigated the idea of importing chicken meat from New Zealand, processing it into pies, then exporting it back. This practice was also not allowed at the time, but appears to be an option under the proposed standard - Part B 5.2. This has proven not to be economically viable however, as we are paying two lots of freight charges in effect.”

MAFBNZ response:

MAFBNZ understands Mrs Mac’s’ comments. It is regrettable that Mrs Mac’s views the biosecurity measures put forward in the IHS as “technical barriers to trade” as those measures are the minimal biosecurity requirements as recommended by the OIE for a compartment (TAHC 2008, chapters on Compartmentalisation).

One of the purposes of a compartment is to allow trade to take place when a disease that would have significant consequences on the importing country’s animal health status and economy is widespread in the exporting country. This is the case for infectious bursal disease which is endemic in Australia but not present in New Zealand poultry. MAFBNZ is allowing an alternative to the importation of cooked poultry meat from Australia. Poultry meat originating from New Zealand may be processed in a secondary processing plant in Australia, provided the biosecurity measures in place are sufficient to deliver products that are free of infectious bursal disease.

3. Michael Brooks, Poultry Industry Association of New Zealand (PIANZ)

3.1 The Poultry Industry wrote: “clause 5.2 [Part B: Importation Procedure] states that a permit to import is not required if the poultry products originate from export farms in New Zealand and are only processed in Australia. Industry acknowledges the logic behind this requirement. However industry suggests in the interests of clarity that point 5.2 be reworded to read “A permit to import is not required if the poultry products originate from export farms in New Zealand, are only processed in Australia and are kept separate from any product which is not derived from New Zealand or intended for export to New Zealand at all stages in the production process”.

MAFBNZ response:

Please note that clause 5.1 now states that “a permit is required for importing specified cooked poultry meat products, whether they originate entirely from compartments in Australia or they are derived from meat that originates from farm(s) in New Zealand”. The requirement to keep these poultry products separated from any product for which the poultry meat does not originate from New Zealand and/or that is not intended for export to New Zealand is found in clause 3.1 of the Veterinary Certificate. Although the poultry meat would originate from New Zealand where IBDV is not present, conditions surrounding its inclusion in the processing chain in Australia will be detailed in the compartment’s biosecurity plan, which will have to be approved by AQIS and MAFBNZ so that a permit to import can be granted.

- 3.2** The Poultry Industry requested that clause 7.4 [Article 7 on Eligibility of the Part B: Importation Procedure] be amended to “Where serological tests are required, these tests must be carried out at a laboratory approved by the Australian Quarantine Inspection Service (AQIS) using a test approved by AQIS”.

MAFBNZ response:

MAFBNZ agrees to modify this clause (now clause 7.6 in the final IHS version) accordingly to the Poultry Industry’s comment.

- 3.3** The Poultry Industry was concerned that the information required for the Export Poultry Farm Declaration (Part D: Zoosanitary Certification) would not be sufficient to demonstrate how a compartment had been established and how it would be maintained free of IBDV. The Poultry Industry quoted the OIE Terrestrial Animal Health Code to support their argument. They suggested that the wording of this section (Zoosanitary Certificate) should be changed in order to emphasise on the prerequisites to establish a compartment and to describe how its IBDV-free status will be maintained.

The Poultry Industry pointed at the lack of evidence to demonstrate that a compartment is still free of IBDV, and this is of particular concern when considering the timeframe allocated to demonstrate IBDV freedom of the compartment in an area where the disease is endemic.

As a consequence the Industry requested that point 1 of the Export Poultry Farm Declaration be reworded to “The integrity of the export poultry farm as a compartment has been maintained for at least 12 months prior to the scheduled date of slaughter”. Similarly, point 1 of the Veterinary Certificate should also be reworded to read “The export poultry farm has maintained its status as a compartment free from infectious bursal disease (following the guidelines of Chapter 1.3.5 on zoning and compartmentalisation in the *Terrestrial Code*) for at least 12 months prior to the scheduled date of export”.

MAFBNZ response:

MAFBNZ understands the Poultry Industry’s request to clarify conditions of IBDV-freedom of the export farm before processing and exportation of the products. Under the draft IHS, clause 1 of the Export Poultry Farm Declaration and clause 2.2 of the Veterinary Certificate (cited by the Poultry Industry as “point 1”) do not require a definite period of IBDV-freedom prior to slaughter and exportation.

MAFBNZ draws attention to the fact that, before a compartment is established, the export farm will have provided evidence for IBDV freedom for 12 months prior to application for

the compartment itself. Once the compartment has been approved, if a test result was found positive for IBDV, the compartment would immediately cease. Importation would resume only after a reevaluation of the compartment by AQIS and MAFBNZ could *de novo* demonstrate its IBDV-free status. The export farm will have to provide evidence of IBDV-freedom for a significant period of time that may differ from the 12-month period required for establishing a compartment.

MAFBNZ agrees to amend clause 1 of the Poultry Farm Declaration A (entire production and processing in Australia, as in the amended version) to “The integrity of the export poultry farm belonging to the compartment free of infectious bursal disease has been maintained prior to the scheduled date of slaughter for at least the time defined in the biosecurity plan”. Similarly, clause 2.2 of the Veterinary Certificate will be changed to “The export poultry farm of the approved compartment has maintained its status free of infectious bursal disease prior to the date of slaughter (according to the recommendations in the OIE *Code*) for at least the time defined in the biosecurity plan”.

3.4 The Poultry Industry noticed that at point 3 of the processing plant declaration both ante-mortem and post-mortem inspections were to be performed by appropriately trained operators.

The Poultry Industry wrote: “Although Industry is aware that the clause is included to ensure that poultry products meet the human consumption specifications, it is currently unclear whether or not the clause intends for inspectors to examine the bursa or those poultry which may show clinical signs of the disease, i.e. chickens. Industry strongly suggests that ante- and post- mortem inspectors be trained to examine the bursa of chickens processed for export to New Zealand, and any other chickens which are taken from the same the compartment, to ensure that any possible breach in biosecurity is identified at an early stage. It is similarly unclear what is meant by “appropriately” trained operators, as there is no stated minimum standard to which operators must be trained.

Industry suggests that this point should be reworded to read “The poultry meat products were derived from birds that passed ante-mortem and post-mortem inspection by operators trained to a level equivalent to the New Zealand specifications at the time of slaughter and the products are sound and fit for human consumption”.

MAFBNZ response:

MAFBNZ acknowledges the Poultry Industry’s comments on the lack of clarity regarding the expertise of operators completing ante-mortem and post-mortem inspections.

For more precision, the following statement was added in clause 2.4 of the Veterinary Certificate “a full necropsy was conducted during which samples were collected under the direct supervision of the official veterinarian. For all birds, there was no macroscopic sign suggesting clinical infection with infectious bursal disease virus”.

MAFBNZ also agrees to amend the Processing Plant Declarations (clause 2 in Declaration A and clause 3 in Declaration B of the final IHS version) so that “ante-mortem and post-mortem inspections are conducted by trained operators following the standard operating procedures stated in the biosecurity plan”.

3.5 The Poultry Industry reiterated its concerns regarding serological testing in ducks. The Poultry Industry wrote: “Industry notes the requirement under point 2.4 [of the veterinary certificate], for birds to be subjected to an infectious bursa disease ELISA. Industry has highlighted on two previous occasions concerns regarding the proposed use

of an ELISA for the serological testing of ducks. Copies of our previous letters relating to this issue are attached for your information.

Industry strongly believes that any ELISA test which is used in determining the serological status of any export flocks must be validated for use in that particular species. Furthermore industry believes that the test must be accepted as appropriate by the Veterinary Authority of the exporting country. Industry suggests that point (ii) of point 2.4 be reworded to read “infectious bursal disease ELISA, approved for use by the Veterinary Authority of the exporting country, on a sufficient number of serum samples to be able to detect a prevalence of 10% with a confidence of 99%”.

MAFBNZ response:

MAFBNZ agrees to modify the clause cited above (point (ii) of paragraph 2.4, Veterinary Certificate) as per the Poultry Industry’s suggestion.

- 3.6** The Poultry Industry wrote: “In Appendix One (Export farms and processing plants approved by MAF-BNZ), point 2 currently states “AQIS sends PCR test results for infectious bursal disease virus on a sufficient number of bursae to be able to detect a prevalence of 20 %, with a confidence of 99 %, which indicates that the export farm is a compartment free from infectious bursal disease. It is unclear to the New Zealand Poultry Industry why the requirement included in point 2.4 of the section Veterinary Certificate (included in Section 10 Model Zoosanitary Certificate), which requires infectious bursal disease ELISA on a sufficient number of serum samples to be able to detect a prevalence of 10 % with a confidence of 99 %, is not included?”

MAFBNZ response:

Please note that the revised version of the IHS no longer includes appendices and that the requirement to detect a prevalence of 10% with a confidence of 99% has been included in the veterinary certificate.

- 3.7** The Poultry Industry wrote: “Industry notes that point 2.1.1 states “initial PCR test result for infectious bursal disease virus which indicate that any Australian export farms are compartments free from infectious bursal disease”. Industry is strongly opposed to the wording of this point and to the suggestion that a compartment can be defined solely on the basis of PCR test results alone. Furthermore, Industry is gravely concerned at the inference that any export farm is free from infectious bursal disease, despite the fact that PCR results may not have been provided for all farms. Industry does not support the inclusion of this point in its current format and suggests that this point be reworded as follows “initial PCR test results for infectious bursal on a sufficient number of bursae to be able to detect a prevalence of 20% with a confidence of 99%. These test results will be used to evaluate the infectious bursal disease free status of the farms for which the test results are supplied at the time of application for recognition of the compartment”.

Similarly point 2.1.2 should be reworded to read “the disease monitoring programmes and the biosecurity manuals for those Australian export poultry farm seeking recognition as a compartment in order that these can be assessed by MAF-BNZ”.

MAFBNZ response:

MAFBNZ acknowledges the Poultry Industry’s comments and confirms that negative PCR results for infectious bursal disease (IBDV) alone are not sufficient to recognise a compartment free of IBDV. Conditions of recognition of freedom from infectious bursal disease will be detailed and agreed upon in the biosecurity plan.

3.8 “Industry notes that while point 3 of Appendix One allows for the recognition of a compartment by Biosecurity New Zealand, there does not appear to be a requirement in the draft IHS for regular auditing of the compartment by Biosecurity New Zealand, or, at least, a minimum requirement to advise Biosecurity New Zealand of any changes to the animal health status, the disease monitoring programme in place for the export poultry farm or the biosecurity manual for the export poultry farm. As maintenance of a compartment, through biosecurity measures laid out in the appropriate biosecurity manual, is key to the concept of compartmentalisation, it is essential that Biosecurity New Zealand be advised of any changes to or deviations from the disease monitoring programme in place or to the biosecurity manual. Furthermore, it is essential that these changes are approved by Biosecurity New Zealand. Industry notes that the chapter on Zoning and Compartmentalisation currently included in the OIE Terrestrial Animal Health Code (TAHC) is undergoing review and that proposed amendments to the code have been made.

Industry notes that Article 3.x.x.8 of the draft chapter on zoning and compartmentalisation currently requires that any significant change in biosecurity be notified to the importing country. Industry has proposed that all changes must be notified as the decision of what is “significant” and what is not is extremely subjective. Industry believes that it is imperative that this requirement is listed in the IHS so that any one intending to export to New Zealand is aware of the minimum requirements and their obligations.”

MAFBNZ response:

MAFBNZ acknowledges that the draft IHS does not clearly state that the compartment should be audited to ensure that the biosecurity plan’s requirements are met on a permanent basis. Details of the audit programme will be included in the compartment’s biosecurity plan. MAFBNZ understands that AQIS intends to audit the compartment’s export farm once per month, which means at least twice during the 10-12 week production cycle.

MAFBNZ agrees with the Poultry Industry on the fact that to maintain a compartment free of infectious bursal disease, the compartment must be audited. Conditions of audit will be agreed in the biosecurity plan. In case of any deviation from the biosecurity plan, the Australian Veterinary Authority (AQIS) will be required to notify MAFBNZ. The importation will immediately cease until the compartment is reassessed for IBDV freedom and *de novo* declared free from IBDV.

3.9 The Poultry Industry wrote: “The Industry acknowledges that point 1 of the Veterinary Certificate (included in Section 10 Model Zoosanitary Certificate) requires the official veterinarian to state that “the export poultry farm has maintained its status as a compartment free from infectious bursal disease according to Chapter 1.3.5 on zoning and compartmentalisation in the *Terrestrial Code* ...”. However, the concept of compartmentalisation is not based solely on disease freedom, but rather on the definition of an animal subpopulation in regards to “management and husbandry practices related to biosecurity”, as stated in the *Terrestrial Code*.

Industry has highlighted, on more than one occasion, the importance, at this early stage in the international application of any new concept (such as compartmentalisation) designed to mitigate the risks associated with trade in live animals or animal products, of ensuring clarity of process and to adopt a precautionary approach, until such time as the appropriateness of the concept has been proven or established. Any models for compartmentalisation should be based on clearly evident and proven epidemiological separations, which must be maintained on an ongoing basis, and which must be auditable.

Therefore, the industry strongly believes that an audit of the biosecurity practices in place within the compartment must be undertaken on at least a yearly basis and that the status of the compartment should only be retained on successful completion of the audit. As with the previous point, industry believes that this requirement must be stated in the IHS to ensure clarity and to ensure that all exporters are aware and meeting their obligations when trading with New Zealand.”

MAFBNZ response:

MAFBNZ concedes that, despite point 2.2 of the Veterinary Certificate stating that the compartment must have been maintained free from infectious bursal disease according to the OIE Terrestrial Animal Health Code (TAHC), it is essential that all other steps concurring to compartmentalisation (including definition of the animal subpopulation) strictly meet MAFBNZ biosecurity requirements. To implement compartmentalisation at an international level, MAFBNZ agrees with the Poultry Industry that emphasis should be put on control procedures to ensure that compartmentalisation remains the highest biosecurity reference in terms of international trade.

3.10 The Poultry Industry wrote: “In point 2 – Poultry Health Status of Part A – Export Poultry Farms in Australia (Appendix Two: MAF-BNZ standard for maintenance of infectious bursal disease freedom in poultry meat products exported to New Zealand), the New Zealand poultry industry is concerned that, despite the requirement for birds where the cause of death is not immediately apparent to be examined for signs of infectious bursal disease, it is still possible that birds which have died of undetermined causes may not be submitted to a laboratory for confirmation of an infectious bursal disease negative status. As such, the New Zealand Poultry Industry requests that Biosecurity New Zealand amend point 2.2 to state "For species of birds in which clinical signs of infectious bursal disease occur, any dead birds where the cause of death is not immediately apparent must be examined for infectious bursal disease. Where clinical signs are suggestive of infectious bursal disease, samples must be sent to a laboratory approved by AQIS. In addition, samples from any birds where the cause of death cannot be determined from observation of clinical signs must be sent to a laboratory approved by AQIS, to ensure that the presence of infectious bursal disease can be ruled out. The supervising veterinarian must notify MAF-BNZ and AQIS within 24 hours of suspecting a case of infectious bursal disease, or where the cause of death cannot be determined from observation of clinical signs, so that exports to New Zealand can be suspended until laboratory confirmation of negative results".

MAFBNZ response:

MAFBNZ wishes to underline the fact that systematic necropsy of birds for which cause of death could not be determined will be conducted by a trained veterinary officer following a procedure that will have been explained in the compartment’s biosecurity plan. Procedures for immediate notification to AQIS by the supervising veterinarian and to MAFBNZ will be detailed in the biosecurity plan.

3.11 The Poultry Industry wrote: “In point 3 – Hygiene requirements, the Industry notes that extensive clean out and disinfection of each poultry house is required, along with disinfection using a disinfectant at a rate known to be effective against infectious bursal disease and approved by AQIS. However, the New Zealand Poultry Industry notes that the infectious bursal disease virus is a particularly hardy virus and difficult to eliminate from the environment. Similarly, it is difficult to thoroughly and effectively clean dirt

floors, a common feature of many poultry houses in Australia. For example, McFerran (1993)¹ stated “IBDV is a very resistant virus and it is virtually impossible to disinfect open-sided housed or those with earth floors”

The New Zealand Poultry Industry is concerned that, although the draft IHS requires extensive clean out and the removal of the top layers of soil, the requirements are still subjective and open to interpretation. Industry believes that a minimum requirement should be that floors are concreted. Industry acknowledges that this may be an added expense for an export farm. However industry notes that the likely benefit of gaining certification for export to New Zealand should offset this cost. In addition, there is likely to be an increase in the performance of birds kept on concrete as compared to dirt floors as the disease challenges from organisms present in the difficult to clean environment of dirt floor houses will be controlled. Moreover the cost to New Zealand of an outbreak of an exotic disease such as infectious bursal disease would be significant and would far outweigh the cost of a concrete floor.

Similarly, the New Zealand Poultry Industry does not believe that it is possible to state an effective disinfectant usage rate where dirt floors are used and, as such, the New Zealand Poultry Industry believes that this further strengthens the argument for the concreting of poultry shed floors in any houses on farms intending to export to New Zealand.”

MAFBNZ response:

MAFBNZ agrees that IBDV is a highly resistant pathogen that is particularly difficult to eliminate from the environment and concedes that concrete floors may contribute to optimal efficacy of disinfectants. However, it is expected that flooring will have been ruled out as a source of IBDV during the process to establish the compartment (this conclusion could be based on a 12 month-testing history with negative results immediately prior to freedom recognition of the compartment). Would the compartment lose its IBDV-free status, concrete floors will then be considered as a measure to eradicate the virus from the compartment. Please note that the revised version of the IHS no longer includes appendices.

3.12 The Poultry Industry wrote: “In point 4 – Farm access (Part A: Export Poultry Farms in Australia of Appendix Two), the experience of the Poultry Industry suggests that, unless the standard of washing is clearly detailed, the standard will be open to interpretation, and cleaning may be undertaken in a token manner. The industry therefore requests that the standard either includes detailed cleanout requirements for all vehicles accessing the farm or compartment (point 4.2).

Alternatively, the IHS should, at a minimum, include a requirement for a detailed procedure, which should be included in the biosecurity manual presented to Biosecurity New Zealand by the AQIS and subsequently approved by Biosecurity New Zealand. This procedure should be able to be audited (with this occurring regularly).”

MAFBNZ response:

MAFBNZ shares the Poultry Industry’s views regarding cleanout requirements for all vehicles accessing the export farm. Details of cleaning standard operating procedures will be included in the compartment’s biosecurity plan.

3.13 The Poultry Industry wrote: “The Poultry Industry notes that point 5 of the Processing Plant Declaration and point 5 of the Veterinary Certificate (both included in Section 10 Model Zoosanitary Certificate) both refer to the requirement for poultry meat products to have been cooked at a minimum temperature and for a minimum time period. However this is not reflected in Part B of Appendix 2 and should be included under section 12 Processing and packaging details for consistency and clarity.”

MAFBNZ response:

MAFBNZ acknowledges the importance to stress the requirement of minimum temperature and minimum duration of cooking, although it is already stated in the Processing Plant Declarations (A and B) and in point 5 of the Veterinary Certificate.

4. Laura Scandurra, United States Department of Agriculture (USDA)

4.1 The USDA wrote: “Under the draft “Import Health Standard for the Importation of Specified Processed Poultry Meat Products for Human Consumption from Australia”, an AQIS accredited veterinarian is required to submit a letter attesting that: “(i) there has been no outbreaks of infectious bursal disease on a specified export poultry farm and other farms forming part of the same compartment for at least 12 months prior to the date of application AND (ii) the export poultry farm has had a biosecurity management program which includes a disease monitoring program in place for at least 12 months prior to the date of application.”

Part E of the model import health standard specifies conditions that must be met before the government of New Zealand will recognize a farm or farms as a compartment free from IBDV, including initial polymerase chain reaction (PCR) testing on a statistically valid sample of birds and extensive biosecurity and disease monitoring programs.

Through these requirements, New Zealand appears to be embracing the concept of compartmentalization as defined and recognized by the World Organization for Animal Health or OIE. We commend New Zealand for this demonstrated willingness to accept compartmentalization as a means of risk mitigation.”

MAFBNZ response:

MAFBNZ notes USDA’s positive appreciation and confirms that the present IHS is based on the OIE guidelines on compartmentalisation as stated in the TAHC (2008).

4.2 The USDA wrote: “The United States has several questions regarding the processing requirements. What is the rationale for requiring poultry meat and meat products derived from compartmentalized birds shown to be negative for IBDV to be highly heat processed? Is the required heat processing intended to address diseases of concern other than IBDV? If not, what is the scientific basis for the heat processing requirements? Does New Zealand have scientific data showing that heating poultry products to the required parameters is effective in destroying the IBDV? What is the scientific basis for excluding bone-in chicken parts?”

MAFBNZ response:

Although biosecurity measures accompanying the establishment and maintenance of the compartment aims at guaranteeing the absence of IBDV inside the production system, it is still necessary to apply heat-treatment to the poultry products to mitigate the risks associated with other pathogens. Please refer to page 7 of the MAFBNZ import risk analysis on “Cooked duck meat from Australia” (September 2006) for the list of organisms inactivated at the time/temperature combinations used in the manufacture of the commodities. The statement requiring poultry products to exclude any bones if derived from chicken has been removed.

4.3 The USDA wrote: “The United States contends that there are other risk mitigation factors that should be considered to prevent the entry or spread of IBDV. Although

studies using SPF chicks (naïve birds) challenged with very high dosages of virulent IBDV and euthanized after 72 hours showed that IBDV could be transmitted through tissues harvested from these birds, we do not believe that this study reflects reality or is applicable to vaccination as practiced in the U.S. broiler industry. In the United States, breeder flocks are hyperimmune and their chicks have protective maternal antibodies which protect them until they are about 3 weeks of age. During the time the maternal antibodies are declining, the chicks are exposed to vaccine and/or field IBDV and are developing active immunity. Virus persists in the bursa about 3-4 weeks, and the birds do not go to slaughter until they are between 6-7 weeks of age. The birds should not have detectable field or vaccine viruses after 5 weeks of age. The probability of virus being present in the bursa of birds at the time of slaughter is extremely low.

The minimal IBDV risk associated with slaughtered birds can be further reduced by ensuring the removal of all bursal tissue and avoiding cross contamination of parts with bursal or respiratory tissue (which can be addressed through HACCP); and by limiting imports to parts (instead of whole carcasses); and possibly cooking at reasonable temperatures.

The United States believes these mitigation measures will result in insignificant risks of transmitting IBDV through poultry meat products. Where birds can be shown to be compartmentalized and free of IBDV, the need for additional risk mitigations, including cooking, is questionable.”

MAFBNZ response:

Vaccination is strictly prohibited for birds related to or entering the compartment. MAFBNZ did not comprehend whether USDA suggested that birds should be vaccinated to mitigate the early risk of infection, but can assure that vaccination is not included in the options considered in its risk management.

Epidemiology of infectious bursal disease virus (IBDV) in naturally-infected and non-vaccinated birds shows that virus replicates predominantly in the bursa of Fabricius, but can also spread to other internal organs. The import health standard includes a requirement for both heat treatment/cooking and exclusion of any internal organs from the meat processed into products. It is worth noting that the requirement to remove internal organs and the requirement that birds originate from a compartment free of IBDV make the risk of introducing IBDV through poultry meat products into New Zealand negligible.

5. Leanne Perry-Meyer, Department of Conservation

5.1 The Department of Conservation (DOC) wrote: “[In point 2.2 (p 13, Paragraph 2 – Poultry health status in Part A of Appendix Two)], the use of species implies that species other than poultry (domesticated chickens) could be exported under this IHS, [I] suggest the definition section include what poultry are to be exported, ie just chickens or wild duck, pheasant, turkeys [should] also be included. I got this off the internet and wonder if we can include the actually taxonomic name of the species to be exported ie is it *Gallus gallus* [Chickens are classified as: order: Galliformes, family: Phasianidae, genus: *Gallus* (junglefowl). Four species of junglefowl are recognized. These are: a) *Gallus gallus* (red junglefowl), b) *Gallus varius* (green junglefowl), c) *Gallus sonneratii* (grey junglefowl) and d) *Gallus lafayetii* (Ceylon junglefowl).] The current chickens that are used for both meat and egg production commercially are domesticated fowl and

are the descendants of the red junglefowl species.”

MAFBNZ response:

MAFBNZ notes DOC’s comments regarding the lack of precision in defining poultry species. However the OIE definition of poultry, given page 4 of the IHS defines what the term poultry entails. Please note that the revised version of this IHS no longer includes appendices.

5.2 DOC wrote: “[In paragraph 3 – Hygiene requirements (p13, in Part A of Appendix Two)], I wonder whether you could put an overarching statement at the beginning of this section that all references to cleaning (unless stipulated) will be by a method approved by AQIS and with a disinfectant at a rate known to be effective...”

MAFBNZ response:

MAFBNZ understands DOC’s concern since only few disinfecting procedures have shown to be efficient against IBDV. Procedures of disinfection will be detailed in the compartment’s biosecurity plan.

5.3 DOC suggested that the following statement “and this process” should be inserted after “top layers of soil from each poultry house, and...” (p13, line 5 in point 3.2 in Part A of Appendix Two).

MAFBNZ response:

MAFBNZ notes DOC’s comment, the revised version of this IHS no longer includes appendices.

5.4 DOC wrote: “In paragraph 3.3 (p13, point 3 - Hygiene requirements in Part A of Appendix Two), [I] suggest you include that if there are multiple sources of water (i.e. rain, bore or separate tanks etc) supply each will need testing independently”.

MAFBNZ response:

Such precision on the export’s farm water supply will be provided in the compartment’s biosecurity plan.

5.5 DOC suggested that the following statement “independently and” should be inserted after “all sheds must operate...” (p15, line 3 in point 7.4 in Part A of Appendix Two). DOC similarly advised to add the statement “and contamination by any avian species is prevented” at the end of the sole sentence of paragraph 8.1 (p15, point 8 – Supplies, in Part A of Appendix Two).

MAFBNZ response:

MAFBNZ notes DOC’s suggestion. Further details with regards to avoiding contamination by wild birds will be detailed in the biosecurity plan. Please note that the revised version of this IHS no longer includes appendices.

5.6 In the paragraph 8.3 in the section 8 – Supplies (p15, Part A of the Appendix Two), the Department of Conservation advises that it would be more relevant to require that litter and feed trucks be cleaned and disinfected prior to being loaded with litter/feed for the export farm rather than after having been used for a facility that does not belong to the compartment.

MAFBNZ response:

MAFBNZ notes DOC’s advice. Details on procedures guaranteeing that trucks have been

cleaned and disinfected immediately prior to be used for the compartment will be included in the compartment's biosecurity plan. Please note that the revised version of this IHS no longer includes appendices.

- 5.7** DOC suggested that any species likely to act as vectors of infectious bursal disease should be mentioned in paragraph 8.4 (p15, line 3 in point 7.4 in Part A of Appendix Two).

MAFBNZ response:

Given that the mode of transmission of IBDV is faecal-oral, vermin, but very improbably insects, could vehicle infected material.

However, vermin and insect control in the poultry houses will be part of the farm's general biosecurity measures and details of the general hygiene procedures will be given in the compartment's biosecurity plan.

- 5.8** DOC similarly advised to insert the statement "immediately or within a reasonable time" after "...export poultry farm must occur" in paragraph 8.5 (p15, line 1, point 8 – Supplies, in Part A of Appendix Two).

MAFBNZ response:

MAFBNZ does not think that this addition would significantly increase the level of biosecurity and in this decrease the risk of cross-contamination with farms not recognised as IBDV-free compartments. In contrary, the lack of precision expressed by "reasonable" may be misleading.

- 5.9** In paragraph 9.1 (p15, point 9 – Equipment used in poultry houses, in Part A of appendix Two), DOC questioned the relevance of the 24 hour stand-down to ensure that the treatment is efficacious at this step of the procedure.
In paragraph 9.2 of the same section, DOC noted that there was no stand down required for the equipment before it can be used in a different poultry house. DOC questioned the relevance of a stand-down for equipment within the compartment but acknowledges the importance of stand-down at the processing plant. It also suggested that transports should respect a stand-down period but given the inconvenience caused by such a procedure, it would be ideal to disinfect transport structures at a "higher disinfectant dose giving equivalent efficacy" to a stand-down period.

MAFBNZ response:

The 24 hour-stand-down period required after cleaning is part of standard procedures followed regardless of an export farm being part of a compartment. MAFBNZ feels that this stand-down period should be maintained for consistency of the biosecurity procedures.

The reason why no stand-down period is required for the equipment in clause 9.2 is that the equipment stays on the compartment's export farm. Therefore MAFBNZ does not consider the movement of equipment within the export farm as a critical point. A stand-down period for this equipment would significantly impede the production cycle, with a risk to compromise biosecurity measures along the production chain in the compartment.

- 5.10** DOC noted that there was a lack of precision on the conditions of the stand-down period between processing of products not belonging to the compartment and processing of those belonging to it (p16, paragraph 11.1, point 11 – Hygiene requirements, in Part B of the Appendix Two). The end of the first sentence should be amended as follows:
"...must occur before processing of poultry products for export to New Zealand as the first batch of birds of the new processing run".

MAFBNZ response:

MAFBNZ acknowledges DOC's suggestion and the conditions of stand-down periods will need to be detailed in the biosecurity plan.

5.11 DOC underlined the importance of being more specific about the definition of a “break” as referred to in paragraph 12.1 (point 12 – Processing and packaging details, in Part B of the Appendix Two). This is to ensure that the break and any activities that occur during this time are unlikely to present a contamination risk.

MAFBNZ response:

MAFBNZ notes DOC's comments. By “break”, MAFBNZ meant a period of inactivity (cease of production chain) to ensure that all products from the compartment have been processed and that only processed meat products originated from the compartment are packaged in cartons and labelled as such. To avoid cross-contamination, the processing plant should be cleared of any products from the compartment before any poultry (live and/or meat products) not originating from the compartment (or not identified as such) could be present at the processing plant.

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Appendix 1: Copies of Submissions

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1. Paul Gilchrist, Luv-A-Duck Pty Ltd

From: Paul Gilchrist

Sent: Friday, 30 November 2007 11:43 p.m.

Subject: [Requires Classification] Comment on November Version IHS cooked duck meat.

Comment on November version of IHS
[...] there are a few comments to make.

Page 13. Appendix 2 -

I note that chlorine is still checked at drinker level despite my earlier comments that this does not make practical or scientific sense -testing at the header tank makes more sense.

Page 15. Item 7.5

Still unchanged despite my comment that stocking density and multiple pick-ups are irrelevant while the confinement of the export batch to a single pickup is relevant. However this does not affect LAD.

Page 15. Item 8.5

"or litter" should be included in second line after "feed".

Page 16 item 12.1

Insert "a" after "there must be " in second line.

Paul

Warraba Consulting Pty Ltd
Paul Gilchrist Meyrick Gilchrist
0415467072 0410614014
25/1 Fig Tree Avenue
Abbotsford NSW 2046
Australia

2. Merilyn Elson, Mrs Mac's Pty Ltd



Mrs Mac's Pty Ltd
5-9 Marchant Way
Morley WA 6062

21st January 2008

Mrs Mac's has been exporting a range of meat pies, pasties and sausage rolls from Australia to New Zealand for over 10 years. During that time we have become a leading brand in the market place with a growing band of loyal consumers and satisfied customers.

For the last 5 years we have made numerous approaches to the authorities to allow us to expand our product range to include chicken pies. These pies have proven popular in Australia over many years and we are confident that they will perform well in New Zealand along side locally produced chicken pies.

Over this time we have communicated both verbally and in writing with MAF, AQIS and Austrade New Zealand on the matter and have been told that the issue is related to IBD (infectious bursal disease). It was recommended that we wait, as a new Health Standard was to be drafted for cooked chicken products into New Zealand that would clarify the matter more, as there were some inconsistencies.

It is a little disconcerting that all of these approaches appear to have not been recorded as commercial expressions of interest. We certainly have a paper trail that reaches back many years and are eager to get this issue resolved so we can capitalise on a further trade opportunity. Whilst we understand the biosecurity issues, we are very keen to ensure that a system can be implemented that is both achievable and affordable for Australian chicken meat suppliers.

Having now had a chance to read the draft standard, discussions with our chicken meat supplier indicate that they will not be able to comply. They have no issue with the processing, but source their birds from Inghams. Inghams have indicated that despite vaccinating parent stock, they will not be able to eliminate all traces of the IBDV from their flock, even though we don't see the disease here as such. They cannot anticipate any chicken supplier in Australia being able to achieve this, and in fact question whether it is the same in New Zealand.

There are various strains of IBDV internationally. The strain that we have in Australia is of low pathogenicity and is of little consequence. This is unlike the European and American strains which would be much more of a concern.

The process for cooking of chicken meat for our pies is a long one. The processor cooks the meat for 6 hours, bringing it up to 78°C. It is then cooked twice more times by us - once in the filling and once as a finished product. It is highly unlikely that a virus could survive this rigorous process, even as a residual risk. In the event it did survive, what is the chance of a chicken pie coming into contact with a live chicken in New Zealand?

It would appear that there has been no real easing of restrictions in the new draft import standard. Technical barriers to trade to protect industry from fair competition should be avoided wherever possible.

As an alternative we investigated the idea of importing chicken meat from New Zealand, processing it into pies, then exporting it back. This practice was also not allowed at the time, but appears to be an option under the proposed standard - Part B 5.2. This has proven not to be economically viable however, as we are paying two lots of freight charges in effect.

We believe that this draft import health standard is still too restrictive and will have no effect on easing trade restrictions. We would ask that you reconsider in an effort to get a workable system for all.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'M. Elson', written in a cursive style.

Marilyn Elson

(Marketing Manager)
B App Sc, Grad Cert Mark

(08) 9442 5222
0416 259 716

3. Michael Brooks, New Zealand Poultry Industry



Poultry Industry Association of New Zealand (Inc)

1st Floor, 96D Carlton Gore Road, Auckland 1001, New Zealand

Phone: 64 9 520 4300

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Email: michael@pianz.org.nz

Vivian Dalley

Import Standards Group

Border Standards Directorate

MAF Biosecurity New Zealand

P. O. Box 2526

Wellington

18 February 2008

Dear Vivian

Import Health Standard for the Importation of Specified Processed Poultry Meat Products for Human Consumption from Australia

The Poultry Industry Association of New Zealand (PIANZ) and the Egg Producers Federation of New Zealand (EPF) have reviewed the draft Import Health Standard for the Importation of Specified Processed Poultry Meat Products for Human Consumption from Australia (hereafter referred to as the draft IHS). The New Zealand Poultry Industry (including PIANZ and the EPF) notes the following points in this regard to the draft IHS.

Part B Importation Procedure

5 Permit to Import

Point 5.2 states that a permit to import is not required if the poultry products originate from export farms in New Zealand and are only processed in Australia. Industry acknowledges the logic behind this requirement. However industry suggests in the interests of clarity that point 5.2 be reworded to read “A permit to import is not required if the poultry products originate from export farms in New Zealand, are only processed in Australia and are kept separate from any product which is not derived from New Zealand or intended for export to New Zealand at all stages in the production process”.

7 Eligibility

The Poultry Industry requests that point 7.4 be amended to read “Where serological tests are required, these tests must be carried out at a laboratory approved by the Australian Quarantine Inspection Service (AQIS) using a test approved by AQIS”.

Part D Zoosanitary Certificate

10 Model Zoosanitary Certification

Export Poultry Farm Declaration

The New Zealand Poultry Industry strongly believes that the declarations required in this section do not sufficiently demonstrate that a compartment has been established and maintained, particularly in those areas where diseases are endemic.

Industry reiterates an earlier observation that the concept of compartmentalisation can be used in one of two ways:

1. to ensure and subsequently demonstrate the maintenance of freedom in a compartment in the face of an outbreak in a previously free country (such as highly pathogenic avian influenza in New Zealand)
2. to attain and maintain freedom from disease in a compartment in a country where the presence of a disease is endemic.

Industry strongly believes that the establishment of a compartment, as described in this draft IHS, refers to the second situation. It is therefore essential that sufficient evidence is provided by the exporter to demonstrate unequivocally both the animal health status of the compartment and the ability of the compartment to maintain its status.

Industry notes that under the current wording of this section of the IHS, the integrity of the compartment need only be maintained for a single production period and as such industry believes that this is in conflict with the intention of the concept of compartmentalisation as it is not appropriate to “switch on / switch off” compartments, for short periods, as and when it becomes expedient to do so. Furthermore, industry believes that where a compartment is established, compartmentalisation must be maintained for the same time period as that over which disease freedom must be demonstrated. If the requirements for compartmentalisation are not met on an ongoing basis, it will not be possible to argue that there is ongoing freedom from disease and an absence of epidemiological links with poultry flocks external to the compartment. Similarly, if biosecurity measures are “turned on / turned off” as and when required, the chances of an accidental breach of biosecurity will increase dramatically and consequently the integrity of the compartment is likely to be questionable.

Industry acknowledges the requirements listed in **Appendix One of Part E: Appendices** for Biosecurity New Zealand to recognise the export poultry farm as a compartment free of infectious bursal disease, and further acknowledges that this will go some way to addressing the concerns that freedom from disease must be demonstrated unequivocally. However, industry is concerned that the current time frame over which a compartment must be maintained (and which may be as little as one production cycle) is not a sufficient time period to demonstrate both freedom from and the ability to continually maintain freedom from infectious bursal disease in a compartment, particularly as the disease is not only hardy but endemic in Australia.

Industry requests that point 1 of the Export Poultry Farm Declaration is reworded to read “The integrity of the export poultry farm as a compartment has been maintained for at least 12 months prior to the scheduled date of slaughter”. Similarly, point 1 of the Veterinary Certificate should also be reworded to read “The export poultry farm has maintained its status as a compartment free from infectious bursal disease (according to Chapter 1.3.5 on zoning and compartmentalisation in the *Terrestrial Code*) for at least 12 months prior to the scheduled date of export”.

Processing Plant Declaration

Point 3 requires that poultry meat products are derived from birds that passed ante-mortem and post-mortem inspection by appropriately trained operators. Although Industry is aware that the clause is included to ensure that poultry products meet the human consumption specifications, it is currently unclear whether or not the clause intends for inspectors to examine the bursa or those poultry which may show clinical signs of the disease, i.e. chickens. Industry strongly suggests that ante- and post- mortem inspectors be trained to examine the bursa of chickens processed for export to New Zealand, and any other chickens which are taken from the same the compartment, to ensure that any possible breach in biosecurity is identified at an early stage.

It is similarly unclear what is meant by “appropriately” trained operators, as there is no stated minimum standard to which operators must be trained. Industry suggests that this should point should be reworded to read “The poultry meat products were derived from birds that passed ante-mortem and post-mortem inspection by operators trained to a level equivalent to the New Zealand specifications at the time of slaughter and the products are sound and fit for human consumption”.

Veterinary Certificate

Industry notes the requirement under point 2.4, for birds to be subjected to an infectious bursa disease ELISA. Industry has highlighted on two previous occasions concerns regarding the proposed use of an ELISA for the serological testing of ducks. Copies of our previous letters relating to this issue are attached for your information.

Industry strongly believes that any ELISA test which is used in determining the serological status of any export flocks must be validated for use in that particular species. Furthermore industry believes that the test must be accepted as appropriate by the Veterinary Authority of the exporting country. Industry suggests that point (ii) of point 2.4 be reworded to read “infectious bursal disease ELISA, approved for use by the Veterinary Authority of the exporting country, on a sufficient number of serum samples to be able to detect a prevalence of 10% with a confidence of 99%”.

Part E Appendices

Appendix One: Export farms and processing plants approved by MAFBNZ for the export of poultry meat products from Australia to New Zealand

Point 2 currently states “AQIS sends PCR test results for infectious bursal disease virus on a sufficient number of bursae to be able to detect a prevalence of 20 %, with a confidence of 99 %, which indicates that the export farm is a compartment free from infectious bursal disease. It is unclear to the New Zealand Poultry Industry why the requirement included in point 4.2 of the section Veterinary Certificate (included in **Section 10 Model Zoosanitary Certificate**), which requires infectious bursal disease ELISA on a sufficient number of serum samples to be able to detect a prevalence of 10 % with a confidence of 99 %, is not included?

Industry notes that point 2.1.1 states “initial PCR test result for infectious bursal disease virus which indicate that any Australian export farms are compartments free from infectious bursal disease”. Industry is strongly opposed to the wording of this point and to the suggestion that a compartment can be defined solely on the basis of PCR test results alone. Furthermore, Industry is gravely concerned at the inference that any export farm is free from infectious bursal disease, despite the fact that PCR results may not have been provided for all farms. Industry does not support the inclusion of this point in its current format and suggests that this point be reworded as follows “initial PCR test results for infectious bursal on a sufficient number of bursae to be able to detect a prevalence of 20%

with a confidence of 99%. These test results will be used to evaluate the infectious bursal disease free status of the farms for which the test results are supplied at the time of application for recognition of the compartment”.

Similarly point 2.1.2 should be reworded to read “the disease monitoring programmes and the biosecurity manuals for those Australian export poultry farm seeking recognition as a compartment in order that these can be assessed by MAFBNZ”.

Industry notes that while point 3 of **Appendix One** allows for the recognition of a compartment by Biosecurity New Zealand, there does not appear to be a requirement in the draft IHS for regular auditing of the compartment by Biosecurity New Zealand, or, at least, a minimum requirement to advise Biosecurity New Zealand of any changes to the animal health status, the disease monitoring programme in place for the export poultry farm or the biosecurity manual for the export poultry farm. As maintenance of a compartment, through biosecurity measures laid out in the appropriate biosecurity manual, is key to the concept of compartmentalisation, it is essential that Biosecurity New Zealand be advised of any changes to or deviations from the disease monitoring programme in place or to the biosecurity manual. Furthermore, it is essential that these changes are approved by Biosecurity New Zealand. Industry notes that the chapter on Zoning and Compartmentalisation currently included in the OIE Terrestrial Animal Health Code (TAHC) is undergoing review and that proposed amendments to the code have been made. Industry notes that Article 3.x.x.8 of the draft chapter on zoning and compartmentalisation currently requires that any significant change in biosecurity be notified to the importing country. Industry has proposed that all changes must be notified as the decision of what is “significant” and what is not is extremely subjective. Industry believes that it is imperative that this requirement is listed in the IHS so that any one intending to export to New Zealand is aware of the minimum requirements and their obligations.

The Industry acknowledges that point 1 of the Veterinary Certificate (included in **Section 10 Model Zoosanitary Certificate**) requires the official veterinarian to state that “the export poultry farm has maintained its status as a compartment free from infectious bursal disease according to Chapter 1.3.5 on zoning and compartmentalisation in the *Terrestrial Code* ...”. However, the concept of compartmentalisation is not based solely on disease freedom, but rather on the definition of an animal subpopulation in regards to “management and husbandry practices related to biosecurity”, as stated in the *Terrestrial Code*.

Industry has highlighted, on more than one occasion, the importance, at this early stage in the international application of any new concept (such as compartmentalisation) designed to mitigate the risks associated with trade in live animals or animal products, of ensuring clarity of process and to adopt a precautionary approach, until such time as the appropriateness of the concept has been proven or established. Any models for compartmentalisation should be based on clearly evident and proven epidemiological separations, which must be maintained on an ongoing basis, and which must be auditable.

Therefore, the industry strongly believes that an audit of the biosecurity practices in place within the compartment must be undertaken on at least a yearly basis and that the status of the compartment should only be retained on successful completion of the audit. As with the previous point, industry believes that this requirement must be stated in the IHS to ensure clarity and to ensure that all exporters are aware of their obligations to New Zealand.

Appendix Two: MAFBNZ Standard for maintenance of infectious bursal disease freedom in poultry meat products exported to New Zealand

Part A: The Export Farm

2 Poultry health status

The New Zealand poultry industry is concerned that, despite the requirement for birds where the cause of death is not immediately apparent to be examined for signs of infectious bursal disease, it is still possible that birds which have died of undetermined causes may not be submitted to a laboratory for confirmation of an infectious bursal disease negative status. As such, the New Zealand Poultry Industry requests that Biosecurity New Zealand amend point 2.2 to state "For species of birds in which clinical signs of infectious bursal disease occur, any dead birds where the cause of death is not immediately apparent must be examined for infectious bursal disease. Where clinical signs are suggestive of infectious bursal disease, samples must be sent to a laboratory approved by AQIS. In addition, samples from any birds where the cause of death cannot be determined from observation of clinical signs must be sent to a laboratory approved by AQIS, to ensure that the presence of infectious bursal disease can be ruled out. The supervising veterinarian must notify MAFBNZ and AQIS within 24 hours of suspecting a case of infectious bursal disease, or where the cause of death cannot be determined from observation of clinical signs, so that exports to New Zealand can be suspended until laboratory confirmation of negative results".

3 Hygiene requirements

The Industry notes that extensive clean out and disinfection of each poultry house is required, along with disinfection using a disinfectant at a rate known to be effective against infectious bursal disease and approved by AQIS. However, the New Zealand Poultry Industry notes that the infectious bursal disease virus is a particularly hardy virus and difficult to eliminate from the environment. Similarly, it is difficult to thoroughly and effectively clean dirt floors, a common feature of many poultry houses in Australia. For example, McFerran (1993)¹ stated “IBDV is a very resistant virus and it is virtually impossible to disinfect open-sided housed or those with earth floors”

The New Zealand Poultry Industry is concerned that, although the draft IHS requires extensive clean out and the removal of the top layers of soil, the requirements are still subjective and open to interpretation. Industry believes that a minimum requirement should be that floors are concreted. Industry acknowledges that this may be an added expense for an export farm. However industry notes that the likely benefit of gaining certification for export to New Zealand should offset this cost. In addition, there is likely to be an increase in the performance of birds kept on concrete as compared to dirt floors as the disease challenges from organisms present in the difficult to clean environment of dirt floor houses will be controlled. Moreover the cost to New Zealand of an outbreak of an exotic disease such as infectious bursal disease would be significant and would far outweigh the cost of a concrete floor.

Similarly, the New Zealand Poultry Industry does not believe that it is possible to state an effective disinfectant usage rate where dirt floors are used and, as such, the New Zealand Poultry Industry believes that this further strengthens the argument for the concreting of poultry shed floors in any houses on farms intending to export to New Zealand.

4 Farm access

The experience of the Poultry Industry suggests that, unless the standard of washing is clearly detailed, the standard will be open to interpretation, and cleaning may be undertaken in a token manner. The industry therefore requests that the standard either includes detailed cleanout requirements for all vehicles accessing the farm or compartment (point 4.2). Alternatively, the IHS should, at a minimum, include a requirement for a detailed procedure, which should be included in the biosecurity manual presented to Biosecurity New Zealand

¹ McFerran, J. B., 1993. Infectious Bursal Disease: In: *Virus Infections of Poultry*. Eds. McFerran and McNulty, M.S., Elsevier Science Publishers B.V., Amsterdam, The Netherlands, pages 213 - 227.

by the AQIS and subsequently approved by Biosecurity New Zealand. This procedure should be able to be audited (with this occurring regularly).

Part B: The Processing plant

12 Processing and packaging details

The Poultry Industry notes that point 5 of the Processing Plant Declaration and point 5 of the Veterinary Certificate (both included in **Section 10 Model Zoosanitary Certificate**) both refer to the requirement for poultry meat products to have been cooked at a minimum temperature and for a minimum time period. However this is not reflected in **Part B** of **Appendix 2** and should be included under **section 12 Processing and packaging details** for consistency and clarity.

The New Zealand Poultry Industry appreciates the opportunity to provide input on the draft IHS at this stage in the development process.

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

Kind regards

Michael Brooks
Executive Director

4. Laura Scandurra, United States Department of Agriculture

From: Scandurra, Laura

Sent: Wednesday, 5 March 2008 12:42 p.m.

Subject: [Requires Classification] US Comments on poultry

As promised, the following are our comments on poultry.

Cheers, Laura

BEGIN COMMENTS

The United States appreciates the opportunity to comment on the proposed import health standard for poultry meat products for human consumption from Australia, as notified to the World Trade Organization in G/SPS/N/NZL/390. Although this notification pertains to imports from Australia, it addresses restrictions due to infectious bursal disease virus (IBDV), a pathogen that also negatively impacts the ability of the United States to export poultry meat products to New Zealand even though the United States, like Australia, does not have the virulent form of IBDV.

Compartmentalization

Under the draft "Import Health Standard for the Importation of Specified Processed Poultry Meat Products for Human Consumption from Australia", an AQIS accredited veterinarian is required to submit a letter attesting that: "(i) there has been no outbreaks of infectious bursal disease on a specified export poultry farm and other farms forming part of the same compartment for at least 12 months prior to the date of application AND (ii) the export poultry farm has had a biosecurity management program which includes a disease monitoring program in place for at least 12 months prior to the date of application."

Part E of the model import health standard specifies conditions that must be met before the government of New Zealand will recognize a farm or farms as a compartment free from IBDV, including initial polymerase chain reaction (PCR) testing on a statistically valid sample of birds and extensive biosecurity and disease monitoring programs.

Through these requirements, New Zealand appears to be embracing the concept of compartmentalization as defined and recognized by the World Organization for Animal Health or OIE. We commend New Zealand for this demonstrated willingness to accept compartmentalization as a means of risk mitigation.

Processing Parameters

In addition to the requirement for compartmentalization of the farms from which the birds are sourced, New Zealand is prohibiting the importation of any internal organs, such as the bursa of Fabricius, crop, gizzard, heart, intestine, kidney, liver, proventriculus, or spleen; as well as any poultry products containing bones and/or respiratory tissue if derived from chicken.

New Zealand is also requiring the poultry meat products derived from compartmentalized birds/farms in Australia to be cooked to a minimum core temperature of greater than 60 degrees Celsius for at least 30 minutes, and within this 30 minute period the meat and meat products must have achieved a minimum core temperature of greater than 80 degrees Celsius for at least 10 minutes.

The United States has several questions regarding the processing requirements. What is the rationale for requiring poultry meat and meat products derived from compartmentalized birds shown to be negative for IBDV to be highly heat processed? Is the required heat processing intended to address diseases of concern other than IBDV? If not, what is the scientific basis for the heat processing requirements? Does New Zealand have scientific data showing that heating poultry products to the required parameters is effective in destroying the IBDV? What is the scientific basis for excluding bone-in chicken parts?

Other Risk Mitigations

The United States contends that there are other risk mitigation factors that should be considered to prevent the entry or spread of IBDV. Although studies using SPF chicks (naïve birds) challenged with very high dosages of virulent IBDV and euthanized after 72 hours showed that IBDV could be transmitted through tissues harvested from these birds, we do not believe that this study reflects reality or is applicable to vaccination as practiced in the U.S. broiler industry. In the United States, breeder flocks are hyperimmune and their chicks have protective maternal antibodies which protect them until they are about 3 weeks of age. During the time the maternal antibodies are declining, the chicks are exposed to vaccine and/or field IBDV and are developing active immunity. Virus persists in the bursa about 3-4 weeks, and the birds do not go to slaughter until they are between 6-7 weeks of age. The birds should not have detectable field or vaccine viruses after 5 weeks of age. The probability of virus being present in the bursa of birds at the time of slaughter is extremely low.

The minimal IBDV risk associated with slaughtered birds can be further reduced by ensuring the removal of all bursal tissue and avoiding cross contamination of parts with bursal or respiratory tissue (which can be addressed through HACCP); and by limiting imports to parts (instead of whole carcasses); and possibly cooking at reasonable temperatures.

The United States believes these mitigation measures will result in insignificant risks of transmitting IBDV through poultry meat products. Where birds can be shown to be compartmentalized and free of IBDV, the need for additional risk mitigations, including cooking, is questionable.

END COMMENTS

Laura Scandurra
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5. Leanne Perry-Meyer, Department of Conservation

Hi Aurelie

Please find attached a tracked changed version of the IHS with some further minor comments for you to consider.

Do not hesitate to contact me if you require further assistance.

Yours

Leanne Perry-Meyer

Biosecurity Technical Officer

DoC

Wellington

IMPORT HEALTH STANDARD FOR THE IMPORTATION OF SPECIFIED PROCESSED POULTRY MEAT PRODUCTS FOR HUMAN CONSUMPTION FROM AUSTRALIA

[...]

APPENDIX TWO: MAF-BNZ STANDARD FOR MAINTENANCE OF INFECTIOUS BURSAL DISEASE FREEDOM IN POULTRY MEAT PRODUCTS EXPORTED TO NEW ZEALAND

[...]

PART A: EXPORT POULTRY FARMS IN AUSTRALIA

2.2 For **species** of birds in which clinical signs of infectious bursal disease occur, any dead birds where the cause of death is not immediately apparent must be examined for infectious bursal disease. Samples from any birds with clinical signs suggestive of infectious bursal disease must be sent to a laboratory approved by AQIS. The supervising veterinarian must notify MAF-BNZ and AQIS within 24 hours of suspecting a case of infectious bursal disease, so that exports to New Zealand can be suspended until laboratory confirmation of negative results.

Comments: Page: 32

The use of species implies that species other than poultry (domesticated chickens) could be exported under this IHS, suggest the definition section include what poultry are to be exported, ie just chickens or will duck, pheasant, turkeys also be included. I got this off the internet and wonder if we can include the actually taxonomic name of the species to be exported ie is it *Gallus gallus* [Chickens are classified as: order: Galliformes, family: Phasianidae, genus: *Gallus* (junglefowl). Four species of junglefowl are recognized. These are: a) *Gallus gallus* (red junglefowl), b) *Gallus varius* (green junglefowl), c) *Gallus sonneratii* (grey junglefowl) and d) *Gallus lafayetii* (Ceylon junglefowl). The current chickens that are used for both meat and egg production commercially are domesticated fowl and are the descendants of the red junglefowl species.]

3 Hygiene **requirements**

3.1 Disinfection must be with a disinfectant at a rate known to be effective against infectious bursal disease and approved by AQIS.

Comments: I wonder whether you could put an overarching statement at the beginning of this section that all references to cleaning (unless stipulated) will be by a method approved by Aquis and with a disinfectant at a rate known to be effective...

3.2 An AQIS approved regime of extensive clean-out and disinfection of each poultry house in the export poultry farm including all entranceways and all associated equipment (including drinker lines) must occur between batches of birds and prior to arrival of the first batch of birds. This clean-out regime must involve removal of all litter and top layers of soil from each poultry house, and this process must be recorded and subjected to regular internal audits.

3.3 Water used on the export farm must be: suggest you include that if there are multiple sources of water (i.e. rain, bore or separate tanks etc) supply that each will need testing independently

EITHER i) tested weekly and found to be chlorinated to a level between 2-3 ppm measured at drinker level

- OR ii) tested during the production cycle and found to be potable according to Australian standards for *E.coli* and coliforms.

[...]

7 Birds for export to New Zealand

- 7.1 All birds in the export poultry farm must not have been vaccinated against infectious bursal disease.
- 7.2 All birds in the export farm must be transported as day-old juveniles to the export poultry farm in clean and either new unused or disinfected containers.
- 7.3 The day-old juveniles must be accompanied by company documentation from the hatchery which states that all birds in the hatchery were hatched from eggs which had been disinfected according to Appendix 3.4.1 of the *Terrestrial Code*. The egg disinfection practices must be subjected to annual auditing by an AQIS accredited veterinarian against Appendix 3.4.1 of the *Terrestrial Code*.
- 7.4 The export poultry farm must operate as an all-in all-out production cycle, where the birds arrive as day-old juveniles and are resident in the export poultry farm until they are sent for processing. Should more than one shed exist on any given farm, all sheds must operate independently and under the same all-in-all-out system.
- 7.5 No partial depopulation or thin-out operations must occur on the farm supplying the export birds. They must be placed at a density that will result in birds being picked up and processed in one complete operation.

8 Supplies

- 8.1 Litter used on the export poultry farm must be clean, not contaminated by rodents or vermin and sourced from a site where contact with poultry is prevented and contamination by any avian species is prevented.
- 8.2 No used litter is to be stockpiled on the farm, and any spilt litter at the end of a production cycle must be cleaned up before any new batches of birds are placed on the farm.
- 8.3 Litter and feed trucks must be cleaned and disinfected with an AQIS approved disinfectant inside and out after being loaded with litter or feed for farms not recognised as compartments free from infectious bursal disease better to say prior to being loaded with litter /feed for a compartment farm. Whether it is disinfected whilst they service other farms is irrelevant
- 8.4 There must be at least a 24 hour stand-down period after this cleaning and disinfection prior to being loaded with litter or feed for the export poultry compartment farm. During this stand-down period, the trucks must be maintained free from any contamination by insects, vermin and birds or avian material. Nothing that the other species may act as vectors of the disease
- 8.5 Supply of litter and feed to the export poultry farm must occur immediately or within a reasonable time (YOU pick) after the stand-down period and prior to delivery of feed to any farms not recognised as compartments free from infectious bursal disease.

9 Equipment used in poultry houses

- 9.1 All equipment must be thoroughly cleaned and disinfected with an AQIS approved disinfectant prior to being used inside poultry houses. In particular, poultry transport crates and catching equipment must follow this regime of cleaning and disinfection and must be subject to a 24 hour stand-down what is the purpose of the stand down period here to ensure that the treatment is efficacious? after disinfection prior to being used to collect birds from the export poultry farm.
- 9.2 Note, no stand down here so maybe we need to think when and where stand down is necessary definitely at the processing plant, possible at the transporters but this could be inconvenient, could a higher disinfectant dose give equivalent efficacy? Any equipment moving from one poultry house to another must be thoroughly cleaned and disinfected before being transferred. Any such movement of equipment in and out of poultry houses on the export poultry farm must be recorded in a log book.

PART B: THE PROCESSING PLANT

10 Auditing and records for the processing plants

- 10.1 The primary and secondary processing plants must operate according to and be audited by the Veterinary Authority against the *Australian Standard for Construction of Plants and Hygienic Production of Poultry for Human Consumption AS 4465: 2005* at least on an annual basis.
- 10.2 Records must be kept of each production batch ensuring traceability of each batch of product for export and non-export production.

11 Hygiene requirements

- 11.1 To prevent cross-contamination of poultry carcasses with infectious bursal disease virus, extensive cleaning and disinfection of the processing plants and equipment must occur before processing of poultry products for export to New Zealand as the first batch of birds of the day if they are a 24 hour processor this could be problematic, possibly better to say first batch of birds of the new processing run. This must involve at least a 24 hour stand-down period between the end of production not for export to New Zealand and processing of poultry products for export to New Zealand.
- 11.2 This cleaning must comply with the *Australian Standard: Guide to Cleaning and Sanitising of Plant and Equipment in the Food Industry. AS 4709: 2001* and involve the use of chlorine-based disinfectants effective in the reduction of infectious bursal disease virus.

12 Processing and packaging details

- 12.1 To ensure that batches for export to New Zealand are clearly demarcated and separation maintained, there must be break between the processing of these birds and other birds not for export to New Zealand important to be more specific about what a 'break' is to ensure that the break and any activities that occur during this time are unlikely to present a contamination risk
- 12.2 During processing, storage and transport, poultry meat products for export to New Zealand must be maintained separate from any other poultry meat products or other avian products not intended for export to New Zealand.
- 12.3 All products for export to New Zealand must be packaged in cartons with tamper-evident seals on completion of processing.
- 12.4 The packaging used for processed poultry products for export to New Zealand must be new and clean, and have been stored in a manner to prevent any cross contamination with any avian materials.

Comments provided on behalf of the Department of Conservation by:

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