

**REVIEW OF SUBMISSIONS ON:**

**DRAFT IMPORT HEALTH STANDARD FOR THE IMPORTATION  
INTO NEW ZEALAND OF HIDES AND SKINS**

Ministry of Agriculture and Forestry  
Wellington  
New Zealand

15 June 2011

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Ministry of Agriculture and Forestry  
Te Manatu Ahuwhenua, Ngaherehere  
Pastoral House  
25 The Terrace  
P O Box 2526  
Wellington  
New Zealand

Telephone: +64 4 894 0100  
Facsimile: +64 4 894 0733  
Internet: <http://www.maf.govt.nz>  
<http://www.biosecurity.govt.nz>

Standards Branch  
MAF

**REVIEW OF SUBMISSIONS ON:**

**DRAFT IMPORT HEALTH STANDARD FOR THE IMPORTATION**

**INTO NEW ZEALAND OF HIDES AND SKINS**

15 June 2011

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 hides and skins from all countries was notified for consultation on 29 March 2011.

MAF received submissions from the following:

<b>Name</b>	<b>Organisation</b>
Ray Watson	Slinkskins Ltd
Sue Cooper	New Zealand Leather and Shoe Research Association Inc. (LASRA)
Stephen Webley	G L Bowron & Co Ltd
David Burt	Federated Farmers of New Zealand
Laura Scandurra	United States Department of Agriculture (USDA)

This document summarises the issues raised in the submissions, and presents the MAF response to each.

## Review of submissions

### 1 Ray Watson – Slinkskins Ltd

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- 1.1 For clause 21 suggest the heading should read Casualty Skins which would include (slink lamb, slink calf) and also included in this area should be (possum skins and fox skins).

**MAF Response:** MAF have reworded this heading to read “casualty skins” A clause has been added to define casualty skins and clarify that they may only be derived from ovine and bovine species.

Salted or dried possum and fox skins are not covered by the scope of this standard. No risk analysis has been conducted for these species and MAF is not aware of any request for the commercial importation of these products. Any request would have to be considered under the import health standard prioritisation process.

- 1.2 Request clearer clarification that casualty skins (slink skins) are not required to be subjected to ante and post-mortem inspection.

**MAF Response:** The standard has been edited to make it clear that casualty skins are not required to be subjected to ante- and post-mortem inspection.

### 2 Dr. Sue Cooper - LASRA

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- 2.1 We request that partially tanned material be included in this standard. We define this as material that has been treated with a cross-linking agent (pickling does not involve cross-linking of collagen) to an extent which increases its thermal stability, but not to the degree that a full tannage would. A partial tannage may be reversible or irreversible. Although partially tanned material is stable and can be stored, its storage life is finite and further treatment is required before it is ready for the next stage of processing

**MAF Response:** Since pickled or limed hides and skins pose no biosecurity risk MAF have amended the standard to cover any material provided it has been subjected to either process. The standard now reads:

1. Processed hides and skins may be imported from any country and from any species. They must be accompanied by either a manufacturer’s declaration or a veterinary certificate stating that:
  - a. the hides and skins have been subjected to a liming process at a pH equal to or greater than 12.5; AND/OR
  - b. the hides and skins have been subjected to a pickling process in a solution of salt and mineral acid at a pH equal to or less than 4.

Processed hides and skins have been defined in the standard as hides or skins that have been pickled and/or limed and/or tanned. This includes wet whites, wet blues, and wet browns.

- 2.2 Where appropriate, we recommend that the words “this includes re-importation of material of New Zealand origin” be included, as the standards previously covering re-importation will be revoked by this new standard.

**MAF Response:** MAF have inserted a generic clause into the standard as suggested.

- 2.3 There is concern that the requirement for ante- and post-mortem inspection may not be a standard requirement in all countries from which skins/hides are imported, and also that it may be difficult to establish whether this is the norm in the country of origin of the skins/hides.

**MAF Response:** Our current import health standards require hides and skins to meet this measure so MAF proposed this measure for hides and skins exported from any country in line with our current level of protection.

This measure was also derived from the [Import Risk Analysis for Hides and Skins from Specified Animals](#) (published 2008) which states that ante- and post-mortem inspection provides a level of assurance that significantly reduces the risk of infectious agents of concern (especially anthrax).

Analysis of current measures however shows that hides and skins originating from Australia, Vanuatu, and New Caledonia are required to meet this measure for all diseases, whereas hides and skins originating from Canada, USA, Norway, or Chile are required to meet this measure but only specifically for the disease anthrax.

Taking the above points into consideration MAF has decided to amend the ante- and post-mortem inspection measure to read:

“Salted or dried hides and skins must originate from animals that have been slaughtered in a government licensed processing establishment. “

The requirement for ante- and post-mortem inspection has been included as a specific optional measure for the disease anthrax only.

- 2.4 We recognise that the use of 2% sodium carbonate in salt is the generally accepted method of rendering FMD-affected hides and skins non-infective, there is concern that sodium carbonate used at this level for this period of time will damage the wool on sheepskins/lambskins. This is especially relevant where skins are to be tanned wool-on, but even for skins to be dewooled before tanning the wool is a valuable by-product. We recommend that consideration be given to including the option of an acidic salt additive, if one can be found that is as effective as sodium carbonate in destroying FMD virus, as acidic treatment is less likely to damage wool.

**MAF Response:** The requirement for salting with 2% sodium carbonate is currently the only measure recommended by the World Organisation for Animal Health Terrestrial Animal Health Code (OIE Code) for the inactivation of FMD. MAF will consider adding any

alternative treatment provided it can be clearly and scientifically demonstrated to inactivate the FMD virus.

To minimise any potential damages arising from this treatment MAF would advise importers to source ovine skins from countries or zones free from FMD.

- 2.5 There is concern that limiting the country of origin of skin skins to Australia will unduly restrict future importations from other countries.

**MAF Response:** MAF has amended this clause so that casualty skins can now be sourced from the same countries and zones as dried or salted hides and skins.

- 2.6 We would like the method by which the ammonium persulphate is to be applied detailed, including duration of contact. In addition, when it is to be used (country of origin or during processing in New Zealand) needs clarification. Also, it is unknown whether this material, however applied, will damage the wool or the skin. We would like reassurance on this point. We would also like the purpose of this treatment to be included in this clause, so that "other MAF approved treatments" may be more easily found if deemed necessary.

**MAF Response:** This treatment has now been removed from the standard in line with the requirements for salted or dried hides and skins.

- 2.7 Immersing macropod skins in water at 75°C for 5 minutes would severely damage them, making them unusable for any further processing to leather. As all macropod skins that are not in some way processed will be hair-on (have "fibre attached") this clause effectively bans their importation, and we recommend that it be removed.

**MAF Response:** This treatment was transcribed from the existing standard for [macropod hides and skins from Australia](#) – dated 15 May 2001. MAF understands this treatment was intended to mitigate the risk of q-fever and ectoparasites. MAF have removed this clause and have added a clause allowing for post entry processing (pickling) at an approved Transitional Facility to manage the risk of q-fever or ectoparasites.

- 2.8 If partially tanned material is included in this standard, we suggest that the criteria include "Partially tanned hides and skins may be imported from any country from any species. They must be accompanied by a manufacturer's declaration or a veterinary certificate stating that the hides and skins have been subjected to a liming process at a pH greater than or equal to 12.5, and/or have been subjected to a pickling process in a solution of salt and mineral acid at a pH equal to or less than 4 for at least one hour."

**MAF Response:** See clause 2.1

- 2.9 Clarification of "stored separately" is requested, so it is known whether a spatial separation is adequate or if a physical barrier is required. Currently we understand that a 1 metre spatial separation is acceptable to MAF, and we recommend that this be included. There is also concern that making a facility totally inaccessible to birds may be impractical.

**MAF Response:** Separately stored and bird accessibility have been removed as this is defined under section 4.6 of the MAF Standard for General Transitional Facilities for Uncleared Goods (TF GEN) - <http://www.biosecurity.govt.nz/border/transitional-facilities/bnz-std-tfgen>.

MAF considers that the security of imported product is facility specific and that requirements around security are more appropriately covered by the TF GEN standard. The level of security can depend on many factors, such as where the facility is sourcing hides and skins from, and the quantities that the facility imports.

This clause has therefore been amended to read:

“While in the transitional facility, and prior to processing, imported hides and skins shall be clearly marked, stored, and handled in accordance with the [MAF Standard for General Transitional Facilities for Uncleared Goods](#) and any associated requirements listed in Annex F of the Guidance Document to that standard”

- 2.10 Disposal of solid waste by incineration or rendering may not be possible in some areas. Rendering is not suitable for all materials as there are restrictions on some of the chemical additives (for instance boric acid used in salting) that may be present in trimmings/fleshing waste etc. In some areas there are no facilities available for incineration. There are also some solid wastes not able to be rendered or incinerated, for example the gritty material resulting from the washing of some imported wool-on skins. We recommend that deep burial in a certified landfill be included as an option for disposal of solid waste. This is currently the practice for some processors, with MAF approval.

**MAF Response:** This clause has been amended to allow for other methods provided they have first been approved in writing by MAF.

- 2.11 Disposal of packaging by incineration may likewise pose problems if no suitable incinerator is available. Again, we recommend that deep burial in a certified landfill be included as an option for disposal.

**MAF Response:** This clause has been amended as per 2.10 above.

- 2.12 Clause 31d may be difficult for processors to meet. Even where processed municipal sewage is discharged to the ocean, solid wastes from the system may be disposed of on land by councils, and skin/hide processors have no control over this.

**MAF Response:** This clause has been amended to state “the effluent shall be discharged into a municipal sewage system”

MAF notes that to discharge solid wastes from tanneries onto land agencies in New Zealand generally follow the New Zealand Waste Water Association Guidelines for the safe application of bio-solids to land in New Zealand -

[http://www.waternz.org.nz/documents/publications/books\\_guides/biosolids\\_guidelines.pdf](http://www.waternz.org.nz/documents/publications/books_guides/biosolids_guidelines.pdf) .

These guidelines state that bio-solids should be stabilised with lime to approximately pH12 which MAF considers equivalent to the liming process in tanning (pH 12.5).

- 2.13 Under Equivalence we would require reassurance that currently accepted procedures certified by MAF as effective which do not explicitly meet the requirements specified in clauses 1-31 would still be acceptable under this new standard.

**MAF Response:** This standard will not affect any existing equivalence arrangements.

### 3 Stephen Webley – G L Bowron & Co Ltd

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- 3.1 Bowron propose that partially tanned skins be recognised at a category under this standard. This will enable more flexibility in sourcing raw material and possibly offer alternative methods ensuring the skins are disease free. A section will need to be added into Part C detailing the requirements for partially tanned skins.

**MAF Response:** See clause 2.1.

- 3.2 It is recommended that a code of practice be developed which will specify tanning processes which will effectively eliminate diseases. If the approved processes are totally effective, it should be possible to import any type of skin from any country. It is recommended that the New Zealand Leather and Shoe Research Association work with MAF to produce this code of practice.

**MAF Response:** MAF believes that a code of practice would be beneficial but that this may not be necessary and may take some time to develop. The tanning processes that are effective in eliminating diseases of concern are specified in the [MAF import risk analysis for hides and skins](#) (published 2008). This import health standard reflects those processes and therefore allows for any type of skin to be imported from countries where FMD and anthrax have been mitigated as diseases of concern.

- 3.3 Section 17. Bowron propose that the requirement for both ante and post-mortem inspection will mean skins cannot be imported from some countries. It will be impractical to expect that post-mortem inspections will be carried out in a slaughter house solely to fulfil a requirement for skins to be exported to New Zealand.

**MAF Response:** See clause 2.3.

- 3.4 Section 18b. Bowron consider that treatment outcomes be specified (ie the elimination of potential foot and mouth disease) rather than defining specific treatments. Specific treatments, such as the proposed Sodium Carbonate, are likely to have negative effects on the quality of finished products produced by Bowron. Suitable treatment regimes should be included in an approved code of practice.

**MAF Response:** See clause 2.4.

- 3.5 Section 21. Restricting the importation of slink skins from only Australia will eliminate access to alternative sources of raw material. The importation of slink skins should be allowed from other disease free countries, or the skins should be able to be treated to eliminate diseases.

**MAF Response:** See clause 2.5.

- 3.6 Section 24. Bowron again propose that the outcome of the treatment be defined instead of the actual treatment. In this case ammonium persulphate will have a detrimental affect on wool quality. Suitable treatment regimes should be included in an approved code of practice.

**MAF Response:** See clause 2.6

- 3.7 Section 30. Treating any untanned skin, and also many tanned sheepskins, at 75oC, will irreversibly damage the skin and make it useless for making leather. In line with proposals above, Bowron propose the requirement be outcome based rather than specifying a specific treatment

**MAF Response:** See clause 2.7. Only macropod skins are required to undertake this measure.

- 3.8 Section 31a. This section needs clarification as to the requirement for "separately stored". The current accepted practice of "1 m separation" needs to be defined as acceptable. The requirement to keep the storage are free of birds is impractical, and should be reworded to say "all practical steps should be taken to keep the storage area free of birds"

**MAF Response:** See clause 2.9.

- 3.9 Section 31b. Both of the proposed methods of disposing of waste may be impractical in some locations. Affordable incineration is unlikely to be able to obtain resource consents. Rendering in existing plants is not always an option due to the unacceptability of trimmings in these plants and possible chemical contamination. Bowron request that deep burial in an approved landfill facility be an acceptable means of disposal. This is the current approved means of disposal used by Bowron.

**MAF Response:** See clause 2.10.

- 3.10 Section 31c. Incineration of packaging, as above, is impractical. Bowron request the same ability to use deep burial as per section 31b

**MAF Response:** See clause 2.10.

- 3.11 Bowron request that if any changes are made to requirements, that a sensible transition period be defined in order to give organisations time to adapt to the changes.

**MAF Response:** All importers will be forewarned of when the new standard will come into effect.

## **4 David Burt – Federated Farmers**

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- 4.1 The document refers to the treatment conditions required for hide and skin types. If the information provided is adequate to ensure effective treatment, the Federation has no concerns, but if further information is required (eg around treatment time or temperature), then the Federation suggests that this information could usefully be provided to importers, either in the document or by means of referenced/linked information.

**MAF Response:** MAF agrees and will amend the guidance document where appropriate to provide more useful information to importers on how to meet the treatment requirements of this standard.

- 4.2 Point 31(b) notes that trimmings and solid waste must be disposed of. What are the conditions under which these operations are to be carried out?

**MAF Response:** The conditions under which trimmings and solid wastes are disposed of are outlined in facility operating manuals in accordance with the MAF Standard for General Transitional Facilities for Uncleared Goods - <http://www.biosecurity.govt.nz/border/transitional-facilities/bnz-std-tfgen>

MAF notes that each transitional facility is unique so the conditions under which trimmings and solid waste are disposed of will vary by facility.

## 5 Laura Scandurra – US Embassy

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- 5.1 *Paragraph 17.* Please clarify if New Zealand is requiring hides and skins intended for industrial use only (e.g., leather production) to originate only from animals that passed post-mortem inspection. If so, please provide the scientific basis and international standard for this requirement.

**MAF Response:** See clause 2.3. This requirement has been removed.

- 5.2 Paragraph 20. U.S. origin hides and skins exported to New Zealand would meet New Zealand's stated requirements, i.e., they would either be salted or dried, and the United States Department of Agriculture (USDA) would certify that the United States is free of foot and mouth disease and that the hides or skins originated from establishments that were not subject to restrictions imposed for the control of anthrax. Please explain why these commodities would be restricted to transitional facilities in New Zealand. What are the additional diseases of concern relevant to hides and skins whose risk would not be mitigated by salting or drying?

**MAF Response:** MAF considers anthrax and FMD to be high impact diseases of concern that warrant additional measures for salted and dried hides and skins. The measures proposed for these two diseases are in accordance with the OIE Code.

Hides and skins are required to proceed to a transitional facility for further processing due to a number of additional diseases that are not controlled by salting or drying alone. In 2008, MAF published an [import risk analysis on hides and skins](#) that identified the following additional diseases of concern:

- *Coxiella burnetii* (Q fever)
- Swine vesicular disease
- Lumpy skin disease and sheep and goat pox
- African swine fever
- Classical swine fever
- Bovine viral diarrhoea (type 2)
- Highly pathogenic avian influenza
- Newcastle disease
- *Brucella spp.* (Brucellosis)
- *Chlamydophila abortus* (Enzootic abortion of ewes)
- Enterobacteriaceae
- *Burkholderia mallei* (glanders)
- Porcine enteroviruses

The risks to New Zealand posed by these organisms are managed by regulating the disposal of any wastes generated during processing.

5.3 Paragraph 21. Please explain why New Zealand is limiting the importation of this commodity to Australia only.

**MAF Response:** See clause 2.5. The country scope has been expanded in line with salted and dried hides and skins.

5.4 Paragraph 31. What are the diseases of concern relevant to hides and skins that are not addressed in certification requirements for foot and mouth disease and anthrax and whose risk would not be mitigated by salting or drying?

**MAF Response:** See clause 5.2.

## **APPENDIX ONE: COPIES OF SUBMISSIONS**

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1. Hi Charlotte

We would like to suggest a couple of minor changes.

21. Slink skins (calf and lamb)

We suggest the heading should read **Casualty Skins** which would include (**slink lamb, slink calf**) and also included in this area should be (**possum skins and fox skins**).

Clearer clarification that the Casualty Skins (Slink Skins) are not required to have ante and post-mortem inspection.

Regards

Ray Watson - Manager

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2. Submission on proposed import standards for hides and skins dated March 29 2011

Contact details:

Name: Dr S M Cooper

Title: Senior Scientist

Organisation: New Zealand Leather and Shoe Research Association (Inc)

Postal address: PO Box 8094  
Hokowhitu  
Palmerston North 4446

Phone number: 06 355 9028

Fax number: 06 354 1185

Email: sue.cooper@lasra.co.nz

Our submission on behalf of our members is as follows:

### **PART A. INTRODUCTION**

Under “Scope” (3) we note that wet blue and wet white dehaired/unwooled hides/skins are covered in a separate standard (Import Health Standard for the importation into New Zealand of Specified Animal Products and Biologicals, 2005). However, there is no standard for partially tanned material. We would request that this be included in the current standard.

## PART C. COMMODITY SPECIFIC REQUIREMENTS

- a Where appropriate, we recommend that the words “this includes re-importation of material of New Zealand origin” be included, as the standards previously covering re-importation will be revoked by this new standard.
- b There is concern that the requirement for ante- and post-mortem inspection (17) may not be a standard requirement in all countries from which skins/hides are imported, and also that it may be difficult to establish whether this is the norm in the country of origin of the skins/hides.
- c With regard to 18b, although we recognise that the use of 2% sodium carbonate in salt is the generally accepted method of rendering FMD-affected hides and skins non-infective, there is concern that sodium carbonate used at this level for this period of time will damage the wool on sheepskins/lambskins. This is especially relevant where skins are to be tanned wool-on, but even for skins to be dewooled before tanning the wool is a valuable byproduct. We recommend that consideration be given to including the option of an acidic salt additive, if one can be found that is as effective as sodium carbonate in destroying FMD virus, as acidic treatment is less likely to damage wool.
- d There is concern that limiting the country of origin of skins to Australia (21) will unduly restrict future importations from other countries.
- e We would like the method by which the ammonium persulphate (24) is to be applied detailed, including duration of contact. In addition, when it is to be used (country of origin or during processing in New Zealand) needs clarification. Also, it is unknown whether this material, however applied, will damage the wool or the skin. We would like reassurance on this point. We would also like the purpose of this treatment to be included in this clause, so that “other MAF approved treatments” may be more easily found if deemed necessary.
- f Immersing macropod skins in water at 75°C for 5 minutes (30) would severely damage them, making them unusable for any further processing to leather. As all macropod skins that are not in some way processed (ie all those described in 27) will be hair-on (have “fibre attached”) this clause effectively bans their importation, and we recommend that it be removed.
- g If partially tanned material is included in this standard, we suggest that the criteria include “Partially tanned hides and skins may be imported from any country from any species. They must be accompanied by a manufacturer’s declaration or a veterinary certificate stating that the hides and skins have been subjected to a liming process at a pH greater than or equal to 12.5, and/or have been subjected to a pickling process in a solution of salt and mineral acid at a pH equal to or less than 4 for at least one hour.”

## PART D. POST ENTRY REQUIREMENTS

- a Clarification of “stored separately” (31a) is requested, so it is known whether a spatial separation is adequate or if a physical barrier is required. Currently we understand that a 1 metre spatial separation is acceptable to MAF, and we recommend that this be included. There is also concern that making a facility totally inaccessible to birds may be impractical.

- b Disposal of solid waste by incineration or rendering (31b) may not be possible in some areas. Rendering is not suitable for all materials as there are restrictions on some of the chemical additives (for instance boric acid used in salting) that may be present in trimmings/fleshing waste etc. In some areas there are no facilities available for incineration. There are also some solid wastes not able to be rendered or incinerated, for example the gritty material resulting from the washing of some imported wool-on skins. We recommend that deep burial in a certified landfill be included as an option for disposal of solid waste. This is currently the practice for some processors, with MAF approval.
- c Disposal of packaging by incineration (31c) may likewise pose problems if no suitable incinerator is available. Again, we recommend that deep burial in a certified landfill be included as an option for disposal.
- d Clause 31d may be difficult for processors to meet. Even where processed municipal sewage is discharged to the ocean, solid wastes from the system may be disposed of on land by councils, and skin/hide processors have no control over this.

## **PART E. EQUIVALENCE**

- a We would require reassurance that currently accepted procedures certified by MAF as effective which do not explicitly meet the requirements specified in clauses 1-31 would still be acceptable under this new standard.

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### 3. Submission on proposed import standard for hides and skins

G L Bowron & Co Ltd  
May 2011

G L Bowron & Co Ltd are tanners of wool-on lambskins, supplying tanned product to markets around the world. Skins for processing are sourced predominantly from New Zealand and Australia. However with decreasing sheep populations in both of these countries it is apparent that skins will need to be sourced from other countries. Therefore in order for the business to continue it is imperative that Bowron are able to continue to import raw skins from Australia and have the ability to import raw skins from other countries. If this ability is not available, the impact on Bowron's business will be severe and possibly affect its overall viability. However Bowron do recognise the requirement that New Zealand's biosecurity must not be compromised.

Bowron support the revision of the health standards and offer these submissions so that the standard will meet both the objectives of not hindering Bowron's business and protecting New Zealand's biosecurity.

Bowron request that they be able to present this submission in person.

Part A. Introduction  
Scope

Bowron propose that partially tanned skins be recognised at a category under this standard. This will enable more flexibility in sourcing raw material and possibly offer alternative methods ensuring the skins are disease free. A section will need to be added into Part C detailing the requirements for partially tanned skins. It is recommended that a code of practice be developed which will specify tanning processes which will effectively eliminate diseases. If the approved processes are totally effective, it should be possible to import any type of skin from any country. It is recommended that the New Zealand Leather and Shoe Research Association work with MAF to produce this code of practice.

#### Part C. Commodity specific requirements.

##### Section 17

Bowron propose that the requirement for both ante and post-mortem inspection will mean skins cannot be imported from some countries. It will be impractical to expect that post-mortem inspections will be carried out in a slaughter house solely to fulfil a requirement for skins to be exported to New Zealand.

##### Section 18b

Bowron consider that treatment outcomes be specified (ie the elimination of potential foot and mouth disease) rather than defining specific treatments. Specific treatments, such as the proposed Sodium Carbonate, are likely to have negative effects on the quality of finished products produced by Bowron. Suitable treatment regimes should be included in an approved code of practice.

##### Section 21

Restricting the importation of slink skins from only Australia will eliminate access to alternative sources of raw material. The importation of slink skins should be allowed from other disease free countries, or the skins be able to be treated to eliminate diseases.

##### Section 24

Bowron again propose that the outcome of the treatment be defined instead of the actual treatment. In this case ammonium persulphate will have a detrimental affect on wool quality. Suitable treatment regimes should be included in an approved code of practice.

##### Section 30

Treating any untanned skin, and also many tanned sheepskins, at 75oC, will irreversibly damage the skin and make it useless for making leather. In line with proposals above, Bowron propose the requirement be outcome based rather than specifying a specific treatment

#### Part D. Post Entry Requirements

##### Section 31a

This section needs clarification as to the requirement for “separately stored”. The current accepted practice of “1 m separation” needs to be defined as acceptable. The requirement to keep the storage are free of birds is impractical, and should be reworded to say “all practical steps should be taken to keep the storage area free of birds”

##### Section 31b

Both of the proposed methods of disposing of waste may be impractical in some locations. Affordable incineration is unlikely to be able to obtain resource consents. Rendering in existing plants is not always an option due to the unacceptability of trimmings in these plants and possible chemical contamination. Bowron request that deep burial in an approved landfill facility be an acceptable means of disposal. This is the current approved means of disposal used by Bowron.

### Section 31c

Incineration of packaging, as above, is impractical. Bowron request the same ability to use deep burial as per section 31b

### Part E

Bowron request that if any changes are made to requirements, that a sensible transition period be defined in order to give organisations time to adapt to the changes.

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4. To: Biosecurity New Zealand  
On the: Draft Import Health Standard For Hides and Skins  
Date: 10 May 2011  
Contact: **DAVID BURT**  
POLICY ADVISOR, MEAT & FIBRE  
Federated Farmers of New Zealand  
Box 715, Wellington 6140, New Zealand  
P 04 494 9182  
F 04 473 1081  
✉ [dburt@fedfarm.org.nz](mailto:dburt@fedfarm.org.nz)

## SUBMISSION TO BIOSECURITY NEW ZEALAND ON THE DRAFT “IMPORT HEALTH STANDARD FOR HIDES AND SKINS”

### 1. FEDERATED FARMERS CONCERNS

Federated Farmers is supportive of the move to rationalise the import health standard documentation system.

Three items in the document are commented on below.

We would be pleased to discuss the matters raised with you in more detail should you believe this is necessary. Please contact David Burt, Policy Advisor Meat & Fibre [[dburt@fedfarm.org.nz](mailto:dburt@fedfarm.org.nz); DDI 04 494 9182] in the first instance.

### 2. BACKGROUND

Our Submission is in accordance with the request for comment on the above document [“Hidcomic.all” (IHS for Hides and Skins, 29 March 2011)] and the associated “Guidance Document for the Import Health Standard For Hides and Skins” in an e-mail from the Border Standards Directorate, Biosecurity New Zealand, 29 March 2011.

### 3. GENERAL COMMENTS

#### 3.1 Rationalisation of documentation

The Federation is supportive of this move. In this instance the draft IHS – when used in conjunction with the related Guidance Document for the Import Health Standard For Hides and Skins – enables twelve documents to be condensed into two.

#### 3.2 Comments on the Draft “Import Health Standard For Hides and Skins”

The document refers to the treatment conditions required for hide and skin types. If the information provided is adequate to ensure effective treatment, the Federation has no concerns, but if further information is required (eg around treatment time or temperature), then the Federation suggests that this information could usefully be provided to importers, either in the document or by means of referenced/linked information.

#### 3.3 Post Entry requirements

Point 31(b) notes that trimmings and solid waste must be disposed of. What are the conditions under which these operations are to be carried out?

#### 4. ABOUT FEDERATED FARMERS OF NEW ZEALAND

4.1 Federated Farmers of New Zealand is a member-based organisation representing farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.

4.2 The Federation aims to add value to its members' farming business. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
  - Our members' families and their staff have access to services essential to the needs of the rural community; and
  - Our members adopt responsible management and environmental practices.
- 

5. Hi Chris – Please find US comments below. Laura

#### **BEGIN COMMENTS:**

The United States appreciates the opportunity to comment on the proposed import health standard notified by New Zealand to the World Trade Organization in G/SPS/N/NZL/450: "Import Health Standard for Hides and Skins."

#### ***Comments on Part C, Commodity Specific Requirements***

*In paragraph 17*, under the section on salted hides and skins, it states:

"Salted or dried hides and skins must originate from animals that have been slaughtered in a government licensed processing establishment under the direct supervision of an official veterinarian, subjected to ante and post mortem inspection, and certified as fit for human consumption."

Please clarify if New Zealand is requiring hides and skins intended for industrial use only (e.g., leather production) to originate only from animals that passed post-mortem inspection. If so, please provide the scientific basis and international standard for this requirement.

*In paragraph 20*, under the section on salted hides and skins, it states:

"Salted or dried hides and skins must be directed to a transitional facility on arrival in New Zealand for completion of processing as per Part D of this standard."

U.S. origin hides and skins exported to New Zealand would meet New Zealand's stated requirements, i.e., they would either be salted or dried, and the United States Department of

Agriculture (USDA) would certify that the United States is free of foot and mouth disease and that the hides or skins originated from establishments that were not subject to restrictions imposed for the control of anthrax. Please explain why these commodities would be restricted to transitional facilities in New Zealand. What are the additional diseases of concern relevant to hides and skins whose risk would not be mitigated by salting or drying?

*In paragraph 21*, under the section on slink skins (calf and lamb), it states:

“Slink skins imported under this standard must only originate from Australia.”

Please explain why New Zealand is limiting the importation of this commodity to Australia only.

### ***Comments on Part D, Post Entry Requirements***

*In paragraph 31*, on requirements in the transitional facility, it states:

“b. All trimmings and solid waste removed from the hides and skins during processing shall be collected and disposed of by incineration or rendering; c. The packaging shall be destroyed by incineration; and d. The effluent shall be either i. discharged into a municipal sewage system that does not discharge waste to agricultural land or into a river, OR ii. discharged into a securely fenced and isolated soak-pit or another method approved by MAF; OR iii. treated with a MAF approved biocide.”

Our comments are the same as for paragraph 20, above. What are the diseases of concern relevant to hides and skins that are not addressed in certification requirements for foot and mouth disease and anthrax and whose risk would not be mitigated by salting or drying?

The United States thanks New Zealand for the opportunity to comment on this notification and for the favorable consideration of these comments.

END U.S. COMMENTS

Laura Scandurra  
Agricultural Attache  
US Embassy  
Wellington, New Zealand  
Tel: 64-4-462-6012  
Cell: 027-205-4299  
<http://newzealand.usembassy.gov/>  
<http://samoa.usembassy.gov/>  
<http://blogs.newzealand.usembassy.gov/ambassador>  
<http://paper.li/usembassynz/us-embassy-nz-news>