

REVIEW OF SUBMISSIONS ON:

DRAFT IMPORT HEALTH STANDARD FOR THE IMPORTATION INTO NEW ZEALAND OF ORNAMENTAL PRODUCTS OF ANIMAL ORIGIN

Ministry of Agriculture and Forestry
Wellington
New Zealand

05 May 2011

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**DRAFT IMPORT HEALTH STANDARD FOR THE IMPORTATION INTO NEW
ZEALAND OF ORNAMENTAL PRODUCTS OF ANIMAL ORIGIN**

05 May 2011

Approved for general release

Mathew Stone
Animal Export/Import Group Manager
MAF New Zealand

INTRODUCTION

The draft import health standard for the importation into New Zealand of Ornamental Products of Animal Origin from All Countries was notified for consultation on 12 November 2010

MAF received submissions from the following:

Tyron Southward, Tyron Southward Taxidermy Ltd	23 December 2010
David Jacobs, The Taxidermist Ltd	23 December 2010
Geoff Olsen, GoDo NZ Ltd	24 December 2010

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

SUBMISSIONS

1 David Jacobs & Tyron Southward

1.1 The submitters raise interpretive concerns over the definitions and classifications presented in the standard.

MAF comment: MAF has modified the definitions and classifications in the standard after discussions with all submitters.

1.2 The submitters request that there be a provision for a transitional facility (TF) requirement.

MAF comment: MAF acknowledges that the decision to become a TF can be a commercial decision and has discussed this with both submitters. Given the small numbers of game trophies imported MAF believes the cost/benefit is unfavourable for TF operators. MAF may revisit this in the future when the standard is reviewed.

1.3 The submitters raise concerns over the standard failing to recognise there is no facility capable of a radiation of game trophies and that this treatment renders the specimens unsuitable for taxidermy.

MAF comment: MAF acknowledges the submitters' concerns but notes that only non-compliant game trophies are to be treated on arrival under the new draft standard. Treatments on arrival are prescribed in a separate standard that is referenced in the draft standard - MAF Approved Biosecurity Treatments Standard – Dated 11 October 2010
<http://www.biosecurity.govt.nz/files/regs/stds/bnz-std-abtrt.pdf>.

MAF is aware that only one facility in New Zealand is currently capable of gamma irradiation (Schering Plough Animal Health Ltd, Upper Hutt). The chamber of this facility is small but may accommodate some hunting trophies. MAF is aware that irradiation may be detrimental to game trophies (only hides and skins of) but under the Biosecurity Act (1993) all treatments must be conducted with the importer's authority. If an importer has any concerns regarding any treatment they can elect for another approved treatment (i.e. formalin) or reship the product.

1.4 The submitters state that the rules that apply to documentation should apply to all game trophies regardless of whether they are accompanied or unaccompanied. In the absence of documentation there needs to be procedures in place for issuing a compliance document or a requirement for further processing (at a transitional facility), re-inspection etc. There is no allowance for this recertification upon further treatment.

MAF comment: The rules that apply to documentation have been amended to apply to both accompanied and unaccompanied game trophies. Non-compliant consignments will be authorised for treatment by an inspector at the border. Upon receipt of a valid treatment certificate the goods will be released by the inspector.

2 Geoff Olsen

2.1 The submitter is concerned that inspecting officers are not adequately trained to recognize the differences between “fully processed animal trophies” and “partially “and “un-treated” animal trophies.

MAF comment: As per 1.1 above, the definitions and classifications have been amended. Staff training manuals will be updated to provide guidance to inspectors.

2.2 The submitter points out that the Risk Management Proposal does not really account for the high instances of “interpretive discrepancies” by MAF inspectors with the previous standard. The submitter wants assurance that the guidance for MAF staff includes access to people who know what they are dealing with.

MAF comment: See 2.1 above. Where inspectors require further guidance they will have access to technical assistance from the Animal Imports Team.

2.3 The submitter is concerned with the model health certificate and how the protocol or OMAR system works with the many exporting countries that send trophies to New Zealand. The copies of health certificates that the submitter has on file do not look like the draft model health certificate.

MAF comment: MAF is aware that most consignments of game trophies imported are accompanied by health certificates that do not match either the old standard or the new draft standard. Once the new draft standard is issued then exporting countries have the option to develop and model their export certificates in accordance with our model health certificate.

APPENDIX ONE: COPIES OF SUBMISSIONS

Submission One

Tyron Southward
Owner/Director
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Ph/Fax +64 3 325 4545

David Jacobs
Owner/Director
The Taxidermist Ltd
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Christchurch
Ph: 03 338-4266 Fax: 03 338-4061

Hello Charlotte,

Regarding Import Health Standard for Ornamental Products of Animal Origin we would like to outline the following, however we need to discuss this in person before it is passed as it requires alot more work.

* The current definitions of classifications of game trophies - they need rewriting as they are inaccurate. They show a lack of understanding of the taxidermy procedures. They also do not clearly define what standard is compliant and non compliant. Once these definitions have been ratified then actions can be developed to bring trophies up to a compliant standard.

* There is no provision for a transitional facility. The assumptions made are incorrect, the decision to invest in this is a commercial one to be made by individual operators or at least available to us.

* The standard fails to recognise there is no facility capable of a radiation of game trophies and that this treatment renders the specimens unsuitable for taxidermy, therefore an alternative treatment has to be found. This should take place at a transitional facility.

Regarding Part B - General requirements

* Documentation

The rules that apply to documentation should apply to all game trophies regardless of whether they are accompanied or unaccompanied. In the absence of documentation there needs to be procedures in place for issuing a compliance document or a requirement for further processing (at a transitional facility), reinspection etc. There is no allowance for this recertification upon further treatment.

Submission Two

Geoff Olsen
GODO New Zealand Ltd
6 Sir William Pickering Drive
PO Box 31-216
Christchurch
Ph: +64 03 358 7179

Charlotte Richmond

My concern in reading the draft import health standard remains that the inspecting officers be fully trained to recognize the differences between "Fully Processed Animal trophies" and "Partially "and "Un-Treated" animal trophies.

In the Risk Management Proposal dated October 2010: Background. It states "high volume of non-compliant consignments". This statement does not really account for the high instances of "Interpretive discrepancies" encounters by MAF inspectors with the previous ambiguous standard. The cost incurred by importers for erroneous opinions by MAF personal etc. we need be assured that the guidelines for MAF staff include access to people who know what they are dealing with.

The draft copy of the model Health certificate concerns me in that I am unaware of how the protocol or OMAR system works with the many exporting countries that send trophies to New Zealand.

I have copies of Health Certificates for previous shipments from 7 different countries (2010) and non are in a standard format that looks anything like the draft copy. Are there active regulatory negotiations with out trading partners to ensure correct Veterinary certificates are supplied?

I welcome the opportunity for further discussion.

Kind regards and Merry Christmas

Geoff Olsen