

24 January 2017

Animal Imports  
Ministry for Primary Industries  
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**DairyNZ submission on:**

- **Draft Risk Management Proposal: Pig Semen**
- **Draft Import Health Standard: Pig Semen**
- **Draft Guidance Document: Pig Semen**

**Introduction**

1. DairyNZ is the industry good organisation representing New Zealand's dairy farmers. Funded by a levy on milksolids and through government investment, our purpose is to secure and enhance the profitability, sustainability and competitiveness of New Zealand dairy farming. We deliver value to farmers through leadership, influencing, investing, partnering with other organisations and through our own strategic capability. Our work includes research and development to create on-farm practical tools, leading on-farm adoption of best practice farming, promoting careers in dairying and advocating for farmers with central and regional government.
2. DairyNZ has looked at these consultation documents from the perspective of the overall management of animal health for the livestock industries in New Zealand. There are a number of diseases not present in New Zealand that affect pigs, as well as cattle, sheep, deer and goats, therefore the impact of importing these diseases via porcine semen would extend well beyond the pig industry.
3. The dairy industry in New Zealand is a major exporter of milk products. Arrival of an exotic disease would not only impact on the health and productivity of the national dairy herd, but in all likelihood, would have serious ramifications for the industry's ability to export milk products. Annual export revenue for New Zealand from dairy products has ranged from \$12.2 to \$17 billion dollars over the last five years (June ended years), and this has accounted for 26-34% of New Zealand's merchandise trade annually (29% average on last five seasons). Loss of dairy export revenue would have a very significant impact on the country's economy.

## Comments on these consultation documents

4. DairyNZ can appreciate that MPI wish to establish a generic IHS for porcine semen to serve as a basis for country-to-country negotiations. This IHS and the model veterinary certificate are very much based on current knowledge of pig diseases. How do emerging diseases or syndromes, which may not be covered by any OIE recommendations, come to be considered during the negotiation phase? We consider it is essential that industry has input into this process – will this routinely occur?
5. Both the Guidance Document and Import Health Standard (IHS) make reference to *MPI Approved Diagnostic Tests, Vaccines, Treatments and Post-arrival Testing Laboratories for Animal Import Health Standards* (MPI-STD-TVTL), and the IHS states 'diagnostic tests and vaccines used must be those that have been approved by MPI and documented in MPI-STD-TVTL'. However, this document does not include any IHS for pig semen so it is unclear what diagnostic tests and vaccines are approved by MPI. Without this information it is not possible to assess whether any testing or use of vaccines will be sufficient to protect New Zealand from the import of unwanted animal diseases.
6. In general, DairyNZ is supportive of using OIE standards to develop IHS. However, New Zealand still needs to undertake its own risk assessment for each disease agent. This needs to include the risk of the disease arriving in New Zealand, the likelihood of spread given our livestock husbandry practices, and the impact an outbreak of disease will have on both the target livestock and any other livestock that may be susceptible. The focus of OIE standards appears to be on reducing the risk of arrival. For some diseases, the impact of a disease outbreak in New Zealand would be so great, that it would appear justifiable to impose more stringent conditions for import than are present in OIE standards. Foot and Mouth Disease (FMD) is one such example.
7. A number of diseases of interest for the import of porcine semen are not covered by OIE standards. In some cases, these diseases are of limited impact in pigs, but could have a significant impact on cattle, or are of interest from a human health perspective. DairyNZ is of the view that consideration of the impact of any disease needs to take into account wider ramifications that just the impact on the species the IHS applies to. For example, BVD type 2 virus may not be of any particular concern for the pig industry, but is of considerable concern for the dairy industry.
8. The requirements for FMD appear inconsistent. This is unacceptable for a disease that would have such a severe impact on all of New Zealand, not just the livestock industries. From the proposed IHS we have extracted this summary:
  - For the importation of fresh semen from FMD free countries or zones where vaccination is not practised, or FMD free compartments, donors must have been at least 3 months in the FMD free country or zone and be kept in an AI centre. However, for frozen semen from the same countries/zones there is no requirement to keep the donors in an AI centre. Why shouldn't all boars having semen collected for export be kept in AI centres under clear veterinary supervision?
  - For frozen semen from FMD free countries where vaccination is practised there is again no requirement to keep donors in AI centres, however the donors must be free of clinical signs of FMD on the day of collection and for the following 30 days, have been kept in the country for at least 3 months prior to collection, and be

- either vaccinated against FMD or tested. It is unclear how such requirements can be controlled outside of a supervised AI centre.
- For frozen semen from FMD infected countries the following controls and testing requirements are described. Donors must be kept in AI centres with some requirements around entry of new animals and absence of FMD in the area, be free of FMD on the day of collection and for the following 30 days, and either be vaccinated or tested for FMD. Semen from boars that are vaccinated must be tested, boars that are not vaccinated are tested and their semen is not tested. Hence there is only one test applied to ensure the semen is free of FMD, with all other disease control measures relying on good management of the AI centre and adequate surveillance for FMD. For a disease such as FMD we do not consider such management of the risk to be acceptable for New Zealand. DairyNZ is of the view that high risk products such as semen should not be imported from FMD infected countries or zones.
9. Within the proposal, for some diseases absence of infection is assessed only by absence of clinical signs on the day of semen collection. If clinical signs are mild, transient or inconsistent this does not seem a very robust way of ensuring freedom from disease. An example of this is Brucellosis where clinical signs in infected boars are rarely seen, and where porcine semen would be eligible for export to New Zealand if the boars are free of clinical signs on the day of collection, without the need for any prior testing. Such boars can be kept in AI centres, or in a herd free from Brucellosis that is only tested once every 6 months. There is no check here to ensure that the herd has not become infected between the last test and semen collection. New Zealand is free of Brucellosis, and *Brucella suis* is a zoonosis of concern, especially given the large number of backyard pigs kept in New Zealand. DairyNZ is of the view that for any disease where disease freedom is assessed only by the absence of clinical signs on the day of collection, a review of these requirements should occur.
10. Given the number of significant concerns raised here DairyNZ requests that further expert advice is sought, and that further formal consultation with the wider livestock industries occurs before this IHS and the Guidance Document are finalised.

Thank you for the opportunity to comment on these consultation documents.

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