



25 January 2017

Animal Imports
Ministry for Primary Industries
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Review of draft porcine material import health measures: *draft Risk Management Proposal (Pig semen); draft Import Health Standard (Pig semen); draft Guidance Document (Pig semen)*

Deer Industry New Zealand (DINZ) is a levy funded industry-good body established by the Deer Industry New Zealand Regulations 2004 under the Primary Products Marketing Act 1953. It represents producers of farmed deer, and processors, marketers and of products from farmed deer, which are principally venison and velvet.

The New Zealand deer industry has about 900,000 farmed deer, and in 2015 exported products to a total value of about \$255 million. These exports are primarily made up by venison, velvet, co-products, leather and hides.

As the team knows from its recent assistance to DINZ in relation to import controls for Chronic Wasting Disease-risk material, DINZ takes seriously risks from imported material to deer and pasture/fodder health. Given that many such risks arise from the importation of material not directly associated with deer, DINZ seeks that controls on such material appropriately take into account the effect of the material and the proposed control on the deer industry.

We have seen DairyNZ's draft submission on these three documents and share its concerns that the proposed import health standards applicable to pig semen do not adequately take into account the risk to the livestock sector of FMD-contaminated pig semen. Even a small FMD incursion is likely to severely constrain deer farming and the export of deer products for at least a year and have longer-term impacts on consumer confidence in New Zealand deer products, whether from a quality or reliability of supply perspective.

Given the likely significant impact of a FMD incursion on both the deer industry and New Zealand, DINZ agrees with DairyNZ that New Zealand is justified in imposing controls stricter than OIE guidelines, which are focussed merely on blocking transmission pathways. In particular, DINZ considers that importing pig semen from FMD-infected countries should be prohibited. Additionally, we consider that the surveillance of semen donors from other countries should be more comprehensive, for instance donor boars should be under surveillance for the duration of the FMD incubation period and be tested for infection rather than merely observed for clinical signs.

We also note that some requirements (such as for testing of products for contamination or veterinary

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supervision of donor animals) are inconsistent, depending on the state of the substance in question, without good reason.

We therefore join with DairyNZ in recommending that the proposed standards be reconsidered by experts for efficacy, that unjustified inconsistencies between controls be eliminated and the scope of the controls be reviewed in light of the consequence of residual risk or non-compliance on sectors other than simply the pork industry.

Yours sincerely,



Catharine Sayer
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