

SUBMISSION

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To: Ministry for Primary Industries

Submission on: Draft Import Health Standard: Pig Semen

From: Federated Farmers of New Zealand

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Contact:

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SUBMISSION

DRAFT IMPORT HEALTH STANDARD FOR PIG SEMEN

1. INTRODUCTION

- 1.1 Federated Farmers welcomes the opportunity to make this submission to the Ministry for Primary Industries on the “Draft Import Health Standard for Pig Semen”. The Federation’s members are primarily sheep, beef and dairy farmers and not pig farmers, and so the comments are primarily of a general nature, but the Federation does have some concerns about the content of the draft IHS that are raised below.
- 1.2 The Federation believes that these are significant and requests that further expert advice is sought. As a consequence, the Federation believes that publication of the final IHS and Guidance Documents should be deferred until this measure has been.
- 1.3 We would be pleased to discuss the matters raised with you in more detail should you believe this is necessary. Please contact David Burt, Senior Advisor, Primary Sector or dburt@fedfarm.org.nz [DDI 04 494 9182] in the first instance.

2. BACKGROUND

- 2.1 Our submission is in accordance with the request, from the Ministry for Primary Industries, for feedback on the Draft Import Health Standard for Pig Semen [MPI IHS PIGSEMEN.GEN] and two related documents; “Guidance Document Pig Semen” [PIGSEMEN.GEN] and “Risk Management Proposal Pig Semen” November 2016.

3. GENERAL COMMENTS

- 3.1 Federated Farmers has concerns with the apparent over reliance on the OIE Terrestrial Animal Health Code as the standard to mitigate biosecurity risks
 - 3.1.1 The Federation acknowledges the importance of international trade in general and in the area of animal products specifically as trade is vital to both the New Zealand primary sector and to the national economy.
 - 3.1.2 Further, the Federation recognises and supports the concept of equivalence (eg with respect to Competent Authorities) and the use of accepted frameworks (such as the OIE Terrestrial Animal Health Code) to underpin animal health measures and to provide a common level of understanding and management of risk. These are vital tools in the facilitation of international trade.
 - 3.1.3 Nevertheless, no framework, of itself, provides a guarantee that the intended outcome will always be met as all systems, including the administration and implementation of the OIE Code and its measures as they pertain to the draft IHS, are liable to fail under certain conditions.
 - 3.1.4 For this reason it is vital that MPI retains and, more importantly, uses, the other validated tools that are available to it – such as system verification and product testing – to reduce biosecurity risks to the point where they are as low as is reasonably practicable in the context of the biosecurity risks that importation of specific animal products presents to New Zealand.
 - 3.1.5 In the case of the Draft IHS for Pig Semen under consideration, the Federation is not confident that the measures proposed are adequate with respect to some of the animal diseases considered.

- 3.1.6 In particular, the Federation is concerned with the measures proposed to be taken in respect of the diseases that affect the sheep and/or dairy and beef cattle sectors such as Foot and Mouth Disease (FMD) and Brucellosis.
- 3.1.7 In the case of FMD, the Federation fully agrees with the comment on page 15 of the MPI Risk Management Proposal (RMP, 2016) document that the introduction of FMD would result in “*catastrophic consequences*” for New Zealand.
- 3.1.8 In principle, the Federation agrees with the RMP comment (*op cit*) that “ ... **importation of pig semen should be limited**] ...**from FMD infected countries or zones** [to situations where compliance with the relevant OIE requirements] **has been reviewed and accepted by MPI**” (emphasis added).
- 3.1.9 However, the Federation believes that, as written in the IHS and the associated Guidance Document, the controls to be applied to the importation of pig semen from countries/zones where FMD is present are not strong enough. Any consideration of importing such potentially hazardous material must include a full in-country verification audit in conjunction with a robust level of product testing.
- 3.1.10 There should also be in one or both documents a section, preferably highlighted, where this requirement (and the diseases that it applies to) are stated.
- 3.1.11 The Federation believes that the matters raised are significant and requests that further expert advice is sought. As a consequence, the Federation believes that publication of the final IHS and Guidance Documents should be deferred until this measure has been taken.

4 ABOUT FEDERATED FARMERS

- 4.1 Federated Farmers of New Zealand is a primary sector organisation that represents 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.

ENDS