

***Import risk analysis: Freshwater Frozen, skinless and boneless fillet meat of  
Oreochromis spp. from China and Brazil for human consumption***

**Review of Submissions**

**Biosecurity New Zealand  
Ministry of Agriculture and Forestry  
Wellington  
New Zealand**



**February 2008**

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Biosecurity New Zealand

*Import risk analysis:* Frozen, skinless and boneless fillet meat of *Oreochromis* spp. from China and Brazil for human consumption

Review of Submissions

February 2008

Approved for general release

Christine Reed  
Risk Analysis Manager  
Policy & Risk  
Biosecurity New Zealand

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## Executive Summary

Biosecurity New Zealand carried out an analysis of the risks associated with the importation of frozen skinless and boneless fillet meat of *Oreochromis* species (tilapia) from China and Brazil. The risk analysis was released for public consultation on 12 October 2007, and submissions closed six weeks later on 23 November 2007.

Three submissions were received.

Issues of direct relevance to the risk analysis highlighted by the submissions included: -

- safety to humans of the imported commodity;
- the potential for raw product to enter the aquatic environment here and spread or introduce disease;
- clarifying water-quality outcomes and standards; and
- the difficulty, and need, to direct bulk shipments to a transitional facility for processing.

As a result of the information in the submission from Independent Fisheries Ltd., the general sanitary measure 5.1.2, related to control of large quantities of trim waste, was considered to be unnecessary and has been deleted.

To clarify the water standards required in the processing of the fish, the commodity definition (Section 2.2) has been amended to read:

“The commodity considered in this risk analysis is frozen, skinless, boneless fish fillets (or mince derived from fillets) from *Oreochromis* spp. farmed in Brazil and China. Fish are harvested from the farm, bled, scaled, eviscerated, filleted, skinned, trimmed, washed and graded. Potable water is used in the manufacturing process. Product may contain sodium tripolyphosphate as additive at a rate of 300 – 350g per 7.1 – 7.2 kg of fish. Fillets are then packaged/wrapped and block/individually frozen to a core temperature of -18 °C or -20 °C and then stored and transported at those temperatures. Deliveries are expected to be made by sea with a time of approximately 30 days between freezing and arrival at the New Zealand border.”

Following this change, the specific sanitary measure relating to required water treatments (Section 5.2) was removed, as the use of potable water would achieve the same result as specifying water treatment regimens. Instead, an additional paragraph (Section 5.1.2) (General sanitary measures) was added and reads:

“To avoid contamination of the commodity with exotic foodborne pathogens it is necessary to use potable water at all times in the processing plant.”

The final recommended risk management measures are: -

“**General sanitary measures** were considered necessary:

to ensure that the likelihood of clinically or subclinically diseased fish being harvested for processing is minimised.

- both the farm of origin and the processing facility must be registered with the Competent Authority of the country in question; and
- fish processed must be derived from broodstock resident in the exporting country; and

- fish showing clinical signs of disease, septicaemia or skin ulceration must not be harvested for processing into this commodity; and
- fish harvested must not be subject to emergency slaughter for disease reasons, regardless of whether or not they display clinical signs themselves.

to avoid contamination of the commodity with exotic foodborne pathogens

- only potable water should be used during the processing of the fish into fillet meat.

to ensure compliance with the freezing and transport time regime included in the commodity definition.

- To ensure that the inactivation of organisms that is inherent in this freezing process does occur it must be determined that the commodity was frozen and held at  $-18^{\circ}\text{C}$ , or lower, for at least 7 days (168 hours) before a biosecurity clearance is issued.”



## Introduction

The completed risk analysis was released for public consultation on 12 October 2007. Submissions closed on 23 November 2007.

Biosecurity New Zealand received the following submissions:

<b>Name</b>	<b>Organisation Represented</b>	<b>Date Received</b>
John Beattie	No affiliation stated	12/10/2007
Ron Dougherty	New Zealand Salmon Anglers Association Incorporated	22/11/2007
Stella Stacey	Independent Fisheries Ltd	23/11/2007

This document reviews each submission in turn. The full text of each submission is included in Appendix 1.

## **Review of Submissions**

### **1. John Beattie**

This submission questions why commodities such as this are considered for import health standards and raises concerns around the movement of didymo from the South island to the North island. The submission contained no direct comments on the content of the draft risk analysis released for public consultation. As a result, there are no recommended changes to the risk analysis.

## 2. Ron Dougherty, New Zealand Salmon Anglers Association Incorporated

This submission raises four main concerns of the submitting body:

- The enforcement of import health standards
- The domestic availability, or lack thereof, of New Zealand derived fisheries products
- Food safety and environmental issues – exemplified by product recalls of goods produced in China, a food poisoning outbreak following the consumption of raw South Korean prawns and indicates concern over environmental conditions in Brazil and China.
- The possibility that raw product may be used for direct consumption or be discarded into the aquatic environment.

MAFBNZ thanks the submitter for forwarding their concerns around the general issue of fisheries imports and exports. These concerns have been noted and, in the case of food safety concerns, were considered and investigated by MAFBNZ at an early stage in the drafting of the risk analysis.

In regards to the issue of enforcement of import health standards, the submitter should be assured that MAFBNZ takes the biosecurity of New Zealand seriously and makes strenuous efforts to ensure that import health standards are adhered to. The issue of domestic availability of New Zealand derived fisheries products does not lie within the remit of MAFBNZ, nor the risk analysis, and thus the review of submissions is unable to speak to these concerns.

In considering food safety issues associated with the importation of this commodity MAFBNZ must adhere to the Biosecurity Act (“The Act”). The Act however restricts our consideration to “organisms” that may be present in the “risk good”. The definition of “organism” in the Act does not include chemical contamination, thus the risk analysis cannot formally address the issue of chemical residues in an imported commodity. However, as indicated above, it should be noted that the New Zealand Food Safety Authority (NZFSA) was consulted during the drafting of this document with the following response:

*“The New Zealand Food Safety Authority (NZFSA) has made a preliminary evaluation of the food safety risks associated with the importation of skinless, boneless fillet meat of tilapia from China and Brazil. While it has no specific food safety concerns associated with import of these products, it does have general concerns about hazards that may be present in the commodity, particularly chemical hazards such as antimicrobial drugs, residues of agricultural compounds, and heavy metals. While there are currently no specific food safety standards or import requirements that would apply to tilapia from China and Brazil, if imported they would need to meet the requirements of all relevant food legislation, including the Food Act 1981 and the Australia New Zealand Food Standards Code. In future, additional requirements may apply to these products as NZFSA is in the process of implementing the outcome of a major review of its imported food programme. Implementation will occur over the next few years and will involve grouping imported foods into one of three categories of regulatory interest with different requirements and clearance options applying to each category. Foods may also be put on a “scanning list” and subjected to additional monitoring (including sampling and testing) should this be warranted. Further information on NZFSA’s import requirements and the new imported food programme is available on NZFSA’s website at <http://www.nzfsa.govt.nz/imported-food/index.htm>.”*

The submitter also queries whether raw, imported fillet meat could be used as sushi, bait or discarded into the New Zealand aquatic environment. As the commodity definition was for uncooked product, the risk analysis examined the risk from the entry of raw fillet meat, taking into

consideration that the commodity could be consumed raw or could be diverted to other uses. In all the hazards identified it was concluded that the processing of the fish and the freezing process involved would reduce any risk in the raw product to negligible.

There are no recommended changes to the risk analysis as a result of this submission.

### 3. Stella Stacey, Independent Fisheries Ltd.

This submission agreed with the majority of the general sanitary measures suggested in the risk analysis, but raised some issues regarding the commodity definition, the specific sanitary measures regarding waterborne contaminant organisms and the general sanitary measure regarding bulk shipments and high volume waste generation.

#### Submitter comment 1:

2.2 COMMODITY DEFINITION	“ <u>Treated water</u> is used in the manufacturing process.” Is this always the case? The intent would be clearer if the term potable water was used as opposed to treated water.
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#### MAFBNZ response 1:

Upon examination of the original “Request for development of an import health standard (animal products) it is clear that the commodity is designed to be processed using potable water. It is therefore acceptable to alter the commodity definition to reflect this.

#### Recommendation 1:

The commodity definition (Section 2.2) is amended to read:

“The commodity considered in this risk analysis is frozen, skinless, boneless fish fillets (or mince derived from fillets) from *Oreochromis* spp. farmed in Brazil and China. Fish are harvested from the farm, bled, scaled, eviscerated, filleted, skinned, trimmed, washed and graded. **Potable** water is used in the manufacturing process. Product may contain sodium tripolyphosphate as additive at a rate of 300 – 350g per 7.1 – 7.2 kg of fish. Fillets are then packaged/wrapped and block/individually frozen to a core temperature of -18 °C or -20 °C and then stored and transported at those temperatures. Deliveries are expected to be made by sea with a time of approximately 30 days between freezing and arrival at the New Zealand border.”

#### Submitter comment 2:

4.14 WATER-BORNE CONTAMINANTS	<p>If the processing facility is registered with the Competent Authority of the country in question then we question the need for further specifying a water quality standard that must be complied with. If the fish is coming from a registered processor then there will already be controls in place to ensure that the water used is potable.</p> <p>We are applying the NZ standard to another country. The NZDWS is relevant for community supplies and not necessarily for processors. Should we not also be looking at outcomes, i.e. is the water potable, rather than specifying controls.</p>
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**MAFBNZ response 2:**

The general issues raised in this comment are noted. As the commodity definition has been readdressed to include potable water used in the manufacturing process, it is suggested that much of the concerns regarding the sanitary conditions associated with water quality can be addressed now in a general sanitary condition relating to compliance with the commodity definition. The risk analysis was carried out on the basis that the commodity would comply with that stated, therefore to be eligible for biosecurity clearance the imported commodity must be certified to be equivalent to that specified in the risk analysis. In this regard it is suggested that the specific sanitary measure relating to water quality be removed and replaced with a general sanitary measure requiring the use of potable water at all times in the processing of the fish into fillet meat. As the conditions for the registration of a fish processor in the exporting country are beyond the control of MAFBNZ and may change it is still considered necessary to specify the use of potable water as a general sanitary measure.

**MAFBZ recommendation 2:**

The specific sanitary measures (Section 5.2) are deleted; and an additional paragraph placed in Section 5.1 (General sanitary measures) to read:

“To avoid contamination of the commodity with exotic foodborne pathogens it is necessary to use potable water at all times in the processing plant.”

**Submitter comment 3:**

<p style="text-align: center;">4.14 WATER-BORNE CONTAMINANTS (continued)</p>	<p>If the processor has a “secure” groundwater supply then it may not be necessary for them to chlorinate their water prior to use. At Independent Fisheries Ltd (PH37) we would not meet the water requirements specified in the draft hazard analysis as we do not chlorinate the Christchurch City Council municipal supply, or our own well sourced water.</p> <p>We already import fish fillets and mince that are processed in China and have never encountered any issues associated with the processing water. The Import Health Standard for Marine Fisheries Products (fismaric.all) does not specify specific sanitary measures for water used for processing so why are they necessary here?</p>
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**MAFBNZ response 3:**

The first paragraph of the comment is addressed by MAFBNZ response 2 and requires no additional amendment to the risk analysis.

As regards the second paragraph of the comment, the Biosecurity Act 1993 (“The Act”) requires the consideration of organisms that may cause harm to natural and physical resources or human health in New Zealand. The definition of “risk good” in The Act includes organisms that may be harboured in a commodity. The water used in the processing and freezing of the commodity may harbour harmful organisms and thus it is appropriate to include this aspect for consideration in a risk analysis. This approach is supported by both the Ministry of Health and the New Zealand Food

Safety Authority. The suggested general sanitary measure requiring the use of potable water at all times in the processing of the fish into fillet meat should fulfil this requirement without proving onerous on either the processing plant or the importer. As previous import health standards are reviewed it is likely that similar issues will be taken into consideration.

**MAFBNZ recommendation 3:**

No amendment of the risk analysis is required.

**Submitter comment 4:**

<p>5.1 GENERAL SANITARY MEASURES</p>	<p>We agree with the proposed general sanitary measures outlined in Section 5.1.1 and 5.1.3</p>
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**MAFBNZ response 4:**

Support for the general sanitary measures 5.1.1 and 5.1.3 is noted.

**MAFBNZ recommendation 4:**

No amendment of the risk analysis is required.

**Submitter comment 5:**

<p>5.1.2 GENERAL SANITARY MEASURES</p>	<p>Section 5.1.2 has controls regarding waste from further processing in New Zealand. The Executive Summary states - <i>“Bulk shipments that will undergo further processing involving the generation of waste fish trim or liquid effluent therefore must be directed to a transitional facility where any solid and liquid wastes must be disposed of in a manner approved by the Ministry of Agriculture and Forestry.”</i></p> <p>IFL would be looking at importing bulk shipments for further processing. As the commodity is already in a partially processed form, i.e. fillet or mince (and what is generally considered as high risk waste has already been removed, i.e. the head, frame and gut) there will be minimal quantities of processing waste if further processing in New Zealand is carried out. Most further processing would entail cutting to size and/or coating. When product is cut to size any “trimmings” as such are minimal and are generally re-used as a raw material in another value-added product and do not enter the waste stream.</p>
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Section	Comments
<p style="text-align: center;">5.1.2 GENERAL SANITARY MEASURES (continued)</p>	<p>The amount of fish entering the waste stream would be minimal and this could be expected to enter the normal waste stream without any issues. The potential for “concentrating the waste in one location” is minimal. Hence the theoretical risk of disease introduction discussed in the Executive Summary is negligible due to standard processing practices.</p> <p>There is also a conflict with the NZFSA requirements for premises who are listed for export to the European Union. (Refer to NZFSA EU OMAR Section 1.7.14). The EU requirements do not permit premises to also be biosecurity transitional facilities. This would preclude any NZFSA licenced fish processor (who is EU listed) from being able to further process the commodity with the intent to re-export it. It would limit processing in New Zealand to non-export premises and those that are non-EU (which there are not many). It would mean that IFL would not be able to import Tilapia for further processing (i.e. coating) at our premises.</p> <p>Section 5.1.2 would be relevant if whole or head and gut fish were being further processed in NZ, however as the commodity is fillet / mince we would like to see this sanitary measure removed.</p> <p>I note that this is not a requirement of the Frozen Nile Perch Import Health Standard (fisnpeic.all)</p>

**MAFBNZ response 5:**

The content of this comment, and the difficulties such a requirement would place on the importers is noted. This requirement is consistent with more recent, risk analysis based import health standards for the importation of salmonids for human consumption, rather than the older health standard for frozen Nile perch. Regardless, it is appropriate to re-examine the requirement in the light of this information, the commodity definition and the necessity to provide biosecurity clearance at the border, which in this case would need to be prior to delivery to the processing plant in New Zealand. The risk analysis for the importation of salmonids for human consumption considered head-off, gutted and chilled salmonid carcasses. As such this commodity differs in that it is also skinless and boneless and must be frozen. The individual risk assessments do, indeed, conclude that there is negligible risk posed by the commodity under normal conditions. As the level of risk inherent in a commodity is also a function of volume of trade, it is possible to consider that the discarding of large volumes of the commodity could increase that risk above negligible. However, such volumes would need to be very large, and it is accepted that this would not make appropriate commercial sense. It is noted that waste trimmings are redirected into other value-added product lines and that the waste stream is not large. Given the highly processed nature of the



commodity and the information provided by the submitter it is considered appropriate to remove the requirement to direct bulk shipments to a transitional facility, but to allow clearance at the border.

**MAFBNZ recommendation 5:**

The general sanitary measure 5.1.2 is deleted. The requirement, expressed in the executive summary, to direct bulk shipments to a transitional facility is likewise deleted.

**Submitter comment 6:**

5.2 SPECIFIC SANITARY MEASURES	Please see earlier comments regarding Section 4.14 Water-Borne Contaminants. We feel that these extra controls are unnecessary and do not align with other current Import Health Standards such as Marine Fisheries Products (fismaric.all) or Frozen Nile Perch (fisnpeic.all).
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**MAFBNZ response 6:**

The issue of water quality controls has been addressed in MAFBNZ response 2. The issues of consistency with other import health standards has been addressed in MAFBNZ responses 3 and 5.

**MAFBNZ recommendation 6:**

No amendment of the risk analysis is required.

## Conclusions

Following consideration of submissions received during public consultation on the “*Import risk analysis: Frozen, skinless and boneless fillet meat of *Oreochromis* spp. from China and Brazil for human consumption*” the following are recommended changes to the content of the risk analysis:

1. The commodity definition (Section 2.2) is amended to read:

“The commodity considered in this risk analysis is frozen, skinless, boneless fish fillets (or mince derived from fillets) from *Oreochromis* spp. farmed in Brazil and China. Fish are harvested from the farm, bled, scaled, eviscerated, filleted, skinned, trimmed, washed and graded. **Potable** water is used in the manufacturing process. Product may contain sodium tripolyphosphate as additive at a rate of 300 – 350g per 7.1 – 7.2 kg of fish. Fillets are then packaged/wrapped and block/individually frozen to a core temperature of -18 °C or -20 °C and then stored and transported at those temperatures. Deliveries are expected to be made by sea with a time of approximately 30 days between freezing and arrival at the New Zealand border.”

2. The specific sanitary measures (Section 5.2) are deleted; and an additional paragraph placed in Section 5.1 (General sanitary measures) to read:

“To avoid contamination of the commodity with exotic foodborne pathogens it is necessary to use potable water at all times in the processing plant.”

3. The general sanitary measure 5.1.2 is deleted. The requirement, expressed in the executive summary, to direct bulk shipments to a transitional facility is likewise deleted.

As a result the suggested final sanitary measures can be expressed as:

“**General sanitary measures** were considered necessary:

to ensure that the likelihood of clinically or subclinically diseased fish being harvested for processing is minimised.

- both the farm of origin and the processing facility must be registered with the Competent Authority of the country in question; and
- fish processed must be derived from broodstock resident in the exporting country; and
- fish showing clinical signs of disease, septicaemia or skin ulceration must not be harvested for processing into this commodity; and
- fish harvested must not be subject to emergency slaughter for disease reasons, regardless of whether or not they display clinical signs themselves.

to avoid contamination of the commodity with exotic foodborne pathogens

- only potable water should be used during the processing of the fish into fillet meat.

to ensure compliance with the freezing and transport time regime included in the commodity definition.

- To ensure that the inactivation of organisms that is inherent in this freezing process does occur it must be determined that the commodity was frozen and held at -18°C, or lower, for at least 7 days (168 hours) before a biosecurity clearance is issued.”

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## **Appendix 1: Copies of Submissions**

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## 1. John Beattie

**From:** John Beattie [mailto:josu@paradise.net.nz]

**Sent:** Friday, 12 October 2007 10:25 p.m.

**To:** Martin Van Ginkel

**Subject:** Re Risk analysis applications

Martin hi,

I am a fly fisherman, and it mystifies me as to why you even put the types out for comments of some of these most ridiculous applications of importation.

To me and others in the sport can't understand why DOC and Biosecurity have taken so long to get the most basic of protection work set up to protect the North Island from the DIDYMO situation of the South Island.

Both Govt. Depts. have had just on three years to put systems in place, since didymo was first discovered, yet little has been done so far as meaningful control methods to inspect both travellers and vehicles to ensure that the procedures of cleaning Jet boats kiyaks and fishing gear is adequately done, it will be too late.

Actions are greater than words, and if the appropriate Govt,Depts don't stop pontificating and start taking some urgent action it will be too late, didymo will arrive in the North Island, and those of use who enjoy fresh water angling will be the losers, little alone those who derive an income from it.

Stop even contemplating what some of these crackpots are wanting to import, but rather what is best for the population as a whole.

Perhaps you should talk to NZ fish & game and get the ideas of some of these preposals.

Cheers

John Beattie

## **2. Ron Dougherty – New Zealand Salmon Anglers Association Incorporated**

22 November 2007

Biosecurity New Zealand  
P O Box 2526  
Wellington

Attention: Martin Van Ginkel

Dear Sir

### **IMPORTATION OF TILAPIA FROM CHINA AND BRAZIL DRAFT RISK ANALYSIS**

Thank you for the opportunity to make a submission on the above proposal. NZ Salmon Anglers Association (“NZSAA”) comments as follows:

We have products being exported out of China of every type and class of manufacture (including foodstuffs) with at least one highly publicised product recall each month. Brazil remains to most of us as an unknown quantity but Trout Unlimited news footage of their waterways abuse paints an abysmal picture.

Having seen (on TV news) and read of the high levels of pollution of all waterways, the air, and the land in China, we are dubious that the promised washing of the fillets in certified “pure” water will be sufficient. What about the rearing waters, the leachate from the surrounding lands, the aerosols in the air and the solubles in the rainwater? Where and what will the fish food be made of?

Imported products, visibly labelled on the bags, as required by health regulations, are ignored in New Zealand, e.g. oysters labelled “must be served cooked” were served as raw oysters at an international rugby game in Auckland and caused a large food poisoning outbreak. The oysters were admittedly farmed in South Korea. But blatantly ignoring the warning label by the caterers must be taken notice of. There are currently doubts about farmed shrimp and prawns from the Far East.

NZSAA has concerns at the diligence of border security in New Zealand. We quote examples:

- a. Varroa bee mite, presumably smuggled into New Zealand on a queen bee, in a small undetected container (or multiples of) by an amateur bee farmer or a commercial apiarist.
- b. Rabbit Calcivirous Disease (RCD) smuggled into Central Otago and illegally released.
- c. Didymo, arrived presumably on damp clothing or damp gear. Blame was directed at the freshwater anglers, not the other fresh water users, canoeists, trampers, rafters, or the lack of scrutiny at the arrival points.
- d. Painted Apple Moth in Auckland.

- e. We have imported Chinese “whitebait” being sold in New Zealand - cheap, poor quality, still being sold as whitebait despite being ordered to stop.

What is to stop thawed, spoiled imported fish fillets being used as fishing bait or discarded into waterways or the marine environment. There is the possibility of the importation of a new freshwater organism, not necessarily affecting fish.

Could these thawed fillets be used as sushi?

NZSAA made earlier submissions about the importation of fresh pilchards as bait from Western Australia, despite an outbreak of a marine herpes in Western Australia. This spread around Australia’s coast and caused a massive fish kill. Then we had a pilchard kill in New Zealand waters. Pilchards (as bait) can only be imported as frozen fish. Is this enforced?

New Zealand is internationally famous for its marine fishery and the quality of its products. Over fishing and over exporting has presumably brought about the perceived demand for these fillets for the commercial food trade.

I am sure that tourists do not come to New Zealand to eat imported, farmed fish - they can do that at home. I have, over the years, spoken with many tourists and generally they seem unimpressed with the quality of fish served up off the menus in New Zealand. Comment: “I have eaten better New Zealand fish in the American mid-west”.

New Zealand would be better served by reserving fish harvested in New Zealand at sea for the exclusive use of the catering trade and labelling the fish as “reserved from New Zealand stocks”.

Finally: who would eat this wondrous product? How would it be merchandised? Would the customer even be told?

Thank you for your consideration of our submission.

Yours faithfully

(Signed) R Dougherty

Ron Dougherty  
VICE PRESIDENT



### 3. Stella Stacey – Independent Fisheries Ltd.

<p>Stella Stacey  <a href="mailto:stella.stacey@indfish.co.nz">stella.stacey@indfish.co.nz</a>  Quality Manager</p> <p>Independent Fisheries Ltd (PH37)  Shadbolt Boulevard, Woolston, Christchurch</p> <p>Phone 03-3842344      Fax 03-3844650</p>	
<p>Independent Fisheries Ltd is the operator of a Risk Management Programme registered with the NZFSA. We process coated fish products for export through out the world. Our fish raw materials are currently sourced from NZ waters and also imported from China, Chile, Argentina, Peru, USA, Russia and several other countries.</p>	
Section	Comments
<p>2.2 COMMODITY DEFINITION</p>	<p>“<u>Treated water</u> is used in the manufacturing process.”  Is this always the case? The intent would be clearer if the term potable water was used as opposed to treated water.</p>
<p>4.14 WATER-BORNE CONTAMINANTS</p>	<p>If the processing facility is registered with the Competent Authority of the country in question then we question the need for further specifying a water quality standard that must be complied with. If the fish is coming from a registered processor then there will already be controls in place to ensure that the water used is potable.</p> <p>We are applying the NZ standard to another country. The NZDWS is relevant for community supplies and not necessarily for processors. Should we not also be looking at outcomes, i.e. is the water potable, rather than specifying controls.</p>

Section	Comments
<p style="text-align: center;">4.14 WATER-BORNE CONTAMINANTS (continued)</p>	<p>If the processor has a “secure” groundwater supply then it may not be necessary for them to chlorinate their water prior to use. At Independent Fisheries Ltd (PH37) we would not meet the water requirements specified in the draft hazard analysis as we do not chlorinate the Christchurch City Council municipal supply, or our own well sourced water.</p> <p>We already import fish fillets and mince that are processed in China and have never encountered any issues associated with the processing water. The Import Health Standard for Marine Fisheries Products (fismaric.all) does not specify specific sanitary measures for water used for processing so why are they necessary here?</p>
<p style="text-align: center;">5.1 GENERAL SANITARY MEASURES</p>	<p>We agree with the proposed general sanitary measures outlined in Section 5.1.1 and 5.1.3</p>
<p style="text-align: center;">5.1.2 GENERAL SANITARY MEASURES</p>	<p>Section 5.1.2 has controls regarding waste from further processing in New Zealand. The Executive Summary states - <i>“Bulk shipments that will undergo further processing involving the generation of waste fish trim or liquid effluent therefore must be directed to a transitional facility where any solid and liquid wastes must be disposed of in a manner approved by the Ministry of Agriculture and Forestry.”</i></p> <p>IFL would be looking at importing bulk shipments for further processing. As the commodity is already in a partially processed form, i.e. fillet or mince (and what is generally considered as high risk waste has already been removed, i.e. the head, frame and gut) there will be minimal quantities of processing waste if further processing in New Zealand is carried out. Most further processing would entail cutting to size and/or coating. When product is cut to size any “trimmings” as such are minimal and are generally re-used as a raw material in another value-added product and do not enter the waste stream.</p>

Section	Comments
<p style="text-align: center;">5.1.2 GENERAL SANITARY MEASURES (continued)</p>	<p>The amount of fish entering the waste stream would be minimal and this could be expected to enter the normal waste stream without any issues. The potential for “concentrating the waste in one location” is minimal. Hence the theoretical risk of disease introduction discussed in the Executive Summary is negligible due to standard processing practices.</p> <p>There is also a conflict with the NZFSA requirements for premises who are listed for export to the European Union. (Refer to NZFSA EU OMAR Section 1.7.14). The EU requirements do not permit premises to also be biosecurity transitional facilities. This would preclude any NZFSA licenced fish processor (who is EU listed) from being able to further process the commodity with the intent to re-export it. It would limit processing in New Zealand to non-export premises and those that are non-EU (which there are not many). It would mean that IFL would not be able to import Tilapia for further processing (i.e. coating) at our premises.</p> <p>Section 5.1.2 would be relevant if whole or head and gut fish were being further processed in NZ, however as the commodity is fillet / mince we would like to see this sanitary measure removed.</p> <p>I note that this is not a requirement of the Frozen Nile Perch Import Health Standard (fisnpeic.all)</p>
<p style="text-align: center;">5.2 SPECIFIC SANITARY MEASURES</p>	<p>Please see earlier comments regarding Section 4.14 Water-Borne Contaminants. We feel that these extra controls are unnecessary and do not align with other current Import Health Standards such as Marine Fisheries Products (fismaric.all) or Frozen Nile Perch (fisnpeic.all).</p>