



SUBMISSION TO
MINISTRY OF AGRICULTURE AND FORESTRY
BIOSECURITY NEW ZEALAND

on the

**Draft Import Health Standards (IHS) for Pig Meat and Pig Meat
Products**

By

DEER INDUSTRY NEW ZEALAND

5 June 2008

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5 June 2008

Vivian Dalley
Import Standards Group
Border Standards Directorate
Biosecurity New Zealand
Ministry of Agriculture and Forestry
PO Box 2526
Wellington

Dear Ms Dalley

DRAFT IMPORT HEALTH STANDARDS (IHS) FOR PIG MEAT AND PIG MEAT PRODUCTS

Deer Industry New Zealand (DINZ) is the levy funded industry-good body established under the Deer Industry New Zealand Regulations (2004). One of its key functions is to promote and assist the development of the deer industry in New Zealand. DINZ, along with other primary sector industry organisations has a significant interest in maintaining robust biosecurity measures to preserve valued perceptions of clean, disease-free and sustainable New Zealand's primary products for overseas markets.

The Pork Industry Board (PIB) has asked other primary industry groups to look at draft import health standards (IHS) for pig meat and pig meat products due to its concerns around the setting of these in relation to impacts to biosecurity border controls.

While it is not within the scope or mandate of DINZ to comment on the IHS, DINZ has looked at some material circulated by both PIB and the Ministry of Agriculture and Forestry, Biosecurity New Zealand (MAF BNZ) on this matter and also an analysis of the risk of introduction and spread of porcine reproductive and respiratory syndrome virus (PRRS) that may result from lowering of biosecurity controls (Neumann *et al.*, in *New Zealand Veterinary Journal* 55(6), 326-336, 2007). In doing so DINZ acknowledges that there is other material that it has not viewed, but has chosen not to do so due to expediency.

DINZ fully acknowledges MAF BNZ's role and responsibility for objectively setting biosecurity border controls and also notes the invaluable and necessary role that the various industry-good bodies and other industry experts can play in providing objective, science-based information to assist MAF BNZ in this regard. In a small country such a partnership approach (across all facets of biosecurity) maximises the value of our limited resources.

DINZ therefore wishes to express some concern over the apparently wide divergence of positions adopted by MAF BNZ and PIB over the risk that the IHS pose to the introduction of PRRS. While not wanting to re-litigate the science behind both positions it does highlight a problem that if there is contrasting or even contradictory science, then decision-making in a partnership approach is severely compromised.

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Deer Industry New Zealand is the operating name of the Game Industry Board.



Although DINZ is not aware of any similar situation regarding a PRRS-like risk for the deer industry, if there was an occasion where DINZ and a partner had conflicting scientific knowledge, DINZ would seek some process of engagement between the scientific providers that would allow an exchange of ideas, assumptions and methodologies. From this iterative process one would expect that either a positive outcome would result in both parties agreeing on the science-base and hence an appropriate assessment of the risk of any particular incursion, or at the other extreme, an open and clear understanding of the different parties' bases of knowledge.

It is not apparent, despite some evidence of information sharing, that such engagement has occurred in this case. DINZ would be keen to see such engagement occur as evidence that a partnership approach is indeed the preferred mode of operation between MAF BNZ and primary industries.

On behalf of Deer Industry New Zealand.

A handwritten signature in black ink, appearing to read "Lindsay Fung".

Lindsay Fung
Science Manager