



Meat Industry Association of New Zealand (Incorporated)

Submission on:

**Reviewing the Biosecurity (Meat and Food Waste for Pigs)
Regulations 2005**

17 April 2025

1. Introduction

- 1) The Meat Industry Association (MIA) is a voluntary, membership-based organisation representing processors, marketers, and exporters of New Zealand red meat, rendered products, and hides and skins. MIA represents 99 percent of domestic red meat production and exports. With export revenues of \$9.86 billion (2024), the red meat industry is New Zealand's second largest goods exporter.
- 2) The meat processing sector is New Zealand's largest manufacturing sector that employs over 25,000 people in about 60 processing plants, located mainly in the regions. The sector is a significant employer in many of New Zealand's rural communities and contributes over \$4 billion in household income.
- 3) MIA is a signatory to the Government Industry Agreement (GIA) for biosecurity readiness and response, joining in September 2017. MIA staff are engaged in numerous biosecurity readiness projects and represent Members interests through membership of the Livestock Sector Biosecurity Council
- 4) A list of members is attached (Appendix A). Individual members may have also made their own submissions.

2. Executive Summary

- I. MIA is appreciative of the opportunity to provide feedback on the proposals.
- II. MIA acknowledges that the regulation of waste feeding practices is a particularly challenging area.
- III. MIA notes that options prohibiting feeding meat or food that has been in contact with meat may only be enforceable if appropriate diagnostic tests are available to support enforcement activities.
- IV. MIA considers that strengthening waste feeding requirements will only be significantly more effective in reducing biosecurity risks if accompanied by mandatory registration of locations where pigs are kept, to support biosecurity education, assurance and enforcement activities.
- V. MIA recommends option 3 – prohibiting feeding food waste including meat to pigs unless supplied by a registered supplier and requiring sources and suppliers to adhere to treatment regimens and maintaining records – is preferred.

3. Overview

- 5) MIA welcomes the opportunity to comment on the consultation document.
- 6) New Zealand's high biosecurity status with respect to pests and diseases of livestock underpins our exports of red meat products to premium markets.
- 7) The continued high performance of the biosecurity system is essential for the viability of New Zealand's red meat sector because:
 - a) export of livestock products to premium markets requires the maintenance of freedom from a wide range of exotic pests and diseases
 - b) low occurrence of endemic diseases among New Zealand's extensive pastoral farms supports their financial sustainability
 - c) the high health status of pastoral farming in New Zealand enables world-leading standards of animal welfare and minimal use of antimicrobials and other veterinary medicines. These attributes of the provenance of New Zealand red meat products are increasingly demanded by customers and support the sector's competitiveness in the international marketplace.
- 8) MIA acknowledges that the regulation of waste feeding practices is a particularly challenging area, where there are no easy options, and MIA is encouraged by MPI's decision to prioritise addressing it.

4. Commentary on the proposals

Do you agree with how we have defined the problem? If not, why not?

- 9) MIA recognises the problem as defined but notes there are other important related issues that require consideration (see below).

Are there any factors contributing to the problem that have not been identified here? How much of a problem are they?

- 10) MIA considers that targeting educational material and, where appropriate undertaking compliance inspections, are necessary foundations for improving the compliance of pig owners with requirements regarding waste feeding.
- 11) Accepting this, it follows that obtaining complete and accurate data on the locations where pigs are kept is highly desirable for communicating with, and essential for inspecting, individuals and businesses keeping pigs.
- 12) Accordingly, MIA recommends that MPI develops proposals for a national pig farm registration scheme, requiring owners of pigs to register the locations where these are kept¹.

¹ The scheme operated in the countries of the UK may serve as a useful model for how this can work:
<https://www.gov.uk/government/collections/keeping-pigs-in-england>

Do you think the Meat and Food Waste Regulations are fit for purpose? Why / why not?

- 13) MIA understands that the inability to verify that waste feed has been subjected to the required treatment regime severely constrains enforcing the regulations.
- 14) This is compounded by the absence of any requirements to keep records of waste food sold to pig owners or purchased by them.

Do you find the requirements in the Meat and Food Waste Regulations confusing? Why / why not?

- 15) MIA does not find the requirements confusing but accepts that has been reported by others.

5. Commentary on the options

Option 1: Status quo – Meat food waste cannot be fed to pigs unless treated;
Option 2: Prohibit feeding food waste to pigs that contains meat (or has come into contact with meat);
Option 3: Require food waste producers to treat it before it can be distributed; or
Option 4: Prohibit feeding any food waste to pigs.

- 16) MIA is content that the range of options presented is sensible and the criteria are coherent.
- 17) However, there appears to be a very significant omission from the commentary about option 2, which appears to be MPI's preferred option.
- 18) Specifically, option 2 will only be more amenable to enforcement if there are validated tests that can detect the presence of meat in waste feed and that use of these tests is able to support enforcement action.
- 19) Confirmation that such tests are available, and that MPI is willing to deploy them, is required before MIA can support this option (or option 3, which appears to effectively be option 2 with additional requirements for food waste suppliers).
- 20) A further issue with option 2, that is not discussed in the review document, is the potential for pig keepers to recognise that there is no longer a requirement to cook food waste but to fail to acknowledge the 'no meat or contact with meat' part of the proposed regime. If this eventuates, then implementation of option 2 may in some cases lead to an increase in biosecurity risk.
- 21) MIA supports the application of exemption pathways as described, including verifiable treatments, record keeping and cost recovery.

6. MIA preferred option

- 22) MIA recommends that option 3 is preferred², as it appears to offer potential for a realistic increase in the management of biosecurity risk. MIA would support implementation of option 3 with exemption pathways for commercial businesses able to demonstrate compliance with an effective heat-treatment regime, as described for option 2.
- 23) MIA does not believe that the additional costs likely to be imposed on waste food producers would be significant. These would also be balanced by the ability to pass on costs to purchasers, who themselves will no longer face the costs associated with cooking it.
- 24) For meat containing food waste producers with the inability to cook it, MIA proposes that in future these are likely to sell it to registered suppliers or farmers with an exemption pathway. Alternatively, it can be disposed of as municipal refuse.
- 25) MIA reminds MPI that other countries that have experienced FMD, e.g. the UK and South Korea, have adopted more stringent measures and that the risk FMD poses to the New Zealand economy overall is significant, justifying intervention.
- 26) In summary, MIA supports:
1. Prohibiting the feeding of food waste that contains or has contact with meat to pigs unless it has been sourced from a waste feed 'processor' with an exemption allowing it to prepare this (which could apply to commercial farms with adequate capability).
 2. Auditing and verification of exempted meat-food waste 'processors' to ensure meat containing food waste is appropriately treated.
 3. Prohibiting sources of food waste containing meat from supplying it to any individual or business except those exempted (waste feed processors), unless adequately heat treated.
 4. Requiring commercial sources of food waste containing meat to keep records of either heat-treatments and sale to farms or sales to exempted businesses, if not disposed of as municipal refuse or destroyed on site.

MIA Contact

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² Conditional on a testing regime to support enforcement being available (see paragraph 19)

Appendix 1

MIA members and affiliate members as at 17 February 2025

Members	
Advance Marketing Limited Exporter Membership	Waimarie Meats Partnership
AFFCO NZ Ltd - Membership Levy	Wallace Group LP
Alliance Group Limited	Wilbur Ellis NZ Ltd
Ample Group Limited	Wilmar Trading (Australia) Pty Ltd
ANZCO Foods Ltd	
Ashburton Meat Processors Limited	
Auckland Meat Processors	Affiliate Members
Bakels Edible Oils (NZ) Ltd	Abattoirs Association of NZ
Ballande NZ Ltd	AgResearch
Black Origin Meat Processors	Alfa Laval New Zealand Ltd
Blue Sky Meats (NZ) Limited	Americold NZ Ltd
Columbia Exports Ltd	Aon New Zealand Ltd
Crusader Meats	AsureQuality NZ Ltd
Davmet NZ Limited	AusPac Ingredients NZ Ltd
Fern Ridge Ltd	Beca Ltd
Firstlight Foods Limited	Centreport Wellington
Garra International Limited	CMA CGM Group Agencies (NZ) Ltd
GrainCorp Commodity Management	CoolTranz 2014 Ltd
Greenlea Premier Meats	G-Tech Separation - Bellmor Engineering
Harrier Exports Ltd	Global Life Sciences Solutions New Zealand
Intergrated Foods Consortium	Haarslev Industries New Zealand
Kintyre Meats Ltd	Hapag-Lloyd (New Zealand) Ltd
Lean Meats Oamaru	IBEX Industries Limited
Lowe Corporation Ltd	Intralox LLC
Mathias NZ Limited	Kemin Industries Ltd
Ovation NZ Ltd	Liquistore
Peak Commodities Limited	Maersk A/S
Prime Range Meats	MJI Universal Pte Ltd
Progressive Meats Limited	Oceanic Navigation Ltd
PVL Proteins Ltd	Port of Napier
SBT Marketing (2009) Ltd	Port of Otago Ltd
Silver Fern Farms Ltd	Pyramid Trucking Ltd
Standard Commodities NZ Limited	Rendertech
Taylor Preston Limited	SCL Products Limited
Te Kuiti Meat Processors Limited	Scott Technology Ltd
UBP Limited	Sealed Air - Cryovac
Value Proteins Ltd	Suncorp New Zealand Services Limited