



Meat Industry Association of New Zealand (Incorporated)

And

Beef + Lamb New Zealand Ltd

Submission on:

Agricultural and Horticultural Products Regulatory Review

08 September 2024

Introduction

1. This is a joint submission by Beef + Lamb New Zealand Ltd (B+LNZ) and the Meat Industry Association Inc (MIA) representing the views of the sheep and beef sector (i.e. producers, processors, marketers and exporters).
2. The New Zealand sheep and beef sector (hereinafter “the sector”) is New Zealand’s second-largest goods export income earner, with over a million tonnes, or 86% of total production, being exported to nearly 110 overseas destinations generating \$10.6 billion in export revenue for the year ending December 2023. Ninety percent of this production is further processed into value-added products.
3. B+LNZ is the farmer-owned organisation representing New Zealand’s sheep and beef farmers. B+LNZ is funded under the Commodity Levies Act 1990 through a levy paid by producers on all cattle and sheep commercially slaughtered in New Zealand. B+LNZ invests farmer levies in programmes that grow the sheep and beef industry and provide sustainable returns now and for future generations.
4. B+LNZ represents around 9,300 commercial farming businesses, creating around 92,000 jobs (approximately 5% of total New Zealand employment) in the

red meat sector. Around three quarters of pastoral land and just under a third of New Zealand's total land area is used for sheep and beef farming.

5. The MIA is a voluntary, membership-based trade association 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.
6. 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.
7. A list of members is attached (Appendix A). Individual members may also make their own submissions.

Use of Veterinary Medicines and Compounds in Sheep and Beef Farming in New Zealand

8. Sheep and beef farming in New Zealand is characterised by extensive grazing of permanent pasture, supplemented with forage crops that are invariably grazed in situ.
9. Relative to red meat production overseas, sheep and beef farms in New Zealand use low quantities of agricomponents and veterinary medicines.
10. This low use of veterinary medicines is likely attributable to the minimal burden of disease that occurs in extensive pastoral systems that characterise sheep and beef farming in New Zealand. In addition, New Zealand's high standards of animal welfare mean animals are maintained in conditions that naturally minimise stress and disease.
11. However, disease and other animal health challenges do occur. To address these, access to efficacious and affordable veterinary medicines is essential to protect the health and welfare of stock. In sheep farming, tools for the sustainable control of internal parasites are particularly important.
12. Similarly, farmers are periodically required to use herbicides and pesticides for the control of environmental or production limiting weeds and arthropod crop pests. Without these, the financial viability of pasture and forage-based livestock production would become threatened.
13. For these reasons, B+LNZ supports farmers having access to veterinary medicines and agricomponents, including greenhouse gas inhibitors, as necessary tools for sustainable, responsible and profitable food production.
14. However, the availability and use of veterinary medicines and agricomponents can also carry risks that **must** be effectively managed:

- i. Risks to the environment
 - ii. Risks to human health from occupational exposure
 - iii. Food safety risks associated with residues
 - iv. Risks associated with the development of resistant pathogens
 - v. Risks to trade and market access associated with residues
 - vi. Risks to sector or country reputation associated with perceptions of overuse of these compounds
15. B+LNZ and MIA support continued government regulation of the availability and use of veterinary medicines and agricomponents as necessary to manage these risks. In some cases, the replacement of old chemistries with new compounds in the marketplace can also serve to mitigate risks.
16. The New Zealand red meat industry is also proactive in seeking to reduce and manage risks associated with agricomponents and veterinary medicines, either by emphasising the utility of alternatives, extending advice on appropriate use, or enabling and promoting participation in market-led assurance schemes.
17. The New Zealand Farm Assurance Programmes (NZFAP and NZFAP Plus) are the nationwide red meat farm assurance programmes established to provide confidence and certainty to consumers worldwide that the meat and wool produced from New Zealand's sheep, beef and deer farms is authentic, genuine, and safe. Approximately 8,000 farms are currently certified under the programmes, accounting for a large majority of ~9,300 commercial sheep and beef farms in New Zealand.
18. Under NZFAP/NZFAP Plus, farmers are audited every three years by an independent audit and certification body. Food safety is a fundamental component of the programmes, including record keeping and compliance legislation relating to agricomponents and veterinary medicines and manufacturer's instructions.

Commentary on the Operation of the Regulatory Framework Governing the Registration and Conditions of Use for Veterinary Medicines and Agricomponents in New Zealand

19. B+LNZ and MIA believe that the current regulatory framework is operating well to manage the risks outlined above (14 i to vi), as these have largely failed to materialise. However, it is possible that strengthening these processes in some areas may be desirable, and we encourage the Ministry to consider opportunities for doing so where apparent.
20. In principle, B+LNZ and MIA support the costs of managing registrations being fully recovered from the registrants.

21. B+LNZ and MIA represent the interests of the red meat sector and play no direct role in the registration of veterinary medicines or agricomponents. As such, we have limited understanding of the process, the time and resources required to submit an application and to provide the evidence necessary to support an approval.
22. Similarly, we do not have access to information about the extent of any unmet needs or benefits forgone associated with agricomponents or veterinary medicines where availability is perceived to be 'held up' by the extant process.
23. However, we are aware of anecdotal reports of compounds that are regulated and widely used in OECD countries, including valuable export markets for New Zealand livestock products, but are unavailable in New Zealand owing to issues with the registration process.

Commentary on the potential future operation of the regulatory framework for veterinary medicines and agricomponents

24. Owing to the magnitude of the potential risks to New Zealand's trade associated with agricomponents and veterinary medicines, B+LNZ and MIA do not support any reduction in the overall level of risk-management delivered under the current regulatory framework.
25. It is also imperative that the framework is consistent with key initiatives which are relevant both domestically and on a global scale, such as the World Health Organisation's (WHO) Global Action Plan on Antimicrobial Resistance.
26. The existing framework has served the sector well in facilitating trade to key markets across the globe. Growing scrutiny from overseas customers, consumers and overseas regulators seeking reduced use or freedom from veterinary medicines and agricomponents (often returning added premiums) further warrants the need for the robust regulatory system not to be compromised.
27. B+LNZ and MIA believe that there may alternatively be grounds for streamlining or 'regulating smarter' and, in particular, making greater use of the transparent and robust regulatory processes and risk assessments that apply in comparable overseas countries where appropriate.
28. B+LNZ and MIA wish to see a regulatory framework that is supported by sufficient resources to allow for the necessary assessment of risks and to prevent undue delays in the processing of applications. The requirements, process and progress should be transparent for applicants.
29. B+LNZ and MIA also encourage the New Zealand Government to continue to explore opportunities for multilateral standard setting, sharing of data and collaboration in this area with trading partners.

30. Further, and as noted above, regulation and risk management related to agricomponents and veterinary medicines is persistently hampered by the poor availability of data on their use. B+LNZ and MIA recommend that the Ministry considers potential solutions to this problem, ideally in collaboration with the representatives of the registrants, distributors and users of these compounds.

B+LNZ Contact

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MIA Contact

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Appendix 1

MIA members and affiliate members as at 9 May 2024

Members	Affiliate members
Advance Marketing Ltd	Abattoirs Association of New Zealand
AFFCO New Zealand Ltd	AgResearch Ltd
Alliance Group Ltd	Alfa Laval New Zealand Ltd
Ample Group Ltd	Americold New Zealand Ltd
ANZCO Foods Ltd	AON New Zealand Ltd
Ashburton Meat Processors Ltd	AsureQuality Limited
Auckland Meat Processors Ltd	Auspac Ingredients Pty Ltd
Bakels Edible Oils (NZ) Ltd	Beca Ltd
Ballande New Zealand Ltd	Centreport Ltd
Black Origin Meat Processors	CMA-CGM Group Agencies (NZ) Ltd
Blue Sky Meats (NZ) Ltd	Cooltranz 2014 Ltd
BX Foods Ltd	G-Tech New Zealand Ltd
Columbia Exports Ltd	Haarslev Industries Ltd
Crusader Meats New Zealand Ltd	Hamburg-Sud New Zealand Ltd
Davmet (New Zealand) Ltd	Hapag-Lloyd
Evolution Foods Limited	Intralox Ltd
Farmlands Mathias International Ltd	Kemin Industries NZ Ltd
Fern Ridge Ltd	Liqueo (HB) Ltd
Firstlight Foods Ltd	Maersk NZ Ltd
Garra International Limited	MJI Universal Pte Ltd
Global Life Sciences Solutions NZ Ltd t/a Cytiva	Moda Systems New Zealand Ltd
GrainCorp Commodity Management NZ Ltd	Oceanic Navigation Ltd
Greenlea Premier Meats Ltd	Port of Napier Ltd
Harrier Exports Ltd	Port Otago Ltd
Integrated Foods Limited	PrimeXConnect
Kintyre Meats Ltd	Pyramid Trucking Ltd
Lowe Corporation	Rendertech Ltd
Ovation New Zealand Ltd	Rockwell Automation (NZ) Ltd
Peak Commodities Ltd	SCL Products Ltd
Prime Range Meats Ltd	Scott Technology Ltd
Progressive Meats Ltd	Sealed Air (New Zealand)
PVL Proteins Ltd	SHICO Limited
SBT Group Ltd	Suncorp New Zealand Ltd
Silver Fern Farms Ltd	Visy Industries Australia Pty Ltd
Standard Commodities NZ Ltd	Wiley New Zealand Limited
Taylor Preston Ltd	
Te Kuiti Meat Processors Ltd	
UBP Ltd	
Value Proteins Ltd	
Waimarie Meats Partnership	
Wallace Group	

Members	Affiliate members
Wilbur Ellis (NZ) Ltd	
Wilmar Gavilon Pty Ltd	