



Meat Industry Association of New Zealand (Incorporated)

## **Feedback on MPI's Biosecurity Action Plan 2025**

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, making the meat industry New Zealand's second largest goods exporter with exports of \$9.9 billion.
- 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).

## **2. Overview**

- 5) MIA welcomes the opportunity to comment on the proposed Action Plan.
- 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.

## **3. Commentary on the Plan**

- 8) MIA welcomes the development of the Action Plan and would welcome understanding the composition of the steering group established to guide it.
- 9) MIA's preference would have been for the Action Plan concept to have been developed with livestock industry representatives at the Livestock Sector Biosecurity Council (LSBC), noting members largely have aligned priorities and established relationships.
- 10) MIA considers that decisions about roles, priorities and resourcing are fundamental to the effective operation of biosecurity services and welcomes the Actions in the Plan that seek to characterise and provide transparency of these. As the leader of the biosecurity system, this applies to MPI most of all.
- 11) MIA notes that accountability for delivery of each Action needs to be clearly established and accepted for the plan to deliver value, and in many cases this will require investment.
- 12) Noting the resourcing constraints currently facing Government, industries and other stakeholders, MIA proposes that there may be too many items on the action plan, risking failure of delivery. Accordingly, it is recommended MPI consults stakeholders on the removal of some actions, reducing the overall commitment but at the same time allowing for the addition of priorities for stakeholders not involved in the Plan's original development.

- 13) MIA views return on investment a paramount consideration in any investment decision. The current draft Plan contains a number of Actions where the pathway to realising benefits to New Zealand's biosecurity is far from clear.

Exploring biosecurity risks driven by climate change, understanding social and cultural values, achieving data interoperability, deploying multidisciplinary teams, using AI etc are all fashionable concepts that may offer potential. However, for each action it is essential to evaluate *how much value* will be delivered and at what cost, both absolute and in terms of opportunity. MIA would prefer to see the Plan focus on addressing known priority gaps and on seizing clear and easy opportunities.

- 14) Delivery of the Plan would benefit from coordinated sequencing of Actions, allowing for some management of resource constraints, and from being time-bound.
- 15) MIA offers detailed comments on the proposed Actions in the following table, incorporating answers to the questions posed by MPI.

Action Number	Action	Comments: Q1. How important is this action for strengthening the biosecurity system? Q2. Is this one of the actions that should be delivered first? Q3. What role should you/your organisation play in delivering the action? Q4. Can this action be delivered using existing resources?
1	Establish key performance indicators to drive system improvement	We support KPIs that are targeted and definitive for particular parts of biosecurity that are specific enough to be amenable to such measures, e.g. implementation of border standards. The biosecurity system is likely to be too broad and heterogenous for meaningful system-wide measures to be feasible. <b>Not a priority for the MIA.</b>
2	Clarify expectations of the biosecurity system, and roles and responsibilities of participants	It would be very beneficial for MPI to define and communicate its role in the biosecurity system, and in particular the rationale and priority setting for Government investment in biosecurity. <b>MIA recommends this is a priority Action and should be combined with Action 6.</b>
3	Evaluate alternative governance and delivery arrangements for animal sector readiness and response	We support the creation of a single animal health and biosecurity delivery organisation and propose its function could be expanded to all post-border animal health and biosecurity activities, including readiness, traceability, pest and endemic disease management and on-farm biosecurity. <b>MIA supports this action as a high priority.</b>
4	Streamline the transition of responses led by Biosecurity New Zealand to parties better placed to manage the pest or pathway over the longer term	MIA believes Action 2 (roles and responsibilities) should help address this issue, within the constraints of the Biosecurity Act. <b>MIA recommends that this Action could be removed from the Plan.</b>
5	Improve risk management of invasive aquatic pests and diseases to protect the environment and preserve opportunities for aquaculture	<b>Not a priority for the MIA.</b> However, it is clear in this area that prevention is essential noting that, once established, meaningful control and eradication of aquatic pests is seldom feasible or cost effective, particularly in marine environments.
6	Build a common understanding of the roles of Māori/Treaty partners in the biosecurity system and enable these	MIA notes that this is a Crown obligation. <b>Not a priority for the MIA.</b>
7	Establish a cross-government agency network to identify, evaluate and advise on emerging biosecurity risks within New Zealand	As for several other Actions, not having more detail on the specific issues that the Action may have been proposed to address constrains informed commentary. However, this Action appears to offer little additional to existing coordination between MPI, DoC and Regional Councils via Bionet and other forums. <b>Not a priority for the MIA.</b>

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8	Establish multi-disciplinary teams that also draw in expertise from fields not traditionally associated with biosecurity to address complex challenges	Rather than being an Action, this appears to be a way of working that may in some circumstances offer value in addition to maintaining access to established technical expertise (which is essential). <b>MIA recommends that this Action be removed from the Plan.</b>
9	Build on successful local and regional biosecurity initiatives to generate nation-wide action	This is a good idea but as it sits in the environmental pest area (it is assumed), it is <b>not a priority for the MIA.</b>
10	Develop widely accessible training and support tools to grow local biosecurity awareness and operational capability.	The control of animal diseases requires specialist expertise, which currently exists in rural veterinarians, slaughterers and hygiene teams employed by meat processors etc and it remains a priority to develop a plan to recruit and mobilise this as surge capacity during any future large scale animal disease outbreak. MIA doesn't see growing local <i>operational capability</i> as a priority for the animal industries, where this appears more relevant to the control of environmental pests.  However, regarding <i>growing awareness</i> : this represents an ongoing need among the livestock industry, as we are so heavily reliant on passive surveillance for the early detection of exotic animal diseases. Accordingly, <b>MIA considers the awareness aspect of the Action, if appropriately specific and targeted, is a medium to high priority.</b>
11	Increase importer, exporter, and grower initiatives that drive responsible biosecurity behaviours	Noting that the industry-good organisations in the livestock industry already invest significant resources into on-farm biosecurity, MIA remains to be convinced that there is a significant residual opportunity in this area. <b>Not a priority for the MIA.</b>
12	Develop prioritisation tools to guide investment decisions	MIA would welcome understanding the basis upon which investment in different areas of biosecurity is currently made. Previous investment in tools such as the HPO project appeared to ultimately deliver little value because insufficient consideration appeared to be given to <i>how</i> they would be used.  Accordingly, MIA proposes that this work should consider the wider administrative framework within which investment decisions are made, alongside further defining the roles and rationale for intervention in biosecurity that should stem from Action 2.  Evidence and principles-based setting, and clear communication of, Government biosecurity priorities should serve to:

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		1) Maximise the value obtained from this investment 2) Make subsequent decisions consistent and predictable 3) Enable transparent grounds for shifting existing investments where appropriate 4) Support MPI in making decisions that are unpopular with some stakeholders  <b>MIA recommends this is a high priority Action and should follow Action 2.</b>
13	Develop a long-term investment plan for critical biosecurity infrastructure	<b>MIA is supportive of this work including information systems and considers investment into a system to enable mandatory mob-based traceability for sheep (e.g. eASDs) a high priority.</b>
14	Quantify the value of New Zealand's biosecurity system to inform future investment decisions	<b>Not a priority for the MIA.</b>
15	Simplify industry biosecurity levies to increase flexibility and certainty of funding arrangements	This is a good idea but not a priority for the MIA.
16	Accelerate uptake of new and emerging technologies and data analytics for biosecurity	<p>We are unsure what this Action means in practice. MIA is interested in where technology can help deliver benefits but is wary of any process that is likely to extol the general potential of emerging technologies (e.g. apps, drones, AI etc) but ultimately lead to no meaningful change.</p> <p>MIA notes that the technology to enable high priority capability such as mandatory farm registration databases, eASDs and incursion information management systems etc has existed for many years. MIA would prefer to see investment in addressing known gaps rather than exploratory work involving novel technology.</p> <p><b>Not a priority for the MIA</b></p>
17	Focus research on major biosecurity challenges	<p>MIA wishes to see any investment in research subject to fully transparent assessment of scientific rigour, costs and benefits, technical feasibility and appropriate governance.</p> <p>Gene drives for possums, rats, wasps and mice appear to offer 'game changing' opportunities for New Zealand's biosecurity.</p> <p>However, it is challenging to support investment in research (which is by definition high-risk) into novel solutions to biosecurity challenges when well understood and widely recognised readiness capability and systems (see below), that MPI needs as New Zealand's Competent Veterinary Authority, have not yet been prioritised. <b>This Action is not a priority for the MIA.</b></p>

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18	Establish a collective programme of work to ensure the biosecurity system is adapting to changes in pests and disease risk associated with climate change	<p>MIA understands that research in this area has previously been commissioned by MPI but is unaware of this leading to any appreciable change in settings.  <a href="https://www.mpi.govt.nz/dmsdocument/10979-Effects-of-climate-change-on-current-and-potential-biosecurity-pests-and-diseases-in-New-Zealand">https://www.mpi.govt.nz/dmsdocument/10979-Effects-of-climate-change-on-current-and-potential-biosecurity-pests-and-diseases-in-New-Zealand</a></p> <p>MIA considers that resourcing for biosecurity is too constrained to justify Actions that are likely to have a low to negligible return on investment and <b>recommends this Action be removed from the Plan.</b></p>
19	Strengthen connections between science and mātauranga knowledge for better biosecurity outcomes	<b>Not a priority for the MIA.</b>
20	Research and better articulate impacts of pests and diseases on social and cultural values	<p>New Zealand is already struggling to adequately resource activities to prepare for or control pests and diseases where impacts are understood to be significant enough to warrant intervention. Noting this, allocating scarce resources to characterise other reasons why these organisms may be considered noxious appears to be unnecessary. MIA considers that resourcing for biosecurity is too constrained to justify Actions that are likely to have a low to negligible return on investment and <b>recommends this Action be removed from the Plan.</b></p>
21	Expand the range of acceptable pest and disease treatments that can be used prior to export, at the border, and in New Zealand	It is unusual to see this included, as ACVM licensing is infrequently part of biosecurity focussed conversations. MIA would like to understand this proposal better.
22	Develop common data standards and agreements for sharing and use of biosecurity information	<p>MIA has no information on the extent and feasibility of the opportunity in this area. It is challenging to approach this without some degree of scepticism, noting that 'data harmonisation, interoperability, common standards etc' have been promoted for years in agriculture (where there are also strong commercial drivers), yet little progress appears to have been achieved.</p> <p><b>MIA recommends that MPI carefully considers the resourcing required and the likely return on investment before proceeding with this Action.</b></p>
23	Improve use of biosecurity data to inform system improvements	MIA is uncertain of the potential opportunity associated with this Action and would like to see more details on specific applications.

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24	Improve biosecurity system decision-making and delivery through safe and effective use of artificial intelligence	MIA is uncertain of the potential opportunity associated with this Action, although expects this to offer the most potential at the NZ border.
25	Connect land and crop information datasets to speed up responses to fast moving pest and diseases	Complete and accurate data on the location of at-risk species is essential for responses to animal diseases. The lack of this for livestock species other than cattle and deer is a major gap in New Zealand's biosecurity. <b>MIA supports this Action being delivered in step with legislative changes to require owners of FMD susceptible animals to register the location of their premises with a single farm registration database. For the livestock sector, it is likely to be most efficient for this to be the NAIT replacement IT system.</b>
26	Extend traceability to more species that can transmit Foot and Mouth Disease	<b>MIA is strongly supportive of this Action</b> , which would be most efficiently achieved by making use of electronic Animal Status Declarations mandatory using the NAIT replacement IT system.
27	Develop an incursion response information management system capable of managing large scale outbreaks of fast-moving diseases	(New Action) MIA understands that MPI does not have an IT system that is capable of managing the large volumes of investigation and case management information that would be rapidly generated during a large-scale disease outbreak. The consequences of this gap in capability would be very serious. <b>MIA recommends adding this to the Action Plan as a high priority.</b>



16) MIA wishes to be involved in progressing all the Actions it considers a high priority, shaded in red in the table above.

### **MIA Contact**

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17 April 2025

## 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