



Meat Industry Association of New Zealand (Incorporated)

Submission on:

**Proposed Amendments to Agricultural Compounds
and Veterinary Medicines (Exemptions and
Prohibited Substances) Regulations 2011**

To:

New Zealand Food Safety

03 August 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.
- 2) New Zealand's red meat sector is the country's second largest goods exporter, earning \$10.8 billion in export revenue in 2024/25. While volume was down, strong demand drove increased value leading to the increase in revenue.
- 3) 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.
- 4) A list of members is appended (Appendix 1). Individual members may have also made their own submissions.

2. Overview

- 5) MIA welcomes the opportunity to comment on the proposed amendments to the ACVM regulations.
- 6) MIA supports the overall objective of the amendments to “*ensure that the regulation of agricultural compounds remains risk proportional*” and ‘*the changes to the ACVM Regulations are intended to be enabling of market access.*’
- 7) In this regard, MIA supports New Zealand Food Safety (NZFS) ensuring that risks to food safety and trade associated with agricultural compounds will continue to be effectively managed. This requires a high level of technical expertise, experience, and sound judgement.
- 8) MIA acknowledges the confidence that New Zealand’s primary production sector places in New Zealand Food Safety to strike an appropriate balance between enabling the responsible use of essential production tools and safeguarding public health and market access.

3. Commentary on the Proposals and Answers to Consultation Questions

5.6. Environmental inhibitors

We propose to exempt certain types of environmental inhibitor products from registration on the basis that their risk profile can be managed through compliance with the requirements in the Regulations rather than through registration.....

Questions on policy approach to exempting inhibitor compounds:

a) Do you agree with the policy approach?

- 9) MIA supports previous legislative changes to bring inhibitors within the scope of the ACVM Act.
- 10) MIA understands that the policy intent is to allow for management of risks to trade associated with low-risk compounds that are proposed to be used as inhibitors whilst reducing the compliance overhead associated with full ACVM registration, enabling trialling under New Zealand conditions.
- 11) Put simply, MIA understands that the inclusion of these compounds in schedules 2 and/or 3 of the Food Notice means that no residues are permitted in food, and manufacturers of compounds are required to provide evidence that residues will not eventuate before exemption (and listing in schedules 2 or 3) will be granted.
- 12) Provided the evidential threshold is robust, then MIA supports this approach.

b) Are there other settings that manage the risks to trade and animal welfare that could be applied as a definition or conditions of exemption?

13) MIA lacks the expertise required to answer this question. Including a description in the consultation material about the criteria and process involved to assess a substance as 'low risk' (for adding to schedule 2 or 3) would have been helpful for submitters.

6. Criteria for assessing the proposed amendments

Questions on criteria:

Do you agree with the proposed criteria? Why or why not?

14) MIA notes that, in some places, the criteria duplicate each other – for example, criteria 1, 2 and 6 each appear to contain elements of cost effectiveness.

15) MIA is concerned by that by placing '*Manages risks to plant and animal health*', '*Manages risk to public health*' and '*Manages risks to trade*' as criteria 3, 4 and 5 respectively (out of 6), that NZFS may not be striking the appropriate balance in its posture towards risk management relative to reducing regulatory burden.

16) MIA recommends that NZFS reconsiders this approach and when engaging further on these proposals it reorders the criteria to visibly recognise **the paramount importance of protecting human health and trade**, i.e. by elevating '*Manages risks to public health*' and '*Manages risks to trade*' to criteria 1 and 2 respectively.

Would you propose any other criteria not covered?

17) No.

7. Potential impacts of proposed changes

18) The questions relating to this section appear to be aimed at registrants and others who participate directly in ACVM regulatory processes. These do not generally involve our Members and no answers to these questions are provided.

8. Overview of proposed amendments to the ACVM Regulations

8.1. Amendments to the ACVM Regulations 3 to 15

Question: Do you agree with the proposed changes? Yes/No If No, which proposed amendments would you like to see removed?

19) MIA is generally supportive of the proposed amendments.

- 20) For Regulation 3 (*Interpretation*), MIA recommends that NZFS considers broadening the definition of 'Postbiotic' (*means an unrefined soluble factor, secreted by live bacteria, or released after bacterial lysis.*) Otherwise, this may unnecessarily exclude equivalent compounds derived from eukaryotic microbes.
- 21) For Regulation 5 (*Agricultural compounds exempt from registration if conditions complied with*), MIA recommends that NZFS considers defining the term 'food producing animals'. Some animals, for example horses, may later become food producing animals despite this not being the purpose of owning them at the time they were exposed to the agricultural compound.
- 22) For Regulation 7 (*Fitness for Purpose*), MIA supports including the expectation that compounds are efficacious.
- 23) MIA supports the proposal to *Create Schedules or lists for substances that are prohibited by countries importing New Zealand primary produce if intended for use on foodproducing animals* and again notes the potential need to define the term 'food producing animals'.

Question: What other changes to the regulations would you like to see progressed as part of this amendment?

- 24) MIA recommends that NZFS assesses the adequacy of regulatory tools to manage risks to human health and trade presented by exposure of food producing animals to feed/ forage that has been inadvertently contaminated with compounds registered for use in horticulture. A notable example is the practice of sheep grazing vineyards and orchards.
- 25) This is a general concern, rather than driven by any particular scenario MIA is aware of, and the regulatory amendment process is a valuable opportunity to ensure settings are fit for purpose in this regard.

8.3. Amendments to Schedule 2 – Agricultural compounds exempt from registration – new compounds to be added

Question: Do you agree with the addition of these new classes to Schedule 2? Yes/No If not, why not?

- 26) MIA is generally supportive of the proposed amendments to Schedule 2.

Questions: Do you agree that the product description (column 1) and conditions (column 2) achieve the intended purpose of the amendment? Yes/No

- 27) MIA recommends that NZFS reconsiders the conditions specified for *Non-pathogenic microorganisms applied to the environment of animals, or plants intended as feed, to competitively exclude undesirable microorganisms in animals*. Specifically, the prohibition '*Must not contain any biologically active ingredients*

other than non-pathogenic microorganisms appears unduly stringent when 'biologically active' remains undefined. For example, water and common table salt are both biologically active.

8.4. Amendments to Schedule 2 – Agricultural compounds exempt from registration – changes to existing compounds and/or their conditions

28) MIA notes that regarding the conditions for 12 *Topical veterinary preparations (non-absorbable)* for— NZFS proposes inserting: *The compound must not be used on the udders and teats of animals whose milk is being collected for human consumption*. It is unclear if NZFS has considered that, post amendment, such milk could still be legally fed to food producing animals.

8.5. Substances restricted from use as exempted agricultural compounds or as ingredients in exempted agricultural compounds in food producing animals

29) MIA supports the policy intent behind transferring the lists of restricted substances from guidelines to the ACVM Regulations.

9. Proposed transition period

30) In setting transition periods, MIA expects NZFS will be guided by the paramount importance of protecting human health and trade, in addition to other important considerations.

MIA Contact

Chris Houston – Principal Policy Analyst

Meat Industry Association of New Zealand (Inc)

chris.houston@mia.co.nz

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