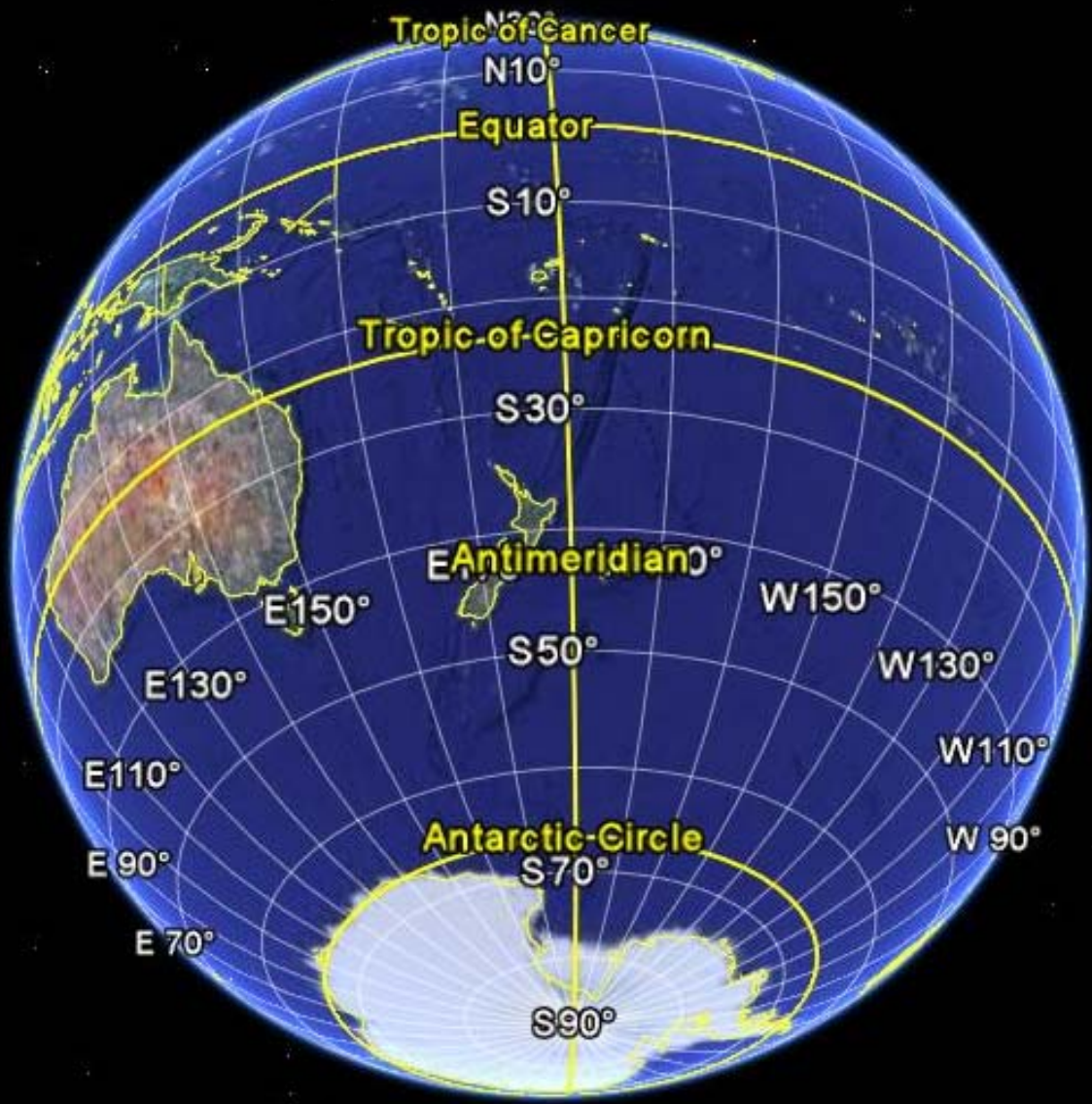
NEW ZEALAND FOOD SAFETY AUTHORITY

Te Pou Oranga Kai O Aotearoa

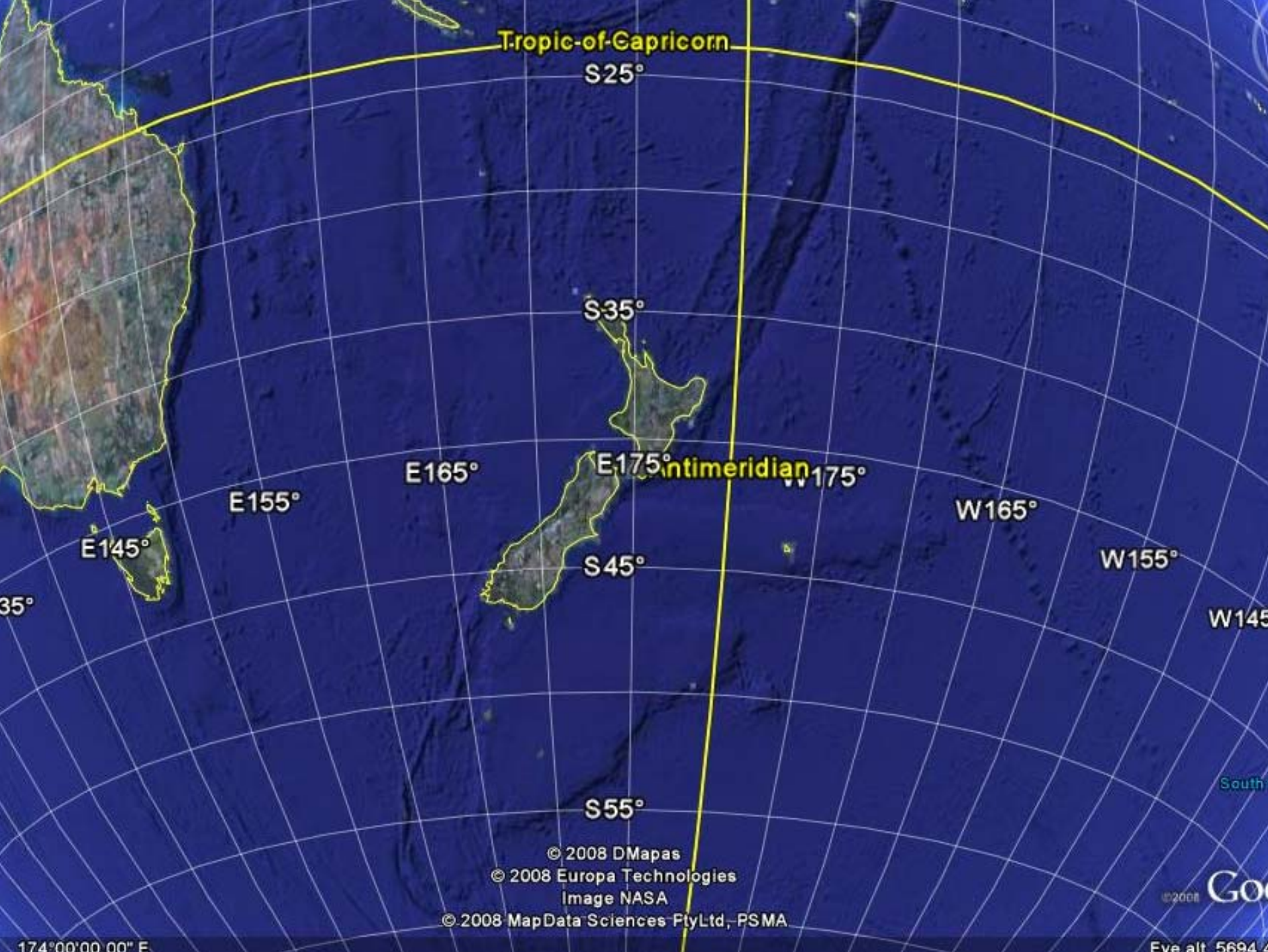
Imports of Agricultural Products and Food into New Zealand

Andrew McKenzie
Chief Executive
New Zealand Food Safety Authority



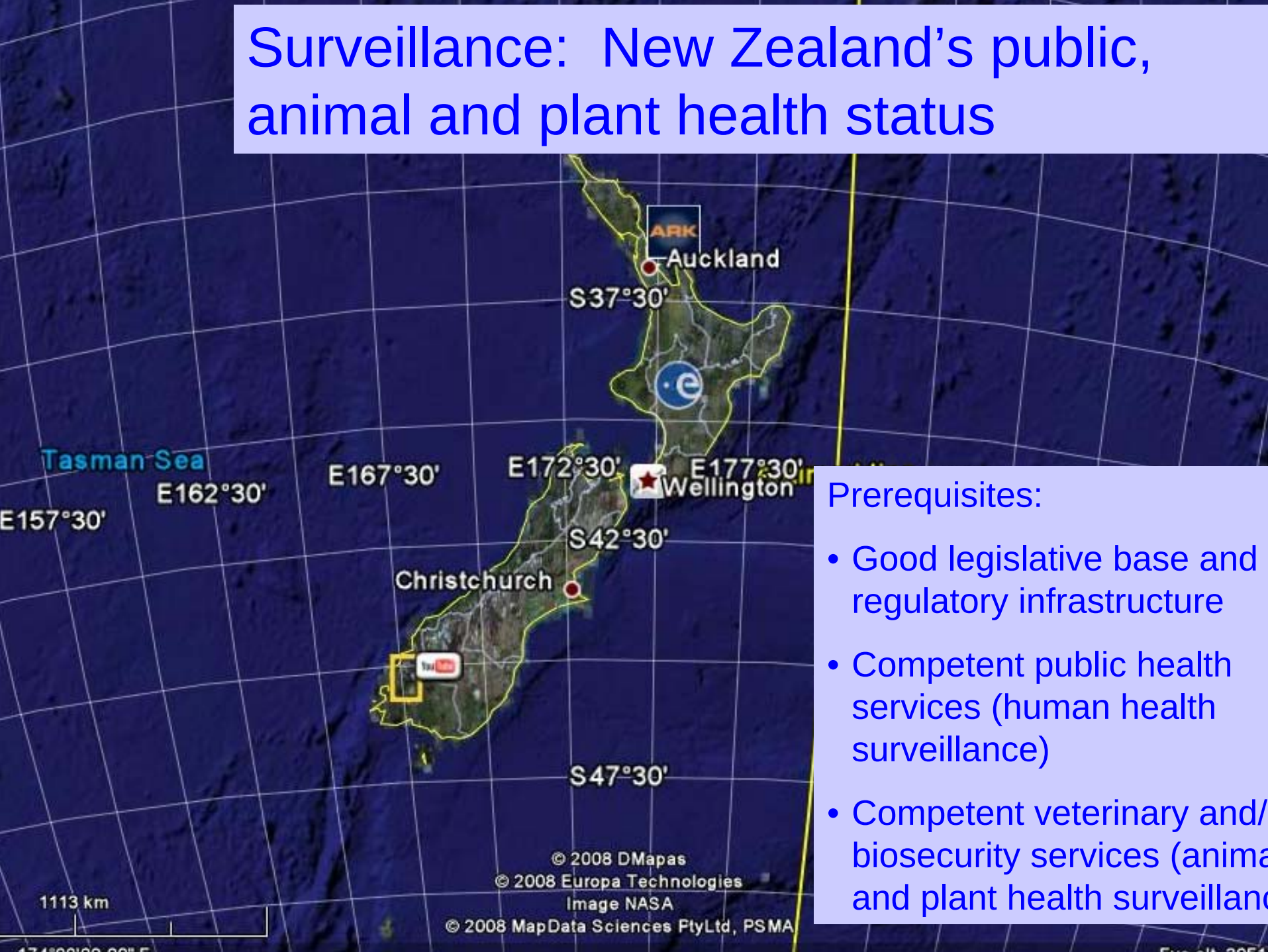
177°28'50.02" E

Eye alt 17672


Tropic of Capricorn
S25°
S35°
E175°
Antimeridian
W175°
E165°
E155°
W165°
E145°
S45°
W155°
S55°
© 2008 DMapas
© 2008 Europa Technologies
Image NASA
© 2008 MapData Sciences PtyLtd, PSMA


S32°30'
ARK
Auckland
S37°30'
Tasman Sea
E167°30'
E172°30'
E177°30'
imeridian
W172°30'
E162°30'
E157°30'
Wellington
S42°30'
Christchurch
S47°30'
© 2008 DMapas
© 2008 Europa Technologies
Image NASA
© 2008 MapData Sciences PtyLtd, PSMA
1113 km

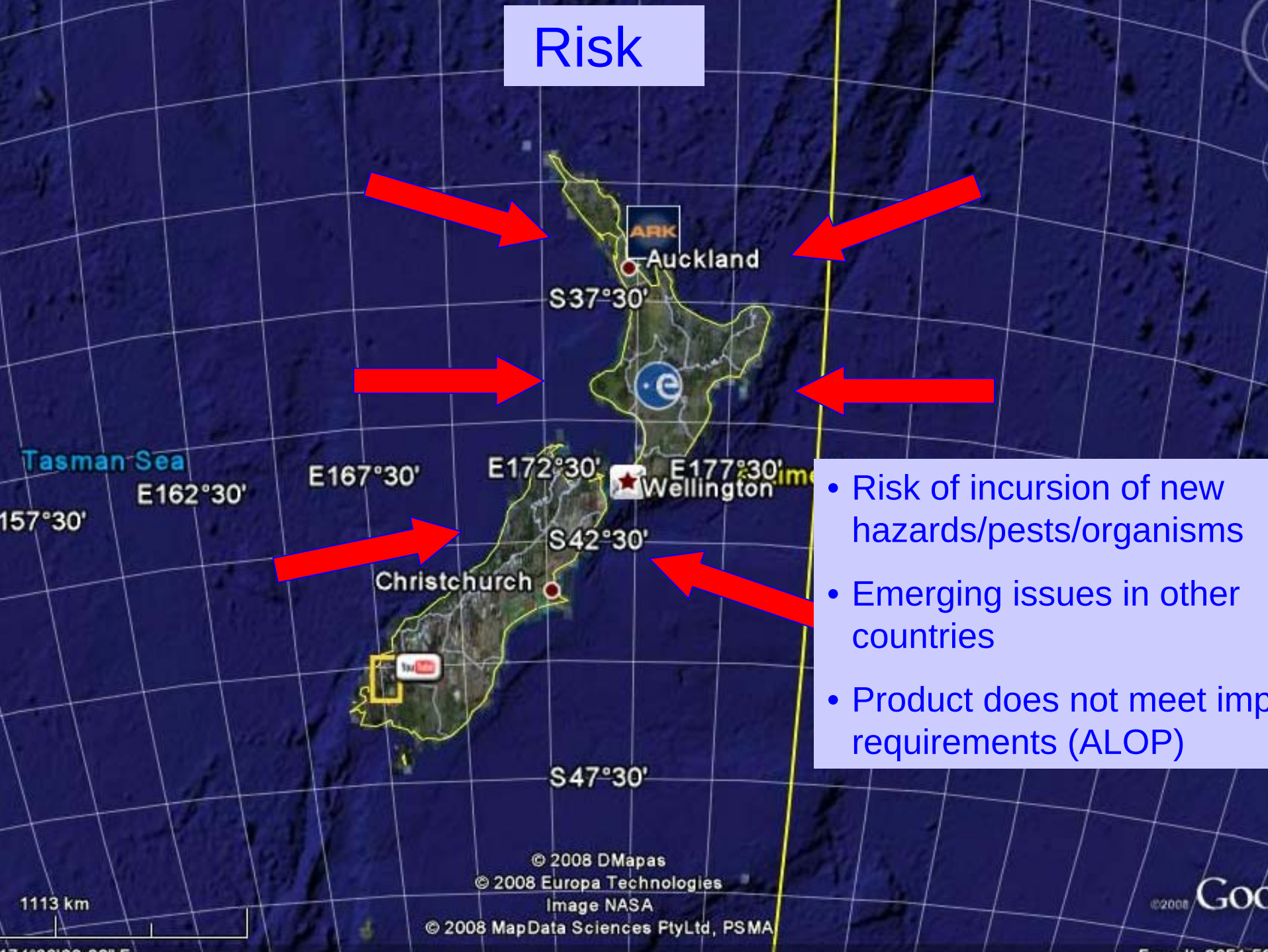
Surveillance: New Zealand's public, animal and plant health status



Prerequisites:

- Good legislative base and regulatory infrastructure
- Competent public health services (human health surveillance)
- Competent veterinary and/ biosecurity services (anima and plant health surveillan

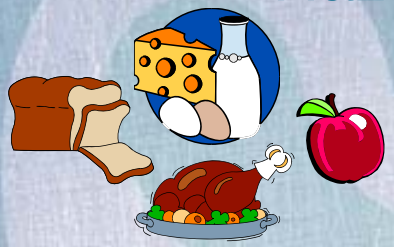
Risk



- Risk of incursion of new hazards/pests/organisms
- Emerging issues in other countries
- Product does not meet imp requirements (ALOP)

Hazard vs. Risk

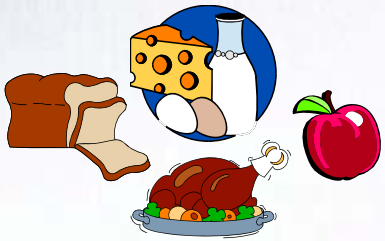
Hazards



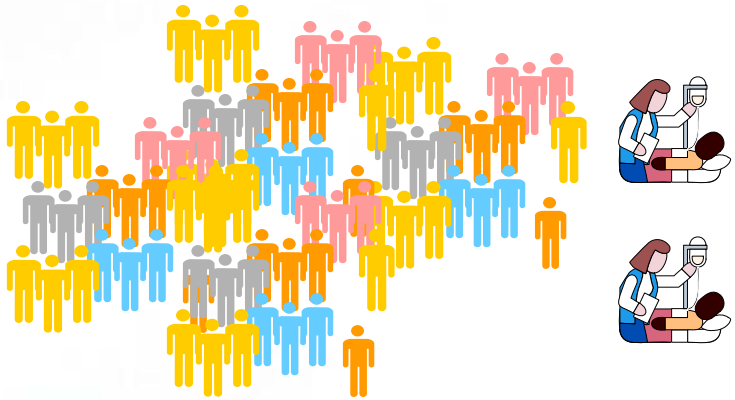
Risks

Risk is the expression of the hazard under relevant epidemiological conditions in the animal/human/plant population

Sanitary measures



Appropriate level of protection

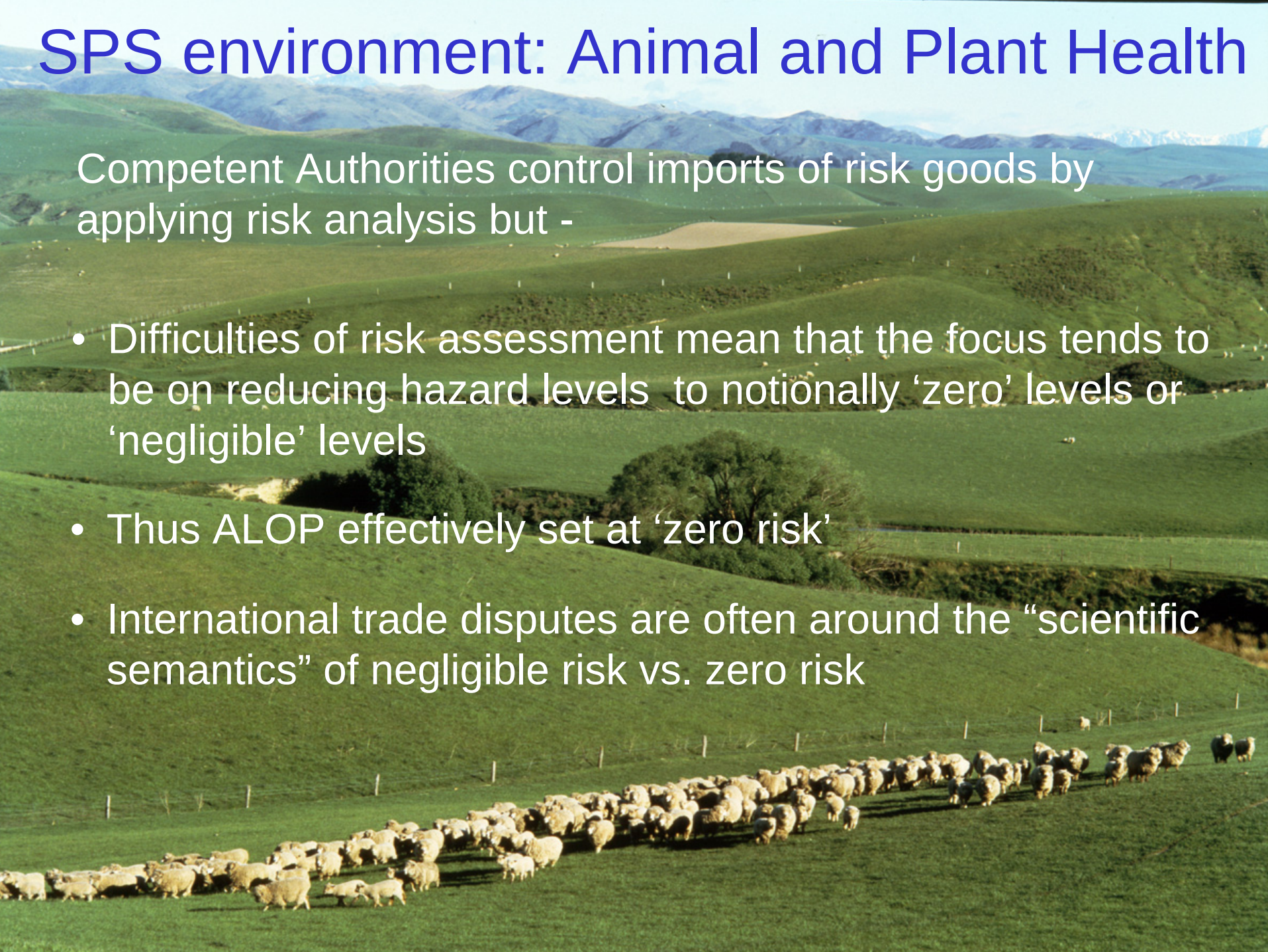


SPS environment: Food Safety

Competent Authorities apply risk analysis to food-borne diseases that are commonly shared between countries but -

- Relatively few (robust) risk assessment models are available for common food/hazard combinations
- Technical and social/political factors govern decisions on appropriate levels of protection (ALOP) within a country
- International or multilateral consensus on ALOP for a particular hazard in a food is difficult to achieve
- Thus judging the equivalence of sanitary measures is problematic

SPS environment: Animal and Plant Health



Competent Authorities control imports of risk goods by applying risk analysis but -

- Difficulties of risk assessment mean that the focus tends to be on reducing hazard levels to notionally ‘zero’ levels or ‘negligible’ levels
- Thus ALOP effectively set at ‘zero risk’
- International trade disputes are often around the “scientific semantics” of negligible risk vs. zero risk

Food Safety: The Focus of This Presentation

- Food must be “safe and suitable” but there is a need to anchor the concept of “safety”
- A ‘notional zero risk’ is not a feasible goal in most food commodity situations

A “zero risk” food supply is an unattainable goal

Hazard Pathways

Not limited to traded agricultural products and food

- People travel by land sea and air
- Food products accompanying people travelling e.g. bush meat from North Africa
- ‘Risk goods’
  - Shipping containers, dunnage, ballast water
  - Agricultural equipment contaminated with unwanted organisms
  - Personal effects contaminated with unwanted organisms

Risk Profiling: Zoo and Phytosanitary

Science (risk assessments) and economics

- Assessment of pathogen and/or commodity
  - What is worth worrying about?
  - ‘National interest’ trade related disease e.g. FMD or fruit fly vs. commercial diseases e.g. PRRS in pigs or codling moth in apples
- Known vs. unknown, visible vs. invisible

New Zealand system for animal and plant health is based on ‘Import Health Standards’ for all ‘risk goods’

Risk Profiling: Sanitary (food)

Import food system: recently reviewed in NZ

Key recommendations:

- Improve the scientific basis for controls applied to food imports and ensure they are proportionate with the risk
- Reduce reliance on testing at the border by putting more weight on exporting country systems

Key components:

- Developing a risk ranking and prioritisation decision support tool that categorises particular foods/hazards according to potential risk and/or regulatory interest –high, medium or low
- Risk management factors include international aspects of risk mitigation and post-import risk mitigation
- Regulatory requirements of appropriate stringency applied to foods/hazards in different regulatory interest categories

“Regulatory interest” Categories

Low Regulatory Interest Category:

- Majority of foods
- Minimal risks associated with foods

High regulatory interest category:

- Food/hazard combinations with potentially high food safety risks
- Food safety assurances must reflect those risks
- Risk management decisions will reflect risk category and regulatory interest factors

Medium regulatory interest category:

- Foods that require additional assurances above low interest category
- Includes foods where a systems failure has been identified - where the issue is specific to processor/region then the food may be re-categorised once issue resolved

Monitoring and Review

- Scanning list is a monitoring tool where selected foods may be subjected to increased monitoring for specific hazards. Foods placed on list according to following triggers:
  - food complaints
  - public health surveillance and source attribution
  - food recalls
  - border inspection and rejection
  - food chain monitoring post-border
  - international intelligence
- Monitor performance of all foods to ensure correct categorisation
- Monitor all foods to ensure compliance trends

Official assurances

Competent Authorities have to rely on food control measures applied in the country of origin for food imports.

NZ Import Assurance Programme:

- Determine arrangements with overseas countries
- All high regulatory interest foods will require overseas country arrangements to permit import
- Manage risks associated with high regulatory interest foods '*at the appropriate point of intervention'* to improve confidence that imported products meet or are equivalent to relevant New Zealand standards

Official assurances

NZFSA will require that the competent authority of the exporting country certifies compliance or equivalence with New Zealand requirements (similar to EU systems).

Building confidence in arrangements may involve overseas-audits by NZFSA and/or assessment of these systems by other competent authorities.

For animals and plants, the Import Health Standard system specifies certification requirements that must be met and they are subject to 100% checks and/or quarantine

Monitoring of official assurances

External Review

Assess performance against negotiated standards

New Zealand Competent Authority

Set standards, assess programme performance

Provide official assurances through certification

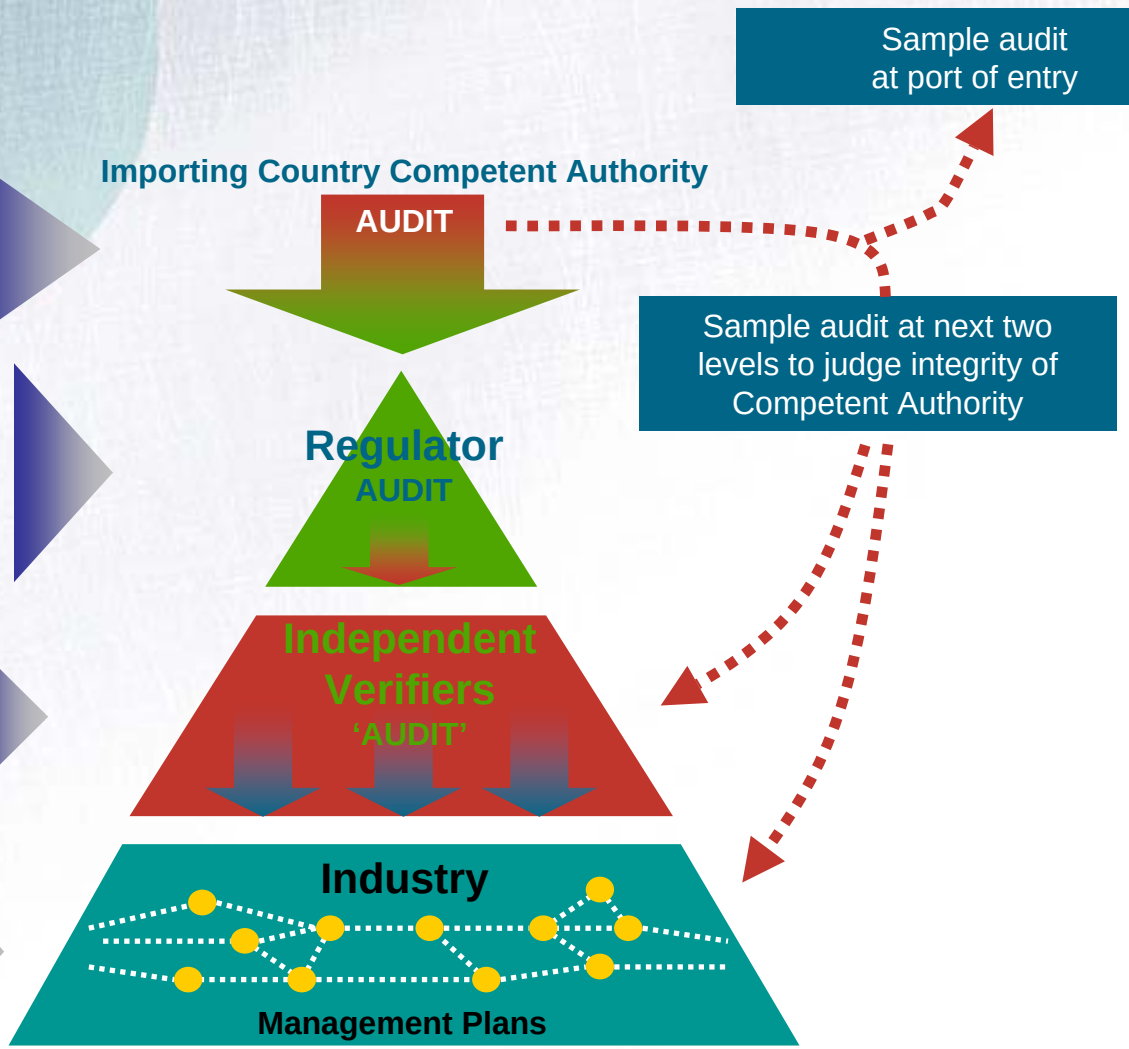
Third party verification

Assess processors' performance

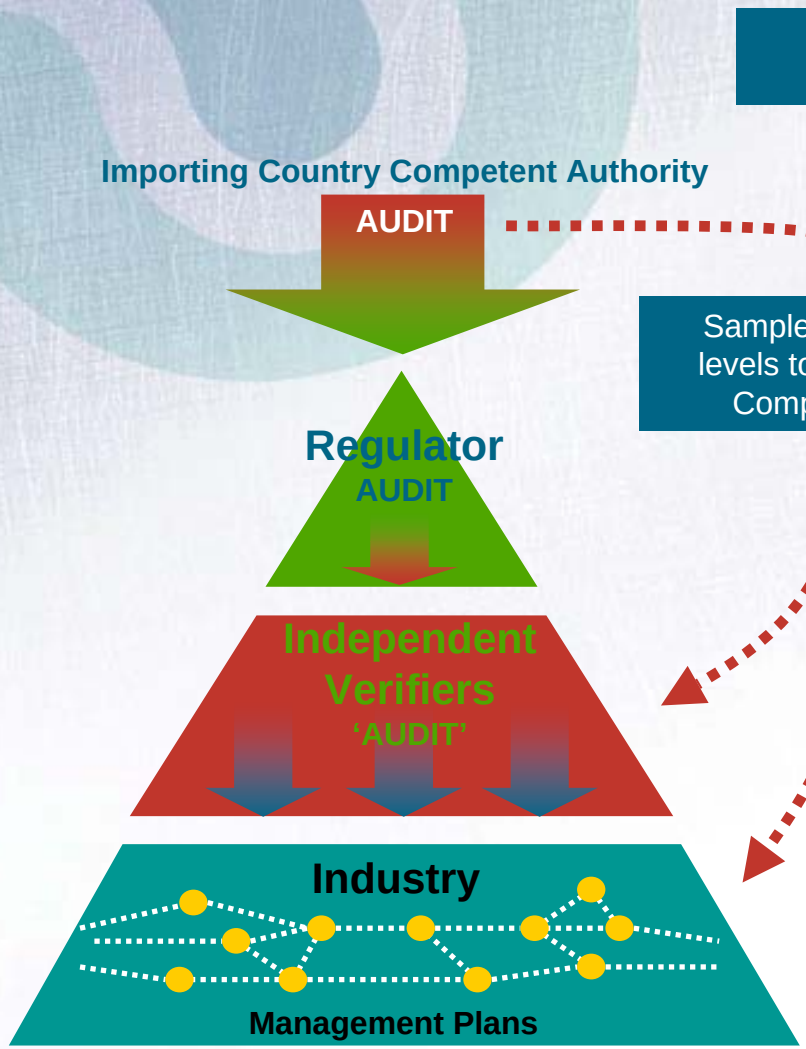
Ensures compliance, 'authenticate' exports

Regulated Industries

Meet standards



Monitoring of official assurances



Resources applied to external review based on experience, knowledge and confidence in the exporting country (or exporter) with resources focussed on those areas of highest risk/lowest performance

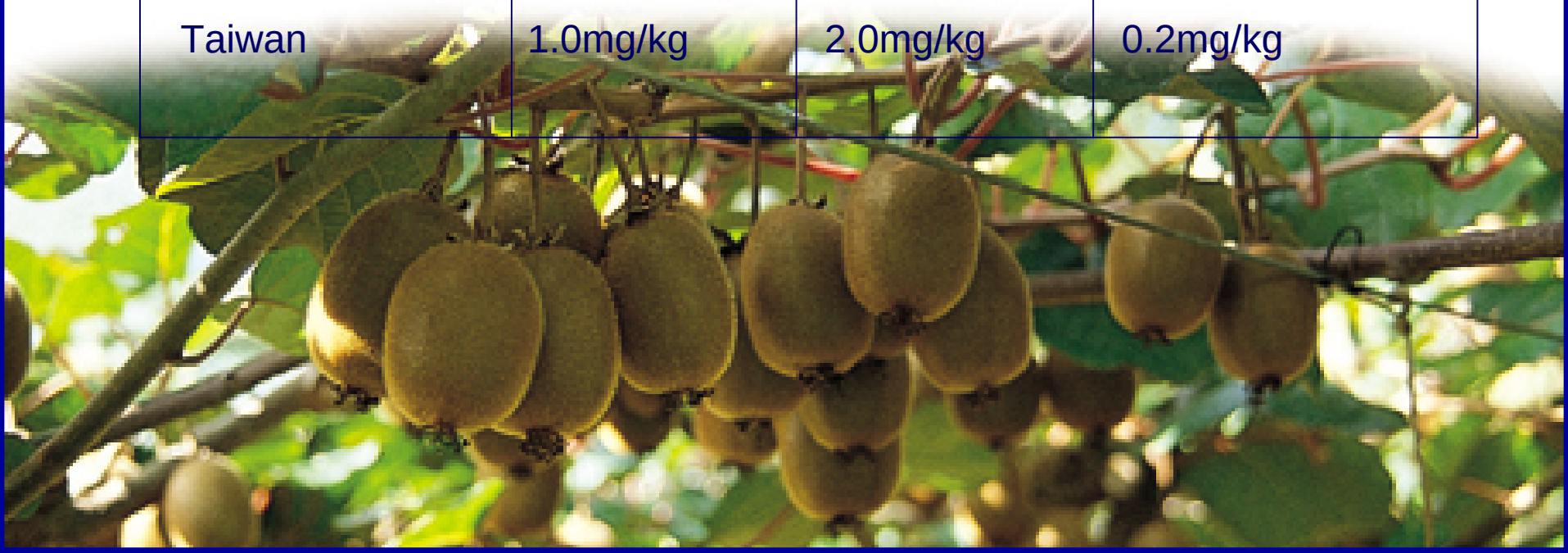
Standards for Chemical Hazards

Countries are likely to follow similar steps in setting MRLs etc. or may adopt Codex standards, however:

- Level of use may vary greatly between countries
- GVP/GAP may vary depending on particular conditions of animal and plant husbandry
- Estimated dietary intake of single foods may vary with culture

Standards for Kiwifruit

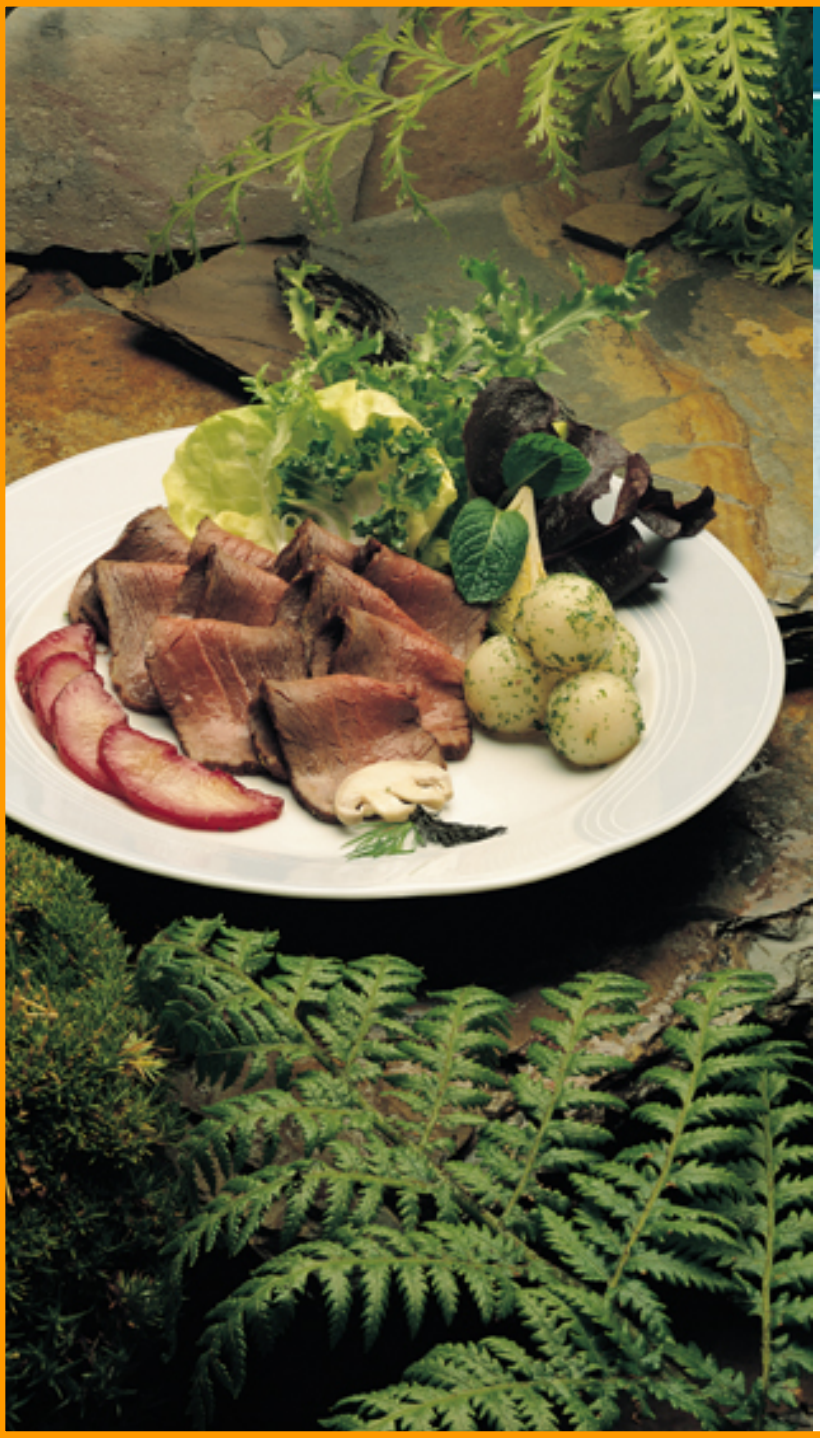
	Carbendazim	Iprodione	Glufosinate-NH3
New Zealand	0.1mg/kg	5.0mg/kg	0.1mg/kg
Korea	0.5mg/kg	No MRL	0.3mg/kg
European Union	0.1mg/kg	No MRL	No MRL
Japan	No MRL	No MRL	0.05mg/kg
Australia	No MRL	10mg/kg	No MRL
Taiwan	1.0mg/kg	2.0mg/kg	0.2mg/kg



Standards for Micro. hazards

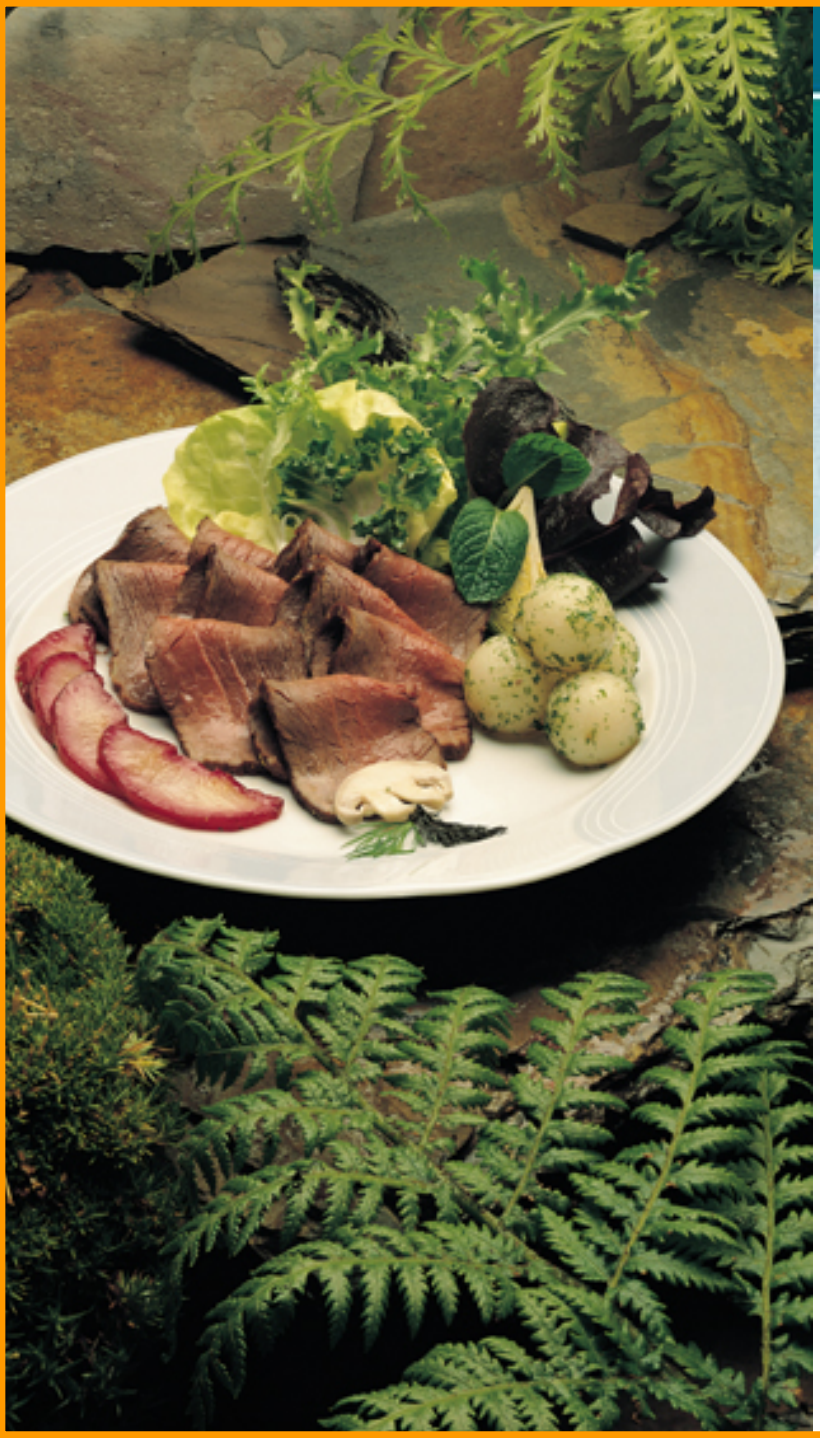
International move towards performance objectives and performance criteria based on risk assessment, however:

- Does not avoid different risk management inputs at the national level when decisions taken on ALOP (and subsequent measures on hazard control)
- Risk management usually takes an “as-low-as-reasonably-achievable” approach
- ALOP (if established) can vary markedly for different foods
- Inevitable that irrespective of sound regulatory systems and certification, an importing country takes on the risk profile of the exporting country



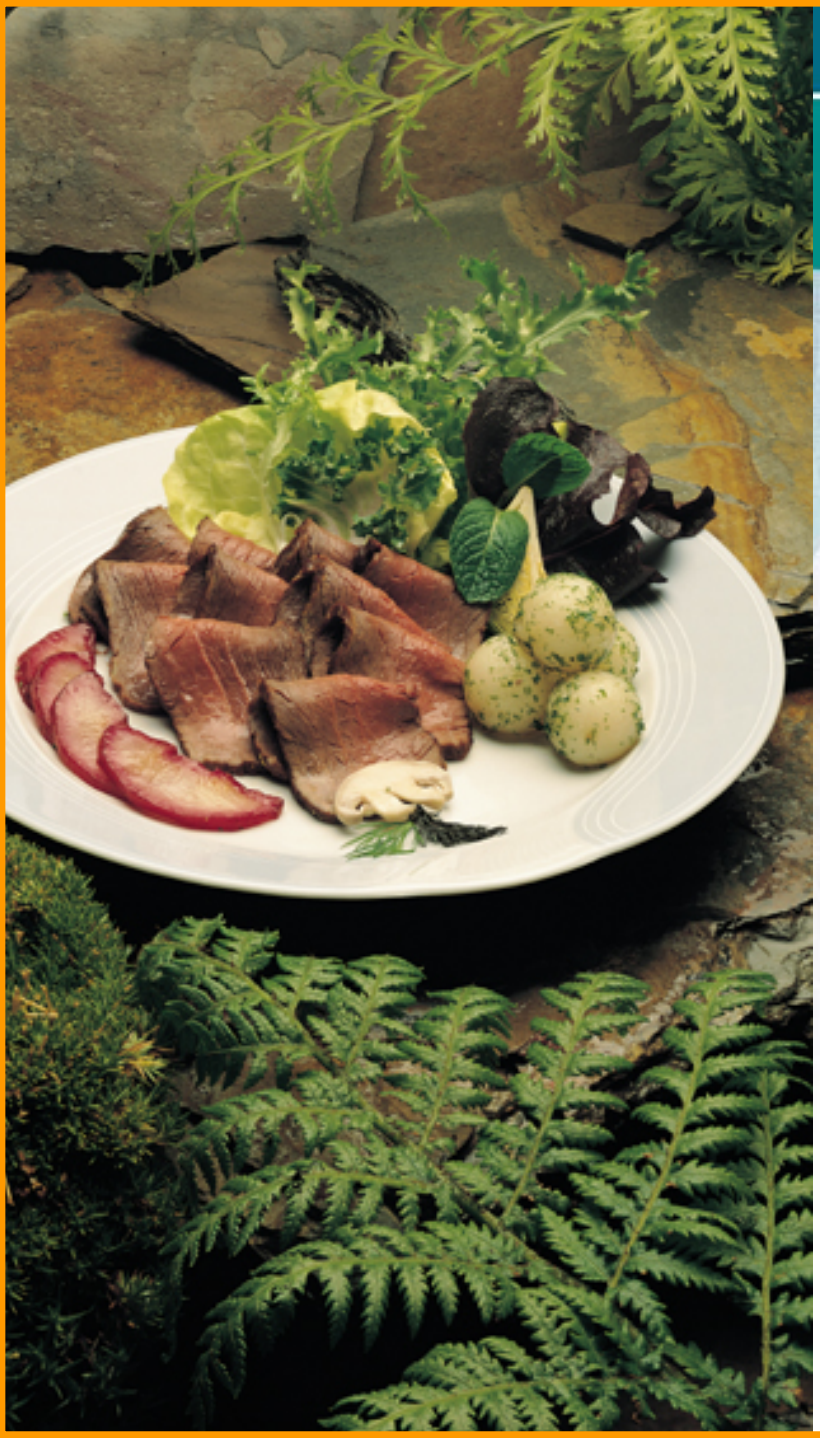
NZFSA approach

- For the import of food NZFSA seeks replication of measures, determination of equivalence of measures or groups of measures, or a higher level ‘mutual recognition’ of the exporting country
- ‘Mutual recognition’ is based on a much broader comparison of the effectiveness of the regulatory programme and in effect is the comparability of public health programmes and what they achieve
- Mutual recognition accepts that currently there is insufficient risk-based science to define and directly compare ALOPs for the large majority of food/hazard combinations



NZFSA Approach

- Moving towards mutual recognition between trading partners means accepting that differences between public health goals and outcomes achieved are likely to be minor
- Where significant differences in hazard status between countries are identified, control measures that achieve a known level of hazard reduction may be required
- Experience, knowledge and confidence in each others food control systems is the building block for mutual recognition



NZFSA Approach

Mutual recognition will depend on:

- A mutually-agreed system that is open, credible and trusted
- Replication of specific requirements by the exporting country if no equivalency determination is sought
- A demonstrated willingness of the exporting country to take safeguard actions where scientific evaluation / risk assessment indicates a specific need
- A demonstrated willingness of the exporting country to act in a precautionary manner to new and emerging hazards
- An ongoing commitment to risk assessment to service continuous improvement in food safety

Trade as a ‘two way street’

Balancing Import and Export regimes

Domestic food safety and imports

ZERO risk **“pull”** required by domestic stakeholders

Consistent application of SPS principles

Trade and exports

TRADE risk “**push”** required by “export” stakeholders

SPS Agreement allows for a country to treat other countries differentially - no need for a ‘one size fits all’ policy

Risk in perspective….

Which country is this picture from?


NEW ZEALAND
nzfsa
FOOD SAFETY AUTHORITY
Thank you…..