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PICNZ Submission – Draft Import Health Standard for Importation of Pig Semen into New Zealand

PIC New Zealand (PICNZ) is a franchise holder and representative for PIC genetics in New Zealand. PIC International represents one of the world's largest pig breeding companies, represented in over 30 countries and playing a major role in the structure and success of the global pork industry.

PICNZ is the second largest pork production business in New Zealand and operates over multiple farming sites providing employment opportunities and contributing significantly to the local economy. PICNZ is also one of two major breeding companies represented in New Zealand that imports and disseminates pig genetics. Frozen semen has been imported at intervals of between 6 and 12 months to minimise genetic lag and ensure that the most advanced genetic material is delivered to the NZ industry to maintain its competitiveness.

PICNZ considers that ongoing access to the world's best genetic material at frequent intervals to minimise genetic lag are vital to the survival of the NZ pork industry and of PICNZ. While historically importing frozen semen has incurred some substantial costs and compliance challenges to meet the stringent NZ import standards, PICNZ are fully supportive of such a position and would be extremely concerned about any attempts to soften the position and increase risk of introducing a new disease. The value of a country's health status is far too important to put at risk. It is PICNZ's view that PICNZ's and New Zealand's high health status plus access to the world's best genetic material are prime competitive advantages.

The Draft IHS for pig semen appears to include a significant softening of NZ's position and to introduce a number of new risks. This is of significant concern to PICNZ. It is extremely difficult to reverse a loss of country health status and the consequences are forever and for many generations of New Zealanders. Financial consequences of a disease introduction can be enormous to a country. With this in mind it would be unwise to take any unnecessary risks, both tangible and intangible. PICNZ have worked strenuously over many years to ensure that biosecurity is maintained by genetic supplier herds both outside of and within New Zealand. Any attempts to reduce standards has been strongly resisted to allow the industry to continue to import semen with confidence. This proposed IHS reduces that confidence which has the potential to be seriously damaging.

Consolidation has been a major feature of the global pig breeding business via mergers, acquisitions and attrition. Consequently, the most economically desirable pig genetic material is in the hands of an increasingly smaller number of business entities which all tend to operate to high standards of health assurance – in some cases substantially higher than some of the controls suggested in the draft IHS. This makes the need for any softening superfluous and unnecessarily risky (with a few exceptions where equivalence can be negotiated). The large global pig breeding companies are based in a small number of countries which all tend to operate to high standards globally with respect to health assurance, disease monitoring, certification, integrity etc. Hence again there is no need to open the doors to a much greater number of countries with potentially lower standards for the above and greater risk from known, emerging and as yet unidentified disease organisms.

PICNZ is concerned about a number of areas. Most are covered in the NZPork submission which PICNZ fully supports so will not be repeated, but proposals like the following are all of major concern to PICNZ:-

- Proposal to allow importation from FMD positive countries and zones
- Proposal to allow importation from CSF positive countries and zones
- Proposal to accept semen from donor boars known to be serologically positive to Porcine Myocarditis while the knowledge base around this pestivirus (pestiviruses usually transfer very capably in semen) is incomplete
- A proposed reliance on clinical signs rather than testing
- Inadequate protection against certain emerging diseases
- Proposal to enable access for all countries subject to risk management, which would provide access to a large number of countries and would clearly be harder to monitor. This would undoubtedly include some countries with a less than ideal standard of certification integrity, disease surveillance and monitoring than the few countries currently exporting semen to NZ

PICNZ have consulted with PIC Canada over the draft IHS. PIC Canada are fully supportive of the New Zealand pork industry's commitment to preserve its internationally very high herd health status and to manage the risk of all diseases that are exotic to New Zealand. PIC Canada have not identified any major unreasonable impediments to the exportation of pig semen to NZ, but has noted there are a few points that CFIA (the Canadian certifying authority) may raise with MPI and request equivalence for. We fully support the acceptance of equivalence that does not take any unnecessary risks.

Yours sincerely

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