

# NZ PORK



## Submission on the ACVM Amendment Bill

June 2026

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### 1. Introduction

This submission is made by NZPork and pig industry veterinarians on behalf of commercial pig farmers in New Zealand. Our submission focuses on the ACVM Amendment Bill, as this is the regulatory area with which we have familiarity. It is intentionally principles-based rather than a detailed analysis of every provision within the Bill.

In making our submission, our focus is on whether the regulatory system is delivering practical outcomes for the pig industry and whether the proposed reforms are sufficient to address the barriers currently limiting access to safe animal health products in New Zealand.

The New Zealand pig industry is increasingly being asked to manage modern animal health and welfare challenges with an outdated and shrinking range of registered animal health products.

Over the past fifteen years, industry veterinarians estimate that approximately two-thirds of the products previously registered for use in pigs have been deregistered or withdrawn from the New Zealand market. Importantly, the need for those products has not disappeared. While herd health, facilities and management practices have continued to improve, veterinarians and farmers still face many of the same animal health and welfare challenges they faced previously.

In a well-functioning regulatory system, products leaving the market would be replaced by newer products and technologies. That is not occurring. Many newer products available to pig veterinarians and farmers in comparable overseas jurisdictions are not being registered in New Zealand. As older products leave the market, they are often not replaced.

*The result is a steadily shrinking toolbox for pig veterinarians and pig farmers.*

The industry has adapted through increasing reliance on veterinary expertise, off-label prescribing and management interventions. Those approaches have helped maintain animal health and welfare outcomes to date. However, they require increasing effort and are not a substitute for access to safe appropriately registered products. The industry is managing the situation, but it is increasingly doing so through workarounds rather than through access to the tools routinely available elsewhere. The approach is not sustainable.

This is not because suitable products do not exist. Around the world, pig veterinarians and farmers continue to have access to a wider range of animal health, welfare and productivity products. Many of these products have been subject to extensive regulatory scrutiny and years of practical field use. The issue is not product availability globally. It is product availability in New Zealand.



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The underlying reason is increasingly clear. New Zealand is a small market. Registration costs, evidential requirements and approval timeframes are often disproportionate to the commercial returns available from supplying our market. One industry participant with direct experience of product registration described the cost of obtaining registration in New Zealand as being comparable to "the price of a house". For many suppliers, particularly generic manufacturers, the business case simply does not exist.

The consequences are predictable. Products leave the New Zealand market. New products do not enter. Veterinarians and farmers work harder to compensate. The pressure on the system increases.

This reflects a broader structural problem. The global animal health industry has changed significantly over the past two decades. Competition has intensified, generic manufacturers have become increasingly important, and companies are more selective about where they invest regulatory resources. New Zealand's regulatory framework has not adapted to these changes and is increasingly viewed as a market that is too costly and too difficult relative to its size.

The competitive implications are significant. Around two-thirds of pig meat consumed in New Zealand is imported from countries whose farmers have access to a substantially wider range of animal health, welfare and productivity products. New Zealand producers are therefore competing against imported product produced using technologies that are unavailable or inaccessible here.

It goes without saying that NZPork and industry veterinarians support robust assessment of food safety, animal safety, public health, environmental risks and matters relevant to New Zealand's international trade obligations.

*Our concern is not with risk assessment itself. Our concern is with duplication, delay and regulatory requirements that add cost without delivering commensurate value.*

The Ministry for Regulation's Agricultural and Horticultural Products Regulatory Review identified many of the same issues. NZPork and industry veterinarians strongly support the review's emphasis on proportionate regulation, better use of trusted overseas assessments, improved timeliness and directing regulatory effort towards areas where it adds the greatest value.

The Amendment Bill moves in that direction. However, in our view, it does not yet go far enough to address the practical barriers currently limiting access to animal health products in New Zealand.

NZPork and industry veterinarians wish to appear before the Select Committee.



## **2. Recommendations**

NZPork and industry veterinarians support the objectives of the Amendment Bill and urge the Select Committee to give significant weight to the recommendations of the Ministry for Regulation's Agricultural and Horticultural Products Regulatory Review.

These recommendations were accepted by Cabinet and by the Ministry for Primary Industries (MPI).

To better achieve those objectives, NZPork and industry veterinarians recommend that the Bill be strengthened to:

1. Require decision-makers to explicitly take into account relevant assessments and data from recognised overseas jurisdictions.
2. Establish clear statutory assessment timeframes, supported by transparent public reporting of regulatory performance.
3. Adopt a more proportionate approach to efficacy requirements where credible overseas evidence already exists (rather than duplicating work already undertaken by trusted regulators).

## **3. Discussion**

### ***a. Overseas Recognition***

NZPork and industry veterinarians strongly support greater use of overseas regulatory assessments and data.

New Zealand is rarely the first market in which agricultural and veterinary products are introduced. In most cases, products have already undergone extensive regulatory assessment and accumulated substantial field experience in comparable jurisdictions before suppliers consider registration in New Zealand.

The Ministry for Regulation review recognised that New Zealand can make better use of this information. NZPork and industry veterinarians agree. Requiring regulators and applicants to repeatedly assess matters that have already been comprehensively evaluated elsewhere imposes unnecessary costs and delays while delivering limited additional value.

We welcome the inclusion of overseas recognition mechanisms within the Amendment Bill. However, the provisions remain largely discretionary and may not materially change current practice.

For the pig industry, the issue is not a lack of credible overseas evidence. It is the failure to make effective use of that evidence. The legislation should therefore be strengthened to ensure overseas assessments become a meaningful pathway to registration rather than simply information that "may" be considered.



## **b. Timeliness and Regulatory Performance**

Timeliness was a recurring concern raised during the Ministry for Regulation review.

For large international markets, delays may be inconvenient. For a small market such as New Zealand, delays can determine whether a product is registered at all.

When suppliers face uncertain timeframes, limited transparency and lengthy approval processes, the commercial case for entering or remaining in the New Zealand market weakens further. In many cases, the easiest commercial decision is simply not to participate.

We are concerned that the Amendment Bill does not provide sufficient emphasis on timeliness, accountability and performance reporting.

If New Zealand wishes to improve access to animal health products, the regulatory system must provide certainty around assessment timeframes and transparency around performance.

Improving timeliness including transparency is not purely an administrative issue. It is a product availability issue.

## **c. Efficacy Requirements**

NZPork and industry veterinarians support the need for regulators to assess genuine risks associated with product registration. However, we question whether the current emphasis on efficacy assessment remains proportionate where robust evidence already exists from recognised overseas jurisdictions. Generating efficacy data is often the single largest cost associated with registration. For a small market, these costs can become a significant barrier to product availability.

We are not arguing against efficacy assessment. Rather, we are arguing against unnecessary duplication of efficacy assessment where credible evidence already exists.

We support efficacy assessment, particularly where overseas evidence is taken into account. However, we also consider that there are circumstances where proving efficacy should not be the regulatory priority, especially where the cost and time involved become the principal barrier to accessing products in New Zealand.

Where products have been assessed by trusted overseas regulators as safe and supported by practical field experience, repeating that work in New Zealand frequently adds cost and delay without generating commensurate benefits.

The Ministry for Regulation review highlighted the importance of directing regulatory effort towards activities that add value. In NZPork's view, requiring duplication of efficacy evidence is often inconsistent with that objective. Regulatory effort should focus on areas where New Zealand-specific assessment is genuinely required.





#### **4. Summary**

The issue facing the pig industry is not a lack of animal health products. The products exist. They are used successfully in comparable jurisdictions around the world.

The issue is that New Zealand's regulatory system is increasingly failing to provide a practical pathway for those products to reach veterinarians and farmers.

The Ministry for Regulation review identified this problem and proposed sensible solutions based on proportionality, timeliness, regulatory efficiency and better use of trusted overseas assessments.

NZPork and industry veterinarians support the direction of the Amendment Bill but considers further reform is essential if those objectives are to be achieved in practice.

New Zealand pig farmers and veterinarians should not be forced to rely on increasingly complex workarounds when safe and effective products are already available internationally. A modern regulatory system should maintain robust protections while ensuring that New Zealand is not unnecessarily left behind.

NZPork and industry veterinarians are seeking practical, real-world change. Such change is overdue.

