

NZ PORK



Submission on the review of the Biosecurity (Ruminant Protein) Regulations 1999

June 2026

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1.0 Summary of Key Points

This submission is from NZPork, the statutory body funded by pig farmers for the purpose of supporting the interests of pig farmers while also making the best possible contribution to the New Zealand economy.

Overall, New Zealand's existing biosecurity controls already maintain a negligible BSE risk. NZPork supports retaining a risk-proportionate, science-based regulatory framework that strengthens clarity and enforcement where needed without imposing unnecessary compliance on commercial pig farming.

- TSEs such as BSE are primarily spread through feeding ruminant protein to ruminants, and New Zealand maintains a WOAAH-recognised negligible BSE risk status supported by strict bans, import controls, and surveillance.
- Pig farming is not considered a contributor to TSE risk because pigs are monogastric and current feeding, separation, and waste management practices provide multiple layers of risk mitigation.
- NZPork supports maintaining current regulatory settings, including feed controls, waste management rules and surveillance.
- In addition, as per WOAAH's recommendations, we support the removal of suspect animals from the food and feed supply chain and implementing a testing programme for ruminant feeds. We see these controls as appropriate and proportionate to the very low risk profile.
- NZPork supports improved clarity around dedicated equipment rules.
- NZPork supports improved visibility of feed mills, but only minimal compliance requirements for non-ruminant feed producers.
- NZPork does not support changes to labelling requirements and will continue engaging with MPI to ensure any regulatory changes remain risk-based and proportionate.

NZPork respectfully requests that MPI engages specifically with NZPork if any changes at all are proposed that impact on pig farming practices.

Please contact Frances Clement, NZPork Policy Adviser in the first instance (frances.clement@pork.co.nz)



2.0 Discussion

NZPork fully supports the necessity of New Zealand maintaining its World Organisation of Animal Health (WOAH) recognised negligible risk BSE status, not only to protect the health of New Zealanders and ruminant animals from any risk of a possible transmissible spongiform encephalopathy, but also to protect our trade position.

NZPork fully supports WOAHA's analysis of the extremely unlikely possibility of any prion disease including BSE emerging or arising spontaneously. WOAHA reports the international incidence of BSE is negligible and estimated to approach zero cases per million bovines¹.

Our analysis fully supports the even more improbable likelihood of the release into New Zealand of a prion disease from ruminant animals, including by the spontaneous development of a prion disease.

New Zealand has never had a case of BSE and New Zealand's ruminant meat protein import standards only permit imports of ruminant meat protein from countries or zones classified by WOAHA as BSE negligible risk status.

However, NZPork fully supports WOAHA's focus on the release risk, by recommending New Zealand:

- implementing a testing programme for raw materials and end-products of ruminant feed, and
- requiring the discarding of TSE- suspect animals to ensure such animals do not enter the food or animal feed supply chain.

Within the framework of negligible release risk for BSE, it follows therefore that the likelihood of any exposure in New Zealand is negligible. Further to this, regulations prohibit feeding of ruminant meat protein to ruminants and also control exposure of ruminant animals to ruminant meat protein, and are supported by a surveillance programme.

Given this estimate of New Zealand's release and exposure risk, NZPork strongly supports the current settings within the ruminant protein control regulations as appropriate and proportionate to the negligible risk posed by commercial pig farming.

While NZPork's specific focus is pig farming, we also offer support in principle for some other proposals sought by WOAHA and /or put forward by MPI in the review. We believe these proposals represent opportunities for New Zealand to strengthen transparency and clarity around New Zealand's practices.

In this way, New Zealand can illustrate its strong commitment and ability to manage any feasible risk of a prion disease, as well as meet WOAHA's requirements to maintain its BSE negligible risk status.

¹ World Organisation for Animal Health [Bovine spongiform encephalopathy aka BSE- WOAHA](#)



2.1 Managing TSEs, including BSE

The pathway for any TSE (including BSE) infection is via the feeding of ruminant protein to ruminants, or in very exceptional cases, via a spontaneous development. As noted above, WOAH reports the international incidence of BSE as negligible and estimates it to approach zero cases per million bovines².

New Zealand produced ruminant meat protein, including rendered, has negligible BSE risk³. Similarly, New Zealand only imports ruminant meat from countries or zones classified as of negligible risk⁴.

In addition:

- for 25 years New Zealand has had regulations in place to prohibit feeding of ruminant meat protein in any form to ruminants, due to any residual risk of amplifying and spreading a TSE including BSE. Any premise that uses or stores ruminant meat protein, and also produces feed for ruminants is required to maintain a programme which assures complete separation; and
- New Zealand conducts surveillance, as is required to maintain New Zealand's BSE negligible risk status recognised by WOAH.

2.2 Commercial pig farming

NZPork has reviewed the exposure risk pathway involving commercial pig farming. Within the context of the risk management measures for release and exposure set out above, we do not believe current pig farming practice is in any way contributory to risk.

Pigs are monogastric not ruminant. Pigs have never been infected with a TSE in farming practice.

Feeding practices on commercial pig farms in NZ involve the buying in of already compounded pig feed or home milling.

On those farms where ruminant meat protein is used as a feed ingredient for pigs, there is a cascade of further risk reduction steps through the feeding to any ultimate waste disposal:

- Feed that may contain ruminant meat protein is eaten and digested by pigs. There may be some small amount of spilled feed alongside;
- Where used, it would contribute within the range 2% to 6% of the diet for grower, finisher and breeding stock;
- In terms of waste management:
 - Effluent, collected and processed in pond systems may be distributed as liquid screened effluent, and be either direct drilled into pasture or spread onto pasture;
 - If it is direct drilled there is no exposure to ruminants. If irrigated onto land it may be cropping land; and

² Ibid

³ WOAH recognition of New Zealand as negligible BSE risk

⁴ [Ruminant Meat and Ruminant Meat Products 2022 - Import Health Standard](#)



- If it is grazed, then regulation 17 A require that there must be no visible contamination of the pasture before grazing. In practice this means a stand down period.
- Spent bedding is another waste stream. This may be composted, aerated and stored for a number of months, and spread to land, we believe usually to cropping land.

NZPork strongly supports the current settings, including regulation 17 A, as appropriate and proportional to any risk for pig farming. For soil conditioning with spent bedding, NZPork strongly supports the position explained by NZ FMA, based on Australian controls for chicken litter. This reflects current good farming practice in New Zealand.

NZPork endorses the submission of Federated Farmers pointing out their concern with the potentially significant implications of changing regulation 17 A on land use patterns across many types of farms in New Zealand. Federated Farmers emphasise that control measures should focus on release risk (manufacturer, importer, processor, renderer, or supplier level), to the extent possible, and be proportionate to risk. We fully agree.

2.3 Support in principle for proposals put forward by MPI

Supporting our recognition of the criticality of New Zealand maintaining its negligible risk BSE status, and in the light of WOA's requests to review New Zealand settings, we believe the following are appropriate:

a. Visibility of all feed mills (Issue 1 (A) and Issue 7 (F))

- Issue 1 (A): Pig farmers who are feed millers are not covered within the feed mill types in Table 6 because they may use or store ruminant meat protein but do NOT produce feed for ruminants.
- However, within Issue 7 (F), it would appear pig farmers who are feed millers may be intended to be included as "feed mills" (not currently defined) because "feed that may contain ruminant protein (either deliberately or accidentally)" is proposed to be in scope.
- NZPork understands that WOA is seeking clearer visibility from New Zealand on feed mills, including providing a framework to establish a testing programme for raw materials and end products of ruminant feed.
- The explanation provided in the Discussion Document around defining further terms notes caution in extending coverage in the regulations that is inappropriately broad. Establishment of a testing programme is not relevant for non-ruminant feeds.
- If pig farmers who are millers producing only non-ruminant feed are required to register, NZPork strongly recommends that minimal visibility requirements are set. Requirements should be limited to registration with MPI by way of a statutory declaration. No audit should be required for a statutory declaration. Any compliance activity should fall within MPI's regulatory compliance activity.



b. Dedicated equipment (Issue 2 (B))

- We support the importance of this proposal, noting we believe it is currently covered by regulation 7 (b).
- Because we believe it is already clear in the current regulation 7 (b), supported by the definition of “dedicated equipment” in Interpretation, we believe that supporting guidance is appropriate rather than the regulations needing amendment.

c. Suspect cases entering the food chain (Issue 4 (D))

- We support the discarding of TSE- suspect animals to ensure such animals do not enter the food or animal feed supply chain. This is a WOH requirement. It strengthens focus on the release risk.

d. Fertiliser and Waste (Issue 6 (E))

- As explained in more detail above, NZPork strongly supports the continuation of current regulation 17 A in respect of pig farming.
- For pig farming, the current regulation is appropriate and proportionate to risk, in the light of New Zealand’s BSE negligible risk status, ruminant protein import standards that permit imports only from countries or zones with negligible risk BSE status, regulations prohibiting feeding of ruminant protein in any form to ruminants, and controlling practices in premises where ruminant protein may be used /stored and feed for ruminants is produced, all backed up by surveillance.

e. Labelling (Issue 9 (H))

- NZPork does not support changing the labelling regime for ruminant feeds. When the New Zealand ruminant protein control regulations were introduced, there was concerted attention afforded to publicising the regulations including the labelling requirements.
- Our view is that consumer education, that is as widespread and as clear as possible, is vital to reduce any possibility of accidental exposure of ruminants to ruminant meat protein, particularly among non-commercial owners.

3.0 Conclusion

Thank you for the opportunity to consider the proposals in this review on behalf of commercial pig farmers. We will continue to engage with MPI through the consultation and follow up process. Please contact NZPork directly if there are any proposed changes to the regulations that would impact on commercial pig farmers.

