

27 April 2025

Biosecurity Partnerships Policy Team
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Regarding: Review of the Biosecurity (Meat and Food Waste for Pigs) Regulations 2005

1. DairyNZ appreciates the opportunity to provide feedback on the meat and food waste for pigs regulations. These regulations are important protections for the livestock sector as the feeding of untreated meat products to pigs is a potential risk pathway for Foot and Mouth Disease (FMD) and is believed to be the cause of the FMD outbreak in the United Kingdom in 2001.
2. DairyNZ is committed to positively progressing FMD readiness and preparedness for response with other livestock sector partners and Government, including development of an Operational Agreement for FMD under the Government Industry Agreement (GIA).

Executive Summary

3. DairyNZ acknowledges that the regulation and enforcement of feeding meat and food waste to pigs is a challenging area. The status quo regulations requiring treatment of food waste that contains, or has had contact with, meat before feeding it to pigs is not fit-for-purpose. The current regulations do not enable effective compliance monitoring or enforcement as it is difficult to verify whether the appropriate treatment has taken place and there are no record-keeping requirements.
4. Elimination of FMD risk through the current pathway of banning the feeding of untreated waste food to pigs would only be successful if this could be strictly enforced, but it has not been practical to do so to date. Therefore, the right balance between risk mitigation and practicality is needed.
5. Strengthening the requirements for feeding food waste to pigs also needs to be supported by mandated effective record-keeping with a farm registration and traceability scheme to identify the locations where pigs are kept. This would enable more effective and targeted biosecurity education, assurance and enforcement activities.
6. **DairyNZ prefers Option 3** that requires food waste producers to treat food waste that contains or has had contact with meat before it can be distributed, traded or sold. Food waste producers would be required **by regulation** to keep records of who they provide, trade, or sell treated food waste to. **DairyNZ also supports the inclusion of an exemption under this option to enable those who have commercial-grade facilities to treat food waste safely** can continue to do so (similar to Option 2).

Who are DairyNZ

7. DairyNZ is the industry good organisation that represents all New Zealand dairy farmers. DairyNZ is focused on helping farmers build profitable, sustainable, and resilient farm businesses through extension, advocacy, science and research. Our purpose is to progress a positive future for New Zealand dairy farming.
8. DairyNZ is funded by a levy on milksolids that is paid by all dairy farmers under the Commodity Levies Act 1990, with 23 cents of every \$1 of DairyNZ investment invested in biosecurity. DairyNZ is a signatory to the GIA Deed and is responsible for the Biosecurity (Response—Milksolids) Levy



to fund commitments under the GIA partnership. Dairy farmers also pay other levies to fund biosecurity, including for pest management.



Consideration of Proposed Options

Option 1: Status quo – Meat food waste cannot be fed to pigs unless treated

Option 2: Prohibit feeding food waste to pigs that contains meat (or has come into contact with meat)

Option 3: Require food waste producers to treat it before it can be distributed

Option 4: Prohibit feeding any food waste to pigs

Key aspects for a regulatory approach to feeding food waste to pigs

- **Risk mitigation should take place at the source:** Producers of food waste are best placed to know if food waste is likely to contain or be in contact with meat and to be able to treat it or provide it to a registered treater of food waste.
- Option 3 requires food waste producers to treat food waste intended for feeding to pigs before it can be distributed.
- **Enable those who have commercial-grade facilities to treat food waste safely to do so:** Those who have invested in processes and equipment to treat food waste appropriately to meet the requirements should be able to continue to do so. This would likely include commercial pig farmers that utilize feeding food waste to pigs that may contain or have been in contact with meat.

This has been proposed for Option 2, but this exemption could also apply to Option 3. There would be a requirement to register as an approved treater of food waste. Producers of food waste that may contain or have been in contact with meat must either treat the food waste before distribution for the intended purposes of feeding pigs or by regulation declare and keep record of providing this waste to a registered/ approved treater of food waste for treatment and feeding to pigs.
- **Record-keeping requirements to enable tracing of food waste:** Producers of food waste should be responsible for appropriately disposing of food waste, recording who and how the food waste is treated for feeding to pigs, and declaring if untreated food waste has been provided to a registered/ approved treater of food waste for feeding to pigs.

Option 3 requires food waste producers to keep records of who they provide, trade, or sell treated food waste to under their Food Control Plan. The current “Undertaking for Food Waste Supply and Collection” template [Undertaking for Food Waste Supply Collection Template](#) provides an existing template that could be mandated under regulation.
- **Farm registration and traceability to identify the locations where pigs are kept and the feeding of food waste:** Traceability of food waste could be provided through record-keeping requirements as outlined above. Pig traceability could be done through eASDs and farm registration requirements for locations where pigs are kept. Leveraging more actively NAIT annual declarations of non-NAIT species could also be useful to inform more targeted education and compliance monitoring of pig owners.

All options would benefit from the inclusion of a farm registration and traceability component in the regulations to enable more effective and targeted biosecurity education, assurance and enforcement activities.



DairyNZ's Preferred Option for feeding food waste to pigs

DairyNZ prefers a modified Option 3, with inclusion of an exemption to enable those who have commercial-grade facilities to continue to treat food waste (a combination of Options 2 and 3).

Strengthening the requirements for feeding food waste to pigs also needs to be supported by effective record-keeping requirements, with a farm registration and traceability component to identify the locations where pigs are kept and food waste feeding practices.

Responses to Consultation Questions

1. Do you agree with how we have defined the problem? If not, why not?

DairyNZ agrees that the problem has been partially defined, though note that other contributing factors exist (see below).

2. Are there any factors contributing to the problem that have not been identified here? How much of a problem are they?

Data on the locations of pigs and the practice of feeding food waste to pigs is lacking, so it is difficult to understand the relative risk to be mitigated by these regulations or to be able to effectively enforce them. A farm registration and traceability scheme to identify the locations where pigs are kept would enable more effective and targeted biosecurity education, assurance and enforcement activities.

3. Do you think the Meat and Food Waste Regulations are fit for purpose? Why/why not?

The status quo regulations requiring treatment of food waste that contains, or has had contact with, meat before feeding it to pigs are not fit-for-purpose. While they set an appropriate precedent for risk management, they are largely unenforced as there is no way to know where the risk material originates from and who is responsible for the requirements of the regulation. They do not enable effective compliance monitoring or enforcement as it is difficult to verify whether and where the appropriate treatment has taken place, which limits the ability to audit the practice, with no record-keeping requirements.

4. Do you find the requirements in the Meat and Food Waste Regulations confusing? Why/why not?

It is understandable that some find the regulations confusing. The regulations are not explicit in how to meet the treatment requirements, and it can be unclear for food businesses whether cooking for human consumption meets the treatment requirements.

5. Do you agree with the range of options MPI has identified? If not, what additional option or options do you think should be considered?

DairyNZ sees value in a modified Option 3 requiring:

- food waste producers to treat food waste that contains or has had contact with meat before it can be distributed, traded or sold,
- food waste producers to keep records of who they provide, trade, or sell treated food waste to,
- an exemption to enable those who have commercial-grade facilities (e.g. pig farmers register as treater of food waste) to treat food waste safely can continue to do so, and;
- a declaration required by food waste producers if providing untreated food waste to a registered treater of food waste.



- An underpinning traceability system for the entire pork industry, not just the commercial farmers, with mandated farm location declarations to support risk mitigation in a FMD event.

6. Do you think the criteria for evaluating the options are the right ones? If not, why not? What additional criteria would you add, or existing criteria would you remove, and why?

Yes, the evaluation criteria are appropriate.

7. Do you support remaining with the status quo? Why/why not?

No, the status quo regulations are not fit-for-purpose (see above).

8. Would you support remaining with the status quo and requiring people to keep records of food waste they feed to pigs? Why/why not?

This would be preferable over the status quo, however there is still the issue of the regulations being difficult to enforce.

9. Do you think MPI's education and verification activities would be sufficient to manage the biosecurity risk from untreated meat and food waste?

MPI's education and verification activities have not been sufficient to date to manage the biosecurity risk from untreated meat and food waste, in the absence of data on the locations of pigs and the practice of feeding food waste to pigs. While the commercial pork industry is well managed, the number of non-commercial entities with other species is a significant risk to our biosecurity system. A farm registration and traceability scheme to identify all locations where pigs are kept would enable more effective and targeted biosecurity education, assurance and enforcement activities.

10. Do you support providing for exemptions from this option? Why/why not?

Yes, providing exemptions under Option 2 for those who have commercial-grade facilities to treat food waste safely seems reasonable.

11. Do you support MPI recovering costs associated with any exemption scheme? Why/why not?

Providing MPI follows its established cost-recovery principles, this seems reasonable.

12. Do you support prohibiting food waste to pigs that contains, or has come into contact with, meat? Why/why not?

We are not opposed to Option 2, it provides clear obligations that can be enforced. However, this option lacks record-keeping requirements that would be useful in supporting the operation of the scheme. Option 3, with the addition of an exemption (like Option 2) is our preferred option.

13. Is there anything else that you think would be needed for this option to be effective?

Option 2 would benefit from the addition of record-keeping by food waste producers if they are providing food waste for pigs.

14. Do you support requiring food waste producers to treat food waste before it can be distributed? Why/why not?

Yes, treating food waste at its source is the most effective risk mitigation.

15. Do you support including producing food waste for pigs as part of a Food Control Plan under the Food Act 2014? Why/why not?

Yes, an important aspect of Option 3 is the inclusion of how producers deal with food waste as part of a Food Control Plan and keeping a record of providing food waste for pigs, requiring this [Undertaking for Food Waste Supply Collection Template](#)

16. Is there anything else that you think would be needed for this option to be effective?

The addition of an exemption would be useful for Option 3 to enable those who have commercial-grade facilities (e.g. pig farmers) to treat food waste safely can continue to do so. This would enable a multi-pronged regulatory approach, spanning across food waste producers and users.



17. Do you agree with MPI that this option should not be considered? Why/why not?

Yes, Option 4 is not practical.

18. Do you agree with MPI's evaluation of the options? Why/why not?

Yes, the evaluation seems reasonable.

19. Do you think there are additional criteria or other factors we should consider?

The criteria look sensible.

20. Do you agree with MPI's proposed approach to implementation? Why/why not?

Yes, however implementation would benefit from a farm registration and traceability scheme to identify the locations where pigs are kept and a better understanding of the practice of feeding food waste to pigs.

21. Do you think there are additional things MPI should do to implement the selected option?

A farm registration and traceability scheme for all pigs.

Nāku iti noa, nā

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