



Meat Industry Association of New Zealand (Inc)

Submission to MAF Biosecurity New Zealand
on

Proposal to Prohibit the Sale and Use of
Rodent Glueboard Traps

30 October 2008

Meat Industry Association Submission on the Proposal to Prohibit the Sale and Use of Rodent Glueboard Traps

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I: About the Meat Industry Association

1. The Meat Industry Association of New Zealand Incorporated ('MIA') is a voluntary trade association representing New Zealand meat processors, marketers and exporters. It is an Incorporated Society (owned by members) that represents companies supplying virtually all of New Zealand sheepmeat exports and all beef exports, producing 15 per cent of our nation's exports by value (26 percent of New Zealand's primary sector export revenue). The New Zealand meat industry earned \$5.5 billion in export revenue in the year ended May 2008.
2. MIA member companies operate approximately 80 processing plants dispersed throughout the country. The plants slaughter and process approximately 27 million lambs, 5.1 million sheep and 3.7 million cattle and calves each year. Ninety percent of this production is processed into value-added products. Approximately 1,200,000 tonnes or 86% of the production is exported to overseas destinations. Our affiliate members add to the depth of expertise available from the membership, with representation throughout the meat supply chain, including road and rail transport, shipping lines, ports, packaging firms, specialist product exporters, research and technology.
3. The Association advocates on behalf of its members and provides advice on economic, trade policy, market access, employment relations, business compliance costs and technical and regulatory issues facing the industry, with a particular focus on:
 - Food safety trends and developments in importing countries
 - Economic and trade aspects of market access to key overseas markets
 - Major public policy proposals that could impact on industry operations
4. The MIA is also the interface between the meat industry and government (i.e., it is the consultative body referred to in various New Zealand statutes, such as the Meat Board Act 2004, Meat Act 1981 and the Animal Products Act 1999).
5. The Association's mission is to:
 - Provide a forum for consideration of industry-wide commercial, human resource, marketing, and sanitary and zoosanitary issues; and
 - Provide the means of formulating a collective view on issues of industry wide interest, and of conveying that position to government, departments of state, trade bodies, and other appropriate external agencies and organisations.
6. A list of Association members is attached as Appendix 1.

II: Background

7. This submission is in response to MAF Biosecurity New Zealand Discussion paper: 2008/06, Proposal to Prohibit the Sale and Use of Rodent Glueboard Traps.
8. In developing the submission all MIA members and affiliate members were consulted and asked for input, although individual members may also make their own submissions specific to the view of their operations.

III: Executive Summary

9. MIA has prepared a submission in response to MAF Biosecurity New Zealand's second paper on the issues and options, and proposed policy changes for the sale and use of rodent glueboard traps.
10. The MIA submission does not support the prohibition of the use of glueboards and repeats the argument made in the 2003 MIA submission, recommending that the issue should be left to the individual operator who can appropriately address any animal welfare issues.
11. Two further recommendations are made that:
 - i. If MAF are to proceed with the preferred option of prohibiting glueboards, that this should only proceed for food production premises if a tool is available that is equally effective, hygienic and cost efficient as glueboards, and
 - ii. That MAF reviews their animal welfare priorities and ensures that resources (government and industry) are focused on the issues of importance to the economy of New Zealand before committing any resource to legislation in relation to rodent glueboard traps.

IV: Submission

12. The MIA recognises the concerns of the National Animal Welfare Advisory Committee (NAWAC) on the use of glueboards.
13. The MIA submitted in March 2003 on the December 2002 proposal with the key points of the submission being:
 - That this issue should not impact the use of insect glueboards.
 - A rodent should be able to be humanely trapped on a glue board. It is the length of time it is trapped that should be the issue. Prompt disposal of the trapped animal is the desirable outcome and adequate trap check frequencies minimises the time the animal is exposed to the stress of entrapment.
 - The welfare of a trapped rodent should not overrule the fact that these animals are food safety risks and what may under normal circumstances appear to be an act of cruelty must be correspondingly related to the importance of maintaining sanitary food processing facilities. This does not imply that because an animal is a pest it can be treated in an inhumane manner, but care is needed not to reduce the effectiveness of any vermin control programme at the expense of human health versus the welfare of a rodent.
14. The MIA recommended that no regulatory action be taken and that the issue should be left to the individual operator who can appropriately address any animal welfare issues in their individual vermin control programmes.
15. The June 2008 discussion document notes that:

- The use of glueboards in meat processing facilities has declined and that few are used in those premises now.
 - Alternative, cost-effective pest control methods exist, especially for rodents.
16. The MIA notes that there may have been a slight decline in the use of glueboards in processing premises but they are still utilised in many premises especially in areas where high hygiene standards are required.
 17. The MIA does not support the prohibition of the use of glueboards. The MIA believes that this is an over-use of legislation to remedy an unquantified animal welfare issue.
 18. The discussion paper notes that “when animals are left on glueboards for extended periods, the animals suffer a level of pain or distress that is unacceptable”. The MIA contends that this is the real issue and thus this is the issue that needs to be addressed.
 19. The MIA re-submits the point made in the March 2003 submission that:
 - “A rodent should be able to be humanely trapped on a glue board. It is the length of time it is trapped that should be the issue. Prompt disposal of the trapped animal is the desirable outcome and adequate trap check frequencies minimises the time the animal is exposed to the stress of entrapment.”
 20. Furthermore while evidence is provided in the December 2002 discussion paper that prolonged entrapment does cause stress, no information is provided in either the December 2002 or June 2009 discussion papers as to the extent of the problem in New Zealand and thus the justification for legislation.
 21. The MIA further submits that introducing legislation to prohibit the use of glueboards will increase both costs and hygiene risk unnecessarily to the meat industry.
 22. The MIA notes that the meat industry premises are in the same category as dairy premises in that high hygiene standards apply under risk management programmes and other processes are in place to limit the potential for contamination.
 23. Therefore the MIA supports the statements in the discussion document from the dairy industry (page 7) in relation to fewer alternatives being permitted due to potential biological contamination and the risk of escaping rodents.
 24. MIA notes that the June 2008 discussion document states (6.1.1), that the proposed requirement “does not apply to an insect so does not affect the use of glueboards for cockroaches, flies and other insects”.
 25. The MIA supports this clarification.
 26. The MIA notes the MAF preferred option of prohibiting glueboards from July 2009 with an exception for places operating under strict hygiene till July 2014 and from that date only with the approval of the minister.

27. Notwithstanding the MIA opposition in paragraph 17, if MAF are to proceed with the preferred option, this should only proceed for food production premises if a tool is available that is equally as effective, hygienic and cost efficient to glueboards.

V: Priorities

28. As noted above in paragraph 9, the MIA recognises the concerns of the National Animal Welfare Advisory Committee (NAWAC) on the use of glueboards.
29. However it is of serious concern to the MIA that this minor issue has had so much government and industry resource (two discussion papers prepared by MAF, two lots of submissions prepared by industry, two lots of submissions analysis, etc) with no conclusion in five years. This is for an issue that is of minor importance to biosecurity, conservation, human health, animal health, food safety and food quality.
30. This amount of consultation on a minority issue contributes negatively to the government aim of improving the productivity of New Zealand.
31. MIA recommends that MAF reviews their animal welfare priorities and ensures that resources (government and industry) are focused on the issues of importance to the economy of New Zealand such as the codes for cattle and commercial slaughter. The latter has been in gestation for over six years and still not approved.

VI: Recommendations

32. The MIA recommends that:
 - i. No regulatory action be taken to prohibit the use of glueboards, and that the issue should be left to the individual operator who can appropriately address any animal welfare issues in their individual vermin control programmes.
 - ii. If MAF are to proceed with the preferred option of prohibiting glueboards, that this should only proceed for food production premises if a tool is available that is equally effective, hygienic and cost efficient as glueboards.
 - iii. That MAF reviews their animal welfare priorities and ensures that resources (government and industry) are focused on the issues of importance to the economy of New Zealand before committing any resource to legislation in relation to rodent glueboard traps.

VII: Concluding Remarks

33. The MIA recognises the concerns of the National Animal Welfare Advisory Committee (NAWAC) on the use of glueboards.
34. The MIA does not support the prohibition of the use of glueboards and that the issue should be left to the individual operator who can appropriately address any animal welfare issues.
35. The MIA expresses the view that the issue of rodent glueboard traps has been given a disproportionate amount of government and industry resource in relation to the importance of

the issue and recommends that MAF reviews their animal welfare priorities before proceeding with any rodent glueboard trap legislation.

VIII: Contact Details

36. For any queries relating to this submission, please contact Kevin Cresswell at email Kevin.Cresswell@mia.co.nz or DDI (04) 495 8377.

Meat Industry Association of New Zealand (Inc)
30 October 2008

IX: Appendix 1: Association Members and Affiliate Members as at 1 July 2008

Members
Advance Marketing Ltd
AFFCO New Zealand Ltd
Alliance Group Ltd
ANZCO Foods Ltd
ANZCO Green Island Ltd (ANZCO group)
ANZPAC Foods Ltd
APJ Meats Ltd
Auckland Meat Processors Ltd
Ballande New Zealand Ltd
Bernard Matthews New Zealand Ltd
Blue Sky Meats (NZ) Ltd
Canterbury Meat Packers Ltd (ANZCO group)
Columbia Exports Ltd
Crown Marketing Ltd (ANZCO group)
Crusader Meats New Zealand Ltd
Davmet New Zealand Ltd
Fern Ridge Ltd
Frasertown Meat Company Ltd
Garra International Ltd
Greenlea Premier Meats Ltd
Harrier Exports Ltd
Horizon Meats New Zealand Ltd (wholly owned subsidiary of Blue Sky Meats (NZ) Ltd)
Lamb Packers Feilding Ltd (wholly owned subsidiary of Bernard Matthews NZ Ltd)
Land Meat (NZ) Ltd (AFFCO group)
Lanexco Ltd
Lean Meats Oamaru Ltd
Lowe Corporation Ltd
Mathias International (Mathias Meats NZ Ltd)
New Zealand By-Products
Pilot (NZ) Ltd
Progressive Gisborne Ltd (wholly owned subsidiary of Bernard Matthews NZ Ltd)
Progressive Meats Ltd
Riverlands Ltd (ANZCO group)
Silver Fern Farms Limited (previously PPCS LTD)
South Pacific Meats Ltd (AFFCO group)
South Pacific Meats - Malvern (AFFCO group)
Tara Exports Ltd
Taylor Preston Ltd
Te Kuiti Meat Processors Ltd
Towers Thompson (New Zealand) Ltd
Universal Beef Packers Ltd (UBP)
Wallace Corporation Ltd

Affiliate Members
AgResearch-MIRINZ Centre
Aon New Zealand Limited
Axis Intermodal (Ports of Auckland Ltd)
CentrePort Wellington
DeLaval Cleaning Solutions
Energy for Industry (ex Meridian Solutions)
GHD International
Hamburg-Sud New Zealand Ltd
Hapag-Lloyd (New Zealand) Ltd
Intralox Ltd
Maersk New Zealand Ltd
Millers Mechanical NZ Ltd
NZI Marine
Oceanic Navigation Ltd
Port of Napier
Port Otago Ltd
Port Taranaki Ltd (previously Westgate Transport Ltd)
Sealed Air (New Zealand), Cryovac Division
Vero Marine Insurance