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Consultation: Ruminant Protein Regulations
Ministry for Primary Industries
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DairyNZ submission on Biosecurity (Ruminant Protein) Regulations 1999

1. DairyNZ appreciates the opportunity to provide feedback on proposed changes to the Biosecurity (Ruminant Protein) Regulations 1999 ('the Ruminant Protein Regulations').
2. We support strengthening the Ruminant Protein Regulations and advocate for the following policy to manage disease transmission risk and maintain New Zealand's negligible bovine spongiform encephalopathy (BSE) status, as recognised by the World Organisation for Animal Health (WOAH):
 - All renderers and feed manufacturers are required to prepare a Ruminant Protein Control Programme (RPCP) or equivalent Risk Management Programme (RMP) and register with MPI, in-line with WOAH recommendations;
 - Permitting the use of fertilisers, soil conditioners and wastewater containing ruminant protein with suitable conditions to avoid ingestion by a ruminant;
 - Excluding suspect carcasses from human and animal food chains;
 - Clarifying the definition of 'feed' and 'operator' to avoid unintended regulatory burden on dairy farmers.
3. 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 deliver a positive future for New Zealand dairy farming.
4. DairyNZ is funded by a levy on milk solids that is paid by all dairy farmers under the Commodity Levies Act 1990, a significant proportion of our work is allocated towards biosecurity.

General comments

5. DairyNZ recognises that maintaining WOAH's confidence in New Zealand's negligible BSE status is critical to protecting market access with major trading partners.
6. Continued but proportionate measures to manage the risk of transmission of prion diseases are important despite the risk of BSE entering New Zealand being very low.



Recommendation

We have identified four key issues affecting dairy farmers and propose the following positions:

Animal feed could become contaminated with ruminant protein during the manufacturing process

7. DairyNZ supports requiring any renderer or feed manufacturer with a credible risk of ruminant protein contamination to operate under an RPCP, or equivalent RMP. At a minimum, all renderers or feed manufacturers should be registered with MPI, allowing for greater oversight of this industry. This is in-line with WOAHA recommendations.
8. MPI are testing whether the requirements for RMP's and RPCP's could be aligned. If possible, we would support this to decrease regulatory burden and duplication of processes.

Fertiliser, soil conditioner, and wastewater that contains ruminant protein could be ingested by domestic or feral ruminants

9. DairyNZ supports permitting the use of fertilisers or wastewater containing ruminant protein provided there is development of suitable conditions proportionate to the risk presented by different parties.
10. Commercial fertilisers should continue to label their products if they contain ruminant protein as is required by the Ruminant Protein Regulations.
11. Wastewater from meat processing facilities could be managed using a Risk Management Programme for market access requirements. Guidance could be provided to meat processing plants to ensure that wastewater is appropriately screened of ruminant protein contaminants.
12. Supporting guidance could be produced for fertiliser, wastewater and other types of risk products such as compost or soil conditioners.
13. Animal Health Australia has published guidance on the use of fertilisers and composts that contain ruminant protein. They are yet to develop guidance on the application of food waste to pasture so considers this practice unacceptable in the interim.
14. DairyNZ recognises that there is a lack of scientific evidence regarding the potential risk associated with the land application of these products.

Allowing suspect cases to enter the human food/animal feed chain before a negative test result is returned

15. DairyNZ supports requiring that carcasses under BSE (or other prion diseases) investigation must not enter the food or feed chain. This is in-line with Australian standards.
16. There is a risk that this will reduce participation in BSE surveillance due to the imposition of carcass disposal and loss of pet food source for farmers. We recommend that MPI strengthens testing incentives and works with WOAHA to understand potential repercussions of decreased surveillance.



The definitions of 'feed' and 'operator' are unclear in the Regulations

17. DairyNZ supports clarifying the definitions of feed and operator in the Regulations to avoid unintended capturing of dairy farmers in RPCP requirements.

Next steps

DairyNZ welcomes the opportunity to discuss these topics further, if you have any questions on the feedback provided in this submission, please contact me.

Yours sincerely,

A handwritten signature in brown ink that reads "Fi Roberts".

Fi Roberts

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DairyNZ

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