



freshPork^{nz}

NZ's Pork Specialist



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FRESHPORK SUBMISSION

Consumer Information Standards (Origin of Food) Regulations 2019



OVERVIEW

Established in 1985, Freshpork New Zealand Limited (Freshpork) is the country's leading pork processor and wholesaler. For over three decades, Freshpork has been 100 per cent privately owned and managed by the Glass family, and today provides approximately one third of New Zealand's pork to markets across New Zealand. We have a dedicated team of approximately 175 people working with us across New Zealand, who bring a wealth of experience and knowledge on "all things pork".

Freshpork operates primarily as a wholesale supplier of pork carcasses and pork cuts to retailers and the foodservice industry across New Zealand. While local consumers won't often see the Freshpork brand, we're a trusted partner to the country's major retailers, foodservice suppliers and independent butchers.

Freshpork has plants in Timaru, Burnham (Feedmill), Levin (two sites), a sales & marketing office in Auckland and its head office in Christchurch. An extensive external distribution network is coordinated by Freshpork to ensure efficient distribution between plants and customers throughout the country daily.

Having farmed for generations on the Mainland, Freshpork has long-standing relationships with the predominantly South Island-based farmers who supply pigs to the Timaru abattoir.

As well as processing pigs under the Freshpork wholesale brand, Freshpork holds an exclusive contract to process pigs under the Freedom Farms' consumer brand.

Freshpork believes there's a significant opportunity to build demand for New Zealand born and raised pork products – especially compared to other proteins like beef and chicken. Local consumers are not only demanding food that is affordable, convenient and nutritious but they increasingly want to know where the food they feed their families comes from and how it was produced.

Accordingly, Freshpork is continuing to innovate our trade products, improve our service to the retail and foodservice markets and provide a greater range of choice, flavour and inspiration to local consumers. This has seen the development of our new brand, Heartland NZ Fresh Foods which is available through leading local retailers.



REQUEST FOR A WIDER DEFINITION
Cured/Flavoured/Marinated Pork Products

CONSUMER CONFUSION

As previously communicated, approximately 60% of pork consumed in NZ is imported. Most of these imports are frozen pork and this is used in bacon, ham and smallgoods processing. However, over the last several years, the market has also seen an increase in fresh meat imports.

Imported pork is cheaper than locally born and raised products, raised under substantial different standards, including the use, in some cases, of growth hormones and often relies on the further assistance of Government subsidies. All imports are from pigs raised in countries which do not meet New Zealand's animal welfare standards in at least some respects. In a number of areas, these methods are completely outside the standards of local production and contrary to the beliefs of many New Zealand consumers. We have included a table comparing practices as an Appendix to this submission.

While some retailers are voluntarily labelling imported pork with some form of country of origin labelling it is far from the norm. However, given the widespread belief of consumers that, as an expert farming nation, most of the pork available is produced here, in many instances by non-declaration of origin it is effectively disguised. Therefore, a wider definition is absolutely essential for the success of the new country of origin of food regulations.

For example, the marinated pork product below is made from Imported Pork yet this information is not clearly communicated on the manufacturers label – it simply states made from local and imported ingredients. And how disappointing to see the store has labelled as NZ Pork Sirloin Steak. These inconsistencies need to be addressed. A wider definition of pork content and origin should be detailed on the labelling, especially with regard to mixed ingredients e.g. 'USA Pork 75%' not just 'Pork'. This approach will more fully meet the spirit of the legislation, to enable consumers to make choices on the basis of understanding where their food comes from.



Other retailers from time-to-time dice, mince and marinate steaks from imported pork and repackage the product as 'Processed in NZ' or 'Made in NZ'. This loophole in the draft policy has the potential to mislead and further confuse consumers.

Another area of concern is the pork sausage category – fresh, cured, smoked and pre-cooked.

If the sausage has a pork meat content, then it should be labelled accordingly. Our example below is showing an Old English Pork Sausage which has a 'lamb & pork' content? Their marketing quotes 'export grade meats', however it doesn't define country of origin of meat or meat content?



The other example above shows a fresh pork sausage, made-in-store, with no country of origin details for the meat, assuming it's pork? It also provides no indication of the percentage of meat in the product.



Another example above is an imported blended frozen Pork Mince, which has been labelled as NZ Pork Mince. And below is a pre-cooked imported Pork product which is marketed as Made in NZ?





While research and public support for the standard has clearly highlighted that consumers want to know where their food comes from, these examples show the potential for continued confusion and a lack of clear information in the market. A wider definition of cured/marinated & flavoured/cooked pork products is the only way of preventing this misrepresentation or potential loopholes in the Country of Origin of Food regulations.

Freshpork NZ is a very strong supporter of Country of Origin labelling and fully endorses NZPork's request for the definition of cured pork to be widened so it includes processing, including preserving and/or flavouring. Defining cured pork in this way, and qualifying it by a minimum pork content, would mean the regulations would cover imported pork that is processed in some form.

Freshpork NZ would welcome to opportunity to meet to discuss further if required.





APPENDIX

Duration of sow confinement (in a mating or gestation stall and in farrowing crates post-farrowing), and the requirement for pain relief during surgical castration for different countries importing pork into NZ (2018)

Rank	Country importing pork into NZ	Maximum period allowed in a mating or gestation stall (days)*	Maximum period allowed in farrowing crate post farrowing (days)**	Is surgical castration carried out?	Is pain relief required for surgical castration?	% of imports from this country	Cumulative % imports***
1	Spain	28	28	Yes	No	26%	26%
2	Canada	35	42	Yes	Yes	21%	46%
3	USA	115 ¹	28	Yes	No	13%	59%
4	Australia	42 ²	28	Yes	No	11%	70%
5	Finland	28	28	Yes	Yes	9%	79%
6	Sweden	0	0 ⁴	Yes	Yes	4%	83%
7	Germany	28	28	Yes	Yes	4%	87%
8	Belgium	28	28	Yes	No	3%	90%
9	Poland	28	28	Yes	No	3%	93%
10	Denmark	28	28	Yes	Yes	2%	95%
11	Ireland	28	28	No ⁺	Yes	2%	96%
12	Netherlands	9 ³	28	Yes	No	2%	98%
13	Estonia	28	28	Yes	No	1%	99%
14	UK	0	28	Yes	Yes	<1%	99%
15	Italy	28	28	Yes	No	<1%	100%
	New Zealand	7	28	No⁺	Yes		

¹ USA	Arizona, California, Colorado, Florida, Maine, Massachusetts, Michigan, Oregon and Rhode Island are the only US states that have phased out or banned the use of gestation stalls to varying degrees. Many of these states are not considered significant areas for pig production.
² Australia	Can confine sows in a gestation stall for 5 days post-mating, but this is by voluntary agreement – legal upper limit is 6 weeks. Most of the industry is compliant with the voluntary agreement (approx. 80%).
³ Netherlands	Can confine sows in a gestation stall for 4 days post-mating. Assume average sow is mated 5 days post-weaning therefore maximum time in a gestation stall would average 9 days.
⁴ Sweden	Sows can be confined in a farrowing crate temporarily post-farrowing, but the maximum period of confinement that is allowed is not defined.

*The terms 'mating stall' and 'gestation stall' are both used as New Zealand only permits stalls for the purpose of mating, not gestation. Other countries refer to them as gestation stalls as sows are housed in the stalls after mating, during early pregnancy.

**Maximum period allowed in farrowing crates applies to the post-farrowing (lactation) period only as most countries do not specify the maximum amount of time that a sow may be housed in a farrowing crate before giving birth. In New Zealand, this is limited to a maximum of 5 days pre-farrowing.

***Cumulative % of imports has been rounded up. An additional 10 countries collectively contributed up to 0.5% of imports including China, Korea, Taiwan, Philippines, Brazil, Japan, Thailand, Singapore, Hong Kong, Viet Nam, Croatia, and Serbia.

⁺In New Zealand, commercially farmed pigs are not castrated. Castration of pigs is permitted in New Zealand, however it can only be performed by a veterinarian and pain relief must be provided. In Ireland, surgical castration is not permitted.