

25 August 2026

Ministry for Primary Industries
spechumn.consultation2026@mpi.govt.nz

Retail NZ submission: Draft import health standard for specified animal products for human use

Overview

1. Retail NZ is a membership organisation that represents the views and interests of New Zealand's retail sector. We are the peak body representing retailers across Aotearoa, with our membership accounting for nearly 70% of all domestic retail turnover. New Zealand's retail sector comprises approximately 30,000 businesses and employs around 222,000 Kiwis.
2. Retail NZ consulted our membership in the preparation of this submission.
3. Retail NZ supports the intent to simplify the importation of animal-derived products for human use by bringing several separate Import Health Standards under one single Import Health Standard (IHS).
4. However, we do have several concerns with the proposal, namely the potential for increased compliance costs, possible supply chain disruption, and the short implementation timeframe. As Retail NZ members did not provide any feedback on the questions related to specific goods (composite products, functional and biochemical ingredients, and mushrooms for propagation and consumption) our submission is focused on the proposed scope and workability of this draft standard.

New IHS Scope Feasibility

5. Retail NZ supports bringing all these different IHSs under one single standard (SPECHUMN.ALL), as we expect it will ultimately simplify the importation of animal products for human consumption, especially as most businesses which import these goods would import products that currently fall under multiple different IHSs.
6. However, there are some practical concerns over whether the changes to documentation, certification, and product assessment requirements for some of these products and commodities will lead to increased costs, slower processes at the border, or more difficulties sourcing products that can meet these requirements. While Retail NZ understands the importance of ensuring the safety of these products, we ask MPI to provide reassurance to retailers that the proposed changes won't lead to delays at the border.

7. Due to the vast number of IHSs that will now come under this one new IHS, Retail NZ recommends MPI provides simple guidance for businesses importing these goods and commodities to understand what changes, if any, have been made to the products captured by the new Standard.
8. Retail NZ recommends a longer transition period to the new HIS than the proposed four-month timeframe. Four months is not very long in import supply chain terms, with retailers often needing to place orders several months in advance and there is always a risk of freight disruption due to unforeseen circumstances, such as severe weather events or geopolitical conflict. Additionally, overseas suppliers will need time to understand any new requirements they need to adhere to and then update their processes and/or labelling to comply. Retail NZ recommends the transition period be extended to at least six months.
9. While not specifically covered in this consultation, we have had feedback from Retail NZ members that it is important all imported food products should be subject to the same standards that food manufactured and processed in New Zealand are expected to adhere to. This puts New Zealand processors and manufacturers of animal products on a level playing field with their international counterparts and gives confidence to consumers that all animal products they are using and consuming meet a minimum standard.

Conclusion

10. Thank you for the opportunity to make a submission.
11. Retail NZ supports the intent of the changes in this draft IHS, and can see the benefits it could bring to retailers importing these goods and commodities.
12. However, we recommend extending the implementation timeframe to ensure a smooth transition to the new IHS to at least six months.
13. We also ask MPI to consider whether any of these changes will make compliance overly complicated, costly or onerous for international manufacturers and suppliers, and the impact that could have on cost or product availability.
14. Retail NZ is happy to discuss any aspect of this submission.
15. No part of this submission should be withheld under the OIA.

Sincerely,



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