Ministry for Primary Industries Manatū Ahu Matua



Ref: CTO 2018 012 [G]

Aquatic Animal Product: Caviar Extract for Human Skin Care Products

CTO direction as to equivalent measures in relation to caviar extract for human skin care products

Pursuant to section 27(1)(d)(iii) of the Biosecurity Act 1993 I, Vicki Melville, Manager Animal Imports, Ministry for Primary Industries (under delegated authority), give the following direction for clearance of consignments of caviar extract for further processing into skin care products for use by humans in relation to the *Import Health Standard for the Importation into New Zealand of Specified Animal Products and Biologicals* (INEPROIC.ALL; 08 June 2011).

Clause 6.1 of the above Import Health Standard allows importation of animal products for manufacturing into health supplements. Though not defined in the above IHS, health supplement typically means a product intended for oral consumption. However, the imported caviar extract is for further processing into skin care products for use by humans. From a biosecurity risk perspective, the topical preparation pathway has been determined to present no greater risk than health supplements. Further, the imported caviar extract is sourced from the roe of lumpfish (*Cyclopterus lumpus*), a fish species of marine origin. If the caviar extract were to be imported for human consumption than the product would have qualified for biosecurity clearance under the *Import Health Standard for the Importation of Marine Fisheries Products for Human Consumption from All Countries* (FISMARIC.ALL). In summary, the caviar extract is unlikely to present any risk to New Zealand's biosecurity.

The reason for this direction is that the biosecurity risks associated with caviar extract has been assessed and managed effectively.

This direction takes effect from the date of signing and continues in effect until amended or revoked.