



Beef + Lamb New Zealand and Meat Industry Association

Submission on:

**Discussion document – Options for 28-
day rule for homekill and recreational
catch**

MPI Discussion Paper No: 2026 /06

05 October 2026

EXECUTIVE SUMMARY

- I. Beef + Lamb New Zealand Ltd (B+LNZ) and the Meat Industry Association of New Zealand Incorporated (MIA) welcome the opportunity to comment on the Ministry for Primary Industries' review of the rules for homekill and recreational catch.
- II. We recognise that homekill and recreational catch are already lawful activities that sit outside New Zealand's regulated food-safety system. Our key focus is on whether the proposed changes would materially alter the risks that are already present under the existing framework, and if so, how those risks should be managed.
- III. Based on our assessment of the proposal and existing homekill framework, B+LNZ and MIA's key views are as follows:
 - **We do not oppose removing the 28-day rule in principle**, provided MPI confirms how the revised rules would operate in practice and demonstrates that any material risks can be appropriately managed.
 - **We strongly support retaining the prohibition on sale and trade** of homekill and recreational catch.
 - **We support clearer lawful pathways for sharing and donation**, provided these do not become a route to commercial supply.
 - **We support simple and practical information requirements** so recipients understand they are receiving an unregulated product.
 - **We encourage ongoing monitoring, review and industry engagement** as policy advice and implementation arrangements are developed.
- IV. We understand that the 28-day rule was introduced to support genuine ownership and use of homekill, and to help distinguish homekill from commercial supply. However, an owner may currently slaughter their own animal without waiting 28 days, meaning the rule applies only where a listed homekill provider is used.
- V. Our current assessment is therefore that the rule primarily limits access to listed providers rather than access to homekill itself. We also note that listed providers operate within an existing listing and record-keeping framework, which may provide greater visibility than wholly private slaughter.
- VI. We recognise concerns about food safety, animal welfare, biosecurity, traceability, waste management, unlawful trade and confidence in New Zealand's regulated meat system. However, we consider these may more appropriately be addressed via compliance with, and enforcement of, existing legal requirements
- VII. In providing any recommendations as a result of this review, MPI should clearly explain the risks associated with each option, how those risks would be managed, and how affected parties will continue to be engaged as policy advice and implementation arrangements are developed.

Contacts for service

The contacts for this submission are:

Chris Houston
Head of Technical Policy
Beef + Lamb New Zealand

Natasha Watzdorf
Specialist Advisor
Meat Industry Association of New Zealand

chris.houston@beeflambnz.com

natasha.watzdorf@mia.co.nz

1. Introduction

- 1.1. Beef + Lamb New Zealand Ltd (B+LNZ) is an industry-good body, funded under the Commodity Levies Act through a levy paid by producers on all cattle and sheep slaughtered in New Zealand. B+LNZ represents around 9,000 farming businesses, providing around 35,000 jobs across New Zealand.
- 1.2. 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 and beef exports.
- 1.3. MIA member companies operate more than 60 slaughter and further processing plants employing 25,000 people throughout the country. Ninety percent of this production is further processed into value-added products.
- 1.4. The red meat sector is a significant contributor to New Zealand's economy. Export revenue from New Zealand's red meat industry is expected to be \$13.2 billion in the year to 30 June 2026.
- 1.5. B+LNZ and MIA welcome the opportunity to comment on the proposals. Both organisations have a strong interest in maintaining confidence in New Zealand's regulated meat system while recognising the legitimate role of homekill and recreational catch within New Zealand.

2. Chapter One: Background and Scope

- 2.1. MPI has broadly identified the relevant issues.
- 2.2. Homekill already occurs outside the regulated food-safety system. The prohibition on sale and trade remains an important distinction between homekill and regulated meat. MPI is not proposing to change that distinction.
- 2.3. We recognise concerns about food safety, animal welfare, biosecurity, waste management, traceability, unlawful trade and confidence in New Zealand's regulated meat system. However, some of these risks are managed under different legislation and already exist under the current homekill rules. Others may increase if the proposed changes result in more homekill activity or wider distribution of unregulated product.
- 2.4. As part of the review process, MPI should assess the likely scale of any change, confirm how the revised rules would work in practice and explain how any material risks will be managed.

3. Chapter Two: The 28-Day Rule

- 3.1. B+LNZ and MIA do not oppose removing the 28-day rule, provided MPI confirms how the revised rules would work and demonstrates that any material additional risks can be appropriately managed.
- 3.2. We understand that the 28-day rule was introduced to support genuine ownership and use of homekill, and to help distinguish homekill from commercial supply. However, an owner may currently slaughter their own animal without waiting 28 days, meaning the rule applies only where a listed homekill provider is used.
- 3.3. Our current assessment is therefore that the rule may be more effective at limiting access to listed providers than limiting access to homekill itself. This raises the question of whether the rule is materially reducing the risks it was intended to address, including risks associated with ownership, consumer protection or unlawful trade.
- 3.4. Removing the rule may also present an opportunity to encourage greater use of identifiable listed providers, which operate within an existing listing and record-keeping framework, rather than wholly private slaughter.

If MPI recommends retaining, reducing or removing the rule, it should clearly explain the evidence and reasoning supporting that conclusion.

4. Chapter Three: Consumption and Donation and Labelling Requirements

- 4.1. B+LNZ and MIA strongly support retaining the prohibition on sale and trade of homekill and recreational catch.
- 4.2. We do not oppose clearer pathways for lawful sharing and donation, provided the distinction between genuine gifting and commercial supply remains clear and enforceable.
- 4.3. MPI should provide clear guidance on how any revised consumption or donation arrangements would operate in practice and how recipients will be informed that the product sits outside the regulated food-safety system.
- 4.4. If consumption rights are broadened, we support simple and proportionate information requirements for product processed by listed providers.
- 4.5. Recipients should understand that:
 - the product is homekill or recreational catch,
 - it was produced outside the regulated food-safety system,
 - it has not been subject to the inspection requirements applying to regulated meat; and
 - it cannot be sold or traded.
- 4.6. MPI should work with affected parties to develop practical and low-cost approaches to meeting these objectives.

5. Implementation and Review

- 5.1. Regardless of which options MPI adopts, the distinction between regulated meat and homekill should remain clear.
- 5.2. We encourage MPI to continue engaging with farmers, listed providers, regulated processors and other affected parties as advice is developed and implementation arrangements are considered.
- 5.3. If changes are made, MPI should monitor their effects and review the settings if unintended consequences emerge.

6. Recommendations

B+LNZ and MIA recommend that MPI:

1. **Retain the prohibition on sale and trade** of homekill and recreational catch.
2. **Consider removing the 28-day rule**, provided MPI confirms how the revised rules would operate in practice and demonstrates that any material risks can be appropriately managed.
3. **Clearly explain the evidence and reasoning** supporting the preferred option, including how any additional risks would be managed.
4. **Permit clearer lawful sharing and donation pathways** while maintaining a clear boundary against commercial supply.
5. **Require simple and practical information for recipients** identifying the product as homekill or recreational catch, explaining that it is unregulated and cannot be sold or traded.
6. **Continue engaging with farmers, listed providers, regulated processors and other affected parties** as policy advice and implementation arrangements are developed.
7. **Monitor and review any changes** to identify unintended consequences and determine whether the settings remain fit for purpose.