

SUBMISSION ON THE MPI STANDARD FOR PLACES OF FIRST ARRIVAL

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To: The Ministry for Primary Industries

Name of Submitter: Horticulture New Zealand

Contact for Service:

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Our submission

Horticulture New Zealand (HortNZ) thanks the Ministry for Primary Industries (MPI) for the opportunity to submit on the proposed amendment to the MPI standard for Places of First Arrival (PoFA). Our submission provides an end-user perspective.

HortNZ is a pan-sector organisation and has a comprehensive understanding of how the commercial fruit and vegetable growing sector in New Zealand operates.

The horticulture sector welcomes any opportunity to continue to engage with MPI and to discuss this submission.

This submission is being made by Horticulture New Zealand and is supported by the following organisations:

- Katikati Fruitgrowers Association
- New Zealand Asparagus Council
- Strawberry Growers New Zealand
- Summerfruit New Zealand
- Tomatoes New Zealand
- Vegetables New Zealand Incorporated

HortNZ's Role

Background to HortNZ

Horticulture New Zealand (HortNZ) advocates for and represents the interests of approximately 5,500 commercial fruit and vegetable growers in New Zealand. These growers supply fresh and processed fruit and vegetables to domestic consumers, as well as exporting crops to discerning consumers overseas. The horticulture industry is valued at \$7b with \$4.6b in exports annually.

The national and regional economic benefits associated with horticultural production are important. The industry employs more than 40,000 people and provides critical regional development opportunities in Northland, Auckland, Bay of Plenty, Waikato, Hawke's Bay, Gisborne, Manawatu, Marlborough, Nelson, Canterbury and Central Otago. The rural economy supports local communities and primary production defines much of the rural landscape.

HortNZ's purpose is to create an enduring environment where growers thrive. This is done through enabling, promoting and advocating for growers in New Zealand.



Submission

1. HortNZ emphasises the importance of Places of First Arrival (PoFA) as a key part of the biosecurity system for detecting and intercepting potential biosecurity risks associated with craft, people, and goods.
2. HortNZ supports clarifying the requirements for craft, individuals, and risk goods to facilitate improved communication and compliance, therefore, enhancing the biosecurity system and protecting New Zealand from unwanted pests, pathogens and weeds. Documents that are clear and easy to understand are likely to increase compliance which is important for good biosecurity outcomes.
3. HortNZ understands all PoFA are different (e.g. a seaport vs an airport or a large facility vs a small facility). The biosecurity and other regulatory requirements that PoFA must meet are complex. We also understand that currently different PoFA have their unique difficulties in meeting the requirements of the existing standard (MPI draft Risk Management Proposal 2022).

COMMENTS ON THE PROPOSED AMMENDMENTS

4. HortNZ supports the proposed amendments to create a more fit-for-purpose standard that enables greater flexibility for operational and individual PoFA needs, provided biosecurity risks are still adequately managed.
5. HortNZ supports the consolidation of all pertinent guidance into one standard for ease of use and reference.
6. Hort NZ supports the proposed requirement in clause 2.3 (3) (para 66, MPI draft Risk Management Proposal 2022) for contingency planning to be factored into operations in case of a biosecurity risk, response, or emergency. HortNZ understands that PoFA are often busy places which have many goods and/or people moving through them. There is a need to ensure that plans are in place so that biosecurity risks and incidents do not go unmanaged due to logistical requirements at the site.
7. HortNZ supports the development and commencement of a specific training course for PoFA operator delegates (section 3.5, MPI draft Risk Management Proposal 2022). This will ensure a proficient level of biosecurity understanding is maintained at each PoFA, even if staff change frequently.
8. The Biosecurity Act (1993) has a minimum requirement for a PoFA to have a biosecurity control area (BCA). HortNZ recommends amending the wording

of clause 2.3 (2) (para 65, MPI draft Risk Management Proposal 2022) from 'may' to 'must' to be consistent with the legislation.

CONCLUSION

9. HortNZ is supportive of the proposed changes to the PoFA standard as they provide clarification on the requirements which is likely to increase compliance and in turn, result in better biosecurity outcomes.
10. HortNZ believes these proposed changes will help enhance the PoFA standard and make it more fit-for-purpose.

References

Ministry for Primary Industries (MPI), 2022. Draft Risk Management Proposal: Amendments to the *Places of First Arrival* Standard. Accessed: 1 August 2022 <https://www.mpi.govt.nz/dmsdocument/52183-Risk-Management-Proposal-Amendments-to-the-Places-of-First-Arrival-Standard->