



PO Box 10232, The Terrace,
Wellington, 6143

Level 4, Co-operative Bank House

20 Ballance Street, Wellington, 6011

Phone: +64 4 472 3795

Fax: +64 4 471 2861

Web: www.hortnz.co.nz

Email: info@hortnz.co.nz

7 September 2016

SUBMISSION ON BIOSECURITY 2025 PROTECTING TO GROW NEW ZEALAND, THE STRATEGIC REFRESH OF NEW ZEALAND'S BIOSECURITY SYSTEM

Submitter: Horticulture New Zealand Incorporated
Submitted by: Richard Palmer, Biosecurity and Trade Policy Manager
Contact Details: P O Box 10232, The Terrace, Wellington 6143, New Zealand
T. +64 4 472 3795
E. Richard.Palmer@hortnz.co.nz

EXECUTIVE SUMMARY

1. Horticulture New Zealand (HortNZ) commends The Ministry for Primary Industries (MPI) for undertaking this strategic refresh of New Zealand's biosecurity system. Much has changed in New Zealand's trade patterns and risk profile since the 2003 Strategy, *Tiakina Aotearoa - Protect New Zealand*, and this consultation provides a timely opportunity to review biosecurity risks, address challenges and identify/seize opportunities to mitigate biosecurity risk.

2. HortNZ is supportive of the *Biosecurity 2025 - Protecting to Grow New Zealand* proposals for a Direction Statement (B2025). The five Strategic Directions identify the main elements to enable continuous improvement of the biosecurity system, importantly identifying the role partnerships, both formal and informal, will play. Leadership by the serious and committed stakeholders in biosecurity; MPI, GIA partners, and Regional Councils, will set the example for broader partnership and investment across the full breadth of the biosecurity system.

3. HortNZ recommends including the Vision from *Tiakina Aotearoa, Protect New Zealand*, from 2003 which, once updated for 2025, sets out the very expectation our growers have of the biosecurity system:

In 2010 2025... New Zealand has a high performing, integrated system for managing biosecurity risks to the economy, environment and human health. New Zealanders understand and have confidence in the biosecurity system; committed and playing their vital role, from pre-border through to pest management.

4. HortNZ suggests refinements to the Mission for biosecurity, and importantly the principles, which will guide both the system development and the decisions and actions for biosecurity. Two principles that we consider crucial to guiding the biosecurity system and its' decisions out to 2025 are:

- Managing risk offshore
- Decision-making in uncertainty; adopting the precautionary principle

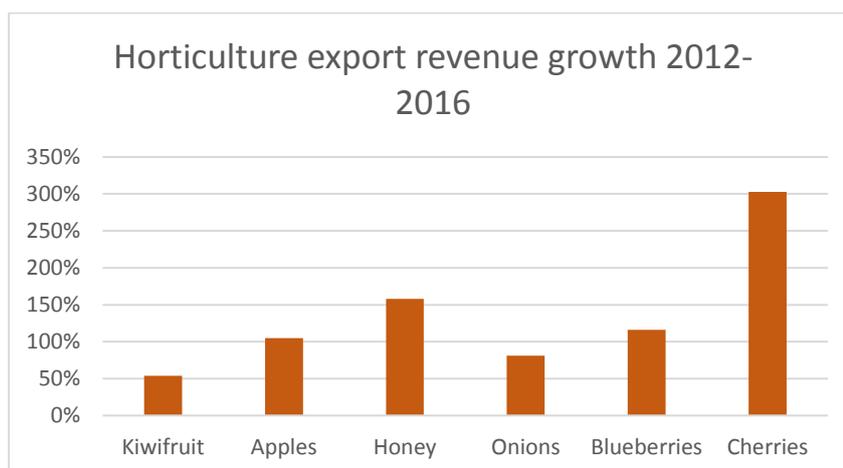
5. HortNZ supports the Strategic Directions as the key elements of the biosecurity system out to 2025. Critical for the horticulture industry is the investment in science to deliver better risk identification and mitigation (SD2) and a role, through Government Industry Agreements (GIA), in governance of the biosecurity system.

6. HortNZ looks forward to playing an active role in the biosecurity system, and working with other partners to invest in those biosecurity activities that contribute to safeguarding New Zealand's economic prosperity, and way of life.

HORTICULTURE IN NEW ZEALAND

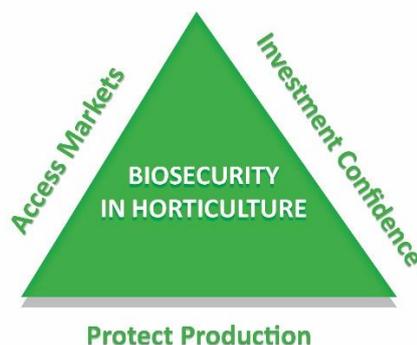
7. HortNZ represents 5,500 commercial fruit, vegetable and berry fruit growers, providing strategic direction and focus, building strong relationships with product groups and associations and working at both a national and regional level across a range of interest areas, including biosecurity.

8. New Zealand's total horticultural produce value (excluding wine) now exceeds \$5.5 billion, whilst horticulture exports have grown from \$NZ100 million in 1980 to \$NZ2.9 billion in 2015. Despite a strong New Zealand dollar, revenues from horticultural exports have grown strongly over the last four years:



9. The New Zealand horticulture industry occupies a total area of 100,000 hectares and employs 50,000 people in eight key growing regions.

10. Biosecurity is the number one concern for New Zealand horticulturalists¹. The horticulture industry relies heavily on New Zealand's excellent biosecurity status to protect productive capacity, and enable international market access— all key to the horticulture industry continuing to make a strong contribution to the Government's 'Export Double' goal. HortNZ views seriously biosecurity risks which may result in the establishment of new pests impacting production of, and domestic and export market access for, fresh fruit and vegetables. New Zealand's horticulture sector needs confidence that New Zealand is well protected from biosecurity risk through a coordinated national approach with clear objectives to meet the contemporary needs of all New Zealanders; is high-performing, responsive, capable; and is appropriately resourced.



11. The role of biosecurity in safeguarding New Zealand's horticultural production, and economic viability, cannot be overstated. The incursion of Psa-V bacteria in the kiwifruit industry is estimated to have cost the industry up 410 million² and 1 billion dollars. Velvetleaf threatens pastoral sector productivity, with more widespread effect likely. Establishment of Queensland fruit fly in New Zealand could threaten our market access for up to 12 months. The establishment of Brown Marmorated Stink Bug would have significant long term effect on production and market access for many of our tree and vegetable crops, would create a significant nuisance for affected homeowners, and could limit access to some markets.

12. The Government focus on biosecurity must not be aimed simply at what is biggest value or volume. New Zealand's primary sector output is comprised of a diverse range, by nature, size and location, of businesses. Preserving this diversity is a key aspect of biosecurity, and economic, risk-management. An overdependence on single sectors or commodities risks exacerbating the biosecurity risk, not diminishing it. Horticulture has a broad biological and geographic base which provides as essential element of biosecurity and market insurance for New Zealand. A careful balance must be struck between prioritisation for best outcome and preserving diverse primary production.

BACKGROUND TO NEW ZEALAND'S BIOSECURITY RISK

13. B2025 identifies the trade context, and the challenges for the biosecurity system in the near and longer term. Overall these serve to amplify the biosecurity pressures already facing NZ. This context is reviewed here, with some additional factors considered relevant by HortNZ.

14. Border Pressures. Of key importance was the increasing volumes of imported goods and passengers, and the change in countries of origin for these goods and passengers. This exposes New Zealand to a broader and more complex range of biosecurity risks. Importantly MPI

¹ <http://www.hortnz.co.nz/assets/Natural-Resources-Documents/New-Zealand-Growers-Priorities-FINAL-for-Publication.pdf> AND <https://assets.kpmg.com/content/dam/kpmg/pdf/2016/06/Agri-2016-Priority-Results.pdf>

² <http://www.kvh.org.nz/vdb/document/91146>

considers the existing border management is not scalable to respond to increased volumes. HortNZ doesn't support this view especially given the border levy provides scalable funding, however this does serve to demonstrate the need for partnerships with all New Zealanders, to address biosecurity risk.

15. Understanding the risk posed by trade from certain countries is key, both to understand the base biosecurity risk, and the limitations of any management offshore. We support trade under the international rules based system (The World Trade Organisation (WTO) WTO Sanitary and Phytosanitary Agreement [SPS Agreement], and the International Plant Protection Convention [IPPC]), but we must be conscious of the limitations of other nations exporting to NZ; their capacity, capability, and contextual understanding as it relates to New Zealand's biosecurity expectation.

Achieving cruise passenger compliance; MPI protecting our borders.

In early 2016, MPI put a cruise line on notice following specific vessel cruise passenger biosecurity non-compliance. MPI proposed a bag search for all 2600 departing passengers. This resulted in the company Vice-president flying from the US to meet MPI Border staff, and agree a remedial course of action. The crew also acted set up the following:

- All whole fruit removed from buffet the night before arrival - only slices allowed
- Ship wide biosecurity announcements broadcast every 30 minutes
- Biosecurity messaging in ships newsletter and on TV screens.
- Ship side amnesty bins and extra signage in place.

After further discussion with MPI, the Chief Purser initiated:

- 100% crew baggage inspection by ships security prior to border inspections
- Passengers were advised that seizures would result in delays at the next port
- Passengers were advised of the \$400 instant fine
- Took up MPI's offer of a Quarantine Officer prior to gangway to assist passengers with their questions

As a result of these actions only 1 seizure occurred

16. Pest Control Tools. The trend of increased public resistance to pesticides and the build-up of agrichemical resistance will continue. Coupled with the limited development of new tools, broadly applicable and feasible control options will diminish. There is a growing drive toward alternative options including Bio-Control Agents (BCAs). There is a need for dynamic, responsive and capable environmental assessment of new bio-controls.

17. Climate Change. With climate change the risk profile from trading partners can change rapidly, and imported organisms may establish more easily. As horticultural production in NZ adapts to climate change it will need to deal with organisms previously not considered a threat. Sentinel locations that reflect changing land use and crop production, and monitoring for pest and disease response will be critical to NZ's adaptation. Additionally risk-based decisions will need to take account of changed climatic conditions and pest distributions in counties we trade with to determine the contemporary risks. Conclusions drawn from historical data and dated scientific papers will require careful analysis, and adjustment for current risk.

BIOSECURITY 2025 VISION AND MISSION

18. HortNZ recommends inclusion of the Vision from the 2003 Strategy, *Tiakina Aotearoa - Protecting New Zealand*, updated to reflect the current timeframe. This vision sums up nicely the expectations expressed in the details of the mission and strategic directions in the B2025 document. This vision would be:

In ~~2010~~ 2025... New Zealand has a high performing, integrated system for managing biosecurity risks to the economy, environment and human health. New Zealanders understand and have confidence in the biosecurity system; committed and playing their vital role, from pre-border through to pest management.

19. HortNZ proposes a stronger commitment to action, and a linking purpose for the value of biosecurity to New Zealanders in the mission statement. Our proposal is a Mission Statement that reads:

Protect New Zealanders, our plants and animals, and our unique natural resources, from harmful pests and diseases, to preserve our way of life and economic prosperity

20. Facts on Biosecurity. HortNZ considers that some of the principles are facts or expectations of the biosecurity system. They are worth recording early in the development of the B2025 strategy. They include:

- Biosecurity facilitates safe imports, assures exports, and enables New Zealand to meet our international obligations.
- The biosecurity system continuously improves
- Biosecurity is everyone's responsibility

PRINCIPLES

21. The principles of B2025 represent the opportunity to agree the fundamental norms and moral rules that will aid in determining the right, and wrong, of the decisions and actions in biosecurity. These principles are fundamental to enabling successful execution of the partnerships envisaged by the B2025 strategy. HortNZ cannot overstate how important we view these principles, and hence our careful consideration and proposal for amendment:

- Everyone has roles, rights, and commensurate responsibilities, in the biosecurity system
- Risk is managed offshore wherever possible
- A precautionary approach is applied when uncertainty exists, whilst meeting New Zealand's international obligations
- Decisions consider economic, environmental, cultural and social values
- Risk-based decision-making is informed by the best available science and information
- Decisions are transparent, and resources are prioritised for greatest benefit

22. The precautionary principle enables appropriate decision making when there is scientific uncertainty – the decision must back protection over other considerations.

KEY ELEMENTS/STRATEGIC DIRECTIONS

STRATEGIC DIRECTION 1 – A Biosecurity Team of 4.7 million

23. HortNZ supports the 2025 Vision for the Strategic Direction (SD). An effective biosecurity system depends on people understanding the values the biosecurity system protects, and how to contribute. The next step of executing operational biosecurity in partnership will draw out the contribution that can be made by different people and organisations. The rapidly evolving

partnership under GIA, of which HortNZ has been a significant development contributor, is but one example.

24. There are significant challenges for all partners in biosecurity. The whole of government challenge for MPI is significant, and recent activities have underscored the divide with other departments. Exercise Rawaho, in late 2015, highlighted the divide on biosecurity between the Ministry of Health, and those in MPI and industry looking for certainty and support, for a critical biosecurity response using agrichemicals. Other agencies have also missed the opportunity to integrate biosecurity in their processes (see Missed Opportunity).

Missed Opportunity. In April the Ministry for Business Innovation and Employment (MBIE) launched a new online visa application process for China visitors to streamline their experience, and thereby enable tourism. Whilst MBIE and MPI were in discussion about biosecurity, the failure to include biosecurity information for tourists at the outset, underscores the challenge of developing a cohesive team. Improving tourist knowledge of our biosecurity context is a simple win to reduce risk at our borders.



25. HortNZ has committed to biosecurity with employment of a specialist Biosecurity Manager, and as an observer on the GIA Deed Governance Group broadening the message of GIA and biosecurity partnership among other things. We don't underestimate the challenge but are absolutely committed to biosecurity partnership.

26. The constantly evolving media landscape presents challenges to all key partners in biosecurity to understand and harness, in order to maintain and build strong community biosecurity connections. Developing a New Zealand sense of biosecurity importance to our businesses, our communities, and our country is a long term challenge – one we're up for. Other commercial sectors must consider carefully their positions. The tourism sector appears flippant both on the risk their industry poses through arriving passengers, and of the importance of biosecurity; yet their value proposition is for the most part based on our unique natural estate. A breach in biosecurity threatens their livelihood as much as the primary sector.

27. Offshore attitudes present a huge challenge and opportunity; how can exporters and visitors quickly and easily grasp the importance of biosecurity to New Zealand. Our challenge is to provide both carrot and stick incentives that compels understanding and compliance. Biosecurity must include social science to identify the human exacerbators of biosecurity risk.

28. HortNZ commends the first steps already identified in B2025. Others may include:

- Push ads, targeting New Zealand based buyers, on offshore sales websites with both NZ rules, and practical steps for receiving goods from overseas
- On-arrival, multi-lingual push messaging to mobile devices of visitors
- Partnership with ports/airports for biosecurity excellence, like Port of Tauranga
- Introduction of biosecurity into Corporate Social Responsibility (CSR) reporting
- Including NZ's biosecurity context, and questionnaire in visa application processes

- Using trusted traveller model to highlight the biosecurity exemplars from this program
- Requiring border operators to have a biosecurity Risk Management Plan.

STRATEGIC DIRECTION 2 – A Toolbox for Tomorrow

29. The 2025 Vision for SD2 is well thought out and clearly articulates the fundamental role of science in biosecurity.

30. Sharpening our toolkit sets out a key part of the challenge – identifying the innovations that can take our understanding, both of risk and mitigations, to a new level; that science will need funding. HortNZ has previously expressed concern about the incremental reductions in Crown Research Institute (CRI) funding. HortNZ doesn't accept that only incremental gains will be made in the current research environment, and lack of strategic view and investment in research have done nothing to enhance our ability to make the step change envisaged. HortNZ welcomes a robust discussion on funding for applied and blues skies research to develop the technologies of the future upon which this strategic direction is founded. It is anecdotally, but widely, acknowledged that NZ has lost focus on research that might enable much of the intended adaptation, mostly through cost-cutting that reduces capacity but also narrows research focus.

31. HortNZ supports the B2025 views on delivery and uptake, and also on utilisation of the current toolbox. Maintaining current biosecurity science is still paramount to achieving success in biosecurity, however anecdotally and substantively this does not appear to be the case. For example The Royal Society of New Zealand was highly critical in its 2015 report into National Taxonomic Collections in New Zealand³. It found “inadequate and overall declining support for this nationally important resource” and noted the fundamental role taxonomy played in biosecurity:

Biosecurity, an important part of risk management for New Zealand's economy, environment, and human health, depends on accurate, authoritative and rapid identifications of invasive organisms such as weeds, pests, toxin producers, and pathogens. Collections and knowledgeable research taxonomists provide the primary material and vouchers needed. Without such capacity, response to biosecurity threats would be based on little more than guesswork.

32. HortNZ encourages Government to do more to support science, and to deliver certainty of funding and the funding mechanism. Contestable funding neither enables the maintenance of taxonomic collections, nor the retention of a thin base of specialised biosecurity science capability. Maintaining core CRI funding is critical to achieving required biosecurity outcomes.

33. The role of bio-control agents (BCAs) and genetic technology requires significant exploration, from both a science and policy perspective. New Zealand is lagging behind in the policy settings for genetic technology which we must explore urgently to examine the opportunities and risks, and determine how to go forward.

STRATEGIC DIRECTION 3 – Free Flowing Information Highways

34. HortNZ supports the vision for SD3. Managing biosecurity risk will be exponentially easier when the hurdles to knowledge exchange are removed. Free flowing information will happen around us if we don't seize the opportunity to create an environment for this in biosecurity. We

³ <http://www.royalsociety.org.nz/expert-advice/papers/yr2015/national-taxonomic-collections-in-new-zealand/executive-summary-taxonomy/>

should embrace the disruptive opportunities to make exponential change in information exchange, which will necessitate Government taking some risk.

35. HortNZ has previously noted that whilst many understand the broad opportunity from “big data” we’re not that well apprised of the reality. Seizing the opportunity from this SD will require decision makers to have a much better grasp of what the challenges, real opportunities and risks are from big data, and free information exchange. This upskilling must happen quickly.

36. HortNZ supports the first steps proposed in the B2025 document. Already we are investing in some key steps in information management to support future biosecurity:

- Engaged with Government and data experts in developing data governance practice
- With New Zealand GAP and Asurequality developing multi-function geospatial tools for farm information consolidation
- With other industry biosecurity managers, developing first steps for online and app based pest and disease reporting
- Considering the privacy needs for data collection to enable wider use without compromising sensitivities of individuals and companies.

STRATEGIC DIRECTION 4 – Effective Leadership and Governance

37. HortNZ considers this the most critical strategic direction in B2025. Changing from an MPI-led to a more broadly governed biosecurity system is paramount to leveraging partnerships, and hence success, in biosecurity.

38. It is unclear what the B2025 Vision statement means by a “distributed leadership model” so HortNZ has taken it to mean the enabling of leadership by those with rights and responsibilities in their chosen areas. Critical to success of the other strategic directions, but especially SD1, will be creating the freedom of decision and action for all others involved in biosecurity, within a coordinated framework that enables success.

39. National governance of the system must be broadened to include those key stakeholders with significant investment in biosecurity, be that investment in funding, legislated obligations, or commercial action. Our proposition is for a small, skilled, and effective Biosecurity Board comprised of MPI, GIA partners, and Regional Councils. This board would govern the biosecurity system, set clear expectations for each aspect of the system, and be held accountable for the system meeting the 2025 strategy. It must create ownership, and enable the collaboration of the key parties to ensure coordinated biosecurity across New Zealand. It would be accountable to all stakeholders (Government, industry, regional councils, science community, Iwi, and New Zealanders), not MPI or the Minister. Without a representative, coordinated approach this strategy risks isolating those very partners it seeks include.

40. Critical to the success of the biosecurity system is the leadership developing clear performance measures, and a transparency in decision-making. Each key stakeholder must recognise that with rights come responsibilities and those will expressed in performance terms.

41. As a first step HortNZ, and the many others in the horticulture sector, have been engaged through GIA Governance, to understand how system governance might work. Through GIA we have already seen greater transparency of MPI’s border activity, gained significant insights to MPI’s performance at the border, and consequently supported MPI is developing new concepts (e.g. Trusted Traveller/Trader programme). We continue to develop robust, trusting relationships with our partners in biosecurity to enable collaboration. We support the first step of a biosecurity system governance review, and will be an active participant in this.

STRATEGIC DIRECTION 5 – Tomorrow’s Skills and Assets

42. HortNZ supports this SD and the Vision for 2025. Delivering the people capability and capacity to adapt to the technological change will depend to the greatest degree on the knowledge, competence, and adaptation of the people involved – both today and tomorrow. Whilst the horticultural industry focus on skilled people has developed fast in recent times. New Zealand will not be unique in this challenge so building strong cultural and knowledge relationships as a key piece of the puzzle will be critical. We must create an environment that enables risk-taking and enables us to harness opportunities of technological and social change.

43. B2025 notes the need for good infrastructure; not just shiny new facilities but taxonomic collections, online databases, and the policy and legislative instruments that enable good biosecurity. HortNZ supports the first steps proposed.

CONCLUSION

44. HortNZ commends MPI for this timely refresh of New Zealand’s biosecurity strategy. HortNZ appreciates the engagement with MPI, in large part through the Government Industry Agreements (GIA), and we look forward to working with key stakeholders to execute the strategy. Biosecurity is a key risk to our industry, one which we actively manage, and encourage the useful collaboration with others to deepen this management. Incredible opportunities exist to harness new information and technology to prevent biosecurity risk from an ever expanding and diverse trade, and from natural pathways. We support the intent for a review of system governance, as a key plank in delivering this strategy.

45. The role of science is both obvious and fundamental to the success of biosecurity. HortNZ encourages Government to support New Zealand’s research capability and capacity, as an essential element of managing the risk to NZ Inc. The, often unseen, work of our scientists to protect New Zealand’s primary sector, the vast economic engine of New Zealand, must be preserved.

46. HortNZ appreciates the engagement with MPI in public meetings and targeted workshops during the public consultation phase. We look forward to our continued partnership in the many guises with MPI and other sectors, and agencies to deliver better biosecurity outcomes.

47. This submission is supported by Vegetables New Zealand, Process Vegetables New Zealand, New Zealand Avocado growers Association, and the kiwifruit industry.