



HORTICULTURE NZ SUBMISSION ON THE MAF BIOSECURITY NEW ZEALAND BIOSECURITY SURVEILLANCE STRATEGY 2020

Introduction

Horticulture New Zealand represents the interests of New Zealand's 7,000 fruit, vegetable, berryfruit and olive growers.

The horticulture industry in New Zealand is underpinned by New Zealand's excellent biosecurity status, including our relative freedom from unwanted pests and diseases. The industry is vitally aware that the introduction of new pests is likely to impact on our production costs, productivity and our access to global markets.

While we export over 60% of our production our success is based on having access to a wide range of seed and other plant material from around the world. This means that the industry has an interface with the biosecurity system, both in terms of the import and the export of products.

Our key policy positions regarding biosecurity are:

- 1 Maintaining New Zealand's biosecurity status is about maintaining New Zealand's natural competitive advantage and is a key responsibility of Central Government.
- 2 We accept that we operate in an international biosecurity system, which is based on effective risk management.
- 3 Wherever possible we should move biosecurity risks off-shore through treatment in the country of origin or the application of assurance systems which are audited by third parties.
- 4 The management of biosecurity risks should be funded by those that create the risk or by Government. This includes pre-border and post-border activities related to meeting biosecurity requirements, surveillance and responding to incursions.
- 5 There should be adequate resources in place to provide early warning of critical pests and diseases arriving in New Zealand and to respond to incursions effectively and efficiently to protect New Zealand's natural advantage.
- 6 Horticulture New Zealand will play a facilitating role and advocate for input from grower members and exporters into the New Zealand biosecurity system to ensure that it effectively meets the needs of growers and industry.

Horticulture New Zealand supports the development of a biosecurity surveillance strategy and supports Biosecurity New Zealand taking a leadership position in terms of Governments investment and in co-ordinating and facilitating other parties operating in this area.

The timely implementation of specific actions in terms of the strategy is important. As a key industry representative group Horticulture NZ looks forward to participating in the implementation of the strategy and surveillance prioritisation process.

Executive Summary

Definition of Biosecurity Surveillance – the current definition is too wide. The strategy should focus on surveillance for pests that are not present in NZ, are under active incursion responses or are the subject of national pest management plans.

Importance of Biosecurity Surveillance - Biosecurity surveillance pests is a vital activity as it:

- provides early warning of the arrival of pests which reduces incursion management costs and significantly increases the chance of a successful eradication; and
- provides export markets with an assurance that we have freedom from a certain pests such as fruitfly.

Need for increased investment in prevention - While we support the need for increased vigilance and surveillance, it is more important that increased investment is made in systems, technology, and processes that move risks off-shore and managing them before the border.

Active Pest Surveys - Government should be funding regular active surveys to determine the presence or absence of pests and diseases in New Zealand. These surveys should be prioritised in terms of the importance of the key host species to NZ's economic, social, environmental and Maori wellbeing and the significance of the risks we face.

Leadership - We agree that Biosecurity New Zealand should take a leadership role in terms of:

- Government investment and operations in relation to biosecurity surveillance; and
- bringing together other parties involved in biosecurity surveillance with the aim of reducing duplication, increasing collaborative approaches and providing tools and processes that assist others in delivering biosecurity surveillance.

Credibility - It is essential that Biosecurity New Zealand manages the wider biosecurity space effectively and efficiently if it wishes to take a leadership role on surveillance.

International Obligations - We are surprised that the international obligations that the New Zealand government has to undertake biosecurity surveillance have not been highlighted in the strategy. The SPS agreement in particular requires biosecurity activity to be science based and this cannot be done without some surveillance occurring to confirm the absence of pests we take biosecurity action against.

Information Sharing - The issue of how we manage the release of information from surveillance to the rest of the world needs to be managed collaboratively in the interests of New Zealand having regard to our international obligations.

Decision Making - The involvement of other parties in decision-making around biosecurity surveillance should not be based on their financial contribution but rather on whether their input would improve the outcomes for biosecurity in New Zealand.

Risk Management - We believe it is absolutely vital that where priorities are identified, they are appropriately resourced by Government which has the responsibility to protect New Zealand's natural biosecurity advantage, or by those who have created the risk. While we accept that the funding available is not unlimited, if we cannot manage risks appropriately including surveillance then we should not be accepting the risk in the first place.

Funding - We strongly disagree with the findings of the Biosecurity Funding Review. We believe that the costs associated with biosecurity, including surveillance, should not be funded from those that benefit from our natural biosecurity status. We believe that it is more appropriate for this activity to be funded either by those who create the risk, exacerbators or by Central Government.

Actions - There is a need to attach responsibilities and time-frames to all actions within this plan.

Specific Submissions

3 Biosecurity Surveillance within the Biosecurity System

- We do not believe that the definition on page 4 is focused enough. The current definition includes work done in association with day to day management of existing pest populations. We do not believe it is appropriate to include this within the definition of biosecurity surveillance, although we accept the importance of this activity.

If we use the current definition it means the majority of biosecurity surveillance undertaken within New Zealand is actually undertaken by farmers/growers and land owners as part of their everyday pest management activities. While this passive surveillance is important and may result in the identification of new pests it is primarily focused on management of existing populations.

We believe that the definition and strategy should be focused on the surveillance for pests that are not present in New Zealand or are under active incursion responses or are the subject of national pest management plans.

We do not believe that Biosecurity New Zealand has a leadership role in biosecurity surveillance in terms of the current definition, as the majority of decisions are made by individual farmers, land owners and regional councils.

- While we agree that biosecurity surveillance is an important part of our biosecurity, we need to focus on reducing pressure on the border and our surveillance system by moving risks off-shore, better use of information to profile risks and gathering information off-shore so we are more prepared for the risks that may encroach on our biosecurity. There needs to be balance of investment which favours prevention rather than finding pests once they arrive in New Zealand.

- Biosecurity surveillance is a vital activity as it:
 - provides early warning of the arrival of unwanted pests which reduces incursion management costs and significantly increases the chance of a successful eradication; and
 - provides export markets with an assurance that we have freedom from certain critical pests such as fruitfly.
- Often the biosecurity surveillance that is provided for the above purposes is not designed (or adequate) to provide information on the distribution or prevalence of an organism. For example, New Zealand's fruitfly surveillance system is an early warning system. If a fruitfly is found through surveillance then a further delimiting survey would be undertaken which would involve a much more intense sampling than that provided by the biosecurity surveillance. It is important that the difference between the aims of these activities is understood, as this means that often the information generated from our surveillance systems is not providing adequate information to make appropriate pest management decisions from. (It should be noted that the current definition would include both of these activities as biosecurity surveillance)
- While we agree that New Zealand's biosecurity surveillance is part of a global system, we must accept that many developing countries have much less sophisticated surveillance systems than those that operate in New Zealand. In contrast to other developed countries and the systems that previously operated in New Zealand our systems today rely much more on passive rather than active surveillance. This is despite the fact that the isolation of New Zealand has maintained our biosecurity status naturally and we have a large number of indigenous species which are unique to New Zealand (and therefore respond to pests and diseases in different ways than other countries) and the importance of our biosecurity to our economic well-being.
- We believe that Government should be funding regular active surveys to determine the presence or absence of pests and diseases in New Zealand's. These surveys should be prioritised in terms of the importance of the key host species to New Zealand's economic, social and environmental wellbeing and the significance of the risks we face.
- On page 6 under 3.2 it states “

“Because of this increased pressure on the border New Zealand has to increase its vigilance and improve biosecurity surveillance methods just to maintain current levels of protection”.

While we support the need for increased vigilance we are concerned that this statement indicates a continued focus on the ambulance at the bottom of the cliff approach. It is more important that increased investment is made in systems, technology and processes that move risks off-shore and managing them before the border.

- We agree that the introduction of new technology is important in terms of surveillance and has the potential to provide more effective and efficient surveillance.

4 **Biosecurity Surveillance strategy development**

- We agree that a strategy is important to manage Government investment, however there are many other parties involved in making biosecurity surveillance decisions and their strategies and drivers may be different from that of Government.

We support the development of an overall framework which all biosecurity surveillance activity can operate to control of the spread of new populations or the introduction of organisms into New Zealand. To extend such a system to all pest management activity (as per the current definition) would generate significant compliance costs and far too much information for it to be managed in an effective and efficient way.

- The items listed under 4.3 about the current state of biosecurity surveillance make no mention of the extensive biosecurity surveillance undertaken by individual land owners (as per your current definition). This illustrates the problems with the broad definition which is included on page 4. Once again we would like to mention the need to focus this strategy on surveillance for pests which are not present in New Zealand or which are controlled by some official means within New Zealand.

5 **Expectations of Participants in Biosecurity Surveillance**

- We agree with the set of common expectations.

6 **Vision**

- We do not believe that the vision is quite right and believe that the following wording would be an improvement:

“An effective and efficient biosecurity surveillance system that gathers, shares and utilises information effectively to support the New Zealand biosecurity vision”.

- It is noted that the biosecurity vision from the biosecurity strategy does not mention trade facilitation, although this is a key feature in the diagram on page 11.

7 **Leading Biosecurity Surveillance**

- We agree that Biosecurity New Zealand should take a leadership role in terms of Government investment and operations in relation to biosecurity surveillance. We also support Biosecurity New Zealand having a leadership role in bringing together other parties involved in biosecurity surveillance with the aim of reducing duplication and increasing collaborative approaches and providing tools and processes that assist others in delivering biosecurity surveillance.
- It is essential that Biosecurity New Zealand manages the wider biosecurity space effectively and efficiently if it wishes to take a leadership role on surveillance. Many participants in the horticulture industry do not have a high level of confidence in Biosecurity NZ’s ability to manage issues in the best interests of NZ. Issues influencing this are
 - concerns regarding the responsiveness
 - the view that the provision of information can and does damage the position of the person or company providing that information

- the view that risk management decisions on imports are exposing us to unnecessary levels of risk
 - the view that the global reputation of BNZ is more important than the interests of NZ exporters
 - issues regarding Crown contributions to pest management on Crown land
- It should be noted that the leadership on specific biosecurity issues is often defined by who funds the activity. The differences between national, regional and industry strategy and leadership must be better recognised and catered for within the strategy.
 - It at times the interests of Government may be in conflict with other parties' interests. The contribution of the Crown to pest management on Crown land is a classic example of this.
 - It is essential that Biosecurity New Zealand oversee and ensure that there are legal frameworks and access to expertise for all parties involved in biosecurity surveillance. This should be provided by the Crown without cost to other parties leading biosecurity surveillance activity.
 - We believe that it is an important part of Biosecurity New Zealand's role to participate in international forum in relation to biosecurity surveillance. This is critical to us benefiting from others knowledge and experience.
 - We are surprised that the international obligations that the New Zealand government has to undertake biosecurity surveillance have not been highlighted in the strategy. The SPS agreement in particular requires biosecurity activity to be science based and this cannot be done without some surveillance occurring to confirm the absence of pests we take biosecurity action against.
 - It is particularly important that we encourage Pacific Islands, Australia and Asia to have effective monitoring systems, as this is a key way of moving some of our risks off-shore and us receiving advance notice of what key risks are to New Zealand's biosecurity.

8 Working Together

- Horticulture New Zealand agrees with the principle that parties involved in biosecurity surveillance should work together in order to avoid duplication, pool resources and maximise outcomes.
- While it is important to engage the general public in biosecurity surveillance, we need to always keep in mind that passive surveillance is an informal process and therefore we can not rely on it. Any formal promotion must be clearly targeted to groups that are likely to contribute to closing gaps in our biosecurity surveillance system.
- At times those undertaking passive surveillance that find new pests and diseases in New Zealand (particularly grower exporters) are being significantly disadvantaged by announcing or notifying these finds. The issues regarding compensation and how we manage the release of information from surveillance to the rest of the world need more careful consideration.
- While working together is sensible, it needs to be recognised that those funding surveillance do have different drivers and will at times make decisions that are not in the best interests of other parties.

- Government, in representing the national interests needs to ensure that it is consulting with parties, even though they may not be contributing funds directly (as opposed to through the tax system). The involvement of other parties in decision-making around biosecurity surveillance should not be based on their financial contribution but rather on whether their input would improve the outcomes for biosecurity in New Zealand.
- We need a simple tool(s) that enables a wide range of groups (not just BNZ) to development comprehensive surveillance systems which may require some legal backing in terms of access to land and information.
- **We strongly disagree with the statement at the bottom of page 19**

“It is unlikely that any increase in resourcing would be sufficient to meet all priorities identified by MAF Biosecurity New Zealand and stakeholders in biosecurity surveillance”.

We believe it is absolutely vital that where priorities are identified, they are appropriately resourced by Government which has the responsibility to protect New Zealand’s natural biosecurity advantage, or by those who have created the risk. While we accept that the funding available is not unlimited, if we cannot manage risks appropriately including surveillance then we should not be accepting the risk in the first place.

We do not support a prioritisation process that is focused on managing continually reducing resources in relation to increasing risks in this area. On the contrary, we believe that the prioritisation process should be aimed at recognising the changing threats to New Zealand’s biosecurity over time and ensuring that continued investment of resources into particular areas (including surveillance) is maintained or increased.

- We strongly disagree with the findings of the Biosecurity Funding Review. We believe that the costs associated with biosecurity, including surveillance, should not be funded from those that benefit from our natural biosecurity status. We believe that it is more appropriate for this activity to be funded either by those who create the risk, exacerbators or by Central Government. It should be noted that it is New Zealand consumers and travel/tourist operators that benefit from the importation of goods and the arrival of passengers in New Zealand.
- We disagree that those who can best assess the benefits of surveillance should fund that surveillance. It is surely common sense that any competent party running a surveillance programme should engage with those that can provide the best advice on cost benefit and effectiveness to ensure that their investment is managed appropriately. Excluding these parties from decision making would seem to be counter to achieving good biosecurity outcomes.
- The suggestion that the primary industry should pay for surveillance and biosecurity incursion responses is strongly opposed. Within the horticulture industry our major biosecurity threats are in bound passengers and the importation of plant products that directly compete with our members’ production. We do not believe that we should be subsidising our competition because of the risks that they create for us. We do strongly support, however, the industry being involved in the decision-making as we believe that we can add value to achieve better outcomes and we are the ones impacted by changes to NZ’s biosecurity status. The suggestion that industry should pay for incursions created by others is effectively asking the victims of a crime to directly fund the prosecution. We believe that the Crown needs to accept more

responsibility, both in the areas of surveillance and incursion response because it is the Crown that is protecting New Zealand's natural competitive advantage for future generations.

- We are unclear of what the last paragraph on page 22 under the heading "Prioritisation" means, although it would appear to mean that stakeholders that are not organised will receive more help than those that are. If this is a correct interpretation then we are opposed to this principle.
- We agree with the comments under the heading "Surveillance Design". It is vital that we have a well designed national surveillance programme and also guidelines which other entities undertaking biosecurity surveillance can operate.
- We support using the best available technologies and that these technologies could offer significant gains in improving surveillance although at times this will be determined by affordability.
- We agree with the comments under "Efficient Surveillance Delivery", that there is a need for statutory and cultural frameworks in which to operate. These frameworks should be flexible and allow various parties involved in biosecurity surveillance to utilise them.
- The ongoing availability of a well resourced infrastructure including diagnostic laboratories and qualified people is essential for our biosecurity system and our surveillance cannot operate effectively without this. We believe that this is a core Government function that requires further resourcing and should be available free of charge to all New Zealanders, including those parties operating national and regional surveillance and sector-based surveillance schemes.
- We accept that surveillance systems need to be regularly reviewed, although the regularity of these reviews will be determined by those providing the funding.
- We agree that the role of science is essential in biosecurity surveillance and further investment in this area is important, although this needs to be balanced against other biosecurity science priorities such as better profiling and moving risks off-shore.

10 Sharing Information

- We agree that where possible, information on the results from biosecurity surveillance should be shared and better utilised for the interests of all parties.
- There is concern about the sharing of information and the potential consequences of this, particularly as it is associated with international market access. While we accept that New Zealand has international obligations about notification of trading partners, recent events mean that some parties in the horticulture industry are not now willing to share information. Issues about how and when such information is released, its ownership and access to data must be discussed, clearly understood and agreed by all parties.
- Horticulture New Zealand supports the engagement of the public in biosecurity activity, we do not however support broad based social marketing programmes. It is important that any investment in this area is well targeted to those groups that we believe will make a significant contribution to biosecurity surveillance, rather than just a broad public advertising programme.

11 Making it happen

- It is noted that the important concept of protecting New Zealand's natural advantage is covered in the third paragraph under this heading.
- We accept and agree with most of the actions outlined here, subject to the comments made on specific issues earlier in this submission.
- There is a need to attach responsibilities and time-frames to all actions within this plan.

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