

**REVIEW OF SUBMISSIONS ON DRAFT IMPORT
HEALTH STANDARD & RISK DISCUSSION
DOCUMENT FOR COCO PEAT PRODUCTS**

Biosecurity New Zealand
Ministry of Agriculture and Forestry
Wellington
New Zealand

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INTRODUCTION

The draft import health standard and risk discussion document for Coco peat and Coir fibre products was notified on the MAFBNZ Biosecurity New Zealand website www.biosecurity.govt.nz on 14 May 2008.

A total of 11 submissions from the consultation period were received.

Submitters	Date Received
Brett Gregory (Hahei Plants)	21 May 2008
Rob Lamb (Fruitfed Supplies)	23 May 2008
Allan Criglington (Nursery and Garden Industry Association)	4 June 2008
Leanne Perry-Meyer (Department of Conservation)	6 June 2008
Ken Robertson (Horticulture New Zealand)	10 June 2008
Shan Halamba (RioCoco)	11 June 2008
Asanga Ponamperuma (RioCoco)	17 June 2008
Madura Amarasinghe (Pelemix Lanka (PVT) Ltd)	11 June 2008
Carly Sluys (Federated Farmers)	11 June 2008
Alan McLean (Grower Technology Ltd)	11 June 2008
Anthony Washington (Pacific Wide (NZ) Ltd)	11 June 2008

This document provides a summary of the submissions and correspondence that were received for the draft import health standard (IHS) and risk discussion document, and how these have been addressed by the Ministry of Agriculture and Forestry Biosecurity New Zealand (MAFBNZ). Comments from submitters are reproduced in normal text and the MAFBNZ responses are recorded in *italics*.

If you wish to see any of the full submissions, please contact Shane Olsen, Border Standards, MAF Biosecurity New Zealand; email: shane.olsen@maf.govt.nz or phone (04) 894 0460.

SUBMISSIONS

1. Brett Gregory (Hahei Plants)

- 1.1. There is no mention of the measures used for nursery stock rooted in coco fibre. Suggests that the holding of the consignments in post-entry quarantine (PEQ) can be used as an equivalent to a grow-out test for the presence of weeds.

Agreed. Assessment of plant material during PEQ will be considered by MAFBNZ as being equivalent to a grow-out test for the presence of weeds.

2. Rob Lamb (Fruitfed Supplies)

- 2.1. Local fumigation will make the products uncompetitive and unattractive financially to the industry.

The only treatment available in NZ for seed devitalisation and other forms of contamination is heat treatment. It is included in the IHS as an option should an importer choose it rather than reshipment of a particular consignment. MAFBNZ will include an extension of the glasshouse interim measure for one year. See also replies 5.9 and 5.12.

- 2.2. The issue of contamination occurs at the source and must be the area focused on to ensure a 'clean' product is imported.

MAFBNZ is proposing a focus by suppliers on producing a 'clean' product by advocating for a quality systems approach .

- 2.3. There are many "cheaply" sourced and processed Coco peat sources that need to be strictly monitored so the industry as a whole does not suffer.

MAFBNZ will not approve any product that might contain material purchased on a wholesale market. Information about the source of material will be sought using the import permit application process. See also reply 8.2.

- 2.4. Local spot testing of consignments will hopefully self regulate production facilities as any reshipping of containers would quickly prove uneconomical to importers and suppliers.

MAFBNZ is confident that this will be the case.

- 2.5. There needs to be consideration of the time delay between receiving an imported container and holding at a transitional facility for grow-out tests. A very clear procedure and timeframe is required.

The inspection on arrival process will add a few days to the importing period as material will need to be taken to a transitional facility for holding risk goods and book an inspection by a MAFBNZ inspector.

3. Allan Criglington (Nursery & Garden Industry Association)

- 3.1. The association are happy with the draft IHS, but raise concerns over the importing conditions currently in place for peat.

The IHS for peat will be reviewed within the next year as part of a review on the import conditions for all growing media.

4. Leanne Perry-Meyer (Department of Conservation)

- 4.1. The Department are concerned that the draft IHS is not supported by a formal risk analysis.

MAFBNZ do not undertake formal risk analyses for commodities that do not have specifically associated organisms.

- 4.2. There is the potential for export of coir products from a wide variety of Asian and Pacific countries and it is inappropriate for an IHS to be issued from all of these countries given that the risks from these countries are likely to be highly variable.

Beyond Sri Lanka, permits will only be issued for other sources when the applicant can show that production is carried out in a purpose built factory handling husks to finished products where elimination of potential contamination has been of major importance. Currently the only other countries involved with likely applications meeting this criterion are India, Malaysia and Mexico. MAFBNZ considers it more important to restrict on the basis of methods of production rather than country of origin.

- 4.3. There is an absence of discussion in the risk document on the possible source of the contamination, and the potential for the wind dispersal of seeds.

It is considered that the most likely source of contamination was either a slippage of standards somewhere resulting in the inclusion of material from a buffer area or old pile to make up an order, or a purchase of material on the wholesale market. MAFBNZ does not believe this is usual practise amongst particular suppliers. There is now a greater awareness of the necessity for cleanliness and regular monitoring and product checks.

MAFBNZ has not assumed that likely contaminating species will not pose a risk of becoming invasive. Any contaminating species is regarded as indicative that others may be present. The potential for contamination from wind blown species has not been ignored, but is considered to be a lower risk. Regular monitoring by the supplier should identify contamination caused by a bad weather event. Such a consignment should be rejected for export to NZ by the relevant NPPO.

Information will be sought via a questionnaire appendix to the IHS to determine the quality of production systems and measures to prevent contamination. Satisfactory responses to the questionnaire will be required as part of the application for an import permit. Issues that will be covered by the questionnaire include the places of temporary storage of husk pieces at the copra factories, methods of transport, the provision of concrete pads at the production sites where the husks are unloaded, and the presence of types of machinery used for either fibre extraction or crushing of the husks prior to drying of the product.

- 4.4. The risk document should discuss treatments that are known to be available in the major coco peat exporting countries of Sri Lanka and India.

The only known treatment in common use in Sri Lanka and India is methyl bromide. This is not a seed devitalisation treatment but recommended for arthropod decontamination.. See also replies to 5.9 and 7.3.

- 4.5. The choice of sanitary measures should primarily be based on their ability to appropriately mitigate risk and the costs of the treatments should not be promoted as the main driver.

MAFBNZ do not consider that cost is the main driver for implementing biosecurity measures. Comments in relation to treatment costs were only included to indicate the possibility that trade is likely to cease if certain treatments were required.

- 4.6. The RHP system has a tolerance for seeds of 8 tropical weeds but this tolerance is not considered appropriate for NZ.

The RHP tolerance is quoted as per square metre, based on 10 litres of thinly spread watered and fertilised per 0.25 square metre grow out tray. We consider an appropriate tolerance for NZ to be no more than 2 identifiable and not new, prohibited or regulated seeds, followed by a second sample with zero seeds. The mention of a possible tolerance was made following concern on behalf of growers that product might be turned away based on the find of one non-regulated seed at border inspection. MAFBNZ's preference is for a zero tolerance with product from all countries.

- 4.7. We suggest that if the IHS was to cover coco peat products that include "beneficial organisms", then it will be essential that the exporter include full details of these organisms because some may require approval from ERMA.

Currently MAFBNZ knows what organism is being used for the one product that has been imported with an added beneficial organism. To be certain for any future requests, an addition will be made to the draft IHS to make it clear that any additives must be declared on the import permit application form.

- 4.8 Organic product has the potential to pose a greater phytosanitary risk than treated material so we would consider that a requirement for full inspection of any 'organic' product is warranted.

Most coco peat products imported into NZ are essentially 'organic' in that there are no additives. Many have been graded by sieving, but the addition of any other material is usually left to the end user or potting mix provider in NZ.

- 4.9 The IHS must include that products be inspected in accordance with appropriate official procedures and these are recorded and audited to guarantee full compliance to improve pre-export inspection.

Communication will be maintained between governments to make MAFBNZ's requirements for the pre-export inspection fully understood.

- 4.10 The IHS should include that the production and holding sites are regularly monitored for the presence of seeds and invertebrate pests.

Importers and suppliers will need to provide suitable evidence that measures are in place to avoid contamination and monitor sites in the production process through the import permit application process. MAFBNZ may also consider auditing production systems and facilities in the future depending on results of inspection at the border. See also reply 5.5.

- 4.11 It is not clear in the IHS what percentage of the product would be acceptable for the grow out test to ensure that any contaminating seeds would be detected.

Grow out tests will be conducted in the exporting countries based on 1% of the product. Visual inspections will be carried out on arrival based on another random sampled 1% of the product.

- 4.12 It is unclear whether the holding area relates to where the coco peat is to be stored or where the coconut husks are stored. The IHS should stipulate that the site needs to be maintained in a manner that will reduce the risk of insect infestations and plant contaminants.

The IHS will be changed to state that all holding areas need to be kept “plant free” rather than “weed free”. The IHS will stipulate that the site needs to be maintained in a manner that will reduce the risk of insect infestations. Producers will need to explain how they achieve this and describe the situation.

5 Ken Robertson (Horticulture New Zealand)

- 5.1 The risk discussion document presents a lightweight assessment of risk that focuses only on the likelihood of weed seeds being present in the import pathway rather than the risks of establishment of weed seeds via the coco peat import pathway.

MAFBNZ prefers to aim at the importation of a product kept free of contaminants either by encouraging producers to develop purpose designed facilities with constant monitoring of product, or the application of effective treatments in the source country. At the moment neither of these preferences can be completely provided and inspection on arrival will be required for products not treated in the source country. See also reply 4.1.

- 5.2 Rationale is not provided for the conclusion that the risk associated with coir fibre is considerably lower than coco peat. This is despite coir fibre also being used as planting substrates such as erosion control mats and hanging basket liners.

Information provided to date shows that some of the hanging baskets are coated with a rubberised latex and subjected to high heating in manufacture. Fibres used in weed control matting are larger fibres which present a lower risk. This risk in these products is not seen as being any more than that for many products which receive inspection on arrival on a periodic basis. It is accepted that erosion control and weed control mats are a higher risk pathway but under the arrangements for MAFBNZ accredited persons (AP) to inspect containers we believe that during unloading if any pests were found these will be reported. These recordings are investigated by MAFBNZ, and to date there has been nothing found in these products.

5.3 The findings of the coco peat risk evaluation in terms of contamination at processing have been largely ignored in the draft IHS.

MAFBNZ has not ignored contamination at processing. MAFBNZ has developed a set of criteria relating to the coco peat production process which will be assessed in the import permit application process. This includes the maintenance of an appropriate plant free buffer zone and facility inspection records.

5.4 The greenhouse industry supports the establishment of pre-export measures that will ensure the rapid clearance of coco peat imported into New Zealand.

MAFBNZ accepts that there will be small delays with inspection of product on arrival. If no suitable treatment is available in the source country, an inspection of approximately 1% of product is regarded as necessary combined with a pre-export grow out test of a similar sampling size. Because MAFBNZ is concerned with importer delays, the interim measure of glasshouse registration will continue as an option until 31 May 2009. After that there should be sufficient information for importers to deal with suppliers who have built a good reputation of freedom from contamination. See also reply 5.7.

5.5 The import requirements do not take into consideration the differing effectiveness of the quality systems of various suppliers. Approval of quality systems appears to be on an ad hoc basis, which gives a committed supplier little basis for improving their facilities and systems.

At the moment it is difficult to judge the effectiveness of how well suppliers are doing with quality systems without regularly visiting exporting facilities and until more inspection records are in existence. Approval of systems will be based on responses to a questionnaire appended to the IHS as part of the import permit application. The main basis for a supplier to maintain or improve their facilities will be the possibility of rejection of a consignment and the likelihood that their product will be preferred by importers based on a good record. The experience in Australia is that only suppliers with good systems have succeeded with exporting to Australia.

5.6 The draft IHS does not specify that an exporter must have a quality system and the criteria used to measure the effectiveness of the quality system.

A questionnaire is now provided in the IHS, as well as a set of criteria that MAFBNZ will be assessing against for import permit applications. The pre-export grow out test and inspection on arrival also provide checks to ensure the effectiveness of the quality production systems. The measures contained within the IHS are intended as a preliminary systems approach to improving quality in the importation of the coco peat products.

5.7 The risk discussion document does not review the reasoning behind the RHP tolerance for weed seeds in the grow-out test.

The RHP tolerance was based on risks of exotic weed establishment associated with horticultural uses in Europe. The likelihood of exotic weed establishment in Europe is different to New Zealand.

5.8 The industry requests the continuation of current import arrangements into registered glasshouses until the new arrangements of the IHS are proven to be workable

The current phytosanitary measure was provided as an interim measure. It was hoped that a solution would be found for the IHS that would minimise disruption to grower supply without a need for this type of post entry control. MAFBNZ is not in favour of continuing the current interim arrangements but in the absence of workable treatments and more information regarding possible interceptions, we have decided that the registration of glasshouses to use uncleared product will remain as an option for one more year until 31 May 2009. A scientific trial currently taking place will provide information about the likelihood of any contaminant seeds remaining viable after several months in this environment. This trial is considered a better approach than examining any piles of recently used material.

5.9 There are no specifications for how the seed grow-out test is to be conducted by the exporting country NPPO.

These specifications are worked out between MAFBNZ and the NPPO of the exporting country. Grow out tests will be conducted by government appointed laboratories, based on sampling of 1% of the product.

5.10 Heat treatment should be included in the draft IHS as this option may suit the circumstances of a particular supply country and processing facility.

MAFBNZ understands that heat treatment is likely to slightly alter the physical properties of the material and there are limited facilities available in the exporting countries. The option will be added to the IHS. Suppliers must be aware though, that for grow slabs and grow bags, the heating must be done prior to inserting the slabs into the UV-resistant polythene bags.

5.11 The phytosanitary measures to prevent contamination are based on offshore measures verified through destructive sampling and phytosanitary inspection. We believe that aspects of these offshore requirements are in general poorly documented and could result in stakeholders being unsure of the phytosanitary requirements.

As stated in reply 5.6, the suppliers information will be assessed against criteria now included in the IHS as part of the import permit application process. The official phytosanitary requirements are the required declarations on the phytosanitary certificate, and MAFBNZ will work with the NPPO of the exporting country to verify good procedures.

5.12 We do not understand the relevance of the requirement for treatment that must be undertaken less than 21 days before arrival given that consignments must be held securely post-treatment to prevent contamination.

The selection of a 21-day period is based on maintaining a consistent importing approach with requirements for other products, and is consistent with international regulations.

6 Shan Halamba (RioCoco)

6.1 Over 80 countries worldwide use coco peat as growing medium and none of these countries have tried to impose similar rules. We consider there should be an alternative option to handle contaminated consignments without reshipping or destroying.

The proposed regulations are very similar to those of Australia, except that Australia can offer ethylene oxide treatment or gamma irradiation in addition to heat treatment. MAFBNZ understands that these options are rarely used (e.g. none in the past year) and it is likely to be more worthwhile to reship the consignment. However, we consider that if 1 seed was found in the sample which was not new or prohibited or regulated to NZ, a further sample can be taken which must show zero seeds for the consignment to receive biosecurity clearance. Otherwise the options are for heat treatment, reshipment or destroy.

7 Asanga Ponamperuma (RioCoco)

7.1 It is unclear if RHP certification is a requirement.

RHP certification is not a requirement but it is a reliable declaration of a quality certification process which will be assessed along with other factors in the import permit application process.

7.2 Will MAFBNZ be restricting importation to particular suppliers only?

MAFBNZ does not intend to restrict importation to particular suppliers at this stage. However, if evidence suggests that there is insufficient checking and monitoring of product, and trends of contamination are identified, that source may be declined for inclusion on a permit in the future, and also run the risk of having consignments rejected at the border.

7.3 Currently Ethylene Oxide treatment is not available in Sri Lanka and the Sri Lankan government does not allow its use. Ethylene Oxide treatment is very expensive, needs a special treatment area and cannot be used for grow bags.

Ethylene Oxide was included as a treatment option because it may be available or become available in some exporting countries and may suit a supplier's purposes in some instances.

7.4 If products are treated with Ethylene Oxide, they are not going to be considered as organic.

MAFBNZ agrees that such a product would no longer be "organic".

7.5 None of the companies or countries in the world have identified a way to eliminate occasional weeds emergence from coir. RHP also had to run various trials for years to finalise their requirements for weed seeds, which includes a tolerance level of 8 viable weed seeds per square metre.

MAFBNZ are aware of the challenges in eliminating weed contamination from these products. Thus, we have adopted a number of measures contained within the IHS which

are intended as an initial step towards a systems approach to reducing the likelihood of contamination. In time MAFBNZ believes it will be possible for newly designed premises to overcome most of the problems of traditional methods. See also replies 4.6 and 5.8.

8 Madura Amarasinghe (Pelemix Lanka (PVT) Ltd)

8.1 The collection of raw material for coco peat and coir fibre products is widely distributed and extremely difficult to manage through processes outlined in the draft IHS.

It is intended that no product should be exported to NZ if it contains coco peat purchased by buying on the wholesale market, unless it is treated prior to export by heat (in accordance with the rates given in the IHS) or ethylene oxide. Suppliers will need to provide suitable evidence that measures are in place to avoid contamination in the production process. It is preferred that products dedicated for importing to NZ be in production facilities dedicated to producing quality growing media products. These facilities are designed to handle the process from delivery of the husk pieces to the finished products. MAFBNZ expects that more of these facilities will be established in the future as a result of the implementation of measures included in the new IHS. MAFBNZ may also consider a formal auditing production systems and facilities in the future depending on results of inspection at the border.

8.2 MAFBNZ should adopt a tolerance level and grade the suppliers/importers according to the risks and sampling undertaken for their consignments.

MAFBNZ expects that measures included in the IHS will encourage importers to improve their production systems in order to maintain trade with NZ. The use of tolerance levels other than something very minimal is not preferred for this type of product and use. The presence of any seeds must be taken as indicative that others may be present. See also reply 4.6.

9 Carly Sluys (Federated Farmers)

9.1 Federated Farmers recommends that MAFBNZ undertake reviews of all plant material imported into New Zealand currently not requiring an IHS and changes to any pathways for other plant material.

MAFBNZ has put in place a review of all the low risk plant products currently not included in import health standards. A number of new standards are currently being developed to accommodate these products. These products are either processed to the point of no risk or are currently being either inspected or treated on arrival. Existing import health standards are also reviewed on an ongoing basis. In addition, MAFBNZ are increasing the number of targeted monitoring reviews at the border across different commodity groups.

9.2 The IHS must have stringent and robust conditions so that when the product is imported from countries with less reliable biosecurity systems, there is no increased risk.

MAFBNZ will consider the risks posed by countries with less reliable biosecurity systems as part of their import permit application process..

9.3 Federated Farmers does not understand why the risk pathway for coco peat products was not identified earlier.

Coco peat was considered not to be a risk good due to the type of product and the manufacturing process undertaken. Under section 22 of the Biosecurity Act, the intent of an Import Health Standard (IHS) is to manage the risks associated with the importation of risk goods. MAFBNZ originally considered that processed plant material such as coco peat, was not a risk good so did not require an IHS. However, due to the recent incursion the status of these products has now changed.

9.4 On page 5 it states "... that if a good buffer zone from the weeds is kept the material should remain free of seeds". Federated Farmers would like to understand the scientific explanation that supports this assumption and how MAFBNZ intends to ensure that this occurs.

A good buffer zone should prevent material from contamination with other material alongside. The supplier must ensure that this occurs in order to maintain MAFBNZ approval for their products to be imported into NZ.

9.5 MAFBNZ has stated that the widely accepted industry standard, the Netherlands RHP product certification scheme, is not appropriate as this has a higher tolerance for weed seeds than MAFBNZ allows. However, registered facilities and/or practitioners are a regular feature for importation of plant material.

The registration of any supplier to the RHP scheme will be regarded as a favourable point, but it will not be a mandatory requirement. A much lower tolerance level for weed seeds is required to apply to the NZ context. See also reply 4.6 and 5.7.

9.6 MAFBNZ needs to carefully consider any quality scheme, and allow for stakeholder input before implementation.

Development of a formal quality scheme will not be undertaken at this time, but may be possible when more information is gathered. Premises that have measures in place to prevent contamination and process husk pieces to finished products on the one site are considered ideal. At the moment there are suppliers who follow their own very tight monitoring with constant checking of the several sites involved in their businesses. Their own quality schemes will be documented when importers apply for permits. Stakeholders will also be consulted if a formal quality scheme is developed in the future.

9.7 Federated Farmers does not believe that random sampling border control procedures should be depended upon as a stand alone measure.

By random sampling both in the exporting country for the grow out test and again on arrival for visual inspection, there is a greater confidence of detection. MAFBNZ will be relying on these combined with documentation from suppliers of their own systems, as provided by import permit applications. There will be penalties for failure. Repeat detection of contamination of consignments will result in loss of the permit for that supplier. New Zealand society has to date taken a stance against the use of some treatments useful in biosecurity e.g. irradiation (a larger new facility) and ethylene oxide. Currently these treatments are not available in Sri Lanka either. An option for the use of ethylene oxide has been included in the standard in case it is or becomes available

offshore. MAFBNZ is investigating other treatments for biosecurity use and encourages suggestions derived from other research.

9.8 Federated Farmers recommends that any import requirements should align with the Australian Quarantine and Inspection Service Import Standards for coco peat. This is due to the co-operation between the Australian and NZ Biosecurity agencies in inspecting production areas.

MAFBNZ considers that the proposed standard does broadly align with the AQIS standard. The major difference is that MAFBNZ will not require a microbiological certificate of analysis with counts for Salmonella and E.coli. A treatment in the country of origin or on arrival in Australia is not mandatory. If seeds are detected on arrival in Australia, a treatment or reshipment is then required.

9.9 Federated Farmers recommends that the statement should be changed to: “coco peat must be kept clean and free of seed pests, soil, contaminant animal material or plant material and any other extraneous material”. This will align it with the additional declaration on the phytosanitary certificate.

Agreed. The first statement of the general information in the IHS (Section 2.1) will be amended to read: “Coco peat must be kept clean and free of seeds, pests, soil, contaminant animal material or plant material and other extraneous material.”

9.10 It is important that any packaging used must be clean and new as this reduces the opportunity for contamination in transit.

Agreed. The requirement for clean and new packaging will be inserted into the IHS.

10 Alan McLean (Grower Technology Ltd)

10.1 The responsibility for providing high quality product that meet biosecurity requirements should rest with the NZ importer and their supplier.

This is agreed but MAFBNZ must inspect to gather more information, and it must be understood that consignments will be subject to rejection or treatment should seeds or other contamination be detected.

10.2 If the product is screened and proven to be satisfactory then the importer should be able to import coir with reasonable checks and balances. This should be without difficult to implement (and certify) requirements that add unacceptable expense.

In time it may be possible to modify the checks and balances depending on the data gathered. However, we are required to manage effectively the risks to biosecurity.

10.3 Heat treatment adds a price increase that is not viable and adds an unacceptable premium that would seriously undermine this industry.

The option of heat treatment prior to export has been provided following comments that it may become available. It is also an option should seeds be detected on arrival. The heat treatment pre-export option is not expected to be widely used.

10.4 None of our customers are interested in the RHP coir as they are satisfied with the non treated product and don't want to pay the 40 to 50 percent extra.

RHP registration is not a requirement, but a useful declaration of an existing certified quality system.

10.5 One positive aspect of RHP certification is acceptance of a tolerance level of 8 seeds per square metre, which has been arrived at after some years of experience. We recommend this tolerance level be accepted. If not this then a reduced level but some tolerance is realistically required for such a plan to work.

See replies to 4.6 and 5.7.

10.6 It would seem impractical to meet all of the conditions under 2.1 'General Information for coco peat products' as many of the raw material for many coco peat products comes from a large number of small producers via wholesalers. While many do have concrete pads for drying, it will become very difficult to ensure that the NZ product complies with the 3 metre buffer zone requirement.

It will not be possible for the practise of purchasing from wholesalers to continue. MAFBNZ believes this may have been an avenue for contamination. See also reply to 8.1.

10.7 The import permit should be issued on the basis of historical results, with new suppliers subject to more stringent tests in the first instance until an import record is established.

It will take time to build up historical results. See also reply to 5.5.

11 Anthony Washington (Pacific Wide NZ Ltd)

11.1 How will the administration and monitoring of the overseas facilities be audited to meet and ensure New Zealand's best interests initially and on-going?

MAFBNZ will be seeking information about the sourcing of material, monitoring and seed presence testing the supplier carries out and how the various premises are physically maintained to prevent contamination. See also replies 5.5 and 8.1.

11.2 How will the Import permits be assessed from the Country of Origin?

As it will be part of the IHS requirement that a permit be issued, a phytosanitary certificate should not be issued by the NPPO of the exporting country unless a copy of the permit is provided. The permit conditions will simply refer to the IHS.

11.3 Will a MAFBNZ representative be required to be present during unloading, or will containers be de-vanned at a Registered Transitional Facility then samples taken?

Containers will be de-vanned at a registered transitional facility then samples taken for inspection. Inspections of product are normally carried out within these transitional facilities. However, the exact procedures are still being determined.

11.4 Transitional Facilities in NZ for sampling product – will this be done onsite at the importers?

It will be done at whatever transitional facility is nominated by the importer.

11.5 Have there been estimated standard costs assessed?

Not yet, but inspection costs estimates are being worked on.

11.6 The use of the terminology as Coco Peat is incorrect as it is not Peat. Peat is extracted from mining. The correct term is Coir Pith. Pith is the fine material after extraction of the Fibre. If the entire husk of the coconut is used, this is termed Coir Fibre.

Your points have been noted. MAFBNZ is conscious that any term incorporating the word “peat” is not desirable. But an effort has been made to use the term that seems most commonly in use. This also aligns with the Australian usage of “coco peat”. Appropriate alternative naming will be provided in brackets in the IHS to help reduce confusion.