



**REVIEW OF SUBMISSIONS ON PROPOSED
AMENDMENTS TO THE OPERATIONAL
STANDARD FOR GENERAL TRANSITIONAL
FACILITIES FOR UNCLEARED GOODS**

July 2011

Ministry of Agriculture and Forestry
P O Box 2526
Wellington
New Zealand

Introduction

A revised Operational Standard and associated Guidance document for operating a General Transitional Facility for Uncleared Goods in New Zealand was notified for public consultation on the MAF website www.biosecurity.govt.nz.

The public consultation period was from 20 June 2011 until 15 July 2011. No submissions were received on the material relating to changes to the Standard.

Four submissions were received on the material relating to the Guidance document material.

Individual submissions relating to Guidance Document material

1. Submission one;

**Submitter: Geoff Ebdon
General Manager
NZ Duct & Flex Ltd**

Hi,

We are a small family company importing industrial goods from Europe and Malaysia.

We have casual staff that we bring in from time to time to assist in unloading containers. Maybe 3-4 times a year.

Your latest proposal says that all staff, rather than say supervisory staff, will need to have been trained on bio security issues.

This would mean we have to train a person who may work for us for 4 hours in total. This is not practical from our viewpoint.

2. Submission 2

Submitter: Mark Hutchinson
Logistics Manager
Husqvarna New Zealand Ltd

Hello

On our site we have,

-Certified Operator

-Certified Deputy Operator

- 4 Accredited persons

- MAF approved operating manual read and signed off by all staff in warehouse.

I am confused about why all staff devanning a container would need biosecurity training in addition to guidelines in manual when the act already requires direct supervision by an accredited Transitional Facility operator for devanning of containers

Will this training need to be carried out by a certified trainer at our cost what is the need that it will address.

Thanks

3. Submission 3

Submitter: Glen Johnson
Operator
Fonterra Canpac
Hamilton

To whom it may concern

I would like to suggest clarification of the section 4.15 of the draft Standard for General Transitional Facilities for Uncleared Goods.

In the summary of changes document, item 15 refers to addition wording to section 4.15 Training staff, this section states "wording added to reflect the need for any staff involved with container devanning or uncleared goods to have received biosecurity training so they are aware of the biosecurity requirements" This could mean that the facility operator can provide a site based induction and overview of biosecurity risk or it could mean that all staff involved in devanning need to be AP trained as per section 7 of the draft Standard for General Transitional Facilities for Uncleared Goods.

I would suggest clarification of section 4.15 and the meaning of biosecurity trained and the word staff, we have over 500 people on site but only about 10 involved in container devanning and 7 AP's for the site, under section 4.15 it could be considered that all staff need "biosecurity training"

Submissions 1 to 3 all related to the same section of the Guidance Document material and as such the following MAF response covers all 3:

An Accredited Person (or MAF Inspector) must be present during the devanning of any imported container at a Transitional Facility, this requirement remains unchanged.

The addition to section 4.15 of the Guidance document is intended to make it clearer that where other 'Non-accredited' staff is involved in the devanning of goods from imported containers that they should also have a basic level of biosecurity awareness.

For example they should be aware of the need to have an accredited person present before opening container doors, and be aware that they should contact their nominated Operator or Accredited Person if they saw insects on the exterior of a container awaiting unloading etc.

These staff will not require formal accreditation as a MAF Accredited Person.

4. Submission 4

Submitter: Clive Harrison
Brustics Ltd; General Manager (and Facility Operator)

Paragraph A.1 Operating Requirements

“The sealed area should be big enough to have a 3m clearance at the front for unloading and 1m around the sides and back...”

This is ambiguous, and I would appreciate clarification. Does it refer to the sealed area or a requirement for clearance around the container?

I am concerned that it can be read as a requirement to have 1m clearance around the container? Does this mean containers must be clear of a wall by 1m?

I know of many facilities where walls (warehouse sides etc) are the sides of the facility and these provide containment. It is preferred that facilities be located in urban areas in a reasonable distance to a port. There are associated costs of land and area constraints with urban locations so any additional requirement for area has implications.

If it is the intent that there is access to all sides, we feel this could be achieved in less than 1m, we normally have approximately 0.5m from our concrete slab warehouse wall, and would suggest that 0.5m from a clean wall is adequate clearance. (And clearance from a wall is not required when the container is checked and ok prior to positioning as indicated for close stacking of containers next to each other in paragraph A.1).

MAF response:

The guidance material for the physical operating requirements (the sealed area requirements) for facilities handling sea containers have not changed from the previous version. The guidance material intent was that sealed areas should extend 1m from the sides of the container and 3m from the front.

Section one of the Guidance document states “.....Equivalent procedures may be used where appropriate; however these must meet or exceed the levels of compliance that the practices in this document meet and be approved prior to use by MAF.”

The material in the Guidance document is a practical guide to meeting the requirements specified in the Standard. Operators of facilities can develop other alternatives to the options listed in the Guidance Document material provided the outcomes in the Standard continue to be met. In the circumstances you have

outlined above I would suggest that the alternative your organization has proposed will comply with the requirements listed in the Standard.

The alternative should be incorporated into your operating manual and approved by the Inspector responsible for the monitoring of your facility.