

Summary of Submissions:

Biosecurity Surveillance Strategy 2020

MAF Biosecurity New Zealand Discussion Paper No: 2008/04

February 2009

Executive Summary

In September 2008, the Ministry of Agriculture and Forestry Biosecurity New Zealand (MAF Biosecurity New Zealand) invited submissions on the discussion paper *Biosecurity Surveillance Strategy 2020* (No: 2008/04).

The paper suggested a strategy that could improve the current biosecurity surveillance system, by clarifying the roles and responsibilities of all surveillance participants, making it easier for these participants to work together effectively, and improving the ability to make decisions about prioritisation and resource allocation.

Prior to the papers' release, MAF Biosecurity New Zealand invited several central government agencies and a small number of key stakeholders to provide input into the preparation of the draft surveillance strategy. The public consultation on the discussion paper was planned and led by MAF Biosecurity New Zealand and included information on MAF's website, articles in *Biosecurity* and *Surveillance* magazines, and mail-outs, notification in regional newspapers and meetings in Auckland, Rotorua, Wellington and Christchurch.

MAF Biosecurity New Zealand received 33 individual and joint submissions from surveillance participants and stakeholders.

The submissions analysis showed that generally there was a high level of praise for MAF Biosecurity New Zealand for undertaking the development of the Strategy and recognition of the importance and timeliness of it. Submitters were also largely supportive of the approach taken and the principles on which the Strategy is based. The majority of submitters expressed either full commitment or provisional commitment to help to implement the Strategy.

Some submitters felt it was lacking somewhat on the 'how' aspects and did not adequately connect to the wider biosecurity system but, once remedied, thought that the Strategy would add a lot of value.

This document provides a summary of the issues raised in submissions and presents MAF Biosecurity New Zealand's response.

1. Introduction

In September 2008, the Ministry of Agriculture and Forestry Biosecurity New Zealand (MAF Biosecurity New Zealand) invited submissions on the discussion paper *Biosecurity Surveillance Strategy 2020* (No: 2008/04).

The discussion paper suggested a strategy that could improve the current biosecurity surveillance system, by clarifying the roles and responsibilities of all surveillance participants, making it easier for these participants to work together effectively, and improving the ability to make decisions about prioritisation and resource allocation.

The paper also suggested the strategy should consider the surveillance requirements for New Zealand's total biosecurity system, not just activities conducted directly by MAF Biosecurity New Zealand. It would include all sectors and participants involved in biosecurity surveillance.

The proposed strategy would be based on the following four central themes:

- Leading biosecurity surveillance;
- Working together;
- Delivering quality surveillance; and
- Sharing Information

Prior to the papers' release, MAF Biosecurity New Zealand invited several agencies to provide input into the preparation of the draft surveillance strategy. These agencies included: Department of the Prime Minister and Cabinet, Treasury, Ministry of Health, Department of Conservation, Te Puni Kōkiri, Land Information New Zealand, Environmental Risk Management Authority, Ministry for the Environment, Ministry of Fisheries, Ministry of Research, Science and Technology, and New Zealand Food Safety Authority. In addition, a representative group of key stakeholders were also invited to provide input into the preparation of the draft surveillance strategy.

Consultation on the discussion paper was planned and led by MAF Biosecurity New Zealand. The public release of the paper included information on MAF's website, articles in *Biosecurity* and *Surveillance* magazines, and mail-outs and notification in regional newspapers. MAF Biosecurity New Zealand also met with surveillance stakeholders at meetings in Auckland, Rotorua, Wellington and Christchurch. Ten weeks were allowed for feedback on the discussion paper.

This document provides a summary of the issues raised in submissions and presents MAF Biosecurity New Zealand's response. While feedback from meeting attendees was taken in to account in the re-drafting of the strategy document it has not been formally recognised in this document.

2. Consultation Outcome

MAF Biosecurity New Zealand received 33 individual and joint submissions from surveillance participants and stakeholders. Six of the joint submissions represented views from fruit, vegetable, berryfruit and olive growers. Three other joint submissions presented views from some of New Zealand's meat producing industries. One joint submission was from a University group.

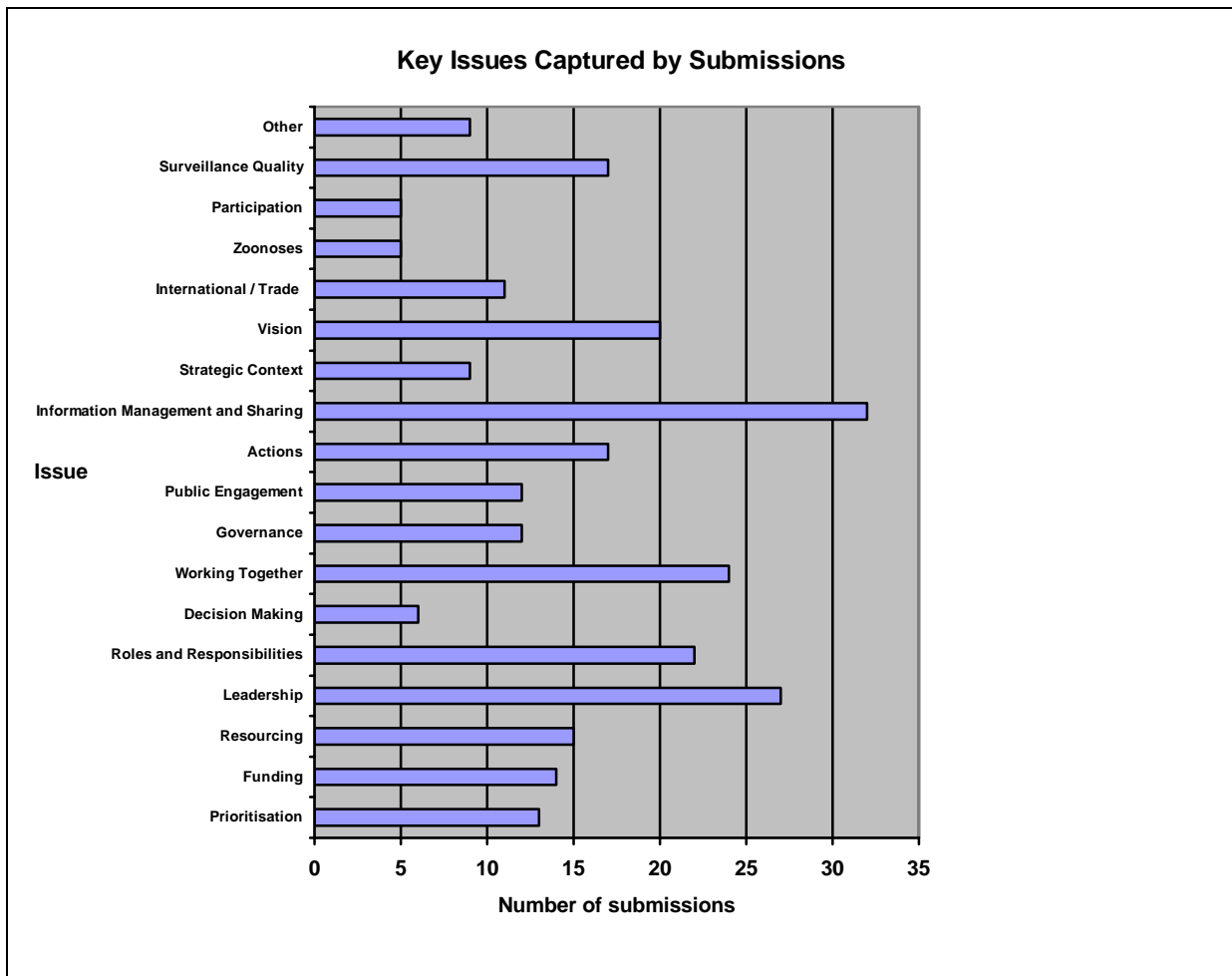
The submissions were reviewed rigorously and have had a significant impact on the strategy document. Amendments to the document were made primarily to improve wording, change emphasis, simplify case studies and moderate the language for better understanding. Other significant changes were made to the "Making It Happen" section, these revisions were intended to:

- make it easier to understand the actions that will follow the Strategy's completion;
- show how the actions will contribute to fulfilling the goals outlined in the Strategy;
- clearly identify the actions that MAF Biosecurity New Zealand will be responsible for implementing;
- outline the expectations regarding the involvement of other participants in system wide actions; and
- identify the expected timeline for implementation of the actions over the next four years.

3. Issues for Raised in Submissions

MAF received 33 submissions on the discussion paper from organisations representing the agriculture, horticulture, forestry sectors, and from regional Government, Crown research institutes, and non-profit organisations. Several private submissions were received also. A list of submissions is provided in appendix 1.

Submissions' views can be summarised by the graph on the following page.



A number of submissions made comments and raised questions specific to their industry or experiences with MAF Biosecurity New Zealand. While all the general issues are covered by this document, where appropriate, any additional issues specific to a business will be addressed directly with the relevant submitter.

Some submissions made comments or raised issues that are outside the scope of the Surveillance Strategy. These, along with issues relating to Document Quality (structure / style/ suggested edits) are addressed in “Other Issues” section on page 14.

Summary of Submissions

Generally there was a high level of praise for MAF Biosecurity New Zealand for undertaking the development of the strategy and recognised the importance and timeliness of it. Submitters were also largely supportive of the approach taken and the principles on which the strategy is based. Some submitters felt it was lacking somewhat on the 'how' aspects and did not adequately provide a connection to the wider biosecurity system but, once remedied, thought that the strategy would add a lot of value. Seventeen submitters expressed either full commitment (thirteen) or provisional commitment (four) to help with the implementation of the strategy.

Two submitters however specifically conveyed their lack of support for elements of the Strategy. Both felt that as the strategy did not contain accountabilities, timelines, and explanations about how costs will be allocated, it did not meet the general expectations of what a strategy should be. One submitter added that the strategy did not comply with the requirements of what a strategy should be under the Biosecurity Act. The Biosecurity Act refers to National Pest Management strategies only, this document is not a National Pest Management Strategy and so the criteria in the Act are not relevant.

1. LEADING BIOSECURITY SURVEILLANCE

MAF Biosecurity New Zealand has a leadership and coordination role in the New Zealand Government's biosecurity activities and ensures that the biosecurity surveillance system leadership is provided and that shared responsibility is promoted.

1.1 Leadership

Twenty seven submitters provided feedback on leadership and the majority agreed that MAF should continue to recognise its responsibilities under the Biosecurity Act and provide leadership and coordination of stakeholder expectations and direction to the biosecurity system as a whole. Submitters also made other comments in relation to leadership:

- The proposed leadership model shows a clear intent for MAF Biosecurity New Zealand to devolve responsibility to a range of other parties
- Many participants in the horticulture industry do not have a high level of confidence in MAF Biosecurity New Zealand's ability to manage issues in the best interests of New Zealand.
- One contributor thought that MAF had not proven itself a safe and careful custodian of the full range of biosecurity surveillance demands and therefore should not lead the system.

Our Response:

Given the large amount of support for the overall intent of this section, significant changes are not anticipated, although we have made efforts to provide more detail around how participation in the system can be improved and how we can be more prepared for emerging risks.

1.2 Prioritisation and Decision Making

Thirteen submissions specifically referenced prioritisation in feedback. Of these, five submitters felt that determining priority would be a problem, as the biggest difficulty would be the balancing of resources and determining what would be an 'effective' use of resources. Five more submitters felt the strategy must further clarify the role that MAF Biosecurity New Zealand will have in relation to priority setting within a formal joint decision making and resourcing framework, as well as present a robust prioritisation methodology. Other comments received about prioritisation included:

- Priorities must be informed by robust science and technology.
- Priorities should not be formally locked down, as they could change based on incursions and responses.

Six submitters specifically addressed the issues around decision making and most made suggestions and raised concerns about how decision making could work in practice. Views included:

- The involvement of participants in decision making around biosecurity surveillance should not be based on their financial contribution but rather whether their input would improve the outcomes for the system.
- The systems and criteria for decision making (including resource allocation) needs to be developed.
- Though MAF has the resources required to take on the leadership role, when there are important decisions to be made, especially where the viability of an industry is involved, much greater consideration of the stakeholders views must be taken into consideration.

Our Response

We recognise that decision making is a very important issue, and is fundamental to successful implementation of the strategy. The development of decision making criteria will be one of the first pieces of work when implementation of the strategy begins (actions 5.1 – 5.4 refer). There is a focus on working together in the strategy so, where appropriate, all stakeholders will be consulted when important decisions need to be made. Prioritisation is specifically addressed in Actions 1.1 and 1.2 in the “Making It Happen” section.

1.3 Funding and Resourcing

Fourteen submitters specifically commented on issues associated with funding. All submitters felt that there will be issues surrounding who funds what and how, and that these issues will need to be clearly identified and worked through with stakeholders before a funding decision could be made. Other views on funding included:

- There will be difficulties in the allocation of costs between Government and industry and that funding assistance and / or cost-sharing needs to exist between MAF Biosecurity New Zealand and partner agencies.
- Greater attention should be given to reducing the financial impact on the sectors involved.
- Industry and regional Governments have only limited resources to contribute to biosecurity surveillance and may struggle to cover the costs.
- The management of biosecurity risks should be funded primarily by MAF Biosecurity New Zealand.
- There should not be a reduction in the level of service delivered to industry out of the existing MAF Biosecurity New Zealand funding.
- The costs associated with biosecurity, including surveillance, should not be funded from those that benefit from our natural biosecurity status.
- The definition of leadership should include also resourcing.

Fifteen submitters specifically commented on resourcing elements of the strategy, with the principal view being that where priorities were identified, they should be

appropriately resourced by MAF Biosecurity New Zealand. Other views expressed were:

- Resourcing constraints would affect the achievability of the strategy's goals.
- The goals and expected outcomes in the strategy should be expressed relation to resourcing levels.
- The availability of staff to assist with surveillance could vary between regions / authorities and could lead to gaps in the surveillance system.
- Recruitment, training and remuneration could be limiting factors in implementing the strategy.
- The contribution that MAF Biosecurity New Zealand would make to the priorities of other participants was not clear from the strategy.
- Any additional administration [for a national plan] would mean extra costs and some diversion of funds from being used on the ground.

Our Response:

Government and industry both wish to make better use of their resources and to improve the effectiveness of biosecurity surveillance. By working together we will improve our ability to make the best use of the resources we have and be able to identify areas where resources are not being used to their full potential. We understand that issues surrounding who funds what, and how, will need to be discussed and worked through with stakeholders before funding decisions can be made.

2. WORKING TOGETHER

There is a strong emphasis in the Biosecurity Strategy on working together to maximise the outcomes of the biosecurity system as a whole.

2.1 Working Together

Twenty four submitters commented on the concept of “working together”. Six submitters felt the model proposed in the strategy was appropriate. Nine submitters felt that there should be more detail around how ‘working together’ will occur in reality, as the mechanisms to deliver on the goals are vague. Other views on ‘working together’ received included:

- The strategy should identify which stakeholders would be involved and which participants would actually be working together, with recognition of the status of Maori.
- ‘Working together’ would be appropriate model, as long as cost-sharing models could be identified and there is not an expectation of industry funding that would over burden producers.
- There would be considerable reluctance for companies to share points of difference (i.e. competitive edge) unless suitable arrangements for ‘working together’ were agreed.

Our Response

We are happy to see so much support for the concept of working together. Detail about how stakeholders will be working together, and with who, will be worked out during the implementation phase but is reliant on the willingness of system participants to be involved.

2.2 Roles and Responsibilities

Twenty two submitters provided feedback on roles and responsibilities, the majority of whom emphasised that it must be clear what Government and each industry party is meant to do, and how the system would be resourced and managed. Additional feedback about roles and responsibilities is as follows:

- While the overall responsibility should remain with MAF Biosecurity New Zealand, partner agencies should be included in decision making, and where appropriate other organisations take a lead role.
- If industry is expected to make a greater investment in biosecurity surveillance activities, it would expect a greater say across the whole sphere of activity (including priority setting, surveillance and response activities).

Our Response:

In a situation where both Government and industry are contributing resources for surveillance, no single party would be exclusively responsible for making decisions. Nor would all parties be involved in decision making for every pest and disease. Rather, Government and affected industries would make decisions jointly and by consensus. Having strong system governance will be integral to this process.

2.3 Governance

Twelve submitters expressed a variety of views on the Governance principles suggested in the strategy, with the primary view being support for the current model with the addition of steering committees / advisory committees / partnership groups (comprising representatives of surveillance participants). Other views include:

- The existing arrangements as outlined on page 41 [of the document] and Governance structures already established would be sufficient for the successful implementation of the strategy.
- The Governance structures should be reviewed to recognise increased levels of sector involvement and responsibility, and that the Biosecurity Ministerial Advisory Council would not provide adequate Governance in the regime proposed by the strategy.
- Governance agreements should be consistent or identical with the outcomes of Joint Decision-Making and Resourcing for Readiness and Incursion Responses (SIRWG).
- Sectors contributing to the implementation of the strategy should have greater and more formal input at Governance level, and sector groups, where they do not exist, should be put in place.

Our Response:

We have considered the responses and aligned the strategy governance with the majority view. The establishment of a small Biosecurity Surveillance Committee is proposed (section 11.1) to ensure that the vision of the strategy is achieved and that the actions required to deliver this change are implemented.

3. DELIVERING QUALITY SURVEILLANCE

The biosecurity system is dependant upon delivering surveillance programmes of appropriate quality to meet expanding risks.

3.1 Surveillance Quality

Seventeen submitters provided feedback about what determines an appropriate level of surveillance, most submitters felt differently about what that meant. Some examples include:

- Being able to detect new incursions promptly.
- Having an independent audit regime.
- Surveillance quality is dependant on the situation and will be different for different sectors, pests and diseases.
- Cost effectiveness and putting more resources into the areas where it will deliver the most good.
- Having outcomes that are acceptable to stakeholders. This includes impacts on the stakeholder, the industry, the country and the future economy.

Our Response:

In line with what some submitters said, our view is that the appropriate level of quality is totally dependent upon the purpose of the surveillance. This is explicitly recognised in Section 9.1 where the expected outcome is that “All biosecurity surveillance activities have explicit surveillance objectives ... and meet their specified objectives”.

3.2 Public Engagement and Passive Surveillance

Twelve submitters commented on public engagement / communications aspects of the strategy, with all agreeing that getting information to and from members will be imperative to the success of the strategy. Other views can be summarised as follows:

- Communication channels between all stakeholders involved or affected by biosecurity surveillance activities should be established.
- There is support for the concept of engaging with the public but a warning that asking the public for information of potential new organisms could create an avalanche of reports and put pressure on scarce resources.
- Maori organisations often find information and channels for gaining it are not easily communicable to all of their members, where only a few have policy/strategy expertise or scientific skills in data interpretation.

Several submitters also commented that passive surveillance is supported as a large component of the strategy, as a better informed public will lead to better, earlier detection passive surveillance reliability.

Our Response:

MAF Biosecurity New Zealand agrees that public engagement and passive surveillance will be a significant part of any future surveillance system. However, targeting passive surveillance initiatives to specific groups or individuals who have the right background, knowledge and exposure will maximise its effectiveness.

3.3 Participation

Five submitters made comments relating to how there is currently a reluctance to report suspect new pests and diseases given the uncertainty of how MAF will respond and the potential impact on industry.

Our Response:

This remains a significant issue affecting participation in the biosecurity surveillance system and came up regularly at public workshops. To address this, we have expanded the focus on improving participation, and aim to help people get involved in surveillance by removing barriers to participation (Action 4.8).

3.4 Systems and Frameworks

Three submitters commented that there is a need for better convergence to make maximum use of existing regional council programmes to support the implementation of the surveillance strategy. One submitter also felt that it would be essential that MAF Biosecurity New Zealand ensures there are legal frameworks and access to expertise for all parties involved in biosecurity surveillance.

Our Response:

We recognise that much of the potential biosecurity surveillance resource in the regional councils could be used more effectively, and are dedicated to ensuring that better use is made of all resources to improve the biosecurity surveillance system. We are also committed to ensuring that tools and processes to support surveillance delivery are available to all stakeholders (Action 4.5) and that there is sufficient expertise available to ensure that all work that needs to be done can be done (Action 1.3).

4. SHARING INFORMATION

To perform to the highest standards, the biosecurity system must be supported by the timely delivery of robust and reliable information.

4.1 Information Management and Sharing

Thirty two submitters provided feedback on this issue. The majority of submissions felt that current information about new incursions, changes to international pest statuses, detections of organisms, and best practice surveillance techniques would

have significant benefits for biosecurity surveillance. Several submitters also suggested that systems containing surveillance information (both domestically and internationally) be integrated for surveillance information to be complete and consistent. Additional feedback relating to information management and sharing included:

- Data security and privacy issues around information sharing were not fully addressed in the strategy.
- Because information belongs to individual farmers, their financial contribution to its collation should to be recognised.
- Government has a responsibility to ensure sufficient information on the biosecurity status of overseas trading partners and the emergence of new pests/pathogens.

Our Response:

We recognise that there is a lot of work to be done in this space. We have a number of actions planned to investigate (and implement where appropriate) solutions aimed at improving the management of biosecurity surveillance data and making it easier for surveillance participants to access and share information.

5. MAKING IT HAPPEN

The actions required to implement the goals for the Biosecurity Surveillance Strategy.

5.1 Actions and Measuring Success

Seventeen submitters commented on ‘how’ the strategy was to be delivered. All of them felt that the strategy did not give a clear feeling of what would change in practical terms and did not provide any concrete information about how the strategy would be operationalised. Additional feedback about actions included:

- A feeling that there was insufficient information about who would be responsible for the elements outlined in the strategy and the timeframes associated with them.
- A lack of commitment to action from MAF Biosecurity New Zealand would be translated into lack of buy-in from surveillance participants.
- Several submissions also expressed a request for actions specific to their industry.

Six submissions included comments on measurement. All of them felt that the strategy should include outcome measures, as it is currently difficult to see how implementation will be monitored and what success would look like.

Our Response:

Based on submissions the “Actions” section was significantly re-worked. To allow easier understanding, actions were grouped into seven main actions with some having sub-actions. A diagram has been added to clarify how the actions align with the Strategy’s themes and goals and an initial implementation plan has been included to demonstrate what actions we will be undertaking in the next four years. We have also indicated those actions that MAF Biosecurity New Zealand is

responsible for delivering and those where a larger group of participants is required to achieve the outcome.

6. OTHER COMMENTS RELATED TO THE DISCUSSION DOCUMENT

6.1 Strategic Context

Nine submitters felt that the document did not adequately portray the importance of surveillance as a component of the biosecurity system as a whole, and that links with offshore, border, and other post border biosecurity activities needed to be highlighted. One submitter also felt that the document did not link strongly enough with other MAF Biosecurity New Zealand strategies.

Our Response:

We feel the strategy conveys how important surveillance is as a component of the biosecurity system. We updated the diagram on page four to demonstrate links with other sections of the biosecurity system and to better reflect the biosecurity continuum. Other MAF Biosecurity New Zealand strategies and their links with the Biosecurity Surveillance Strategy are covered in Appendix A of the Strategy.

6.2 Vision

Twenty submitters made comments on the Strategy's vision. Ten submitters felt that the vision needed to be reworded in some way – six of whom felt the vision needed to be reworded to emphasise effectiveness, instead of efficiency. Other feedback about the vision included:

- It was too long.
- In its current form it was unsatisfactory and needed to be rewritten completely.
- It needed to have more focus on trade facilitation.
- It should have a connection to effective biosecurity management, and the wider biosecurity system overall.

Our Response:

Given the significant feedback on the wording of the Vision, it has been shortened made it more focused, and now emphasises the importance of effectiveness. It now reads: "Working together to achieve efficient and effective surveillance".

6.3 International / Trade

Eleven submitters commented on international or trade-related aspects of the Strategy, with the majority feeling that the focus on the New Zealand economy should be elevated in the document. Some submitters also felt that New Zealand should maintain involvement in the international global biosecurity surveillance community, but one submitter thought that while MAF Biosecurity New Zealand's involvement in the international surveillance community does have some clearly desirable outcomes, provision of resources to achieve such involvement should have lower priority than effective surveillance and incursion response resourcing.

Our Response:

The overall purpose of biosecurity surveillance is to support the biosecurity system in its efforts to protect the economy, environment and people of New Zealand. This means that economic, socio-cultural, health, and environmental values must be considered when decisions are made.

Additionally, New Zealand's surveillance system is informed by the continuous learning generated by our interactions with and lessons from others in the international surveillance community. This process is important and we will continue to review and set priorities for our involvement in international biosecurity surveillance opportunities (Action 3.2).

6.4 Zoonoses

Five submitters made mention of zoonoses in some way. One submitter felt that a consistent policy for dealing with the spread of zoonoses and those that affect trade would be helpful. One questioned how zoonotic diseases would be addressed by the strategy. One had little confidence that human health priorities were adequately understood and subsequently resourced, and one thought that cooperation with Ministry of Health would be very important.

Our Response:

MAF Biosecurity New Zealand recognises the importance of zoonoses (diseases that can affect people and animals) and pests that may impact on human health. This is an area where a clarification of roles and responsibilities (Action 4.1) is expected to result in improved management of these risks. There will also be work undertaken to identify the specific surveillance needs in this area (Actions 1.1-1.4).

The scope of the strategy does not extend to diseases that only affect human health, as this is the responsibility of the Ministry of Health. The scope has been revised to emphasise that it does include risk organisms that affect both animals and humans, whereby MAF Biosecurity New Zealand will work closely with the Ministry of Health.

7. OTHER ISSUES

7.1 Document Quality (structure / style/ suggested edits)

A number of submissions highlighted errors and / or suggested changes that could be made to improve the quality of the document. These were explored and where applicable, changes were made in the document.

7.2 Out of Scope for the Strategy

Several submissions highlighted some contentious issues that, while outside the scope of the Surveillance Strategy, are significant for the industries concerned. These included:

- Concerns regarding MAF Biosecurity New Zealand's offshore and border processes;
- Concerns regarding the timeliness and efficacy of diagnostics;

- Comments relating to incursion response and pest management;
- Comments about the importance of science, research and technology;

Appendix 1:

Submissions

AgResearch Ltd
Anonymous
Dr Ashley Robinson
AsureQuality Limited
Auckland Regional Council
Cawthron Institute
DairyNZ
Department of Conservation
Environment Bay of Plenty
Environment Waikato
Epidemiology and Animal Health Branch of NZVA and Epicentre
FBA Consulting
Federated Farmers of New Zealand
Fonterra Co-operative Group Limited
Greater Wellington Regional Council
Hancock Forest Management
Hawke's Bay Fruitgrowers' Association
Horticulture New Zealand
Landcare Research
Meat & Wool NZ
Ministry of Fisheries
NZ Biosecure
Ngati Tuwharetoa Maori Trust Board
NZ Citrus Growers Inc
NZ Forest Owners Association
New Zealand Food Safety Authority
NZ Kiwifruit Growers Inc
NZ Pork Industry Board
NZ Tree Crops Association
Poultry Industry Association of New Zealand, Egg Producers Federation and New Zealand Feed Manufacturers Association
U R 1 International
Walter C Clarke
Wood Processors Association of New Zealand