



**IMPORT HEALTH STANDARD  
FOR VEHICLES, MACHINERY & TYRES  
Short Name: VEHICLE.ALL  
SUMMARY OF SUBMISSIONS**

**July 2009**

Ministry of Agriculture & Forestry  
Biosecurity New Zealand  
P O Box 2526  
Wellington  
New Zealand

## Introduction

The Ministry of Agriculture and Forestry Biosecurity of New Zealand (MAFBNZ) released the draft revised *Import Health Standard for Vehicles, Machinery and Tyres (vehicle.all)* for public consultation on 8 May 2009. Submissions closed on 19 June 2009. A total of 8 submissions were received:

1. John Nicholls (consultant to the Imported Motor Vehicle Dealers Association (IMVDA))
2. Tony Everett (for the Motor Trade Association (MTA))
3. Perry Kerr (for the MIA)
4. Glen Mackie (for the New Zealand Forest Owners Association)
5. Phillip Bell (for the Department of Conservation (DoC))
6. David Vinsen (for the IMVDA)
7. Cassie Harrison (for Customs Brokers and Freight Forwarders Federation of New Zealand (CBAFF))
8. Justin Downs (for the Japan Biosecurity Organization (JBO))

MAFBNZ thanks all submitters for the time taken to read the draft revised IHS and prepare submissions. The submissions are included in Appendix 1.

This document summarises the submissions, the MAFBNZ response to those submissions and how the final import health standard (IHS) has been amended accordingly.

**NOTE:** One submitter made a joint submission covering both the *Import Health Standard for Sea Containers (SeaCo)* and the draft *Import Health Standard for Vehicles, Machinery and Tyres (vehicle.all)* standard. MAF will be responding to the submitter separately on matters related to the draft *SeaCo* Standard.

## Final Import Health Standard & Associated Guidance Document

Since the release of the draft revised IHS and incorporation of relevant amendments in response to public submissions, the final IHS primarily incorporates only those legal provisions that must be met by vehicle and machinery stakeholders. Additional explanatory and supporting information material, previously in the draft IHS released for consultation, has been incorporated into a separate guidance document to be released, and read in conjunction with, the final IHS. The guidance document also includes the MAFBNZ accepted processes, systems and contaminant threshold levels that enable the requirements of the IHS to be met.

The status of the guidance document is that it is not part of the IHS and therefore not legally binding. This is a new format for the guidance document that is being used and, as such, it is still being developed. Changes and improvements can be made to it in response to new information and improved methodologies, systems and processes, so long as the biosecurity requirements of the IHS are not affected. These will be informed through regular and ongoing stakeholder engagement and consultation.

Consequently, the layout of the final IHS is significantly different to that which was released for consultation as a draft. While most of the original information is still present, it has been reformatted across two documents. MAFBNZ's response to submissions references the draft IHS and provides explanation how any amendments have been incorporated by referencing the final IHS and the guidance document.

## Submissions & MAFBNZ Responses

### 1. John Nicholls (consultant to IMVDA)

- a) Relating to the NOTE in section 10: "Used tyres must not be imported in the boot or interior of a vehicle." I note the words in brackets - (deflated or not on rims) – however, does this not catch the vehicle's spare wheel if (as often is the case) which has become deflated in storage over a period?

#### **MAFBNZ Response:**

*The intent of the NOTE was to make clear that vehicles were not to be used as "space" for transporting used tyres as freight. The biosecurity risks associated with such practices are difficult to manage and are therefore prohibited. The provision is not intended to include the spare wheel of a vehicle, which is seen as a part of the vehicle per se. MAFBNZ accepts that, on occasion, some of these will be deflated.*

*The NOTE has been moved to the guidance document (section 4.5):*

*"Used tyres (not on rims or partially deflated) carried as cargo must not be imported in or on a vehicle, including boot spaces".*

- b) Relating to section 11 which includes "Used tyres (section 10)". If the wording catches the spare wheel - then I query "... must not be imported in the boot or interior ...". I do not think there is any intention to prohibit the import of the normal spare wheel in the usual positioning in or on a vehicle.

#### **MAFBNZ Response:**

*Issues addressed above in 1(a).*

### 2. Tony Everett (for the MTA)

- a) Clarification required on the NOTE (section 10) stating: "Used tyres must not be imported in the boot or interior of a vehicle". There is confusion based on your classification regarding the importation of loose used tyres on rims, for example spare tyres. Are these, or bulk tyres on rims, required to be treated prior to receiving biosecurity clearance?

#### **MAFBNZ Response:**

*See response to 1(a). In addition, spare tyres and bulk tyres on rims are not required to be treated prior to receiving biosecurity clearance unless contamination is found or suspected to be present. Treatment of these items will be dependent on whether they meet the requirements of the IHS, i.e., clean, where the level of biosecurity contaminants is reduced to at least the contaminant threshold levels listed in Appendix 2 of the guidance document.,*

- b) The requirement for mandatory decontamination of the used vehicle parts and used machinery parts (Chapter 11) is confusing based on the wording of the below statement:

*“Used vehicle/machinery parts, including vehicles/machinery imported for dismantling”*

MTA requests that this be separated into two distinct statements, targeting used vehicle parts in one statement and used machinery parts in another statement. The wording of the current statement does not adequately specify that this relates only to parts from used vehicles or machinery.

**MAFBNZ Response:**

*MAFBNZ agrees that the statement is potentially confusing. Instead of separating it into two distinct parts, the wording has been amended to read:*

*“Used vehicle/machinery parts, including **those** imported for dismantling”.*

*This information is found in section 4.1 of the IHS.*

- c) MTA requests that the Note (section 11), shown below, be amended from the following:

*“MAF should be consulted prior to import, on whether vehicles/machinery is likely to fall into the above category will require mandatory decontamination”*

To read as either of the two following statements:

*“MAFBNZ must be consulted prior to import, on whether vehicles/machinery likely to fall into the above category will require mandatory decontamination.”*

OR

*“MAFBNZ should be consulted prior to import, if the importer is in doubt about whether vehicles/machinery likely to fall into the above category will require mandatory decontamination”.*

MTA considers that this provides more clarity on when importers should liaise with MAFBNZ.

**MAFBNZ Response:**

*MAFBNZ agrees that rewording the statement would provide more clarity and has amended the note as follows:*

*“MAFBNZ should be consulted prior to import if there are doubts over whether vehicles/machinery fall into categories requiring specific decontamination measures”.*

*This information is found in section 4.7.2, last paragraph of the guidance document.*

**3. Perry Kerr (for the MIA)**

- a) Overall we are comfortable with the proposals put forward as they relate to vehicles of our interest. The Standard calls for importers of new vehicles and machinery to supply information on the distribution/import chain including such aspects as estimated storage times and so on. It should be noted that as far as we can ascertain a documented process plan as proposed is not required for any other market. As a result several members have

asked for the MIA and MAF to work together to prepare a template for their use. We have raised this matter with Mike Tana and he has advised that the new vehicle industry will have up to 12 months, from the date of implementation, to comply with this requirement.

With regard to used vehicles, including motor cycles, we note the proposed requirements and endorse these. We would also add that with the declining numbers that it is an opportune time to implement new and improved practices. We would also add that we believe it is important that used motor cycles are captured by the revised procedures.

**MAFBNZ Response:**

*Comments noted. MAFBNZ will work with MIA and other industry groups to prepare a template for information to be supplied on the distribution/import chain. The new vehicle industry will have up to 12 months, from the date of implementation, to comply with this requirement.*

**4. Glen Mackie (for the New Zealand Forest Owners Association)**

- a) The two IHS documents lack detail, and refer to a number of other standards, which makes it very difficult to comment. The reference documents provide greater detail but don't fully explain how the IHSs are to be implemented or what changes have been made to previous IHS documents.

**MAFBNZ Response:**

*MAFBNZ is developing and revising import health standards to be "outcome-focused". From a legal perspective, an import health standard must specify the requirements to be met for the effective management of risks associated with the importation of risk goods, not how (the specific mechanisms or actions) those requirements are to be met. MAFBNZ has written guidance documents to accompany the import health standards. These documents outline actions that can be taken to meet the standards. Importers and other affected stakeholders however, can take other appropriate and approved actions that deliver the same outcome. While the guidance documents provide much of the information needed for stakeholders to meet the biosecurity requirements, stakeholders need to work with MAFBNZ to ensure that any proposed risk measures are effective. The implementation of such measures may also need to be approved by a MAF Chief Technical Officer (CTO) and, as such, the guidance document describes implementation in generic terms.*

- b) We strongly support the move to inspect new vehicles as well as used ones, particularly those originating from high-risk countries/ports'.

**MAFBNZ Response:**

*Comment noted.*

## 5. Phillip Bell (for DoC)

### a) Appendix 1: Containment Threshold Levels

We consider that the requirement for the contaminant “Plant material/soil not detectable through physical inspection” should be presence permitted\*. This would allow the MAF inspector the chance to order further action to be taken if they consider it necessary, which may be the case depending on the type found and its quantity.

#### **MAFBNZ Response:**

*Comment noted.*

### b) Appendix 1: Containment Threshold Levels

We consider that seeds should not be presence permitted. These biosecurity contaminants could present a significant risk to our native flora, by introducing new weed species to our environment or by harbouring new diseases that could harm our native species. A zero tolerance approach should be taken.

#### **MAFBNZ Response:**

*A zero tolerance approach has been taken for seeds generally, as noted by the “none” contaminant threshold level for seeds not in air filters nor associated with radiators/exhausts. Indicative studies have shown that seeds present in air filters have a low viability and >99% of those that are viable are not new to New Zealand. Pending more conclusive studies however, MAFBNZ had changed the contaminant threshold level for seeds in air filters to “restricted”, meaning that, “based on the risk analysis, presence may be permitted but is restricted where other risk factors may need to be taken into consideration (e.g., gross contamination), a risk decision warrants further consultation within MAFBNZ.” This will allow the MAF inspector the opportunity to order further action to be taken if they consider it necessary.*

*This information is found in Appendix 2 of the guidance document.*

### c) Appendix 1: Containment Threshold Levels

In our opinion, 20 grams of soil allowable per vehicle/unit of machinery is a significant amount. There is a number of soil borne organisms (such as fungi or phytosphora) that could pose a serious risk to our native flora and/or fauna. We consider the threshold should be zero visible soil at all.

#### **MAFBNZ Response:**

*While MAFBNZ acknowledges the presence of such contaminants in even 20g of soil (or less), there needs to be an operational limit that is able to be implemented in practice. Vehicles/machinery are often large and of complex construction and, as such, it is not practical to ensure that all soil is removed. An amount has been chosen that is deemed to be workable. The contaminant threshold levels are subject to review as new information and monitoring becomes available.*

### d) Re-wording suggestion

Section 7: Documentation - We suggest the following re-wording of this bullet point, for clarity:

**Name of consignor, name of consignee and consignee’s full address**

**MAFBNZ Response:**

*The re-wording has been adopted in the final IHS.*

**e) Re-wording suggestion**

Section 11: Vehicles/Machinery Subject to Mandatory Decontamination - We suggest the following addition to this sentence, to ensure that all importers are aware that MAFBNZ must approve any different treatment method before its use is accepted.

*...heat treatment or other **MAFBNZ** approved equivalent means...*

**MAFBNZ Response:**

*The re-wording has been changed to..."or treated by other **CTO**-approved means"... and adopted in the final IHS.*

**f) Re-wording suggestion**

Section 12.1: Default Intervention Options - Option 2 has an explanatory footnote at the bottom, but it is not included in the section anywhere. We assume it is meant to follow the word "fumigated" in the option.

**MAFBNZ Response:**

*The footnote relates to the MAFBNZ treatment standard which includes approved heat treatment and fumigation methodologies. It has been moved to follow the word "manner".*

**g) Re-wording suggestion**

Section 12.2: Management of Vehicles/Machinery Suspected/Known to be Contaminated On-Arrival in New Zealand - Paragraph 3 has a footnote (after the word 'Management') but the reference or explanatory note is not included at all. We assume this is merely a typo or oversight.

**MAFBNZ Response:**

*The footnote is obsolete and has been removed.*

**6. David Vinsen (for the IMVDA)**

**a)** We have concern ... about the lack of detail on performance measurement, and submit that greater clarity is required on this key issue.

**MAFBNZ Response:**

*The concern over the lack of detail on performance management is noted. While the broad framework of performance management has been mapped out, further development of performance principles and parameters will be the focus during the next 12 months as the IHS is implemented. Much of this is being done on specific risk intervention regimes and these are being used as a model for generic parameters. MAFBNZ will be working closely with vehicle/machinery stakeholders to develop and implement practical and effective measuring methodologies to ensure that performance management is both informative and meaningful.*

- b) The IMVDA strongly supports the general principle of point 4, that biosecurity risks be managed offshore as much as possible.

**MAFBNZ Response:**

*Comment noted.*

- c) The IMVDA recommends clarification and industry agreement on the assessment, development and implementation of Co-management and Equivalent intervention procedures.

**MAFBNZ Response:**

*The recommendation is noted and MAFBNZ is committed to further work in this area. Work has been carried out between MAFBNZ and industry representatives on clarifying the principles of co-management. Work on the assessment, development and implementation of co-management and equivalent intervention procedures and guidelines is continuing.*

- d) The IMVDA has concerns about point 6: Importing Contaminated Vehicles/Machinery. Our concerns centre on the possible implications if this clause is implemented in a narrow fashion, so that an importer who brought a vehicle into New Zealand with the honest intention of cleaning it and having it MAF-cleared here could be unduly penalised by having the vehicle declared "Prohibited".

Prohibition would be an appropriate penalty if the importer "knowingly" imported a contaminated vehicle with the intention of circumventing MAF's biosecurity provisions. There should be provision made when implementing this clause to identify (by declaration?) importers whose genuine intention when importing contaminated vehicles was to take advantage of better interventions available in NZ, and to not penalise them. This is especially relevant for importers of larger vehicles with GVM in excess of 3500kg, who may have few viable intervention options available to them at ports of loading.

**MAFBNZ Response:**

*MAFBNZ agreed, hence the use of the word "known" in section 6 to indicate an intentional action. This provision has been incorporated into the guidance document along with options to best manage particular contaminated vehicles/ machinery.*

- e) The IMVDA notes that point 11, bullet point 8 needs no apostrophe in "its".

**MAFBNZ Response:**

Noted and amended.

- f) The IMVDA would like clarification of 12.1 Default Intervention Options.

**MAFBNZ Response:**

*Further clarification of the default intervention options has been provided in Section 4.8 of the guidance document.*

## 7. Cassie Harrison (for CBAFF)

- a) In reference to section 1 (Introduction), members believe that MAF's intent to 'not unnecessarily impede trade' will be removed by the additional requirements in relation to new vehicles, machinery and tyres.

### **MAFBNZ Response:**

*The risk analysis identified that the biosecurity risks associated with new vehicles and machinery were non-negligible. In addition, the current IHS for used tyres identifies these as risk goods and requires that they be fumigated. Non-negligible biosecurity risks must be managed in such a way that balances the risks of import against the benefits of trade (Section 3 of the guidance document). Additional requirements in relation to new vehicles, new machinery and new tyres have a minimal cost and will 'not unnecessarily impede trade' as much as could be envisaged if contaminant threshold levels were more stringent. Affected industry groups, such as the MIA, accept the new requirements relating to new vehicles and support the need for effective biosecurity management.*

- b) In relation to section 4.6.2 (New Vehicles & New Machinery (including new tyres)), the standard requires importers to supply MAF with information describing how new vehicles, machinery and tyres have been stored (including length of time), transported to the ship and how risks of bio security contamination have been mitigated between manufacture and export. Members believe this will unnecessarily impede trade. The acceptable information required needs to be specified.

### **MAFBNZ Response:**

*One of the key areas of biosecurity risk for new vehicles/machinery is the risk of contamination during storage prior to export, particularly if storage areas are uncovered, lit and therefore liable to attract flying insects. In lieu of instituting more stringent biosecurity measures (such as physical inspection) to manage such risks, MAFBNZ believes that the requirement for manufacturers to provide assurance through documenting storage and transportation procedures and practices is practical, auditable and less imposing. It is also anticipated that new vehicle/machinery importers will be able to meet biosecurity requirements through certification of pre-existing manufacturing supply chain quality assurance systems. The acceptable information needs will be agreed and specified with importers. There will be minimal financial costs associated with this requirement and the new vehicle industry will have up to 12 months from the date of implementation to comply.*

- c) In relation to section 10 (Used Tyres), the term 'landing' must be defined. This could be deemed to be; discharge at first port (even though the consignment may be on a through Bill of Lading to an alternate port) or it could be discharge at the final place of delivery (being a port).

Where a container tranships before reaching its place of delivery where on a through Bill of Lading it is highly likely that more than 48 hours will elapse between tranships. Requirement is then for the container to be sealed and treated with residual insecticide. The practicalities of this will prove costly and be another logistical nightmare. It has the potential to delay tranships enough that they miss forward connections.

**MAFBNZ Response:**

*The term landing/landed is qualified in the standard and Guidance document as being 'discharge at the port of entry in New Zealand'.*

- d) In relation to section 11 (Vehicles/Machinery Subject to Mandatory Decontamination), with this provision, it appears that vehicles from the USA are being singled out by legalising a policy decision currently being applied. Members believe the intent is to require mandatory fumigation however the opening paragraph provides several options for this. These options include fumigation, heat treatment or other approved equivalent means, to remove/inactivate biosecurity contaminants. By including choice it negates the current MAF position of mandatory fumigation.

**MAFBNZ Response:**

*Used vehicles imported from the USA, have a high frequency of contamination with widow spiders. Consequently, decontamination was required unless evidence could be provided indicating that the vehicle was free of biosecurity contaminants. While members may believe that the intent is to require fumigation, it is clear that other decontamination. The current position of mandatory fumigation will be negated upon full implementation of the final IHS but the intent to manage the actual biosecurity risks still applies. The provision is captured in section 4.7.2, bullet point 5, of the guidance document:*

*"Any other vehicle/unit of machinery that, by its very nature, use, source, history or other such factor, has been determined by an inspector to require treatment (e.g., garbage trucks, used vehicles from the United States of America)."*

- e) The definition of vehicles now extends to motor cycles, caravans, buses, trucks, forklifts, where previously the policy related to motor cars only.

**MAFBNZ Response:**

*This is correct. Biosecurity risks are not restricted to motor cars and the previous IHS did not adequately define "vehicles". The revised IHS remedies this.*

- f) In relation to section 4.8 (Default Intervention Options), will videoscope inspection to be available at all ports and at what cost?

**MAFBNZ Response:**

*Videoscopes have been costed by MAFBNZ to be provided at all ports of first arrival that currently have car inspection facilities. There will be a cost for the increased time for videoscope inspection, estimated at approx 3 to 5 min per used vehicle. There will be minimal financial costs associated with this requirement. The savings are substantial when compared to the cost of alternative risk management measures, such as fumigation or heat treatment.*

- g) In relation to Appendix 1 (Contaminant Threshold Levels), the standard now provides for threshold levels. The previous zero tolerance provided certainty whereas the introduced levels will introduce subjectivity without the opportunity to review.

**MAFBNZ Response:**

*The risk analysis has identified what contamination means in terms of negligible and non-negligible risk. Zero tolerance is not practically achievable and therefore could not provide certainty either. Threshold levels define these risks as specific allowances and were seen as the most practical way of making pass/fail decisions. Meeting the requirement of “zero tolerance” in the previous IHS came at considerable cost to importers and was not achievable.*

*It is anticipated that the institution of contaminant threshold levels will reduce the current inspection failure rate even further, reducing decontamination and consequent re-inspection costs, even if the volume of imports significantly increases beyond the current level. It will also mean greater consistency can be expected for inspector decision-making through defining specific levels of risk allowance that are achievable.*

## **8. Justin Downs for Japan Biosecurity Operators (JBO)**

- a) JBO suggests that a process flow diagram is developed to illustrate in a simplistic manner the steps associated with the import pathway.

### **MAFBNZ Response:**

*MAFBNZ will be continually reviewing the guidance document and adding information that will assist in understanding the import pathway. A process flow diagram is a good suggestion and will be considered.*

- b) JBO seeks clarification that the term biosecurity risk organisms is synonymous with the term biosecurity contaminants as the terms are interchanged.

### **MAFBNZ Response:**

*Based on the definition of “Risk Good” as it defined in the Biosecurity Act, MAFBNZ considers that a biosecurity contaminant is a substance/thing that is not naturally associated with vehicles/machinery. Biosecurity risk organisms are live organisms that either are, or associated with, biosecurity contaminants.*

- c) JBO recommends that the term “Operators” be included and defined in the document to clearly identify and delineate roles and responsibilities from that of an Importer.

### **MAFBNZ Response:**

*The term “Operator” is defined to mean “The person or organisation, approved by the Director-General, who has overall responsibility for a facility, under section 40 of the Biosecurity Act 1993.” As such, it is not appropriate that the term be used as suggested. However, MAFBNZ will be continually reviewing the guidance document to clearly identify and delineate roles and responsibilities to assist stakeholders in understanding the import pathway and implement the requirements of the IHS.*

- d) JBO acknowledges that supporting operational documents are being developed to describe in more detail how processes are intended to work, but suggests that the established working group contribute to this process to identify the key steps, “what if” instances, non-compliance actions and time frames for implementation.

### **MAFBNZ Response:**

*MAFBNZ agrees that the established working group contribute to this process to help identify the key steps, “what if” instances, non-compliance actions and time frames for implementation.*

- e) JBO agrees with the biosecurity outcome sought in section 6 and associated actions in section 12.2, but questions the practicality and legality of the biosecurity directions.

**MAFBNZ Response:**

*The biosecurity outcome in section 6 has been incorporated into section 3 and section 4.9.3 of the guidance document instead of the IHS. MAFBNZ has determined that the associated actions in section 12.2 (now section 4.8) are both practicable and legal.*

- f) JBO suggests that specific measures need to be prescribed to mitigate the risks associated with inner cargo, and in particular used tyres and vehicle/machinery parts (ref section 7).

**MAFBNZ Response:**

*Agreed, “Used tyres (not on rims or partially deflated) carried as cargo must not be imported in or on a vehicle, including boot spaces”. This information is found in section 4.5 guidance document.*

- g) JBO requests the inclusion of more specific details for the treatment of consignments of used tyres (ref section 10).

**MAFBNZ Response:**

*The treatment of consignments of used tyres is as per the treatment standard and section 4.7.1 of the guidance document. MAFBNZ will consider including more specific details in the Guidance document at a later date.*

- h) JBO suggests, albeit as **AN OPTIONAL** measure, that recognised quality inspection and/or management system accreditation be included as one of the factors for Assessment and Auditing (ref Appendix 2).

**MAFBNZ Response:**

*Agreed, MAFBNZ is considering such measures as a factor for Assessment and Auditing.*

# Appendix 1 - Submissions

## 1. John Nicholls (consultant to the IMVDA)

As original Chairman of the IMVDA, and still acting as a consultant to the IMVDA, I have a particular interest in the draft standard. It is a huge improvement on the original standards that I was involved with some years back now. (Regards to Ken Glassey)

On a quick first read, I am very impressed with the approach and general clarity of layout and wording.

One initial query relates to the NOTE in section 10:

Used tyres must not be imported in the boot or interior of a vehicle.

I note the words in brackets - (deflated or not on rims) - however does this not catch the vehicle's spare wheel if (as often is the case) which has become deflated in storage over a period ?

I have noted section 11 which includes "Used tyres (section 10)"

If the wording catches the spare wheel - then I query " ... must not be imported in the boot or interior ...". I do not think there is any intention to prohibit the import of the normal spare wheel in the usual positioning in or on a vehicle.

In regard to "on a vehicle" I am thinking of the outside positioning on the rear door, or on the tyre carrier (chassis side or rear x-member) of a truck or bus.

All rather pedantic, but better to ask the question.

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**MOTOR TRADE ASSOCIATION**

**Submission to**

**MAF Biosecurity New Zealand**

**On**

**Import Health Standard**

**Imported Vehicles and Machinery**

Motor Trade Association Inc  
PO Box 9244  
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Date 19 June 2009

**Motor Trade Association (Inc.)**

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19 June 2009

Barbara Wickenden  
Operations Team  
MAF Biosecurity New Zealand  
PO Box 2526  
WELLINGTON 6011

Dear Barbara,

**Submission:** Import Health Standard – Imported Vehicles and Machinery

This submission is from:

Motor Trade Association  
PO Box 9244  
Marion Square  
Wellington 6141

The contact person in respect of this submission is:

Name: Tony Everett  
Title: Project Manager  
Ph: (04) 381 8827  
Fax: (04) 385 9517  
Email: [tony.everett@mta.org.nz](mailto:tony.everett@mta.org.nz)

Thank you for the opportunity for MTA to provide comment on the: Import Health Standard – Imported Vehicles and Machinery.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tony Everett', written in a cursive style.

Tony Everett for:

Dougal Morrison  
**Advocacy and Training Manager**

## **MAF Import Health Standard for Imported Vehicles And Machinery – June 2009**

### **Introduction**

The Motor Trade Association (Inc) (MTA), takes this opportunity to comment on the draft Import Health Standard for Imported Vehicles and Machinery.

MTA represents approximately 4100 businesses within the automotive industry and allied services. Members of our association operate businesses ranging from heavy and light automotive repairers, vehicle importers and distributors, vehicle sales, vehicle entry and in service inspection services, transport services including rental cars, vehicle recovery, vehicle ferrying services, agricultural equipment suppliers and service stations. In turn, our members employ in excess of 45,000 staff who are road and vehicle users in their occupations and private lives.

As a member of the Imported Vehicle and Machinery Advisory Group, MTA has been involved with MAF Biosecurity New Zealand in previous discussions regarding the development of the Import Health Standard. We also acknowledge that the current economic climate may well have a bearing on the current priority of the Imported Vehicle and Machinery pathway.

### **Submission Response**

MTA endorses the proposed Import Health Standard in particular the incorporation of the current standards outlined below into one overarching standard:

- MAF Standard BMG-STD-VEHIL: Import Health Standard for Used Buses, Cars, Motor Cycles, Trucks, Utility Vehicles and Vans from Any Country (11 September 2001)
- MAF Standard 152-07-04i: Import Health Standard for Forestry and Agricultural Equipment from Any Country (18 March 1998)
- MAF Biosecurity Standard BMG-STD-TYRES: Import Health Standard for Used Tyres from Any Country (20 April 2002)
- MAF Biosecurity Authority Standard BMG-STD-HTVEH: Import Health Standard for Treated Used Vehicles Imported into New Zealand (September 2003)

MTA also supports the strengthening of Biosecurity requirements for the Used Motor Vehicle Tyre pathway, as this fits with the MTA position that used tyres should be discouraged from being imported into New Zealand.

### **Questions**

There are two clauses in this proposed standard that MTA require clarification on to ensure member understanding of the new standard:

#### **Chapter 10 – Used Tyres**

The requirement that used tyres (deflated or not on rims) must be treated prior to receiving biosecurity clearance is supported by MTA. However, we seek clarification on the note stating:

*'Used tyres must not be imported in the boot or interior of a vehicle'*

There is confusion based on your classification regarding the importation of loose used tyres on rims, for example spare tyres. Are these or, bulk tyres on rims, required to be treated prior to receiving biosecurity clearance?

#### **Chapter 11 – Vehicles/Machinery Subject to Mandatory Decontamination**

The requirement for mandatory decontamination of the used vehicle parts and used machinery parts is confusing based on the wording of the below statement:

*'Used vehicle/machinery parts, including vehicles/machinery imported for dismantling'*

MTA requests that this be separated into two distinct statements, targeting used vehicle parts in one statement and used machinery parts in another statement.

The wording of the current statement does not adequately specify that this relates only to parts from used vehicles or machinery.

MTA also requests that the Note, shown below, be amended from the following:

**“MAF should be consulted prior to import, on whether vehicles/machinery is likely to fall into the above category will require mandatory decontamination”**

To read as either of the two following statements:

*‘MAFBNZ must be consulted prior to import, on whether vehicles/machinery likely to fall into the above category will require mandatory decontamination’*

**or**

*‘MAFBNZ should be consulted prior to import, if the importer is in doubt about whether vehicles/machinery likely to fall into the above category will require mandatory decontamination’*

MTA considers that this provides more clarity on when importers should liaise with MAFBNZ.

### **Summary**

It is the MTA position that this proposed import health standard is acceptable, subject to our requested questions and concerns being clarified prior to implementation.

MTA supports biosecurity risks being managed effectively, specifically the endorsement of the continued push for offshore biosecurity interventions. The caveat to this endorsement is that the compliance costs involved do not increase significantly in comparison to onshore Biosecurity interventions in New Zealand.

MTA appreciates the opportunity to comment on the proposed Import Health Standard and look forward to seeing a clear and comprehensive standard put in place that MTA members and the wider automotive industry can follow and adhere to.

### 3. Perry Kerr (for the MIA)

Good morning,

This response is on behalf of members of the Motor Industry Association who as detailed in the draft document represents the importers of new motor cycles, passenger cars, light and heavy commercial vehicles. A listing of the marques covered by Association members can be found on our website. (see below)

Overall we are comfortable with the proposals put forward as they relate to vehicles of our interest. The Standard calls for importers of new vehicles and machinery to supply information on the distribution/import chain including such aspects as estimated storage times and so on. It should be noted that as far as we can ascertain a documented process plan as proposed is not required for any other market. As a result several members have asked for the MIA and MAF to work together to prepare a template for their use. We have raised this matter with Mike Tana and he has advised that the new vehicle industry will have to 12 months, from the date of implementation, to comply with this requirement.

With regard to used vehicles, including motor cycles, we note the proposed requirements and endorse these. We would also add that with the declining numbers that it is an opportune time to implement new and improved practices. We would also add that we believe it is important that used motor cycles are captured by the revised procedures.

We would be happy to provide any other information that MAF requires.

Regards

Perry Kerr  
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Motor Industry Association  
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Visit our website: [www.mia.org.nz](http://www.mia.org.nz)

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4. Glen Mackie for NZ Forest Owners Association



Submission by  
NZ Forest Owners Association

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- to -

MAF Biosecurity New Zealand

June 2009

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# CONTENTS

Introduction .....3

Summary 3

Specifics 4.....

Conclusion 6

## Introduction

*The New Zealand Forest Owners Association (FOA) is an NGO that represents the majority of forest owners in New Zealand. Its members' forests comprise more than 75 per cent of the country's 1.8 million hectares of plantation forestry. The Association adds value to the businesses of its members by undertaking activities, which could not be handled easily or efficiently by individual growers working alone. Its credibility also relies on the fact it has the support of the majority of New Zealand's production forest owners.*

*The FOA is very interested in protecting the health of the country's forests and natural resources, and it is also interested in promoting principles of free trade.*

*We have reviewed the documents: Import Health Standard for Sea Containers (SEACO), and Import Health Standard for Imported Vehicles and Machinery (VEHICLE-ALL) and our comments follow:*

*We also referred to the Sea Container Segment Strategy and, while outside of the scope of the main IHS consultation exercise, have made some comments relevant to that document.*

## Summary

*The two IHS documents lack detail, and refer to a number of other standards, which makes it very difficult to comment. The reference documents provide greater detail but don't fully explain how the IHS are to be implemented or what changes have been made to previous IHS documents. Therefore, additional information was sought from MAF/BNZ and this submission refers to that information as well as to the Segment Strategy.*

*For the VEHICLE-ALL IHS we strongly support the move to inspect new vehicles as well as used ones, particularly those originating from high-risk countries/ports.*

## Specifics

*Para 11.3 on “Wood packaging and packaging material” – This refers to wood packing as well, although one has to refer to the reference document for clarity of definition. We are pleased to see the standard stipulate that even wood that has an ISPM15 stamp but has subsequently been contaminated needs to be treated and encourage MAF to be vigilant in ensuring this requirement is met during container inspections. Evidence suggests that this hasn't necessarily been the case in the past and fungal infected wood has been devanned in the country.*

*In a question to Megan Brown (MAF/BNZ) – “Which of the Auditor General's recommendations weren't followed up?” The reply received was: “A recent internal audit (June 09) of the OAG recommendations found that only two recommendations were not implemented. Recommendation 5 stated ‘that MAF enter the results of sea container checks by accredited persons in a timely manner’. Our (MAF) response: Staff knowledge and comments within the audit report recognise that the results of sea container checks by APs are not robust enough for identifying trends and for risk profiling purposes. Because of this, stipulating a timeframe for information to be recorded would not add any material value to the process and the time for MAF to monitor when reporting had occurred would be prohibitive.”*

*We suggest that MAF addresses the issue that “the results of sea container checks by APs are not robust enough for identifying trends and for risk profiling purposes”. This highlights a problem in relying on Accredited Persons to do the inspections, an issue that we have always been concerned about.*

*We support the use of “risk profiling” to determine those containers more likely to carry biosecurity contamination, however, we suggest that risk profiling could be improved if APs were required to improve the robustness of sea container checks – as per the preceding point.*

*We are also concerned that risk profiling is confounded by not always knowing the port of origin of a container (as per the Segment Strategy 5.1.1) or the countries a container may have travelled through. This is an additional reason to ensure that AP's are more focused on performing more robust sea container checks and recording the details.*

*We are concerned that the penalties for non-compliance with the SEACON IHS may not be enough of a deterrent to ensure consistent compliance; however, we have no data to support this concern. We also note in the Segment Strategy document, section 10.3.2 “Compliance and enforcement issues” that this section has yet to be written.*

*While the Segment Strategy recognises that sea containers are a “medium to high risk segment, and that their potential to harbour hitchhiker risk organisms is great, this is not reflected in the level of inspection nor in the cost of inspection, versus other imported pathways such as the plant tissue culture route. The relatively low chance of discovery and the relatively low penalty if discovered, vs. the relatively high cost of importing plant germplasm through a tissue culture pathway, provides a low deterrent for importing plant germplasm illegally in say seed in a sea container, vs. legally importing the same germplasm through the much safer (from a biosecurity perspective) plant tissue culture route. This is particularly true for the importation of germplasm not currently in New Zealand that has to comply with the HASNO legislation. We feel that the incentives (or disincentives) are not in place to promote responsible behaviour.*

*Section 6.1 of the Segment Strategy recognises that “soil is the most common external contaminant of sea containers in NZ (14% of load containers and 24% of empty containers)” and that it is considered to be “high risk” because it may contain seeds, insects, nematodes, fungi etc. This section also recognises the potential impact of contaminants from wood packaging (e.g., fungi) through both lost production, but also phytosanitary restrictions imposed by export markets, should these agents establish. This is an extremely important issue for the forest industry. Section 4 of the Segment Strategy makes the point that while soil is a significant contaminant the risk is “difficult to define”. We are concerned that this statement downplays the potential risk from soil contamination and we believe much greater emphasis should be placed on the soil contaminant pathway as an entry point for highly dangerous (especially from a trade perspective) micro-organisms.*

*Appendix 1 of the Segment Strategy is entitled “Stakeholders and Current Roles” – but does not include the forest industry as a stakeholder. Section 5.3 refers to those listed in Appendix 1 as “Relevant stakeholders”, and the forest industry is referred to in section 5.3.3 as a “Stakeholder likely to benefit from risk management in this segment”. It also states in 5.3.3 that while these stakeholders may be “financially impacted by the costs of biosecurity risk mitigation, they do not usually bear the costs associated with incursions of risk organisms or diseases”. There are a number of errors or perhaps misconceptions in this regard as the forest industry is clearly a major stakeholder in the biosecurity risk aspects of sea containers. Furthermore, the forest has and will continue to bear the costs associated with previous incursions, particularly those that have established and are contributing to the annual productivity loss in the forest estate, which is currently in the order of \$200 million/year. While it may be the stakeholders in Appendix 1 that suffer the direct costs of any biosecurity levy for cleaning and inspecting containers etc., this is relatively insignificant compared to the stake that the forest industry has in ensuring that New Zealand has a robust SEACON IHS and that it is properly implemented.*

## Conclusion

*We recognise that MAF/BNZ has made considerable effort in the last few years to improve the implementation of the SEACON standard and we commend MAF for this effort. We also realise that as a direct consequence of this effort the number of new incursions of Lepidoptera, and specifically Painted Apple Moth, have dropped in recent years. Therefore, we encourage MAF to continually improve the SEACON IHS, but even more importantly, we support even greater effort to ensure that the IHS is fully and properly implemented.*

*Thank you for the opportunity to comment on the Standards. We would be very pleased to provide clarification regarding any of the points raised. Contact details are appended.*

PP



For  
David Rhodes  
Chief Executive  
NZ Forest Owners Association Inc

## 5. Phillip Bell for DOC

# Department of Conservation's comments on the draft Import Health Standard for Imported Vehicles and Machinery

Thank you for the opportunity to review this draft IHS for imported vehicles and machinery. DOC's comments are below.

## Points for consideration

### Appendix 1: Containment Threshold Levels

We consider that the requirement for the contaminant 'Plant material/soil not detectable through physical inspection' should be presence permitted\*. This would allow the MAF inspector the chance to order further action to be taken if they consider it necessary, which may be the case depending on the type found and its quantity.

We consider that seeds should not be presence permitted. These biosecurity contaminants could present a significant risk to our native flora, by introducing new weed species to our environment or by harbouring new diseases that could harm our native species. A zero tolerance approach should be taken.

In our opinion, 20 grams of soil allowable per vehicle/unit of machinery is a significant amount. There is a number of soil borne organisms (such as fungi or phytophthora) that could pose a serious risk to our native flora and/or fauna. We consider the threshold should be zero visible soil at all.

## Re-wording suggestions

### Section 7: Documentation

We suggest the following re-wording of this bullet point, for clarity:

*Name of consignor, name of consignee and consignee's full address*

### Section 11: Vehicles/Machinery Subject to Mandatory Decontamination

We suggest the following addition to this sentence, to ensure that all importers are aware that MAFBNZ must approve any different treatment method before its use is accepted.

*...heat treatment or other MAFBNZ approved equivalent means...*

## Other editorial matters

### Section 12.1: Default Intervention Options

Option 2 has an explanatory footnote at the bottom, but it is not included in the section anywhere. We assume it is meant to follow the word '*fumigated*' in the option.

### Section 12.2 Management of Vehicles/Machinery Suspected/Known to be Contaminated On-Arrival in New Zealand

Paragraph 3 has a footnote (after the word '*Management*') but the reference or explanatory note is not included at all. We assume this is merely a typo or oversight.



**INDEPENDENT MOTOR VEHICLE DEALERS  
ASSOCIATION (Inc).**

**Submission to  
Biosecurity New Zealand**

**on the**

**revised draft**

**Import Health Standard**

**For**

**Imported Vehicles and Machinery**

Prepared 16th June 09

## 1. Background:

The Independent Motor Vehicle Dealers Association Incorporated (“IMVDA”) is the trade association that represents the interests of the wider trade involved in importing, preparing, wholesaling and retailing the majority of used vehicles imported from Japan, Singapore and other jurisdictions.

Our members include importers, wholesalers, Japanese auction companies and exporters, shipping companies, inspection agencies, TSDAs, ports companies, compliance shops and service providers to the trade.

We provide legal and technical advice to the trade, and liaise closely with the relevant government departments, including NZTA, Ministry of Transport, Customs, MAF, Biosecurity NZ, Ministry of Consumer Affairs, Commerce Commission, EECA, MfE etc.

## 2. Official Information Act 1982:

The IMVDA has no objection to the release of any part of this submission under the Official Information Act 1992

## 3. Privacy Act 1993:

The IMVDA has no objection to being identified as the submitter when the Ministry is preparing its summary of submissions.

## 4. Contact:

For further contact in relation to this submission:

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## Acknowledgement and thanks

The IMVDA wishes to record our appreciation for having had the opportunity to actively participate in the consultation process for the development of this Import Health Standard, and for this opportunity to comment on this draft.

## General

The IMVDA supports the general principles of the Import Health Standard ie

- It gives clear direction
- Strongly encourages cleaning of vehicles and machinery offshore
- Provides for alternative interventions and treatment

We have concern, however, about the lack of detail on performance measurement, and submit that greater clarity is required on this key issue.

## Specifics

The IMVDA:

- Strongly supports the general principle of point 4, that biosecurity risks be managed offshore as much as possible.
- Recommends clarification and industry agreement on the assessment, development and implementation of Co-management and Equivalent intervention procedures.
- Has concerns about point 6: Importing Contaminated Vehicles/Machinery. Our concerns centre on the possible implications if this clause is implemented in a narrow fashion, so that an importer who brought a vehicle into New Zealand with the honest intention of cleaning it and having it MAF-cleared here could be unduly penalised by having the vehicle declared "Prohibited".
- Prohibition would be an appropriate penalty if the importer "knowingly" imported a contaminated vehicle with the intention of circumventing MAF's biosecurity provisions. There should be provision made when implementing this clause to identify (by declaration?) importers whose genuine intention when importing contaminated vehicles was to take advantage of better interventions available in NZ, and to not penalise them. This is especially relevant for importers of larger vehicles with GVM in excess of 3500kg, who may have few viable intervention options available to them at ports of loading.
- Notes that point 11, bullet point 8 needs no apostrophe in "its".
- Would like clarification of 12.1 Default Intervention Options.

Yours faithfully,



David Vinsen,  
Chief Executive.



## SUBMISSION

**To The New Zealand Ministry of Agriculture and Forestry (MAF)**

**MAF Biosecurity New Zealand (MAFBNZ) Draft Import Health Standard  
VEHICLE-ALL: Imported Vehicles and Machinery**

### Introduction

1. This submission is from the Customs Brokers and Freight Forwarders Federation of New Zealand Inc.  
**President:** Willie van Heusden  
**Executive Director:** Rosemarie Dawson  
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2. The Federation represents those companies and individuals who are involved in the business of border logistics facilitation. Membership representation is diverse, covering all facets of service provision for the facilitation of international trade – both import and export. Our nationally based membership is comprised of 125 business members, who make up 80 per cent of the industry. Included in the Federation’s aims is the following statement: “To liaise, maintain and develop communication within the industry and between various stakeholders to ensure mutually beneficial strategic partnerships result”.

## General Position

CBAFF have identified several issues which could result in MAF impeding trade and causing additional compliance costs which may be incurred by the approval of the proposed standard.

These are addressed below.

### Concern:

#### 1. Introduction

***This standard requires that all vehicles/machinery imported into New Zealand are clean, internally and externally, to ensure that biosecurity risk organisms are not present. MAFBNZ also intends that the biosecurity requirements of this standard do not unnecessarily impede trade.***

***A biosecurity clearance, pursuant to section 26 of the Biosecurity Act 1993, will be issued when vehicles/machinery are clean (meaning the contaminant threshold level requirements are met as per section 2), and meet all other requirements of this import health standard.***

Members believe that MAF's intent to 'not unnecessarily impede trade' will be removed by the additional requirements in relation to new vehicles, machinery and tyres.

#### 9. New Vehicles & New Machinery (including new tyres)

***Recognising that new vehicles/machinery are normally a lower biosecurity risk, MAFBNZ will consider how the biosecurity interventions used in the supply chain mitigate biosecurity contamination. Importers must supply MAFBNZ with information describing how new vehicles/machinery have been stored (including the length of time), transported to the ship and how the risks of biosecurity contamination have been mitigated between manufacture and export.***

***New vehicles/machinery determined to be free of biosecurity risk by an Inspector will be granted biosecurity clearance.***

***New vehicles/machinery contaminated during transit, must be managed as per section 12.2.***

***NOTE: detection of contamination in a supply chain system may result in changes to that supply chain system so that the risk is managed appropriately.***

The standard requires importers to supply MAF with information describing how new vehicles, machinery and tyres have been stored (including length of time), transported to the ship and how risks of bio security contamination have been mitigated between manufacture and export. Members believe this will unnecessarily impede trade. The acceptable information required needs to be specified.

#### 10. Used Tyres

***Used tyres (deflated or not on rims ) must be treated prior to receiving biosecurity clearance.***

***If treatment has been carried out offshore, used tyres must be appropriately secured within an enclosed area (e.g., a sea freight container or an impervious cover, etc) to prevent recontamination prior to shipping.***

***If treatment has not been carried out offshore:***

- ***Sea freight containers of used tyres must be treated within 48 hours of landing in New Zealand in a manner ensuring that any mobile organisms present do not escape during the treatment process. If treatment cannot be carried within 48 hours, the container must be sealed (including vents and any damaged areas***

*permitting insect egress) and treated with a residual insecticide while awaiting treatment.*

- *Uncontainerised used tyres must be appropriately secured within an enclosed area (e.g., a sea freight container, an impervious cover, or a room etc) immediately upon discharge and treated with a residual insecticide. treatment must be carried out within 48 hours of arrival.*

**NOTE: used tyres must not be imported in the boot or interior of a vehicle.**

The term 'landing' must be defined. This could be deemed to be; discharge at first port (even though the consignment may be on a through Bill of Lading to an alternate port) or it could be discharge at the final place of delivery (being a port).

Where a container tranships before reaching its place of delivery where on a through Bill of Lading it is highly likely that more than 48 hours will elapse between tranships. Requirement is then for the container to be sealed and treated with residual insecticide. The practicalities of this will prove costly and be another logistical nightmare. It has the potential to delay tranships enough that they miss forward connections.

#### **11. Vehicles/Machinery Subject to Mandatory Decontamination**

*Every vehicle/unit of machinery in the following categories requires mandatory decontamination, either through fumigation, heat treatment or other approved equivalent means, to remove/inactivate biosecurity contaminants, prior to receiving biosecurity clearance:*

- *Used vehicle/machinery parts, including vehicles/machinery imported for dismantling,*
- *Used vehicles from the United States of America, unless evidence can be provided indicating the vehicles are free of biosecurity contaminants (e.g., recently restored vehicles or cars currently used for racing),*
- *Used agricultural, forestry and horticultural machinery,*
- *Used wire ropes attached to vehicles/machinery,*
- *Used tyres (section 10),*
- *Vehicles/machinery showing evidence of holding pools of water or being partially or fully submerged in water (e.g., presence of water tide marks, biofouling),*
- *New vehicles/machinery that have become contaminated after manufacture, and*
- *Any other vehicle/unit of machinery that, by its very nature, use, source, history or other such factor, has been determined to require treatment (e.g., garbage trucks).*

**NOTE: MAFBNZ should be consulted prior to import, on whether vehicles/machinery likely to fall into the above category will require mandatory decontamination.**

With this provision, it appears that vehicles from the USA are being singled out by legalising a policy decision currently being applied. Members believe the intent is to require mandatory fumigation however the opening paragraph provides several options for this. These options include fumigation, heat treatment or other approved equivalent means, to remove/inactivate biosecurity contaminants. By including choice it negates the current MAF position of mandatory fumigation.

The definition of vehicles now extends to motor cycles, caravans, buses, trucks, forklifts, where previously the policy related to motor cars only.

#### **12.1. Default Intervention Options**

Will videoscope inspection to be available at all ports and at what cost?

### ***Appendix 1: Contaminant Threshold Levels***

The standard now provides for threshold levels. The previous zero tolerance provided certainty whereas the introduced levels will introduce subjectivity without the opportunity to review.

**JAPAN BIOSECURITY OPERATORS**

**SUBMISSION TO MAF BIOSECURITY**

**NEW ZEALAND**

**ON THE DRAFT IMPORT HEALTH STANDARD  
FOR VEHICLES AND MACHINERY**

## 1. Background

Established in August 2008, the Japan Biosecurity Operators (JBO), is an independent advocacy and consultative forum for the offshore Operators and exporters/shippers of used Japanese vehicles to New Zealand. Currently JBO members account for the majority of the pre-shipment inspected vehicles from Japan to New Zealand.

The over-arching objective of the forum is to ensure that Member's interests are represented and considered in the development of biosecurity decisions, policies, systems and arrangements.

Foundation members are the Japan Export Vehicle Inspection Center Co Ltd (JEVIC) and Hoegh Autoliners (NZ) Ltd.

## 2. Official Information Act 1982

If requested under the Official Information Act, the JBO has no objection to the release of any part of this submission.

## 3. Privacy Act

The JBO has no objection to being identified as the submitter when MAF BNZ is preparing its summary of submissions document.

## 4. Contact

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## 5. Submission

Thank you for the opportunity to comment on the draft Import Health Standard for Vehicles and Machinery, dated April 2009.

Notwithstanding prior dialogue and comments to assist in the design of this IHS through participation at various collaborative working groups, the JBO wishes to make the following comments. The first cluster are generic in nature and the second cluster are specific and relate to sections and/or requirements within the IHS.

At a macro level the JBO:

- concurs with the purpose, scope and direction of the IHS;
- commends MAF BNZ on the introduction of an outcome based standard that allows for the utilisation of a range of biosecurity interventions to mitigate risk;
- is a strong advocate of the strategic desire to manage biosecurity risk offshore and ensure that proposed biosecurity requirements do not unnecessarily impede trade. However, the JBO considers that the reduction in compliance costs should also be included as a further objective or guiding principle.
- is cognisant, supportive and well positioned to assume greater responsibility for ensuring enhanced biosecurity outcomes are continually met. Disappointingly though, the operational aspects of this shared risk management framework are not provided in sufficient detail to either guide future investment decisions in equivalent biosecurity treatments or realise early benefits of improved systems and techniques developed by offshore operators. As such, the JBO views the issuance of this IHS as not the culmination of efforts, but rather as another step in a protracted regulatory process.

In a more specific context, the JBO:

- suggests that a process flow diagram is developed to illustrate in a simplistic manner the steps associated with the import pathway;
- seeks clarification that the term biosecurity risk organisms is synonymous with the term biosecurity contaminants as the terms are interchanged throughout the document;

- recommends that the term “Operators” be included and defined in the document to clearly identify and delineate roles and responsibilities from that of an Importer;
- acknowledges that supporting operational documents are being developed to describe in more detail how processes are intended to work, but suggests that the established working group contribute to this process to identify the key steps, “what if” instances, non-compliance actions and time frames for implementation;
- agrees with the biosecurity outcome sought in Section 6 and associated actions in Section 12.2, but questions the practicality and legality of the biosecurity directions;
- suggests that specific measures need to be prescribed to mitigate the risks associated with inner cargo, and in particular used tyres and vehicle/machinery parts (ref Section 7);
- requests the inclusion of more specific details for the treatment of consignments of used tyres (ref Section 10); and
- suggests, albeit as **AN OPTIONAL** measure, that recognised quality inspection and/or management system accreditation be included as one of the factors for Assessment and Auditing (ref Appendix 2).

The JBO, as always, welcomes the opportunity to assist further in the refinement of this IHS and looks forward to the expedient development of the components for the assessment of biosecurity interventions.

Yours sincerely

Justin Downs  
Principal Advisor - JBO