Management Action Plan
In Response to the Independent Review of Importation of Kiwifruit Pollen, Plant Material, Nursery Stock and Horticultural Equipment

Accepted By: Wayne McNee, Director General

Signed: 

Date: 3/7/12

July 2012
## Independent Review of Importation of Kiwifruit Pollen, Plant Material, Fruit, Nursery Stock and Horticultural Equipment.
### Management Action Plan

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| 1              | MPI needs to look at the relative costs/benefits of reprioritising its resources towards managing the risks for economically significant industries. The consequences of not adequately managing a known risk or not responding appropriately to an emerging risk are heightened for New Zealand’s key agricultural and horticultural sectors. There may well be net benefits in re-prioritising MPI resources away from smaller, less strategic industries, in order to ensure the risks to higher-value sectors are appropriately managed. While this may well be a controversial development, it may prove to be a more appropriate means of making the best use of MPI's limited resources. | 1.1 Continue to prioritise work items (to develop or review IHs, emerging pests) and issues (border non-compliances, PEQ, permits) against the following criteria:  
- Strategic fit (MPI 2030 Strategy)  
- Importance (eg risk impact, value of industry)  
- Net benefit (value in conducting the work)  
- Feasibility (likelihood of success)  
- Barriers (conflict, contentiousness etc)  
The work items are continuously re-prioritised as new potential items arise daily.  
1.2 Examine whether or not we should significantly prioritise biosecurity risk management resources away from lower value industries in favour of higher value industries. The Biosecurity Operations Coordination Group to provide oversight for this work. | H | Director Plant, Food & Environment | Completed |
| 2              | MPI needs to renew efforts to centralise the identification and management of emerging risks, which at present are largely left to the individuals with responsibility for managing particular import pathways. It is apparent that the horizontal environment scanning undertaken by MPI's Emerging Risk and Opportunities Committee and by the Risk Analysis Team did not | 2.1 Continue to progress the emerging risk project as initiated through the Science and Risk Advisory Group. This project brings a much wider reach to the now discontinued BNZ Emerging Risk Organism Committee and will provide a system for identifying emerging risks through appropriate networks and stakeholder engagement, screening, communicating | H | Director Science & Risk Assessment | Implementation commencing in Aug 2012 |
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<td>elevate consideration of the risks posed by a virulent strain of Psa. MPI needs to revisit the extent to which these activities are appropriately resources and connected with the teams responsible for managing individual pathways. MPI should consider allocating key domestic industries to senior staff members and tasking them with responsibility for ensuring the risks to that sector are being appropriately managed across all possible pathways. So instead of the risks to the kiwifruit industry having to be identified and individually managed by those responsible for imports of nursery stock, pollen, fresh fruit imports, seeds-for-sowing, and horticultural equipment, there would instead be a single point of contact and responsibility for ensuring a systems-wide approach to identifying and acting on emerging risk for the kiwifruit industry.</td>
<td>potential impacts, and monitoring MPI-wide management of emerging risk over time. 2.2 Accelerate implementation of MPI's stakeholder engagement model with DDG’s, directors and managers being assigned to significant stakeholder groups. Ensure that discussions create opportunity to raise new biosecurity risks of concern to industry with those risks being fed into the new process. 2.3 Establish processes for ITOC and Standards to share relevant tactical and operational intelligence between the groups to achieve more effective emerging risk identification and assessment process.</td>
<td>M</td>
<td>Director Communications &amp; Channels</td>
<td>Completed</td>
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<td>3 MPI needs to improve the transparency of when organic matter is being imported into New Zealand for the first time. Prior to the import of new organic matter MPI should consult stakeholders on the proposed import requirements; or if the import requirements have previously been specified in an existing Import Health Standard, MPI should issue a notification when the first permit has been issued for a particular type of good.</td>
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<td>Manual solution to be completed by Nov 2012. Semi-automated solution by May 2013.</td>
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<td>3.1 Establish a practice that a risk assessment should be conducted, and interested parties consulted, when a request is received to import new germplasm:  • for the first time from anywhere in the world, or,  • for a new use where that use may significantly change the risk profile, and, a risk analysis has not previously been conducted or industry not previously consulted, e.g. during IHS setting process. Supporting tools will also be developed for</td>
<td></td>
<td>H</td>
<td>Director Plant, Food &amp; Environment</td>
<td>Commence Immediately</td>
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### Recommendation 1

Staff implementing the policy. Draft policy will be developed and consulted with stakeholders.

3.2 Review the current import requests that have not been actioned, to determine whether the new process should be applied.

3.3 Publish a register of first time permits for importation of material covered by 3.1 above listing the material, purpose for which it is being imported, and rules being applied to manage the biosecurity risks, but protecting commercially sensitive information such as the name of the importer, volumes etc.

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### Recommendation 4

MPI should take specific steps to ensure that the border processes in place for imports of risk goods remain robust.

Risk goods should only be released from quarantine once the inspection/testing/treatment regime contained within the most recently published Import Health Standard is carried out. The list of regulated pests and testing methods contained within that standard should always supersede any entry conditions that may originally have been in place when the risk goods entered the country.

There are indications that border staff have been unable to detect the difference between closely related risk goods (with ‘anthers’ assumed to be pollen and gold kiwifruit assumed to be green kiwifruit). While

1. Amend the PEQ standard and import permits to require the most up to date testing to be completed prior to any release. For example, if an improved test is identified/developed while material is in PEQ, then the new test, if accepted by MPI must be conducted before plants are released.

2. Accelerate development of a high level MPI risk management process to guide best practice in regard to biosecurity and food safety risk management.

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<td>H</td>
<td>Director Science &amp; Risk Assessment / Science &amp; Risk Advisory Group Chair, and Director Assurance</td>
<td>Work has commenced. To be completed Aug 2012</td>
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| responsibility must also lie with the importers, MPI needs to ensure there is sufficient rigour applied to making sure imported goods are assessed against the relevant Import Health Standard and that border staff have access to appropriate resources and expertise to allow for effective verification of the goods to take place. | 4.3 All risk profilers and assessors have been reminded of the requirement to check documentation against the import requirements.  
4.4 Further enhancements to support accessing information will be included as part of the introduction of the JBMS risk and intelligence tools. | H | Evaluation  
Director Operational programmes | Completed |
| | 5 | H | Director BCP/JBMS | To be completed Oct 2013 |
| MPI needs to improve its connectedness with industry and research organisations. MPI staff responsible for setting import requirements need a level of awareness of what external research projects are being undertaken that might have implications for New Zealand’s biosecurity settings. In the first instance there would be value in regular information exchanges between the MPI Risk Analysis Team and Plant & Food Research to identify all research that is being undertaken and is in the pipeline that may have implications for import requirements. Establishing a more constructive relationship between the two organisations would also assist Plant & Food Research to recognise MPI’s priorities and areas where further research would be valuable. The successful identification of emerging risks is assisted by having effective working relationships with key industry contacts. Both MPI and industry groups need to reflect on whether more can be done to ensure that those staff that are making decisions about the risk profile of an industry are fully informed of the views of the industry on pests of concern. | 5.1 GIA will provide an opportunity for MPI and industry to establish shared awareness of pests of concern and develop whole of system view of biosecurity risks. MOU are now being signed enabling industry groups and MPI to develop value propositions. These will help industries determine whether to sign a GIA agreement for joint decision-making and cost sharing in biosecurity preparedness and response.  
5.2 Continue to resource MPI forums to improve our connectedness to industry and increase industry input into managing risks associated with imports: Animal Trade Advisory Council (ATAC) established 2009, Plants Germplasm Advisory Committee (GERMAC) established 2010, Fresh Produce Advisory Committee (FRESHPAC) established 2011. | H | Director Preparedness & Partnerships | MOU being sign by industry groups from 1 July 2012. Cabinet report back on final Deed by June 2013 |
| | 5 | H | Director Plant, Food & Environment and Director Animal & Animal Products | Completed |
### Recommendation 6

**MPI should consider establishing a research fund that can be used to commission any targeted research needed to better understand a specific area of biosecurity uncertainty.**

This review highlighted MPI’s dependence on timely access to research being undertaken by external organisations – in this case it was undertaken by Plant & Food Research, but one can expect that industry groups will also often take the lead in researching biosecurity risks. In the case of emerging risks, there may well be instances where MPI would benefit from prompt and targeted research to ensure its standards remain appropriate. Consideration should be given to ability of MPI to commission research to address areas of biosecurity uncertainty in cases where no other organisation has taken the lead.

**Management Action Plan**

- **5.3 Include CRIs, B3 and ACERA (Australia) as priority science stakeholders in the emerging risks system with formalised reporting by key contact points at six monthly intervals.**
  - **Priority (H/M/L):** H
  - **Responsibility:** Director Science & Risk Assessment
  - **Milestones or Due Date:** Initiate this in Aug 2012

- **6.1 Transition the biosecurity operational research fund ($1.5m) and the food safety operational research fund ($2.6m) into a single programme that incorporates the rapid response characteristics of the food safety fund i.e. discretionary application of a significant proportion of funds to newly emerging issues and data gaps.**
  - **Priority (H/M/L):** H
  - **Responsibility:** Director Science & Risk Assessment
  - **Milestones or Due Date:** Already started. To be completed Oct 2012