



**Assurance and Evaluation**  
**Office of the Director-General**

**EXECUTIVE REPORT**

**REVIEW OF STRAWBERRY SEEDS CLEARANCE  
AND RESPONSE**

**FEBRUARY 2012**

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## Section 1: Background

<p><b>Background and context</b></p>	<ul style="list-style-type: none"> <li>• MAF Investigation and Diagnostic Centre (IDC) received notification from a Christchurch based Biosecurity Inspector on 7 November 2011 that she had noticed goods for sale at The Warehouse (Hornby, Christchurch) which she was concerned may present a biosecurity risk.</li> <li>• The goods for sale were strawberry mini grow kits (the kits) which comprised a small package of strawberry seeds, a clay pot and compressed potting mix made from coir. These were imported by Tui Products Ltd.</li> <li>• On 10 November MAF issued The Warehouse with a direction requiring withdrawal of all unsold stock of the strawberry mini grow kits. Of the kits originally imported, around 80% were withdrawn before sale and are being held by MAF. A recall of the strawberry mini grow kits already sold was announced on Friday 18 November.</li> <li>• The Director General requested that a review of the importation of these kits and their recall be undertaken.</li> </ul>
<p><b>Our purpose and objective</b></p>	<ul style="list-style-type: none"> <li>• The purpose of this work was to review the course of events, the processes and decisions relating to the biosecurity processing of and the response to the consignment containing the "Buzzy – Strawberry Mini Grow Kits" (the kits).</li> <li>• The three key objectives were:             <ul style="list-style-type: none"> <li>○ to identify any learning opportunities from this experience,</li> <li>○ recommend any improvements, where appropriate to mitigate areas of risk,</li> <li>○ consider any ways the Joint Border Management System may address these recommendations</li> </ul> </li> </ul>
<p><b>What we did</b></p>	<ul style="list-style-type: none"> <li>• We reviewed the biosecurity process and decision making by which the kits were imported and given biosecurity clearance.</li> <li>• We looked at how the content of the import health standard was applied in this case.</li> <li>• We looked at the risk assessment and analysis processes that led to the decision to recall the kits and the decision not to test the kits or the seeds before initiating the recall.</li> <li>• We also looked at the way that information was sourced and communicated during the initial stages of the response.</li> </ul>
<p><b>How we did it</b></p>	<ul style="list-style-type: none"> <li>• We reviewed key reference material including:             <ul style="list-style-type: none"> <li>○ Biosecurity Act 1993</li> <li>○ Import Health Standard 155.02.05 Importation of Seed for Sowing</li> <li>○ Import Health Standard for Importation of Fertilisers and Growing Media of Plant Origin</li> <li>○ Import Health Standard for the Importation of Coco Peat and Coir Fibre Products</li> <li>○ Biosecurity Risk Analysis Procedures</li> <li>○ Biosecurity New Zealand Policy for MAF's Responses to Risk Organisms</li> <li>○ Biosecurity Response System Knowledge Base</li> </ul> </li> </ul>

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	<ul style="list-style-type: none"> <li>○ Border Systems Manual</li> <li>○ Border Clearance Procedures (Risk Screening and Physical inspection of goods and craft)</li> <li>○ Post –Entry Quarantine Testing Manual (Fragaria)</li> <li>○ International Standards for Phytosanitary Measures (ISPMs)</li> <li>● We reviewed various systems and paper records relating to the import and the recall including the:             <ul style="list-style-type: none"> <li>○ eBACCA and QuanCargo system records</li> <li>○ Clearance documentation</li> <li>○ Rapid assessment report</li> <li>○ Response brief</li> <li>○ Technical advice on seeds transmitted viruses</li> <li>○ Communications plan</li> </ul> </li> <li>● We also reviewed various reports and briefings that had been commissioned as a result of the recall.</li> <li>● We reviewed email correspondence relating to the permit for import of compressed coir tablets.</li> <li>● We spoke to a range of people across various MAF branches with responsibility for different elements of the biosecurity process including: Border Clearance Services, Plant and Plant Products Imports, Plant Risk Analysis Group, Biosecurity and Food Response.</li> <li>● We spoke to representatives of Tui Products Limited to understand their processes for importing these goods.</li> <li>● We spoke to the customs agent at Toll Networks NZ to understand the processing of this consignment.</li> </ul>
<p><b>Thankyou</b></p>	<p>We have appreciated the way in which all those involved in this review have contributed information, clarified facts and provided constructive ideas to achieve the objectives of this review.</p>

## Section 2: Findings

2.1 CONTEXT	
<p><b>Import of Seed for Sowing</b></p>	<p><b>The Requirements of the Import Health Standards</b></p> <ul style="list-style-type: none"> <li>• Seeds within a 'grow kit' must meet the Import Health Standard 155.02.05 – Importation of Seed for Sowing. In addition, if they contain an organic growing media, they must meet the import requirements for the growing media which are set out in the Import Health Standard BNZ-FERTGRO-IMPRT – Importation of Fertilisers and Growing Media of Plant Origin, or the Import Health Standard BNZ-COFP-IMPRT – Importation of Coco Peat and Coir Fibre Products.</li> <li>• The strawberry seed grow kits contained coco peat tablets as the growing media. An import permit and a phytosanitary certificate were required for the coco peat tablets.</li> <li>• Only species of seed listed and approved in the MAF Plants Biosecurity Index (PBI) are eligible for importation to New Zealand. This index is available on the MAF Biosecurity website.</li> <li>• The PBI entry for <i>Fragaria vesca</i> (strawberry) refers the reader to the Import Health Standard '155.02.05 under Fragaria'. This Import Health Standard is the Importation of Seed for Sowing standard and this is also available on the MAF Biosecurity website.</li> <li>• The Import Health Standard 155.02.05 Importation of Seed for Sowing states the basic conditions that all seed consignments must meet (section 2.2.2) AND the special conditions that <i>Fragaria</i> seeds must meet (section 3). The basic conditions cover, for example, cleanliness, packaging, labelling and certification.</li> <li>• The <i>Fragaria</i> schedule of special conditions specifies that a permit to import is required. A phytosanitary certificate issued by the National Plant Protection Organisation (NPPO) in the exporting country must accompany each consignment.</li> <li>• Before any phytosanitary certificate is issued, the NPPO of the exporting country must be satisfied that the phytosanitary import requirements are met. For both coco peat tablets and strawberries the import requirements included a valid import permit. The NPPO in The Netherlands should have sighted these permits before issuing phytosanitary certificates.</li> <li>• Upon arrival in New Zealand all <i>Fragaria</i> seed must enter a MAF-accredited Level 3 post entry quarantine facility for a minimum period of 6 months, undergo inspections during the growing season and testing for regulated pests.</li> </ul> <p><b>The Importer</b></p> <ul style="list-style-type: none"> <li>• Tui Products Ltd (Tui), the importer of the strawberry mini grow kits, is a supplier of gardening products throughout New Zealand. Products include tools, general garden equipment, growing media, fertilisers, seeds, pesticides and herbicides.</li> <li>• Tui sources products in New Zealand if possible, but also imports goods. Most of the imports are classified by Tui as "dry goods" consisting of general garden equipment and accessories. Seeds for sowing are also imported from time to time.</li> <li>• Tui also has a large operation based in Palmerston North that imports viable seed for aviary bird food. This seed is devitalised by heat treatment at a MAF approved transitional facility in Palmerston North and then packed for resale.</li> </ul>

2.2 KEY FINDINGS

Key Findings of this Review

The key findings from this review are:

**The Importing and Clearance Process**

- Tui Products Ltd imported their first consignment of 'grow kits' in 2010. The seeds in that first consignment have not been considered as part of this review. However, an import permit for coco peat tablets was obtained during the preparation for that first consignment of 'grow kits' and that import permit is relevant to the second consignment of 'grow kits'. The second consignment of 'grow kits' and specifically the strawberry seeds within that consignment are the subject of this review.
- The Importers, Tui Products Ltd, did not check the Plant Biosecurity Index and Import Health Standard before committing to import the strawberry mini grow kits. Had the importer made this check they would have realised that the strawberry mini grow kits were not a suitable product for import and sale in New Zealand as the imported strawberry seeds would have to be grown to plants in quarantine for 6 months and the plants tested before being released. They did not apply for an import permit for the strawberry seeds as they did not realise this was a requirement.
- During preparations for the first consignment of 'grow kits' the Dutch supplier advised the importer, Tui Products Ltd, that the companies in The Netherlands who provide heat treatment do not heat products to the temperature specified in the country of origin treatment options for coco peat tablets in the Importation of Coco Peat and Coir Fibre Products standard. The Dutch supplier flagged to Tui Products Ltd that this would mean that there would be difficulty in obtaining a phytosanitary certificate for coco peat tablets in the first consignment of grow kits.
- The importer contacted the MAF Plant and Plant Products Import team who advised that they could offer inspection on arrival, as an equivalent measure to the requirements of the Importation of Coco Peat and Coir Fibre Products standard. Tui were directed to the permit application form if they wanted to proceed.
- The Plant and Plant Products Import team subsequently issued an import permit for Tui Products Ltd for the compressed coir tablets, as required by the standard. In that permit, under the special conditions section a condition "*considered equivalent*" to the Coco Peat standard was included. This special condition provided for destructive visual inspection for weed seeds on arrival in New Zealand. This test replaced the requirement for the coco peat tablets to meet any of the five "*Options for Entry Conditions*" stated in the Importation of Coco Peat and Coir Fibre Products standard. These options for entry conditions include some options applicable in the country of origin and some options applicable in New Zealand. The special condition test stated on the import permit for the coco peat tablets was a test to be conducted on arrival in New Zealand rather than prior to NPPO certification in The Netherlands.
- The use of equivalent measures in import permits is a complex matter and this review has not fully considered their use in this import permit.
- The import permit for the compressed coco peat also contained comments based on the information provided to MAF about the content of the first consignment, using information provided by the importer at the time the import permit was requested. These comments stated "*Compressed coir tablets novelty item containing coco peat (coir) to be used as a*

### 2.2 KEY FINDINGS

*growing medium. This novelty item also contains seeds that do not require a permit as they are listed as 'Basic' on the PBI".*

- The import permit for the compressed coir tablets was valid for one year and could be used for any consignment of goods containing compressed coir tablets during that time.
- Several months after the first consignment, Tui Products Ltd imported a further consignment including mini grow kits. We refer to this as the second consignment.
- For this second consignment, containing the strawberry mini grow kits, the import permit for the compressed coir tablets was presented and a phytosanitary certificate for pressed coco tablets was also issued by the NPPO. This certificate stated that the consignment of coco tablets had been tested using a "grow out test". This was in line with one of the five options for entry detailed in the Importation of Coco Peat and Coir Fibre Products standard. The equivalent test (destructive visual inspection on arrival in New Zealand) stated on the import permit for the compressed coco peat was therefore not necessary for this second consignment. However, this destructive visual test was later conducted by the biosecurity inspector on the instruction of the risk profiler.
- The NPPO should check that consignments satisfy New Zealand phytosanitary import requirements before issuing a phytosanitary certificate for any goods within a consignment. The import requirements for seeds are stated in the Import Health Standard 155.02.05 Importation of Seed for Sowing. However, the NPPO in The Netherlands issued a phytosanitary certificate for 12 types of seeds within this second consignment, including *Fragaria vesca* seeds, without sighting an import permit for the *Fragaria vesca* seeds. An import permit is clearly specified in the Import Health Standard as a requirement when importing *Fragaria vesca* seeds to New Zealand.
- For the second consignment, the presentation of the import permit for the compressed coir tablets and the comments on the permit "*contains seeds that do not require a permit as they are listed as 'Basic' on the PBI*", may have led to assumptions both in The Netherlands and in New Zealand during biosecurity clearance processes. The second consignment contained strawberry seeds in mini grow kits. Strawberry seeds are not "Basic" seeds and they require more than the basic conditions for entry to be satisfied before clearance into New Zealand.
- The MAF risk profiler accepts that he did not thoroughly review all 11 pages of scanned images attached to the eBACCA record for this second consignment. He formed a view on the level of scrutiny this consignment required based on the first few pages of the scanned images, which included the import permit for the compressed coir tablets, the comments on the permit referring to basic seeds and the special conditions on the permit directing "*2 coco peat tablets from each carton are to be (destructively) visually inspected for weed seeds*".
- He assumed that any seeds in the consignment were basic, that the seeds were within the coco peat tablet and that the risk of the consignment had been considered by the Plant and Plant Products Imports team when the import permit for the compressed coir tablets had been issued and when the visual destruction test had been determined as an equivalent test for the coco peat tablets.
- These assumptions may have caused the risk profiler to process this consignment without reference to all the accompanying scanned document images. The risk profiler doesn't recall viewing the second phytosanitary certificate attached to eBACCA which listed

### 2.2 KEY FINDINGS

strawberry seeds within the consignment (pages 9 and 10 of the 11 pages of scanned images). Of all the pages of scanned images attached to the eBACCA record for this consignment, the phytosanitary certificate for the seeds is the only clear reference to the seeds contained in this consignment. Product names on the supplier invoice do not make their contents clear and the selected tariff codes for ceramic and terracotta pots are similarly unhelpful in flagging the specific contents of the second consignment.

- However, the risk profiler has confirmed that had he seen this reference to strawberry seeds in the phytosanitary certificate that in itself would not have triggered a different course of action as he assumed the Plant and Plant Products Import team had risk assessed the consignment when they issued the import permit for the coco peat tablets.
- The risk profiler directed that an inspector carry out the (destructive) testing as specified on the import permit for the coco peat tablets.
- The inspector received instructions and copies of scanned images relating to the inspection of coco peat tablets only. As the existence of non basic seeds (strawberry seeds ) in this consignment had not been recognised by the risk profiler, no instructions were given to the inspector with regard to the strawberry seeds.
- Inspectors are not expected to know the specific content of the PBI and Import Health Standards but they are expected to have a general awareness of these and to alert their Team Leader at the Auckland Biosecurity Centre if they find anything unusual or unexpected when conducting inspections as specified on the Biosecurity Authority Clearance Certificate (BACC).
- The inspector does not recall seeing any seeds (weed or otherwise) during the destructive testing of the coco peat tablets and did not find anything unusual or unexpected during the inspection.
- The inspector has confirmed that even if she had seen strawberry seeds she would not have taken a different course of action as she would have placed reliance on the biosecurity risk profiling, earlier in the process, which led to the directions on the BACC to destructively test the coco peat tablets.

#### The Import Health Standard

- The Plants Biosecurity Index (PBI) and the Import Health Standard 155.02.05 Importation of Seed for Sowing are accessible via the MAF Biosecurity web site.
- There is a search facility for the PBI and searches for "*Fragaria*" do refer the reader to the Import Health Standard 155.02.05. The Import Health Standard is very clear in its statement of conditions, both basic for all seeds and special for *Fragaria*.
- Had the importer or the supplier referred to and understood (using these two reference tools) the import eligibility requirements for all the seeds in the second consignment then they would have realised that the strawberry mini grow kits could not reach the NZ retailer in that kit form as the seeds would have to be grown in post entry quarantine for six months. The product at the end of the post entry quarantine period would no longer be a mini grow kit (seeds, coir tablet and a terracotta pot) but a strawberry plant growing in a coir tablet inside a terracotta pot.
- Had the NPPO in The Netherlands checked the import requirements for all the seeds they

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identified within the second consignment (and which they listed on the phytosanitary certificate) then they would have recognised that strawberry seeds have special conditions for import and require an import permit which they should have checked before issuing the phytosanitary certificate. We have not interviewed the NPPO in The Netherlands to determine the source of their error but we understand this will be discussed with them by the Plant and Plant Products Import team

- Had the risk profiler checked all the documentation for the second consignment, identified the list of seeds on the phytosanitary certificate and followed standard practice in checking the seeds listed against the PBI and Import Health Standard, they would have recognised that the strawberry seeds did not have the required import permit and that they required post entry quarantine.
- In summary, the reference to “basic” seeds on the import permit and the failure to check all documentation at the risk profiling stage were the main contributors to the erroneous border clearance of the strawberry mini grow kits.
- However, the importer, the supplier and the NPPO in The Netherlands also contributed to this error by not checking import requirements for strawberry seeds.
- The Seed for Sowing IHS has subsequently been amended (5 December 2011) to include a new section, 2.2.7 ‘Seed Products’, which more clearly states the import requirements for seed products such as grow kits. This section states that the requirements for these products must meet the individual import requirements for each type of seed as specified within this Import Health Standard. For seed products that also contain organic growing media (for example coir fibre/ coco peat, processed plant products), these must also meet the requirements specified in the relevant Import Health Standard.

#### The response process

- The initial investigation and response processes for this response operated in line with the expectations set out in the Policy for MAF’s Responses to Risk Organisms. The level 4, 5 and 6 staff across MAF involved in the response worked well together and understood their roles and responsibilities.
- Level 2 and 3 staff were informed (at different times) but were not the decision makers in the response initially. This is consistent with the Policy for MAF’s Responses to Risk Organisms which positions decision making with those who have the technical knowledge.
- The Response Strategic Leadership (RSL) team established for this response was chaired by a level 4 manager and a level 6 Adviser was appointed as the response manager. The chair of the RSL has responsibility for decisions relating to the response and takes advice and recommendations from various sources before taking those decisions.
- The instruction to direct The Warehouse to remove from sale and transfer to transitional facilities the unsold strawberry mini grow kits was issued by an appropriately appointed inspector under the Biosecurity Act 1993.
- In the early stages of the response, the response manager prepared a response prioritisation assessment using a MAF developed prioritisation matrix. This prioritisation matrix prompts consideration of the importance of the risk organism, the complexity of the

### 2.2 KEY FINDINGS

response and the barriers to success. The response prioritisation assessment helps determine the category for response. In this case the category was determined to be category 2, medium priority for response. This response prioritisation matrix and assessment was discussed at the RSL and is a tool familiar to those involved in biosecurity responses.

- The processes for the identification, analysis (or assessment) and evaluation of risks related to the strawberry seeds were clear to those involved in the response but unfamiliar to those at senior management levels who needed to understand. The language used, the risk rating terminology and the criteria for rating the risk were not clearly articulated in any of the paperwork for this response and relied on knowledge of documents not circulated or made visible to the broader audience during this response. As a result the basis of the term “relatively low but not negligible” was not confidently and consistently understood outside the RSL.
- This, together with some imprecise use of risk terminology, not clearly specifying whether likelihood, impact or overall risk was being expressed, did lead to some confusion at senior management level about the particular risk resulting from the sale of strawberry seeds to the public and the size of that risk. However, lack of clarity and understanding outside the RSL in terms of “risk” did not impact the handling of the response by the RSL.
- Those involved in the response have remained consistent in their view of the risk and are comfortable that the term “relatively low but not negligible” remains valid and was sufficient to inform their decision making during this response.
- There is a common consensus of senior management, response staff and technical advisers that the decision to recall the seeds was the appropriate decision and executed in a timely and appropriate manner.
- However, the feasibility, purpose and value of testing the recalled seeds or growing the seeds and testing the plants were not commonly understood by senior managers, response staff and technical advisers. This needs to be considered against the backdrop of an unclear or at least not commonly understood framework and criteria for risk identification, analysis and evaluation. Without that common understanding, and in the absence of a forum to bring together senior managers, technical experts and response managers, the decision making process for this testing has been protracted and the authority for this decision making has been at times unclear.
- A testing protocol has been developed by IDC and reviewed by the RSL. A sample of 3,200 of the recalled strawberry seeds were planted at MAF’s Plant Health and Environment Laboratory in Auckland on 14 December and will be grown for 3 months. Tests will be undertaken as the plants develop during this period. Initial indications do not suggest that the viruses of concern, listed in the Import Health Standard, are present.
- With regard to response communication within MAF, some of the cross branch communications that one might have expected did not occur. The response model was developed at a time when MAF Biosecurity NZ reported to one DDG. Under the new structure, 4 DDGs have responsibility for some aspect of biosecurity. In this case not all the DDGs who would have an interest in this incident and response were advised initially. Similarly, some of the managers of staff involved in the border clearance of the strawberry seeds first heard of this incident in the media.

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- The lack of timely information to some DDGs, coupled with the interest of the DG and the current "enquiry" phase across the new organisation as senior managers take up their roles, prompted a series of requests for information through individual line management. Whilst this did not materially affect the pace of the response or the response decision making up to the point of the media announcements of the recall, it has caused a significant amount of duplication of effort across branches. A more coordinated approach, linked to RSL, would have improved consistency of information and understanding.
- Whilst there were communications to the Minister's press office alerting them to this incident, preparation of the full briefing was not given a high priority compared to other existing high priority tasks the Policy team were handling at the time. Delivery of the full briefing was delayed and ideally should have happened earlier.

### Section 3: Learnings and Recommendations

LEARNINGS AND RECOMMENDATIONS	
<p><b>What are the learnings and recommendations</b></p>	<p><b>Learnings</b></p> <p>The key learnings from this review are:</p> <p><b>The Importing and Clearance Process</b></p> <ul style="list-style-type: none"> <li>• Importers do not always effectively check the expectations and requirements that they have to meet before committing to import goods.</li> <li>• Overseas National Plant Protection Organisations do not always meet the Importation Standards for Phytosanitary Measures and check phytosanitary import requirements are met before issuing phytosanitary certificates.</li> <li>• MAF Plant and Plant Products Imports team process approximately 650 import permit applications per year, and are required to strike the balance between trade and protection from biological risk.</li> <li>• The use of comments on re-usable import permits can cause confusion later in the biosecurity clearance process.</li> <li>• The Cargo Risk Profiling team have processed over 131,000 BACCs in the last 12 months. Risk screeners or profilers are sometimes provided with scanned images of import documentation which extend to many screens of information. Some of this material may use a standard layout whilst other parts of the material may not. The image quality can be very poor and hard to read. The content and format of information can make the analysis difficult and time consuming.</li> <li>• The presentation of an import permit containing comments and special conditions can result in assumptions being made by the risk screener about the extent of risk assessment for the whole consignment that has been undertaken prior to the risk screening stage, perhaps resulting in less scrutiny and checking of the information and import requirements for that consignment.</li> <li>• Risk screening staff are trained to check the PBI every time they deal with seeds for sowing. They are not expected to know which seeds are basic and which are not, or to remember the various entry conditions. This information changes from time to time hence the training to check the PBI each time. In this case the risk screener did not check the PBI as, based on the wording of the import permit, they considered this had been done during the issuing of the import permit.</li> <li>• The Joint Border Management System (JBMS) may help mitigate some of the risks associated with risk profiling and screening of future imports of seeds and other goods. More sophisticated system based risk profiling may require data rather than scanned images to support analysis and decision making. Development of JBMS is still in its early stages and it is too early to confirm to what extent the learning points from this incident will be addressed by JMBS.</li> <li>• Inspectors are not expected to know the content of the PBI or the IHS. Their work is directed by the instructions on the Biosecurity Authority Clearance Certificates, with the</li> </ul>

### LEARNINGS AND RECOMMENDATIONS

expectation that they query anything unexpected or unusual and clarify any areas of doubt.

#### The response process

- The initial investigation and response processes for this response operated broadly in line with the expectations set out in the Policy on MAF's Responses to Risk Organisms.
- Assessment of the risks associated with this incursion was based on an initial rapid assessment by the Incursion Investigator and some technical advice from the Plant Risk Analysis team. The processes for the identification, analysis and evaluation of risks related to the risk goods could be refined to provide more confidence, particularly for senior management, about how decisions about levels of risks are made.
- The lack of discussion involving senior management, response staff and technical advisers resulted in an inefficient use of resources and lack of common understanding of the level of risk and the need for further action beyond the recall. In particular, the decision to test for viruses by growing out the seeds was a protracted decision which could have been addressed far more quickly had senior management had a discussion with response staff and technical advisers when this question was first raised rather than using line management hierarchies and emails for communication.
- Having multiple response models within MAF could be causing confusion or an expectation gap for members of senior management. The DG, DDGs and Directors, in particular, could benefit from greater clarity around their roles in the current biosecurity response model particularly in relation to decision making processes and delegated authority.
- Internal communication of incidents like this could be more effective - both upward to DDGs of the various branches with responsibility for aspects of biosecurity and across to managers of staff involved in either border clearance processes or the response.
- Communication to the Minister in the form of a formal briefing, rather than advice to the Minister's press office, could have been more complete at an earlier point in the response.

#### Recommendations

We note that the Seed for Sowing IHS has subsequently been amended (5 December 2011) to more clearly state the import requirements for seed products such as grow kits.

The key recommendations from this review are:

- Ensure that the wording used in import permits is relevant to the specific goods for which the permit applies and that the wording will remain relevant and accurate for all consignments against which the import permit may be presented.
- Ensure that risk profilers are trained (and reminded) to follow standard risk profiling procedures for all consignments and to understand that risk profiling is their role rather than the role of any other contributor to the biosecurity system.
- Consider ways of enhancing the level of understanding that staff have with regard to the

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purpose and impact of their actions within the overall system of biosecurity controls, and the effect of their actions on subsequent stages in the biosecurity control system.

- Ensure that the development of requirements for the Joint Border Management System, Risk and Intelligence Tools includes consideration of this example of biosecurity clearance.

Other significant actions include:

We note that the Senior Leadership Team has recently decided to establish an integrated and scalable response model for all response events and has directed the Compliance and Response Directorate to align and update the existing biosecurity and food safety response documentation to form this integrated and scalable model. The following recommendations should be considered as part of this work.

- Consider redefining the processes, criteria, tools and templates used for identifying, analysing and evaluating risks in the context of response decision making to ensure that risks are assessed consistently and transparently and the nature/level of risk is clearly understood by all the key stakeholders both internally and externally.
- Establish clear criteria to help response managers determine when to advise and involve senior management in initial investigations and responses.
- The DG, DDGs and Directors with responsibilities for biosecurity matters should discuss with experienced response managers their expectations for how future responses will be managed, where decision making will sit for responses in future and their expectations of those with delegated authority under the Biosecurity Act 1993, particularly their expectations of those appointed as Chief Technical Officers.
- Information and communication requirements of the DG, DDGs and Directors should be considered and criteria established to ensure those involved in the response provide the right information at the right time. Similarly, communications across the Ministry for incidents like this should be considered, ensuring line management of areas involved in the incident or response are advised in a timely manner.
- In particular, senior management should ensure that those with the technical knowledge are included in conversations that senior managers have about specific responses.
- Consider using the experience of this response as an opportunity for the DG, DDGs and relevant Directors to gain an understanding of how border clearance and responses currently operate.

We expect that relevant operational areas will:

- Contact the importer and The Netherlands National Plant Protection Organisation to communicate any learning points from this experience and address any breaches, where appropriate.

### APPENDIX 1: ACRONYMS

ABC	Auckland Biosecurity Centre
BACC	Biosecurity Authority Clearance Certificate
BCP	Border Clearance Procedures
CTO	Chief Technical Officer
DDG	Deputy Director General
IDC	Investigation and Diagnostic Centre
IHS	Import Health Standard
ISO	International Standards Organisation
JBMS	Joint Border Management System
MAF	Ministry of Agriculture and Forestry
NPPO	National Plant Protection Organisation
NZCS	New Zealand Customs Service
PBI	Plant Biosecurity Index
PHEL	Plant Health and Environment Laboratory
R&I	Risk and Intelligence
RAR	Rapid Assessment Report
RSL	Response Strategic Leadership
SLT	Senior Leadership Team

### APPENDIX 2: REPORT DISTRIBUTION

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