



MAFBNZ Guidelines for Approving Co-Management and Equivalent System Applications

Overview

Co-management and equivalence are systems options that MAFBNZ can utilise to help manage biosecurity interventions and risk management both offshore and at the border. These guidelines are designed to be followed for any application to MAFBNZ seeking approval to carry out co-management or equivalence systems. This process is not for development or research into potential intervention or management options. MAFBNZ reserves the right to decline any proposal submitted.

Co-management is defined as *'MAFBNZ sharing management of biosecurity risks and hazards through the application of non-MAFBNZ resources'*. This includes where industry performs specific tasks on MAFBNZ's behalf, or where industry-led systems and processes are recognised by MAFBNZ as achieving the same or better levels of biosecurity risk management as systems MAFBNZ has traditionally carried out. Examples include accredited persons inspecting low risk containers and where used vehicles are cleaned offshore by the importer/ exporter reducing the need for full MAFBNZ inspections on arrival in NZ.

An equivalent system is defined as *'the use of different biosecurity risk management interventions to achieve the same or better outcome as prescribed in a standard'*. In other words, substituting one standard approved practice for a system that is shown to achieve the same outcome. An example would be substituting heat treatment for fumigation of a container.

When submitting a proposal for co-management or equivalent system approval, the applicant must clearly show how the risk good(s) will be processed to meet the required import health standard, existing process and/ or system outcomes plus what contingencies around system setup are in place to deal with non-compliances. Consideration should also be given to monitoring and audit, quality assurance systems and benefits and risks of the proposed system.

All costs associated with development of the application and undertaking trials are incurred by the company seeking approval.

MAFBNZ will provide guidance and answer questions about proposals submitted. However MAFBNZ will not write or develop any proposal.

For further information contact:

Equivalent system applications:
Operational Standards and Facilities Group
Border Standards Directorate
MAF Biosecurity New Zealand
PO Box 2526
Wellington
Email: standards@maf.govt.nz

Co-management applications
Cargo Advisory Team
Cargo Directorate
MAF Biosecurity New Zealand
PO Box 2526
Wellington

Approval Process

The approval process consists of six stages. Each is considered in more detail below.

1. Engage
2. Define criteria to meet
3. Submit application
4. Evaluation of application
5. Decision
6. Implementation

1. Engage

Preliminary discussions occur between the applicant and MAFBNZ to consider the applicants proposal and ensure this is the right approach for both parties. Consideration will be given to:

- What is the issue or opportunity?
- What current practice or system is proposed to be replaced?
- What are the objectives?
- What are the benefits? Are there clear benefits to both parties and NZ Inc?
- Would this proposal be covered better by an amendment to an Import Health Standard or use of risk profiles?
- What are the expectations of the applicant?
- What are the business or legal implications of this proposal?
- What impacts on the supply chain will this have?
- What issues or objections may arise from this proposal?
- What existing compliance issues are present?
- What costs are expected to be incurred by all parties?
- What is the size/ volume of the pathway covered by the proposal?
- Will the proposal be operationally viable and sustainable?
- Does this fit with MAFBNZ mandate?

2. Define Criteria to Meet

Criteria are defined by MAFBNZ that the proposal will be evaluated against. Criteria can include:

- Specifying relevant Import Health Standard, existing process and/ or system outcomes the proposal must meet
- Performance measures to be met (these will be aligned with similar systems)
- Quality systems to be met
- Monitoring, data collection and reporting systems to be met
- Long-term viability and sustainability of the proposal (including cost-benefit analysis)
- Volumes of goods imported (is it sufficient to warrant a co-management or equivalence system)

Other information that must be discussed and considered as part of the proposal includes:

- MAFBNZ audit regimes of equivalent systems that will be completed
- Outcomes and actions when non-compliance occurs
- Decision about whether 'desk-top' approval is only required or if trials/ tests are also required as part of the proposal
- Identification of issues. Agreement reached on how to approach, manage or address the issues and who is responsible for them
- Roles and responsibilities in the approval process
- Costs and charging

MAFBNZ Assurance Regime

This will be designed to best monitor the system and give assurance of system outcomes. Assessments will include:

- System audit - regular (possibly annual) audit of the quality systems, records and reporting
- Verification audits - inspection of goods passing through the system to ensure the system is meeting its performance targets.

NB. Regimes may differ from system to system.

3. Submit Application

The following information should be included in each system application:

a. Covering Letter

- A covering letter should be submitted outlining the proposal and providing primary contact details.

b. Application

- All applications should be submitted electronically (word or PDF format) and in hard copy
- Include full company details, sub contractors and other Government agencies involved.
 - NB: Checks may be undertaken on the company and nominated individual. These could involve police checks

c. Supporting Material

- Description of the equivalent system
- Details of the system including:
 - How the system will operate and meet the criteria
 - How the goods will be processed i.e. physical inspection / mechanical washing / physical inspection
 - Monitoring processes in place
 - Assurance of processes in place

- Collection of relevant data
- Security of goods to prevent recontamination
- Other general information about the system
- Results of any trials and/or test results including:
 - Outcomes of trials and/or tests
 - Verified performance measures achieved by the system
- Description and location of the facility where the system is to be undertaken including:
 - Facility maintenance and monitoring procedures and security
 - Facility management and disposal of biosecurity material/ waste
 - Is the facility offshore or in NZ
- Description of staff training applicable to the system including:
 - What training is undertaken
 - Ongoing assessments, measurements and re-training
- Description of contingency plans to address:
 - Non-compliance
 - System failures
- Description of quality systems including:
 - Purpose and scope of the system
 - Delegated responsibilities
 - Document control
 - Record keeping
 - Training and assessment
 - Internal audit mechanisms
 - Quality control systems
- Management of issues
 - Proposal on how issues identified will be managed or addressed

4. Evaluation

MAFBNZ will complete a desk-top review and (where required) will review trial results for the proposed system. The system will be evaluated against its ability to meet the criteria (step 2), the long term viability and sustainability of the system and management of issues including non-compliances.

Where required, clarification or amendments to systems will be referred back to the applicant to change or update and resubmit.

Timelines for evaluation will be agreed and will be dependant on system complexity and the time required for review

5. Decision

A final approval decision will be made once all required actions have been completed, and MAFBNZ have evaluated the system. Approval will be given when MAFBNZ is confident of system performance.

Formal written approval will be provided by MAFBNZ, signed off by a person with delegated MAF Director General authority.

6. Implementation

Once the approval process is complete, the following is required:

- Working through an implementation plan with relevant parties with appropriate transition periods
- Communicate the system to all staff and revise work instructions for both companies
- Signing of agreements by both parties.

Approval Process – Equivalent / Co-Management Systems

