Ministry for Primary Industries
Manatū Ahu Matua

Post Entry Quarantine Facility Operator Training Resource

December 2016

Growing and Protecting New Zealand

Publisher
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December 2016

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Introduction

This booklet is part of the **Post Entry Quarantine** (PEQ) for Plants **Transitional Facility** operator training resource. We encourage you to become familiar with the resource during your training and to refer to it when you become an approved PEQ facility **operator**. The glossary at the back of the resource contains the key terms and definitions that are in **bold** throughout the booklet. Refer to the glossary when you are unsure of what a term means.

The intent of this booklet is to help operators become more familiar with key aspects of the **pathway** for importing plant material into New Zealand, to understand their obligations as a facility operator, and to identify critical requirements that an operator should understand in order to comply with the PEQ facility standard and to effectively manage biosecurity risk.

The Ministry for Primary Industries (MPI) vision is to grow and protect New Zealand. This includes protecting New Zealand's economy, environment and people's health from unwanted **pests**. MPI approves PEQ facilities to help prevent **regulated** pests (hereafter referred to as 'disease organisms') from entering the country. This applies to any **nursery stock** or **seed for sowing** that requires quarantine before it is given a **biosecurity clearance**. Facility operators are appointed to manage **biosecurity** at PEQ and other transitional facilities.

A person wanting to become a PEQ facility operator must complete the PEQ operator training programme (available on the MPI *PEQ Tiritiri site*). This includes passing the online assessment (with 80% or more) and preparing a facility operating manual that is approved by the **MPI inspector**.

Once you have completed the operator training, you should understand:

- MPI's role and responsibility in relation to biosecurity;
- understand and be able to explain your role and responsibilities as a PEQ operator;
- biosecurity standards and requirements appropriate for PEQ facilities;
- the purpose of the facility operating manual;
- the importance of complying with the PEQ facility standard, and the potential consequences of **non-compliance**; and
- understand your obligations as an operator of a PEQ facility.

The operator training covers all types of PEQ facility, although the online assessment is tailored to the specific level of facility a person wishes to operate. Additional resources that can be referred to as part of the operator training programme include:

- Facility Standard: Post Entry Quarantine for Plants
- Guidance Document: Post Entry Quarantine for Plants
- Post Entry Quarantine for Plants – MPI Example Operating Manual
- Import Health Standard (IHS) 155.02.06: Importation of Nursery Stock
- Import Health Standard (IHS) 155.02.05: Seeds for Sowing

This booklet is intended as an additional resource prepared specifically for PEQ facility operators that sits alongside the above documents; it should not be seen as taking the place of these documents. A brief description of each of the above documents is given on page 14 of this booklet.

Any specific questions about operator training or requirements for a PEQ facility should be directed to the MPI inspector who is responsible for the region in which the particular PEQ facility is located.

MPI, its role and responsibilities

This section describes MPI and its role and responsibilities, particularly in relation to biosecurity. MPI has an important role to grow and protect New Zealand, particularly its economy, environment and people's health.

MP's responsibility is to oversee, manage and regulate New Zealand's primary industries, which include the farming, fishing, food, animal welfare, agriculture, horticulture and forestry sectors. MPI is involved in a wide variety of activities which are highlighted in the following video on MPI's website: http://www.mpi.govt.nz/about-mpi/our-work.

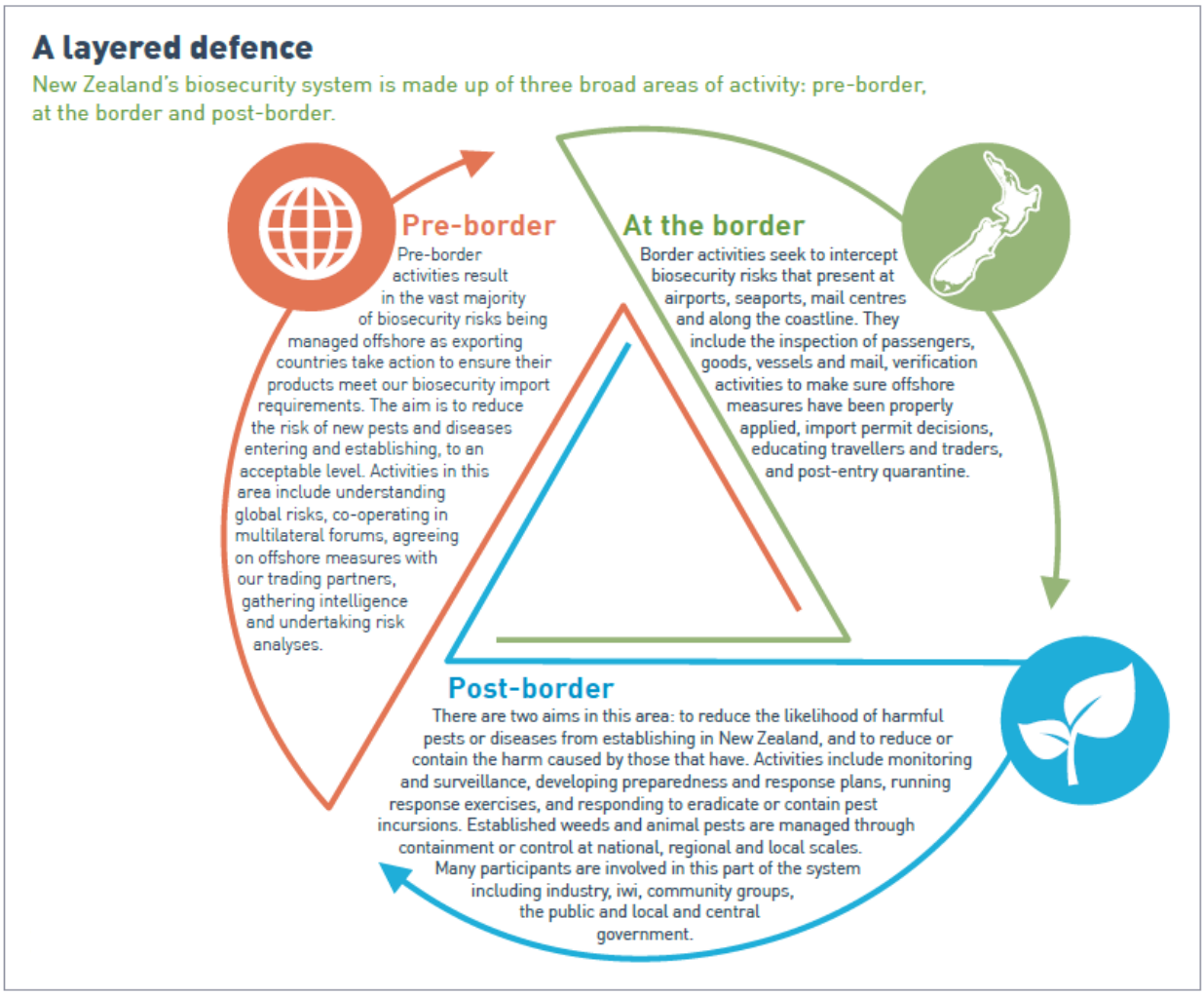
What is biosecurity?

Biosecurity is the protection of New Zealand from unwanted disease organisms. As an island nation, New Zealand is free of many invasive pests and diseases found in other countries that could pose serious threats to our economy, environment, people's health and cultural identity.

The biosecurity system prevents or manages risks from regulated **organisms**. The biosecurity system helps protect New Zealand's economy, environment, human health, and a range of social and cultural values by stopping pests and diseases before they arrive, or dealing with them if they do enter the country.

The biosecurity system operates a series of layers (pre-border, border and post border) as shown in the following diagram. Together, these layers provide a high level of assurance that pests are unlikely to establish in New Zealand. No one part of the system is able to achieve the necessary assurance on its own. As far as possible, MPIs goal is to manage unacceptable phytosanitary risks identified as being associated with imported goods before they arrive at the New Zealand border. The expectation is that, to the greatest extent possible, commercial consignments of plants meet New Zealand's phytosanitary import requirements on arrival (risk is managed off-shore). However, in the case of plant material imported for propagation, MPI recognise that plant pests can survive in living plant material that does not show any signs of infection. This is why certain types of plant material imported for **propagation** must be held in PEQ for **growing season inspections** and/or specific testing before they receive a biosecurity clearance.

MPI has the overall responsibility as a government organisation to oversee and provide leadership in biosecurity. The **Biosecurity Act 1993** provides the legal framework for MPI and others to help keep harmful organisms out of New Zealand and to respond if any do make it into the country.



MPI supervises the effective operation of biosecurity systems and processes, working with many groups and organisations to keep out, remove, or effectively manage the harm that pests or diseases can do to our economy, environment and health.

MPI regulates biosecurity using its legal powers under the Biosecurity Act. MPI inspectors (including inspectors who monitor PEQ facilities) carry out **compliance** monitoring and **inspections** at transitional facilities to ensure that standards are met. During facility audits, they also check that an operator has a current PEQ operator certificate and carries out their responsibilities as described in the transitional facility standard and in the facility operating manual. In PEQ facilities MPI also inspect actively growing plants to make sure they are not showing signs or symptoms of pest or disease organisms.

MPI protects our environment

New Zealand's natural environment of clean water, air and land provides a home to some of the world's most endangered birds, many ancient plants and rare reptiles. Our "clean green" image is important to New Zealanders and the people who visit us.

A recent example of MPI applying measures to protect the natural environment is the introduction of specific measures to prevent entry of the fungal pathogen *Ceratocystis fimbriata* on nursery stock. This fungus has recently caused widespread dieback of a member of the pohutukawa (*Metrosideros*) genus in native forests in Hawaii and could have similar

effects in New Zealand. For this reason, MPI put in place strict measures on all host plants known to be affected by the fungus to help prevent it being introduced to New Zealand.

MPI also helps to eradicate, manage and monitor pests and diseases if they do become established here and need ongoing control programmes. For example, ‘Check, Clean, Dry’ boating or fishing gear is the public message to help control Didymo, a freshwater alga known as ‘rock snot’.



MPI protects our economy

New Zealand is unique in many ways. Our economy is largely supported by the agriculture, forestry, aquaculture, fisheries and horticulture industries.

The impacts of recent introductions of disease organisms into New Zealand, such as Psa on kiwifruit and the tomato potato psyllid on potato and other crops highlight the ongoing need to prevent such organisms from entering and establishing here. As a result of these **incursions**, there is a heightened awareness of the potential consequences of new disease organisms entering and establishing in New Zealand.

There is also greater awareness that the presence of new **quarantine pests** may have market access implications when exporting goods from New Zealand to other countries. This is because other countries are also becoming more aware of the need to exclude disease organisms.

Increased sensitivity of diagnostic techniques has led to a better understanding of host ranges and distributions of disease organisms. This has raised awareness that regulation may be necessary to prevent the entry and establishment of pests and diseases on previously unrecognised hosts that may or may not display disease symptoms. For example, *Potato spindle tuber viroid* is now managed on several ornamental hosts. Even though it does not cause serious disease on these hosts, the viroid is actively managed to prevent its introduction and spread to crops such as potato, where it could have major production and export implications.

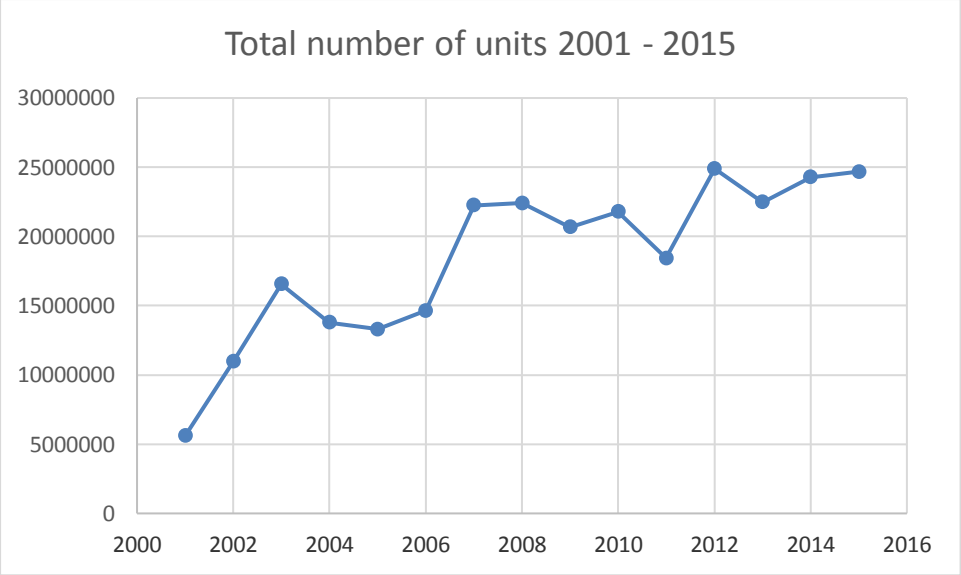


The nursery stock import pathway

Plant material imported for propagation is one of the most high risk pathways for the accidental introduction of disease organisms to new areas. Part of the reason for this is because plant pests can survive in living plant material that does not show any disease symptoms. In addition, because plants imported for propagation may be further multiplied and/or widely distributed throughout the country, the likelihood of disease organisms surviving and being transferred to suitable hosts in the wider environment is higher than for many other import pathways.

The quantity of nursery stock imported into New Zealand continues to grow each year. An indication of this can be seen in the following chart, which shows the quantity of nursery stock (including whole plants, cuttings, dormant bulbs and tissue cultures) imported over the past 15 years. This data highlights why it is particularly important to make sure that all biosecurity risk associated with imported nursery stock is well managed, given the significant increase in imports over the past 15 years.

FIGURE 1. Estimate of the total quantity of nursery stock imported into New Zealand each year between 2001 and 2015*



* The above data is an estimate based on information contained in MPI databases and may contain small inaccuracies.

Arrival of nursery stock in New Zealand

All imported nursery stock and associated documentation should be inspected on arrival, as specified in the IHS for Importation of Nursery Stock. To facilitate this process, the importer, operator of the PEQ facility, or freight forwarder should submit a **Biosecurity Authority / Clearance Certificate** (BACC) application.

For information on how to submit a BACC application please see the following link:
http://www.mpi.govt.nz/importing/border-clearance/containers-and-cargo/steps-to-importing/

MPI's electronic application system (known as eBACCa) allows your application to be tracked while it is awaiting processing. Currently there is a target turnaround of 3 business hours for air cargo and 21 business hours for sea cargo. Business hours are 7am – 5pm, Monday – Friday.

Inspection of documentation

In some cases documentation checks can be done before the consignment arrives (e.g. when a BACC application is submitted early). This may help to speed up the processing of a consignment when it does arrive.

Documents associated with the consignment (e.g. the phytosanitary certificate) will be checked to verify that all pre-export requirements set out in the IHS have been met and that the National Plant Protection Organisation of the exporting country has confirmed and certified that this is the case.

If MPI is satisfied that the documentation meets all requirements then a BACC will be issued directing the plants for inspection on arrival.

Inspection at a transitional facility accredited for inspection of nursery stock

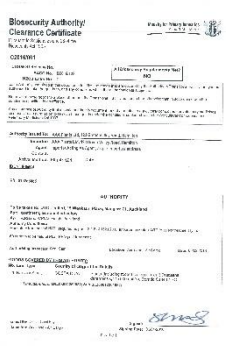
Depending on the means of transport, once nursery stock arrives in New Zealand it may be inspected at the place of arrival (e.g. for consignments sent by international courier) or transported to a transitional facility that is approved by MPI for inspection of nursery stock (for example for consignments sent by sea). As noted above, submitting a BACC application before a consignment arrives may streamline the process and allow a booking for inspection to be made with MPI before the goods arrive.

All plant material imported for propagation must be inspected at an on-arrival inspection facility (this is in addition to growing season inspections which must be done whilst material is in PEQ). Detecting organisms at the border allows the biosecurity risk to be managed before the plant material is transferred to the PEQ facility. This is important because on arrival inspection facilities are located in metropolitan areas away from areas of agricultural, aquaculture, cultural, environmental, forestry or horticultural significance. This minimises the likelihood of these organisms being transferred to the wider environment. Insects and mites are the type of organism that are most often detected during on arrival inspections, although symptoms associated with other classes of organism, such as fungi or bacteria may also be detected.

If disease organisms are detected during the on arrival inspection these may need to be further identified at an MPI approved **diagnostic laboratory** to confirm whether or not they are classified as regulated organisms. An assessment will then be made as to what treatment is required before the material is transferred to a PEQ facility. If treatment is not possible (e.g. in the case of a regulated scale insect which is resistant to treatment) the importer will be given the option of re-shipping or destroying the material.

The on arrival inspection will also verify that the goods are as is described in the accompanying documents, and are not contaminated with other material (e.g. soil etc.).

MPI documentation


Biosecurity Authority/
Clearance Certificate

Once all documentation has been assessed and on arrival inspections are completed MPI will issue a new BACC to identify the next actions that must be taken. An example BACC identifying key points of the authorisation is included in Appendix 1. Depending on the outcome of the inspection and document checks, the following may apply to a consignment:

1. May be directed for treatment (see example BACC in Appendix 1). This will apply if:
   a. correct treatments were not applied prior to export (e.g. non-compliant treatments are recorded on the phytosanitary certificate);
   b. the IHS requires treatment on arrival in New Zealand before the plants are moved to PEQ (e.g. *Dracaena deremensis* nursery stock);
   c. disease organisms have been identified.

2. If all pre-export requirements have been met and the goods comply with the IHS, a BACC will be issued directing that the goods may be transferred to the PEQ facility listed on the import permit (and subject to any conditions on the import permit).

3. May be directed for reshipment or destruction. This will apply if:
   a. goods have been sent that are not eligible for import (e.g. species which are not listed on MPI's Plants Biosecurity Index are included in a consignment);
   b. regulated disease organisms are identified for which there is no appropriate treatment (e.g. some scale insects, or regulated viruses);
   c. goods cannot comply with the requirements of the IHS (e.g. have been imported from a non-approved country, or additional declarations for pest freedom have not been endorsed (and a replacement phytosanitary certificate cannot be obtained).

Once goods have been transferred to the PEQ facility listed on the import permit, they become the responsibility of the PEQ facility operator.

Transitional Facilities

Transitional facilities, including PEQ facilities, are areas approved by MPI for holding, inspecting and/or treating imported material before it is given a biosecurity clearance, or otherwise disposed of.

General transitional facilities ("TFGEN") are the most common facility (several thousand of these facilities are registered with MPI). These facilities are usually for inspecting or treating goods that might have some associated biosecurity risk, such as food products, items made from wood or plant material, sea containers, and used machinery or vehicles.

Other types of transitional facility are used to hold biological products imported for purposes such as research or analysis; imported samples are usually destroyed once the research has been completed so are not eligible for a biosecurity clearance. Other classes of transitional facility are used to hold certain types of animal before a biosecurity clearance is granted.

PEQ facilities

PEQ facilities are a specialised type of transitional facility designed to hold plant material that is imported for propagation. Plants are held in PEQ to make sure that if any disease organisms are present in imported material they will be contained within the facility and detected before plants are released into the wider environment.

Imported plants are inspected for disease symptoms and, depending on the species, may also require **pre-determined testing** before they receive a biosecurity clearance. Depending on the plant species and type of material, plants may need to be held for an extended period of time (e.g. up to three years for imported apple nursery stock). There may also be specific environmental requirements under which certain plant species must be held (for example citrus plants are grown within a set temperature range to help to detect certain disease organisms).

The different types and levels of PEQ facility (summarised in Table 1) reflect the type of material being imported and the biosecurity risk and potential impacts (environmental or economic) of any disease organisms that may be associated with a particular plant species. For example, seeds and tissue cultures are generally lower risk than dormant bulbs, which in turn are considered to be lower risk than whole plants and cuttings. Because seed for sowing is very seldom imported into a PEQ facility, this document, and any specific examples that are given, mainly relates to imported nursery stock.

TABLE 1. Summary of different types/levels of PEQ facility and examples of the type of material and quarantine period for each level of quarantine.

Type/Level of facility*	Types of material**	Indicative quarantine period
Open field/Level 1	Dormant bulbs, some seed	3 months
Greenhouse/Level 2	Whole plants or cuttings	3-6 months
Greenhouse/Level 3B	Whole plants or cuttings	3 months to 3 years
Quarantine aquarium/Level 2	Marine plants	3 months
Tissue culture/Level 2	Tissue culture plants that are hosts of *Puccinia psidii* (myrtle rust)	4 weeks
Tissue culture/Level 3	Tissue cultures of high value crops	Cultures held while mother plants (or deflasked plantlets) undergoing PEQ in greenhouse

***** The table does not yet indicate likely quarantine requirements for material held in a Level 3A PEQ facility. This is because Level 3A is a new level of facility, and MPI have not yet assessed which plant species will require this level of quarantine.

** The type of material and indicative quarantine periods are examples that are based on commonly imported plant species. The import health standard should be checked to verify the requirements for individual plant species.

PEQ facility operator

The operator has the overall responsibility for managing biosecurity procedures at a PEQ facility to ensure it complies with the operating standards set out in the facility standard and the operating manual.

The responsibilities of an operator are to ensure that:

- the facility meets the requirements of the PEQ facility standard;
- the facility is used only for the purpose specified in the operating manual;
- resources are in place for maintaining and managing the facility;
- all requirements of the operating manual can be met;
- all required training is completed prior to receiving MPI approval.

Approval of a PEQ facility operator

A facility operator is a person who has the delegations and authority for the resourcing and operation of the transitional facility. In some cases a transitional facility may need to appoint a deputy operator. Both operators and deputy operators are required to undertake training as prescribed by MPI. The MPI inspector will identify whether a deputy operator is required at the time a facility and/or operator is approved. More information about whether or not a deputy operator may be required can be found in part 1.5.2 of the PEQ guidance document.

If there are any changes to an operator (e.g. if they resign), prospective new operators must complete an application and be approved by MPI. The person who is no longer operating as the approved operator must inform MPI that they are no longer in the position. If this is not done, the former operator may still be liable for any non-compliances at the facility.

An operator will be approved by MPI under section 40 of the Biosecurity Act. Under the Act, the operator must be a fit and proper person to operate the facility, have the authority to resource and operate the facility, and have the technical and financial resources in place to maintain and manage the facility.

MPI determines this in part through a background MPI enforcement check and a police check, as well as looking at the person's position within the company and other business factors. If a person has been convicted for serious fraud or serious violent offences, they may be deemed ineligible to act as an operator. Section 40 also outlines that MPI may suspend or cancel a person's approval to operate the facility if they have a change in status at the facility or are no longer a fit and proper person to operate the facility.

To become an operator you must complete the PEQ facility operator training course including:

- preparing an operating manual that is approved by MPI;
- successfully completing the online assessment;
- having a face to face meeting with the MPI inspector after the above actions have been completed to discuss the requirements of the facility standard and confirm that the facility and operator can meet all requirements;
- obtaining an operator certificate from MPI.

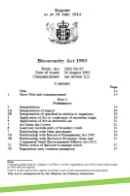
Resources available to the PEQ facility operator

There are four main components to the regulation of biosecurity for PEQ facilities and operators:

1. The Biosecurity Act 1993;
2. The Facility Standard: Post Entry Quarantine for Plants;
3. The Guidance Document: Post Entry Quarantine for Plants;
4. The example Operating Manual for Post Entry Quarantine Facilities.

The Biosecurity Act 1993

The Biosecurity Act 1993 prescribes requirements for the exclusion, eradication and effective management of pests and unwanted organisms in New Zealand.



The Facility Standard: Post Entry Quarantine for Plants (PEQ)

The standard states the requirements for the approval, maintenance and operation of PEQ facilities and the approval of PEQ facility operators.

The Guidance Document: Post Entry Quarantine for Plants

The guidance document was developed as a practical guide to understanding and implementing the requirements set out in the standard and gives some examples of how a PEQ facility can meet the requirements of the standard.

The Example Operating Manual for PEQ Facilities

PEQ facilities apply the standard into their operating manuals, making the legislative requirements work for them on a day to day basis.

The example operating manual provides additional support to help operators develop a manual tailored to their own facility.

Each component works and supports the next to enable compliance with legislation and MPI standards. These are discussed in more detail below.

In addition to the above, the specific import requirements which must be met to import material into a PEQ facility are set out in the relevant IHS. The IHS also specifies the level of PEQ in which material must be held, the length of the PEQ period and any specific treatment or testing requirements that must be completed whilst a consignment is being held in PEQ.

Biosecurity legislation

It is important that you familiarise yourself with the relevant sections of the Biosecurity Act 1993 (the Act). The Act can be viewed online at http://www.legislation.govt.nz/act/public/1993/0095/latest/DLM314623.html.

The Act is the legislation (law) that governs biosecurity in New Zealand. In relation to transitional facilities and the people who work at them, there are specific requirements in the Act, and standards set under the Act. The Act also sets out the consequences if the requirements are not carried out. Set out below is a summary of some sections of the Act with which MPI recommends PEQ facility operators should be familiar.

Note: This section is intended as an overview for training purposes only; it is not to be used as legal advice, and does not replace the need for independent legal advice (if required).

Interpretation

Section 2 'Interpretation' outlines the meanings of words and or terms used in the Act. This section of the Act will assist you if you are unsure about what something means. Note that standards (such as the PEQ facility standard) may contain definitions from the Act. For example, a transitional facility is defined as 'any place approved …. for the purpose of inspection, storage, treatment, quarantine, holding, or destruction of uncleared goods'.

Transitional facility

Section 39 'Approval and cancellation of approval of transitional facilities and containment facilities', describes at a high level how standards are set for transitional facilities, and how facilities are approved and/or cancelled.

For nursery stock and seed for sowing, the relevant standard is the Facility Standard for Post Entry Quarantine for Plants, discussed in more detail in the following section.

The Act allows MPI to suspend a facility approval (sections 39, 40A, 40B, and 40C of the Act) if MPI determines that the facility is not compliant with the facility standard. The provisions of the Act set out:

- how long a facility can be suspended for;
- how MPI will inform the operator of the suspension, the details of the suspension, and actions that must occur for the suspension to be lifted; and
- the powers given to MPI for actions to occur for plants in the facility at the time of suspension (e.g. disposal or treatment of plants).

Transitional facility operator

Section 40, 'Approval and cancellation of approval of facility operators', describes at a high level how a person becomes approved and/or cancelled as a facility operator. This section sets out matters that MPI will take into account in assessing an application for a person to be a facility operator, and notes that the facility operator must comply with the following:

- all conditions of the facility and operator approvals;

- all directions given by an inspector relating to goods held at the facility; and
- all restrictions relating to the release of goods held at the facility communicated to the operator by an inspector.

Suspension of a facility operator (covered in sections 40D, 40E, and 40F of the Act) describes what may happen when MPI determines that the operator has not complied with the requirements listed above, including:

- how long a facility can be suspended for;
- how MPI will inform the operator of the suspension, the details of the suspension, and actions that must occur to enable the suspension to be lifted; and
- the powers given to MPI for actions to occur for plants in the facility at the time of suspension (e.g. disposal or treatment of plants).

Offences and penalties

Facility operators are required by law to carry out their responsibilities. The Act sets out offences and penalties for people and companies who do not comply with the Act, and the standards. The following table summarises some of the offences and the penalties as outlined in the Biosecurity Act.

Section	Summary of offence	Summary of penalties
154N(6)	A facility operator does not comply with the conditions of a facility or operator approval, directions given by an inspector, or restrictions given by an inspector as to release of goods.	Individual person: imprisonment for a term not exceeding 12 months, fine not exceeding $500,000 (or both) Corporation: fine not exceeding $100,000
154N(17)	A person claims to be, or acts as, an operator of a facility when they are not, either because: • the person is not the operator of the facility, or their approval as the operator is suspended • the facility is not an approved facility, or the facility approval is suspended • the person does not comply with the operating standards for the facility.	157(5): Individual person: fine not exceeding $5,000 Corporation: fine not exceeding $15,000
154O(2)	A person threatens, assaults, or intentionally obstructs or hinders an official exercising a power or carrying out a function or duty under law.	157(1): Individual person: imprisonment for a term not exceeding 5 years, fine not exceeding $100,000 (or both) Corporation: fine not exceeding $200,000
154O(11)	A person knowingly removes risk goods (which have been seized or are under control) from a specified place: • when they know that the risk goods have been seized or are under control • they have permission to remove the goods, but they do not remove them in a manner required by the permission.	

If you think someone is committing an offence you should contact MPI. Further information is available at: www.legislation.govt.nz and mpi.govt.nz.

Facility Standard

MPI.STD.PEQ: Post Entry Quarantine for Plants

Under the Biosecurity Act, any risk goods imported under an IHS (e.g. the nursery stock or seed for sowing IHS) must receive biosecurity clearance before they can officially enter New Zealand.

As part of the process for gaining biosecurity clearance, the IHS may require plant material that is imported for propagation to be held in a PEQ facility. Certain requirements must be fulfilled whilst the plants are in PEQ (e.g. growing season inspection, pre-determined testing, and/or treatment), and all plants must remain in the PEQ facility until biosecurity clearance is obtained.

The PEQ facility standard sets out the minimum requirements that facility operators must meet when dealing with imported plant material. As summarised in the Biosecurity legislation section of this document, operating a PEQ facility other than in accordance with the PEQ facility standard may result in a facility and/or operator being suspended.

Note: The facility standard is distinct from the IHS for Importation of Nursery Stock or Importation of Seed for Sowing:

The purpose of the IHS is to specify the requirements for the plant material (relating to plant health and freedom from pest and disease organisms), including:

- what must occur prior to export; e.g. growing season inspections, testing, pest freedom assurances, treatments, and phytosanitary certification;
- what must occur on arrival in New Zealand; e.g. inspection, testing or treatments;
- what must occur while the plants are in PEQ (if required); such as, the level of PEQ, the minimum PEQ period, specific environmental conditions (temperature control), treatments, inspection and/or testing requirements.

In contrast, the PEQ facility standard sets out the legal requirements for constructing and operating a facility but does not identify requirements for individual plant species.

The facility standard is divided into four parts. It is recommended that you familiarise yourself with Parts 1-3 of the standard and with any requirements specific to your level of PEQ facility, as set out in Part 4. The standard can be viewed online here.

Set out below is an brief overview of each part of the PEQ facility standard. When reading the following sections please note the following:

- more detail is given about some key areas of responsibility that have been introduced or substantially changed from the previous (1999) version of the standard, particularly relating to Part 3 of the standard;
- information contained in the overview is not intended to replace or duplicate information contained in the PEQ facility standard or Guidance Document.

Part 1: General requirements for all PEQ facilities

This part of the standard gives general requirements around application of the standard and operator approval.

Part 1.1: Application

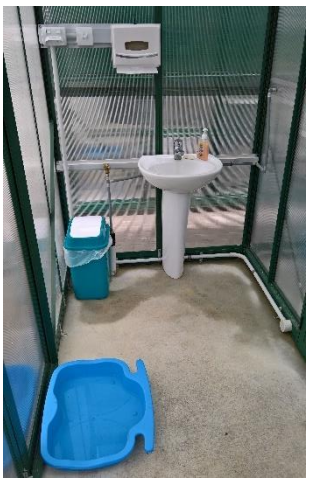
This section of the standard identifies the type of material that can be imported in a PEQ facility, and for what purpose. The operating manual must identify the 'scope' of the approval, including the type of material that will be held in the facility, and for what purpose. As such, the operator will need to discuss with the MPI inspector any intention to provide PEQ space for plants (or a purpose), different to what is specified in the scope.

This section of the standard also assumes that the operator is aware of the following points from the 'Background' section of the standard relevant to the scope and purpose of PEQ facilities:

- the risk goods … must remain [at the facility] until they are given biosecurity clearance or are moved to another facility or exported;
- the aim of PEQ is to effectively manage imported plant material to exclude regulated organisms from New Zealand. Plant health cannot easily be assessed on material that is not actively growing. This is why some plant material must be held to detect any disease organisms before the plants are given a biosecurity clearance;
- it is expected that imported plant material will arrive free of regulated organisms; PEQ is not a process for curing or freeing plant material of regulated organisms.

Part 2: Physical and structural requirements

This part of the standard describes physical and structural requirements that apply to all levels of PEQ facility. All operators should be familiar with these basic requirements.



The operator must make sure that any physical or structural changes made to a facility comply with requirements of the standard. If plants are in facility when changes are planned, the operator needs to either:

- ensure the plants are in a part of the facility where the integrity of the facility will be maintained at all times; or
- arrange to transfer the plants to another PEQ facility while the works are in progress.

The MPI inspector may need to be notified before changes are made. Section 2.4 of the standard identifies circumstances where this is required; please ask the verifier if you are unsure whether notification is required.

Part 3: Operational Requirements

The operator is responsible for managing the systems and procedures used at their facility, to ensure they comply with the operational requirements described in this part of the standard. It is essential that all operators (or anyone acting as an operator) fully understand

the requirements of part 3, and implications of failing to comply with the standard (as discussed in the Biosecurity legislation section of this document). Key operational requirements are identified in the following sections of the standard:

Part 3.1: Operating Manual

Every facility must have an operating manual that is initially submitted to the MPI inspector as part of the operator training programme, and must be approved by MPI before a facility and/or operator approval is granted.

In its simplest sense the purpose of the operating manual is to describe the day to day operations of the PEQ facility and to show how these meet the requirements of the PEQ facility standard. MPI expectations around operating manuals are discussed in more detail later in this document.

The manual is central to the operation of the facility and should be used as a reference document by the operator and other staff for training and operational purposes to ensure ongoing compliance with the standard:

Who needs to know it:	✓	All people who have reason to be involved with the PEQ facility (or plants in the facility).
What they need to know:	✓	Where the manual is stored and how to access it; and What parts of the manual are relevant to their role, and what is required.
What they need to do:	✓	Follow the operating procedures documented in the manual; or If the operating procedures change, or need to be updated, notify the operator so that the manual can be updated and approval obtained from the MPI inspector before any operational changes are implemented.
What needs to be checked:	✓	The operator needs to make sure the operating procedures described in the manual are up to date, are followed, and achieve the requirements of the standard.

Part 3.6 - Inspecting plants

The operator (or MPI-approved delegate) must do regular inspections of plants in PEQ to check for pests or disease symptoms, so these can be notified to the MPI inspector, and appropriate actions taken quickly. Inspections must be done at least once per week, and more frequently for plants held in level 3A or 3B PEQ facilities, or for certain species of high value crop (as specified in the specific IHS schedule).

The MPI inspector will provide specific training about plant inspections required under part 3.6.1 of the standard during the face to face meeting that is part of the PEQ training programme. More information about plant inspections, detection of disease organisms, and some illustrations of common signs and symptoms of pests, disease and other disorders is given in Appendix 2.

Part 3.7: Pests and diseases

Taking action as soon as any diseases are detected will minimise the chances of a disease organism spreading within, or escaping from, a PEQ facility. This is why effective systems are required for reporting the presence of any disease organisms.

As well as the mandatory reporting timelines that must be followed when a disease organism is detected, in some cases the MPI inspector may also direct the facility operator to collect and send samples for diagnosis.

3.10.2: Internal audit *and* 3.1.3: Manual review and amendment

The operator must do regular (6-monthly) internal audits of the facility to ensure ongoing compliance with the standard and verify that activities continue to meet the specifications of the PEQ standard and the processes specified in the operating manual. This can also be a good time to review the operating manual to ensure its continuing suitability and effectiveness. Under the PEQ standard the manual must be reviewed at least once a year.

If you identify any changes or improvements to processes or procedures described in the operating manual you should discuss these with your MPI inspector, and if necessary obtain approval before implementing operational changes.

3.10.3 External MPI assessment

PEQ facilities are assessed by the MPI inspector to ensure the requirements of the facility standard are met, covering both the structural and operational aspects. This involves the inspector auditing the facility and procedures to ensure all requirements specified in the facility standard and the operating manual are met. This may include talking to staff who work in the facility, asking them questions about how they perform a particular task, or observing them while they complete tasks described in the operating manual. MPI reserves the right to audit at any time, and audits may be unscheduled.

3.11 Non-Compliance

A non-compliance is any instance where the facility structure or operating procedures do not meet requirements of:

- the Biosecurity Act;
- the PEQ facility standard;
- the operating manual (including requirements of an IHS which must be detailed in the operating manual, e.g. specific requirements for plant inspections);
- an instruction issued by an MPI Inspector; or
- a direction made by the MPI **Chief Technical Officer**.

Non-compliances can be identified at any time, including during internal audits or external MPI inspections, or as a result of unexpected events such as storms.

The operating manual needs to describe what will happen when a non-compliance is identified by the operator (or other staff). For non-compliances identified during the external MPI assessment, an MPI Corrective Action Request (CAR) will be issued to the operator at

the time of the audit. This may either be on a CAR form (see example in Appendix 3), or through a letter or email from MPI.

A non-compliance will be identified as *critical*, *major* or *minor* depending on the nature of the specific situation.

Critical non-compliance	A critical failure in an operation or system that caused or could have caused a serious risk to biosecurity, the environment, or the health and safety of people and/or communities.
Major non-compliance	A major failure in an operation or system that caused or could have caused a biosecurity risk.
Minor non-compliance	A situation or incident that may not be a major failure, but results in a decrease in confidence in the operation of the facility, and may or may not immediately cause or lead to a biosecurity risk.

Dispensations

In some circumstances, for example if the operator resigns or leaves suddenly due to unforeseen circumstances, MPI may grant a dispensation to allow operations to continue uninterrupted whilst approval of a new operator is resolved. If you find yourself in this situation you must immediately contact MPI to seek a dispensation. A dispensation will only be granted if MPI is notified in a timely manner and considers that all biosecurity risk associated with the operation of the facility can be appropriately managed in the interim period.

Part 4: Specific requirements for different types of facility

This part of the standard focuses on requirements that are specific to each type of quarantine facility. Operators are only required to be aware of the parts of this section which are relevant to their facility.

Guidance Document

MPI.GD.PEQ: Post Entry Quarantine for Plants

The guidance document was developed to help operators implement the requirements set out in the PEQ facility standard, and outlines some best practice that a facility and operator should follow.

The layout of the guidance document mirrors that of the facility standard. Each section of the guidance document relates directly to the same part of the standard. Whereas the standard sets out mandatory legal requirements, the guidance document provides background information relevant to each requirement, and may suggest ways in which the requirements of the standard can be met.

It is not compulsory to follow procedures described in the guidance document; facilities and operators may either follow the examples, or develop systems tailored for their operations that achieve the same biosecurity outcome. In each case, the operational procedures must be included in the facility operating manual and must be approved by MPI before they are implemented.

In particular, all operators should be familiar with the information in part 1.5 of the Guidance Document, which describes requirements around facility and operator approval and identifies MPI expectations of an operator. This section also identifies when a deputy operator may be required. It is particularly important that requirements around deputy operators are clearly understood, as failure to have a suitably qualified person in charge of the facility at all times may have severe consequences on the ongoing approval of a facility and/or operator.

Example operating manual

The example operating manual is intended as a guide to operators when they are preparing their own manual. However, it is essential that a facility operating manual does not just copy the information in the example manual. A manual should describe the actual processes and procedures used by the facility to meet the requirements of the PEQ standard. In MPI's experience, a common failure of operating manuals is that they are written to tell MPI what will be done to meet the regulatory requirements, instead of being written in a way that clearly tells facility users what they must do to meet the requirements.

The operating manual should be seen as the facility 'bible'; the user's reference point for all things regulatory and operational. It should be appropriate for the type of PEQ facility and should describe what is required structurally, what to do, how to do it, how you know it's worked and what you do when something goes wrong. The manual should also clearly show MPI that the operator knows and understands the requirements of the PEQ standard.

At a broad level the operating manual is both a statutory requirement for approval as a facility and a core operational document that describes and demonstrates the following:

- the purpose of the facility including the goals of containment;
- the physical and operational aspects of the facility and how it will be technically and financially resourced and maintained;
- the facility management structure and the roles, responsibilities, delegations and expectations of key personnel and any other staff working in the facility and associated with its operations;
- how the operator will ensure that the facility will meet the specific requirements of the PEQ standard; specifically, the policies, procedures and processes that will be employed;
- how those requirements will be measured, monitored and assessed to determine that they remain effective; and
- how the operating manual will be reviewed and updated to ensure it remains current and applicable for its purpose.

If procedures used at the facility do not reflect the content of the operating manual this will be seen as a major or critical non-compliance with the standard. This may have significant repercussions for the ongoing operation of the facility including potential suspension or cancellation of the operator and/or facility approval.

Glossary

These are words and their definitions that you might come across in your role as a facility operator.

Approved	Means approved under the Biosecurity Act.
BACC	The BACC is a document containing legal directions given under the Biosecurity Act. This authorises actions relating to imported risk goods. It provides either biosecurity clearance or direction for further action.
Biosecurity	The exclusion, eradication or effective management of risks posed by pests and diseases to the economy, environment and human health.
Biosecurity Act 1993	New Zealand's law governing biosecurity.
Biosecurity clearance	A clearance under section 26 of the Biosecurity Act for the entry of goods into New Zealand.
Chief Technical Officer (CTO)	A person appointed by the Director General as a Chief Technical Officer under section 101 of the Biosecurity Act (1993).
Compliance	Complying with (following) rules, standards or laws.
Consignment	Goods being sent to another person.
Contaminate (contaminant, contamination)	Any substance or thing which is undesirable, potentially harmful, or unexpected in a particular product or process. It may be present in, or in contact with, animal material or animal product.
Diagnostic facility	A transitional facility approved by the Director General of MPI as a plant diagnostic facility under section 39 of the Biosecurity Act for diagnosing (identifying) plants or plant pests.
Growing season inspection	Inspection of actively growing plants that are being held in a PEQ facility for the presence of any signs or symptoms of pests or disease.
Import health standard	A document issued under the Biosecurity Act by a Chief Technical Officer, specifying the requirements to be met for the effective management of risks associated with the importation of risk goods before these goods may be imported, moved from a biosecurity control area or a transitional facility, or given a biosecurity clearance.

Incursion	The occurrence of an organism not previously known to be present in New Zealand.
Inspection	An evaluation to determine the level to which the standards and procedures are followed. Provides a basis for ongoing improvement.
Inspector	A person appointed as an inspector under section 103 of the Biosecurity Act.
MPI	Ministry for Primary Industries.
National Plant Protection Organisation (NPPO)	Official service established by Government to discharge the functions specified by the International Plant Protection Convention (IPPC).
Non-compliance	Any instance or action that does not meet biosecurity law, including the Act, regulations and standards.
Nursery stock	Whole plants or parts of plants imported for growing purposes, for example cuttings, scions, budwood, marcots, off-shoots, root divisions, bulbs, corms, tubers, rhizomes and plants in vitro.
Operator	A person registered by the Director General of MPI, under section 40 of the Biosecurity Act, to operate a transitional facility.
Organic material	Material which is derived from an organism, including material that comes from plants, animals or micro-organisms (not humans). It does not include cardboard, paper, coal, petroleum oil, or any substance derived from those.
Organism	An organism includes an animal, plant or micro-organism (but not humans).
Pathway	Any means that allows the entry or spread of a pest.
Pest	Any unwanted plant, animal or other organism with potential to cause harm. For the purpose of the PEQ standard "pest" includes an organism sometimes associated with the pathway, which poses a risk to human or animal or plant life or health.
Post entry quarantine	Quarantine applied to a consignment after entry.
Pre-determined testing	Testing for specific disease organisms, as required by the relevant import health standard, regardless of whether or not the plants are showing signs or symptoms of disease.

Propagation	Production or dissemination of plants or plant parts imported as nursery stock or seed for sowing.
Quarantine	Official confinement of regulated articles for further inspection, testing or treatment.
Quarantine pest	A pest of potential economic importance to the area endangered thereby and not yet present there, or present but not widely distributed and being officially controlled.
Regulated pest	A quarantine pest or a regulated non- quarantine pest listed in BORIC as being regulated for New Zealand.
Risk goods	Anything that it is reasonable to suspect constitutes, harbours, or contains an organism that may cause unwanted harm to natural and physical resources or human health in NZ, or interfere with the management of pests or unwanted organisms.
Seed for Sowing	A unit of reproduction used for sowing. This includes spores, but excludes vegetative propagules.
Transitional Facility	A Transitional Facility is a place that is approved by MPI under the Biosecurity Act for the purpose of inspection, storage, treatment, quarantine, holding, or destruction of uncleared imported risk goods.
Uncleared goods	Imported goods for which no biosecurity clearance has been given.

Appendix 1: Example of a Biosecurity Authority/Clearance Certificate

The C2000 Number is the main reference number used by MPI. *Use it when discussing BACCs with MPI*.

This tells you if the relevant lines are being given a biosecurity clearance. If "NO" check the Authority section to see what actions must be undertaken.

This is the entity to whom the BACC is issued.

The BACC number is an internal MPI number.

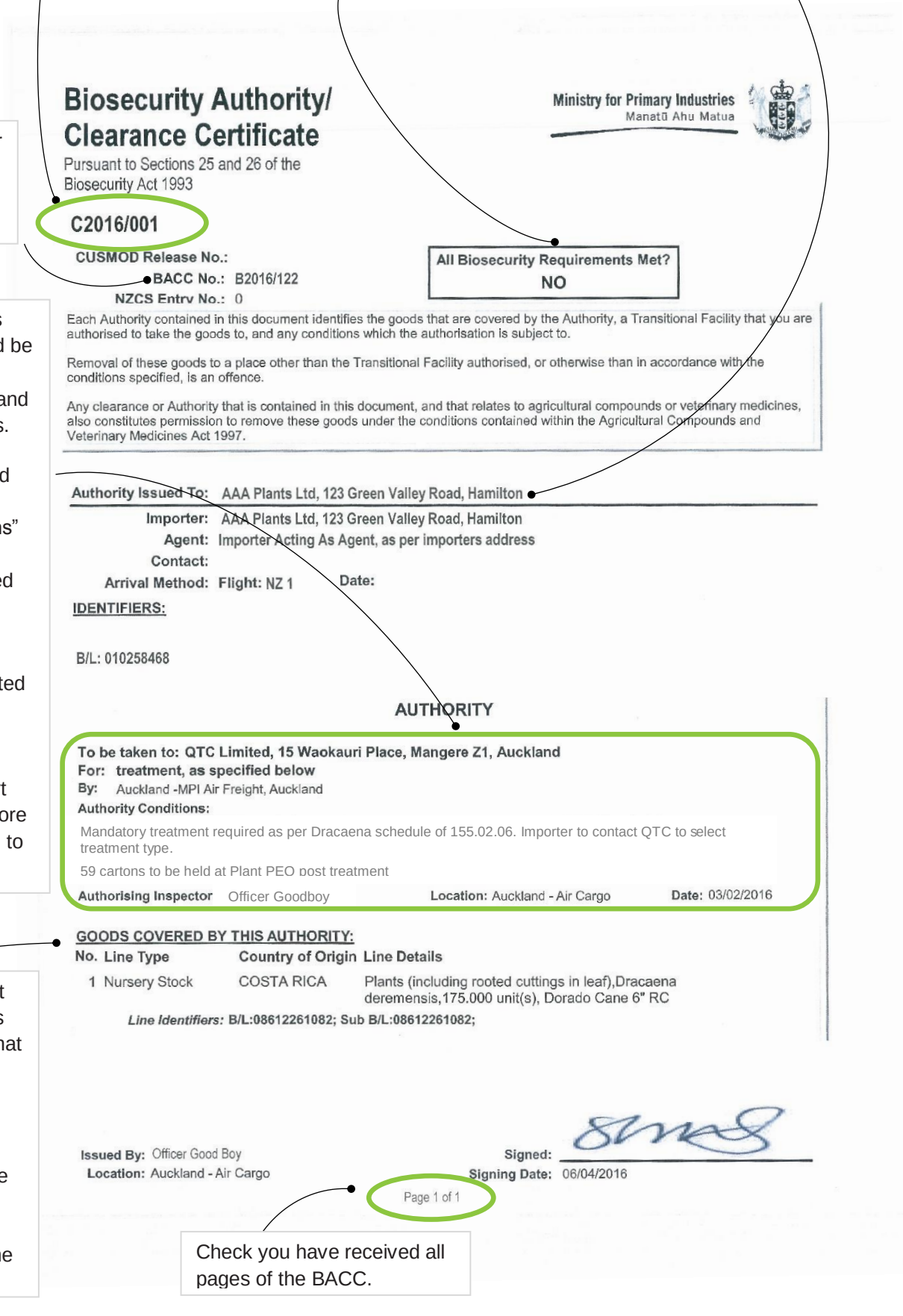
The authority states where goods should be taken, for what purpose, by whom and any extra conditions.

It is essential to read and understand the "Authority Conditions" before starting to process the imported plant material.

In this example, the goods must be treated at an approved treatment facility as described in the nursery stock import health standard before they are transferred to a PEQ facility.

This describes what item(s) the BACC is issued for. Check that all items in the consignment are listed in this part of the BACC, and/or check what lines the authority relates to (e.g. a treatment authority may be line specific).

Check you have received all pages of the BACC.



Biosecurity Authority/ Clearance Certificate

Pursuant to Sections 25 and 26 of the Biosecurity Act 1993

Ministry for Primary Industries
Manatū Ahu Matua

C2016/001

CUSMOD Release No.:

BACC No.: B2016/122

NZCS Entry No.: 0

All Biosecurity Requirements Met?
NO

Each Authority contained in this document identifies the goods that are covered by the Authority, a Transitional Facility that you are authorised to take the goods to, and any conditions which the authorisation is subject to.

Removal of these goods to a place other than the Transitional Facility authorised, or otherwise than in accordance with the conditions specified, is an offence.

Any clearance or Authority that is contained in this document, and that relates to agricultural compounds or veterinary medicines, also constitutes permission to remove these goods under the conditions contained within the Agricultural Compounds and Veterinary Medicines Act 1997.

Authority Issued To: AAA Plants Ltd, 123 Green Valley Road, Hamilton

Importer: AAA Plants Ltd, 123 Green Valley Road, Hamilton

Agent: Importer Acting As Agent, as per importers address

Contact:

Arrival Method: **Flight:** NZ 1 **Date:**

IDENTIFIERS:

B/L: 010258468

AUTHORITY

To be taken to: QTC Limited, 15 Waokauri Place, Mangere Z1, Auckland
For: treatment, as specified below
By: Auckland -MPI Air Freight, Auckland
Authority Conditions:

Mandatory treatment required as per Dracaena schedule of 155.02.06. Importer to contact QTC to select treatment type.

59 cartons to be held at Plant PEQ post treatment

Authorising Inspector Officer Goodboy **Location:** Auckland - Air Cargo **Date:** 03/02/2016

GOODS COVERED BY THIS AUTHORITY:

No.	Line Type	Country of Origin	Line Details
1	Nursery Stock	COSTA RICA	Plants (including rooted cuttings in leaf),Dracaena deremensis,175.000 unit(s), Dorado Cane 6" RC

Line Identifiers: **B/L:08612261082; Sub B/L:08612261082;**

Issued By: Officer Good Boy
Location: Auckland - Air Cargo

Signed:
Signing Date: 06/04/2016

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Appendix 2: Inspections for pests and disease

The MPI inspector will give specific training to all operators around MPI expectations for plant inspections that must be done by the facility operator (or by an MPI-approved delegate). MPI expectations for these inspections are summarised as follows:

1. A walkthrough inspection of all plants in the consignment, looking for any obvious signs or symptoms of pests and disease, which may include:
   i. cupped, chlorotic foliage;
   ii. discoloured foliage/yellowing/necrosis/browning;
   iii. insects and mites, including signs of adults, nymphs and larvae, or symptoms such as webbing or speckling on the underside of leafs;
   iv. leaf spotting, streaking, striping, mosaic patterns, curling, holes;
   v. vein clearing/banding;
   vi. leaf or whole plant wilting.

2. After (or during) the walkthrough inspection, several plants from each lot should be selected for more detailed inspection (which may include using a hand lens). Many symptoms will be visible on the upper side of leafs, although some will first become evident on undersides of leaves (e.g. some powdery/downy mildews). Some insects (e.g. aphids) are more likely to be present on the upper surface of leaves, whereas others (e.g. mites/whiteflies) are more likely on the lower surface. In some cases disease symptoms may be very pronounced, in others they may be less obvious. Some illustrations of disease symptoms and other disorders previously encountered in consignments being held in PEQ are given in the following table.

3. For young plants (e.g. with fewer than 7-8 leaves) the entire plant should be closely examined. For older plants, a total of 7-8 leaves should be selected from the upper, middle and lower layers of plants for detailed inspection.

4. During the detailed inspection, as well as assessing several individual leaves, buds on selected plants should be closely examined for insect and mite infestations, or any other symptoms, and crowns should be closely examined for browning/softness and any other early signs of disease.

5. The number of plants selected for the more detailed inspection will depend on consignment size. The MPI inspector will provide additional advice about this, depending on the type and quantity of material held at your PEQ facility.

6. If any symptoms are detected, plants should be clearly marked and photos taken and sent to the MPI inspector. The inspector must be notified of the presence of symptoms within the timeframes specified in section 3.7.1 of the PEQ standard.

   In some cases (for example if an easily recognisable pest or disease has frequently been associated with previous imports of the same species from the same supplier), the MPI inspector may be satisfied that the photographic evidence provided by the operator provides reliable identification of the disease organism. In such cases, the inspector may be able to verify disease identity without visiting the facility and could then give permission for plants to be treated for phytosanitary purposes. In other cases this may not be possible and the inspector may need to visit the facility and/or require samples to

be sent for diagnostic testing. Further information about this is included in section 3.7.2 of the PEQ guidance document.

7. Keep in mind that abiotic symptoms may sometimes closely resemble disease symptoms (as shown in some of the following pictures). Sometimes it may be not be possible to differentiate between symptoms caused by factors such as soil pH or nutrient deficiency and symptoms caused by disease organisms. In such cases, the MPI inspector is likely to require samples to be submitted for diagnostic testing. In other cases there may be a history of abiotic symptoms being associated with a particular line of imported plant material and it is possible that if symptoms characteristic of a particular abiotic disorder are commonly observed testing will not be required. As in all other cases, the decision of whether or not testing is required will be made by the inspector, who must be notified of the presence of any symptoms within the timeframes specified in section 3.7.1 of the PEQ standard.

Some examples of disease symptoms or other disorders found on plants undergoing quarantine in New Zealand.

	Necrotic lesion on a leaf of Sansevieria caused by the fungus, *Colletotrichum sansevieriae*
	Brown leaf spot on *Colocasia* caused by the fungus *Cladosporium colocasiae*
	Fungal stem blight of *Rubus* caused by *Paraconiothyrium fuckelii*
	Dying off of yucca caused by a combination of the oomycete *Phytophthora asparagi* and the fungus *Fusarium oxysporum*

	Leaf necrosis of *Dracaena* caused by a combination of *Pantoea ananatis* (bacterium) and *Fusarium oxysporum* (fungus).
	Badnavirus infection on Ficus leaf.
	Badnavirus infection of *Dracaena marginata*.
	Badnavirus infection of *Yucca* spp.

	Symptoms of *Eggplant mottled dwarf virus* on hibiscus.
	*Arabis mosaic virus* infection of rose.
	Mottling of blueberry leaves caused by *Blueberry mosaic associated virus*.
	Leaf curling of apple leaf attributed to mite infestation.

	Virus-like symptoms on kiwifruit leaf, but no disease organism detected
	Unusual symptoms on *Ficus lyrata*, no disease organism detected.
	Leaf spotting on blueberry, no disease organism detected.

Appendix 3: Example of Corrective Action Request (CAR)

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Ministry for Primary Industries
Manatū Ahu Matua

CORRECTIVE ACTION REQUEST ☐ / MPI AUDIT REPORT ☐

Facility Name:	**Operator / Delegate:**
Basis of Audit / Inspection:	**ATF Code:**
MPI Auditor / Inspector:	**Date of Audit / Inspection:**

AUDIT OUTCOME: Compliant ☐ Non Compliant ☐ Suspended ☐

Non-Compliance(s) / Recommendations(s): **Minor / Major / Critical** - (please specify) **Mi / Mj / Cr**

Date to be completed by: / /
Please read conditions on reverse side of this form

SIGNED _____ SIGNED:____
Operator / Delegate MPI Inspector
(Indicates Understanding of C.A.R.)

Section for Operator / Delegate to complete prior to sending to MPI

Corrective action(s) taken: **Date action(s) completed:**

SIGNED: _____ Date: / /
Operator / Delegate to sign and date
Once completed by Operator/Delegate fax/email to: **Attention:**

MPI follow up: *(section to be completed by MPI Inspector)*
Corrective action(s) acceptable ☐ Further evidence required ☐ Follow up visit required ☐ Audit closed ☐
Comments:

SIGNED (Inspector) Date: / /

Conditions of Corrective Action Request

The facility operator accepts the following shall apply:

1) The facility operator must comply with the Corrective Action Request issued by the Inspector to maintain approval.
2) Complete Corrective Action Requests by the *agreed date*.
3) Complete the ***Corrective action(s) taken:*** section and send *objective evidence** through to MPI via fax / email for follow up with the respective Inspector.
4) If an extension is needed in order to complete the required corrective actions, this must be requested and approved by MPI prior to the *agreed date* for closure of the Corrective Action(s).
5) ***If the Corrective Action Request is not completed by the agreed date (and extensions are not approved) MPI may withdraw the right of the facility to receive risk goods and/or sea containers without any further warning.***
6) Facilities where MPI has withdrawn the ability to receive risk goods and / or sea containers must not devan containers or hold risk goods.

   ***(NB: if risk goods/sea containers do arrive,* the operator MUST advise MPI immediately.)**
7) MPI will also cost recover for the following:
   a) Further audit/inspection visits
   b) Any Corrective Action Request follow ups

   (NB: this will include time on site, travel fees and additional administration costs, whichever is applicable.)

(Objective Evidence) – E.g. Photos / Proof of Purchase "receipt" / Confirmation of Booking, anything to support your completion of your corrective action.*

New Zealand Government