

Import Health Standard for Treated Used Vehicles Imported into New Zealand

1. This submission is made on behalf of the NZ Forest Owners Association (Inc).
2. The NZ Forest Owners Association is a voluntary organisation representing the interests of commercial forest growers. The Association has 230 members whose forest holdings represent approximately 85% of New Zealand's commercial forest estate. The members include all the major forest corporates, the majority of medium sized forest companies, many forest syndicates, and a number of farm foresters.
3. The total value of NZ exotic plantation estate is approximately \$14 billion.
4. The protection of NZ's forest estate from the introduction of exotic forest pests and diseases is one of the major objectives of the Association.
5. If an exotic pest or disease was to become established in the country's exotic plantations, the impact on the industry, regions and the whole economy could be extremely serious.
6. For this reason, the Association considers that a precautionary approach should be adopted in respect to the systems put in place to prevent the introduction of such pests and diseases.
7. The number of recent examples of exotic pests and diseases which have breached the border controls simply highlight the necessity for robust inspection systems and procedures.
8. The Association supports in principle the proposed Import Health Standard for Treated Used Vehicles Imported into New Zealand but makes the following comments on aspects of the proposals:
 - "Approved Examiners" should be required to meet carefully prescribed training and be required to upgrade their training and certification from time to time.
 - For an initial period, all vehicles imported into New Zealand under the proposed Import Health Standard should be inspected to satisfy MAF that the system is achieving total kill of pests and diseases.

- In addition to “approved examiners” having their right to treat vehicles suspended if vehicles are found to contain contaminants on arrival in New Zealand, consideration should be given to the introduction of financial penalties.
9. In agreeing in principle to the proposed Standard, the Association is assuming that the Ministry has undertaken rigorous investigations into the efficacy of the proposed heat treatment process.
 10. On a more general note, the Association wishes to comment as follows:
 1. We reiterate our view that all imported vehicles should be inspected at the port of origin. We remain unconvinced by the argument that there is virtually no difference in the risk of exotic pests and diseases entering NZ depending whether they are inspected off shore or on arrival in New Zealand.
 2. We note that the proposed Import Health Standard will not apply to imported machinery. As used machinery is potentially more likely to harbour pests and diseases than the vehicles noted for the proposed Standard, we ask MAF to review coverage of the proposed Standard to include used machinery, or to provide an assurance to the industry that the current systems and procedures in place are equally rigorous.
 3. We would ask that the industry’s general comments in its submission on Imported Containers also be read in conjunction with this submission (a copy of the earlier submission is attached).
 11. The Association would be pleased to elaborate on this submission.