

3 March 2003

**GUARDING NEW ZEALAND'S TRIPLE STAR – DRAFT BIOSECURITY
STRATEGY FOR NEW ZEALAND**

**SUBMISSION FROM
NZ FOREST OWNERS ASSOCIATION**

Introduction

1. The NZ Forest Owners Association (FOA) welcomes the opportunity to comment on the Draft Biosecurity Strategy for New Zealand developed by the Biosecurity Council.
2. The FOA is a voluntary organisation representing the interests of commercial forest growers. The Association has 235 members whose forest holdings represent approximately 85% of New Zealand's commercial forest estate. The members include all the major forest companies, the majority of medium sized forest companies, many forest syndicates, and a number of farm foresters.

Forest Industry

3. The forest industry has a major interest and stake in an efficient and effective national biosecurity strategy.
4. The industry has forest assets of around \$14 billion. These assets and their utilisation provide employment for around 25,000 employees directly and 100,000 indirectly.
5. From a national perspective, forestry generates approximately \$3.6 billion in export earnings which is 11% of New Zealand's total, and provides around 4% of the country's Gross Domestic Product.
6. Any introduction of exotic pests or diseases not only poses a threat to the productive capacity of the industry, but also threatens the closure of overseas markets to New Zealand forest product exports.

7. It should be remembered, too, that exotic pests and diseases which impact adversely on exotic forests generally also feed upon vegetation in city parks and reserves, private gardens, orchards, and conservation areas.
8. Thus all parts of the community have a strong vested interest in keeping unwanted forest pests and diseases out of the country and, if or when they do arrive, identifying and reporting them early, and assisting and co-operating in their rapid eradication.

Aspects of a Biosecurity Strategy

9. Any national Biosecurity Strategy must address four major elements:
 1. Preventing exotic pests and diseases entering NZ in the first place
 2. Interception at the border
 3. Early identification post border
 4. Effective eradication once identified.
10. To address these four areas requires a comprehensive policy of:
 1. Public awareness and “buy in”
 2. Well trained, adequately resourced, co-ordinated and equipped border control personnel and systems
 3. Effective post border surveillance programmes including public awareness
 4. Effective eradication and/or control capabilityAbove all, to be effective, the biosecurity system needs to be well funded by the Government.

Biosecurity Goal

11. We support the overall goal for New Zealand’s biosecurity system as proposed in the Strategy as:

“the exclusion, eradication, or effective management of risks posed by pests and diseases to the economy, environment and human health.”

And the breakdown of this overall goal into the following sub-goals for the different parts of a biosecurity system:

Prevention and exclusion

“Prevent the entry and establishment of pests and unwanted organisms capable of causing significant harm to the economy, environment and people’s health”

Surveillance and response

“Early detection, identification and assessment of pests and unwanted organisms capable of causing harm, and where appropriate, deployment of a rapid and effective incursion response that maximises the likelihood of eradication”

Pest management

“Effective management, including eradication, containment and control of established pests and unwanted organisms capable of causing significant harm to the economy, environment and people’s health”

The Association applauds the Draft Strategy having as a sub heading the Title “Defending New Zealand’s Future”. The critical importance of an efficient and effective biosecurity approach is vital as exemplified by the projected cost to the nation of the Painted Apple Moth incursion, and an outbreak of Foot and Mouth disease as set out in the recent Treasury/Reserve Bank analysis. We consider it essential that the ultimate strategy is one that fully recognises this, is funded appropriately, and gains the support of all stakeholders.

Leadership

12. The Association supports the comments in the draft Strategy that there has been a serious lack of clear leadership or direction in the country’s biosecurity efforts. We therefore endorse the conclusions of the draft strategy as follows:

- Biosecurity is a core role of central government and is likely to remain so.
- There is not a Whole of Biosecurity systems approach currently being delivered by government agencies.
- This in turn has led to a lack of clear accountability.
- The intent behind the creation of the MAF Biosecurity Authority in 1999 to achieve this has not been realised due to factors such as:
 - Fragmentation between the interests and responsibilities of the four responsible agencies.
 - Too strong a focus on MAF Biosecurity on primary production in spite of it being charged with delivering a comprehensive Biosecurity system including protecting biodiversity of indigenous species.
 - No mention of the expanded MAF role in this area in its corporate mission statement.
 - Lack of resources.
- There is a lack of clear leadership in biosecurity.
- Only a few positive examples of joint/central government initiatives.
- The co-ordinating role of the Biosecurity Council has not worked.
- There is insufficient long term planning – the system tends to be issue driven – and there is insufficient research.

We appreciate the endeavours made by MAF Biosecurity to involve stakeholders in developing strategy and in refining operational approaches, albeit we consider that greater transparency and earlier involvement may lead to increased efficiencies in operation both through provision of practical advice and by achieving leverage through linkages with related industry programmes.

Accountability

13. FOA considers that it is of major importance for an effective national Biosecurity Strategy to have unambiguous accountability provisions. This will assist in providing the well focussed leadership required for an effective and accountable biosecurity system.

14. We fully support the draft strategy's proposal for MAF and the Director General of Agriculture to be made the lead agency with overall responsibility for all biosecurity matters.
15. We do not believe that a new stand-alone biosecurity agency would be the most effective option mainly because of the potential tensions between protecting the country's economic base and trade; and facilitating the entry of air passengers, particularly tourists, and goods. MAF being the lead agency would also avoid capture by particular interest groups and means it could adopt a "whole of New Zealand" approach to biosecurity.
16. While it is important that border disruption to passengers and goods needs to be minimised, the major focus must remain on intercepting unwanted pests and diseases. MAF has the existing structures and systems which would inevitably be disrupted – even if only in the short term - if a totally new government agency was established to deal with biosecurity issues.
17. Also MAF's "brand" is well recognised and respected internationally – the credibility of the agency is vital for maintaining the confidence of competent agencies offshore including those facilitating trade.
18. FOA considers that there must exist unambiguous accountability within MAF for meeting the government's and society's expectations in respect of biosecurity. For this reason, we have reservations over the concept of establishing an "Advisory Board" as proposed.
19. It may be that we have not clearly understood the suggested roles of this proposed new body. However, if its existence and operations had the effect of diluting the direct responsibility of the Director General for meeting agreed biosecurity outcomes, we would see it as a weakness. If on the other hand, the Advisory Board is envisaged as providing advice to the Director General, we believe that this should be a management decision left to the Director General to determine.

Biosecurity Council

20. FOA supports the concept of a broadly based Biosecurity Council representing non-government stakeholders. We agree that the present Biosecurity Council is not operating successfully largely because of conflicting objectives. Experience would indicate that to have Departmental Chief Executives accountable to both the present mixed private sector/government body, while at the same time being responsible for operational activities and formal advice to their respective Ministers, is not an ideal situation.
21. While we appreciate the reasoning for not having the MAF Director General as an official member of the reconstituted Biosecurity Council, we believe that the Director General should either be a non voting ex officio member of the Council or be expected to attend all meetings both to report and to hear the views of the Council.

22. We agree with the Draft Strategy's suggestion that a main function of the reconstituted Council should be to "review and monitor performance of biosecurity across all systems, from the perspective of all New Zealanders, from all points of view".
23. We also support the suggestion that the Council should report directly to the Minister of Biosecurity.
24. If our perception of the role of the proposed Advisory Board is correct (and therefore that it should not be established), we suggest that its proposed functions be undertaken by the reconstituted Biosecurity Council.
25. Given the important role to be played by a reconstituted Biosecurity Council, particularly if it assumes all or part of the functions proposed for the Advisory Board, we strongly recommend the Council be provided with adequate administrative support and some funds to undertake important research and analysis.

Links between Central and Local Government

26. FOA agrees that the links between central and local government with respect to biosecurity responsibilities are at times muddled with a lack of co-ordination and communication.
27. We also agree that managing the local/central government interface would be improved by having clearly identified local and central government agencies that would also have responsibility for taking a leadership and co-ordinating role across all biosecurity, including pest management.
28. The concept of a standing committee comprising Chief Executives of the operational agencies and representatives of regional councils is sound. To ensure that the reconstituted Biosecurity Council is able to discharge its functions effectively, the convenor of the standing committee should be required to report regularly to the Council and to attend Council meetings at the request of the council.

Biosecurity Funding and Accountability

29. It is clear that biosecurity meets all the requirements of a public good and so should be funded by the Crown. It is also appropriate that the government as the provider of funds, should hold the accountability through the Director General of MAF for Biosecurity Strategy and Operations. To have one specific agency responsible for the development of strategy, operations, and monitoring and outcomes – and to hold that agency accountable - should better ensure that funds are spent effectively.
30. Considerable debate has occurred over the issue of whether MAF should be provided with an emergency incursion fund to allow it to respond quickly to a new exotic pest or disease incursion.

31. FOA has traditionally supported the creation of an emergency fund controlled by MAF to ensure that political or administrative delays in obtaining adequate funds do not allow a new incursion to become established where a quicker response may have prevented this occurring.
32. We have carefully examined the arguments for and against such a fund being established. While we remain of the view that such a fund would be desirable, we are prepared to accept that the system can and would respond quickly as the need arose.
33. While as noted above biosecurity protection should be seen largely as a public good, and therefore the costs should be met by the Crown, there is obviously an element of private good involved, particularly in respect to specific pests and diseases which have a commercial impact.
34. It should be recognised, however, that the private sector already contributes substantially to the costs of biosecurity activities. A number of industries, including the forestry industry, contribute substantially to biosecurity through surveillance activities carried out in forests and on farms, and to research into many aspects of biosecurity. Also, in respect to a new incursion, industry would be expected to and already does assist in the control activities.
35. In summary, FOA believes that the boundary between public good and private good biosecurity issues needs to be clarified. A basic assumption should be that biosecurity is an issue of national (public) importance and therefore should be funded by the State. Any departure from this should be based on a clear and consistent set of criteria. We would recommend that an early task of the reconstituted Biosecurity Council should be to examine this issue and provide advice to the Minister on it.

Need for consistent framework for decision making

36. The draft strategy's proposed criteria for the "escalation" of decisions (at which level the decision is taken – from CTOs to the chief executives to Ministers) is:
 - Whether significant cost of benefit is likely.
 - Whether there is significant difficulty in evaluating impacts.
 - Whether there are strongly conflicting objectives (for example health vs trade).
 - Whether there is a high level of uncertainty about risks.
 - When the decision may invoke a change in policy that has not been previously considered by the Government.
37. The Association agrees there is an urgent need to establish such a framework to ensure consistency in the decision making at the appropriate level of seniority.

Coordination across the public sector

38. The draft Strategy limits its definition of the relationship between government departments to leadership and coordination by MAF. However, in addition, the

relationships between the Government departments need to be more clearly defined. We are also concerned that the proposals for the coordination of decision making with regard to the strategic direction for policy currently omits any requirements for consultation with industry. Similarly there is no specific provision to allow for the immediate involvement of industry in decisions relating to the response to an incursion (refer section below).

Decision criteria for assessing biosecurity interventions

39. The draft Strategy proposes the following criteria for assessing all biosecurity interventions:

The effect on:

- a. primary production and our ability to export;
- b. other economic activity;
- c. biodiversity, ecosystems, and treasured species;
- d. health, lifestyle and
- e. taonga.

1. The alternative value of spending both within biosecurity and within the four Votes.
2. The direct cost of the intervention or non-intervention.
3. The indirect cost of the intervention or non-intervention (for example loss of consumer choice).
4. The impact on the budget and whether other activities are constrained by the decision.
5. The evidential basis for the intervention (for example does science believe the pest can be eradicated, and provide a degree of certainty?).
6. Consistency with domestic and international obligations.
7. Other societal obligations.

40. The draft Strategy does not explicitly detail the value sets that would be applied in the assessment of the decision-making criteria and the extent to which the individual criteria will compete against each other. The strategy also fails to assign responsibility for the application of such value sets to the criteria. These issues need to be addressed

41. We are concerned to ensure that the decision-making process also covers Import Health Standards (IHS) and that the application of a consistent framework will mean the same process and criteria are applied to all IHS. At present, there is little or no coordination between agencies or even within agencies; development of IHS differs according to type of good, and Standards are inconsistent in respect of acceptable levels of risk.

Incursions Policy Procedures

42. The Council and Association are aware that MAF Biosecurity has developed an overall incursions policy which sets out broad principles relating to

responsibility and criteria for dealing with an incursion of an exotic pest or disease.

43. We strongly support the development with the relevant stakeholder representatives of industry specific incursion protocols. The development of these protocols should be a matter of priority and should include relatively detailed procedures to be adopted by all relevant stakeholders when an incursion occurs. Without going into detail on the nature of the proposed protocols, we envisage that they would include a timeline for actions by specific agencies and organisations, a detailed database on major categories of pests and diseases including possible pathways to NZ, and the location of specialised knowledge and diagnostic facilities etc.
44. The country's biosecurity system needs to target known threats, but to be flexible enough to prevent, detect and respond quickly to unexpected or even unknown threats.

Research Priorities

45. The Association strongly supports the draft Strategy's emphasis on the need for increased research resources being diverted to biosecurity issues.

In particular, we support the areas set out in the document as follows:

- Improved ability to predict potential and emerging threats, particularly those to our indigenous species and ecosystems, both terrestrial and marine.
- Better tools for detecting and intercepting exotic species at the border.
- Improved surveillance tools and methodologies both for targeted species and for pathway monitoring.
- Social science research to help define better incentives for compliance with and participation in biosecurity programmes.
- Improved methodologies for taking proper account of all affected values in decision-making.

Public Communications

46. The Association believes that greater emphasis needs to be placed on communicating with the public on the critical importance of biosecurity issues to the welfare of the country.
47. Greater "ownership" of the issue by the public should result in increased awareness of the dangers of bringing into New Zealand potentially damaging pests and diseases, the need for constant vigilance in identifying pests and diseases which breach the border controls, and in providing support for the Government to maintain an appropriate level of investment in biosecurity, and the acceptance of measures taken to eradicate specific pests and diseases.

Conclusions

48. The Association appreciates that the draft Biosecurity Strategy is a high level strategy and that detailed operational procedures will need to be developed in due course.
49. We support the concept of reviewing progress 18 months after finalisation of the Strategy, and after 5 years of operation.
50. The Association is keen to remain involved in the Strategy and in the operational development process.