

Submission

1. Please rate a line or each line by clicking the radio button in the column of your choice.

	Excellent	Good	Average	Poor	Very Poor
A. Conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
B. Conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
C. Conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
D. Risk	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
E. Overall assessment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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BIOSECURITY 2025 Protecting to Grow New Zealand

Submission Form

Submission Form: Biosecurity 2025 Direction Statement

Submissions must be lodged by 5pm on Friday 9 September 2016.

This version is designed to be completed electronically. Please email your completed form to biosecurity2025@mpi.govt.nz

Consultation Questions

The questions are designed to stimulate your thinking and help us report back clearly on people's feedback. There are also spaces after each question on the submission form for your additional comments.

The first page, "General Questions", asks you to comment overall on the proposals in the [discussion document](#). The following pages of the submission form seek your comments on each of the proposals – the mission, principles and the five Strategic Directions.

This survey should take no longer than 45 minutes to complete and you're welcome to answer as little or as much of the form as you like.

If you would like further information regarding the submission process:

- View the Biosecurity 2025 webpages at www.mpi.govt.nz/biosecurity2025
- Ask the Biosecurity 2025 team at biosecurity2025@mpi.govt.nz
- Attend one of the public meetings/hui being held around the country.

Disclaimer

Any submission you make becomes public information. Anyone can ask for copies of all submissions under the Official Information Act 1982 (OIA). The OIA says we must make the information available unless we have a good reason for withholding it. You can find those grounds in sections 6 and 9 of the OIA.

Tell us if you think there are grounds to withhold specific information in your submission. Reasons might include it being commercially sensitive or personal information. However, any decision MPI makes to withhold information can be reviewed by the Ombudsman, who may require the information be released.

Please note that late submissions will not be considered but may be released publicly.

Contact Information

Q1. Please enter your contact information.

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General Questions

The three questions below relate to the overall proposals in the [discussion document](#) set out on pages 19–22.

For each question, please select the option that most closely reflects your opinion. You are welcome to explain your answer or provide additional information in the space provided.

Q2. How strongly do you agree or disagree that the discussion document addresses the challenges, risk and opportunities facing the biosecurity system?

Strongly disagree Disagree Neither Agree Strongly agree

Q3. What's good about what is being proposed?

The document is both aspirational and inspirational and while obviously at a very high level does demonstrate MPI leadership.

Q4. What's missing from what is being proposed?

The document is very high level and is a long way off addressing the biosecurity challenges facing New Zealand. However, it is a good vision document that should go on top of the 2003 Biosecurity Strategy, that is still valid today. Many of the expectations/recommendations in the 2003 Strategy are still valid, many still to be implemented; and some were implemented and then dropped and should be revisited.

For example, a major opportunity identified in 2003 that should be realised, was to develop and report on key performance indicators across the system. The current document lacks accountability and measurable outcomes. What has been achieved since 2003? What happened to Biosecurity NZ? Why, if it was such a good idea in 2003, was BNZ established and then dropped? If biosecurity is so important then why is there no longer a Minister of Biosecurity?

Questions from Part 2: Proposals for a Direction Statement for New Zealand

The mission and guiding principles below are described on pages 20–21 of the discussion document. Please refer to the [discussion document](#) for full detail.

Proposed mission for biosecurity

- New Zealanders, our plants and animals, and our unique natural resources, are kept safe and secure from harmful pests and diseases.
-

Q5. How strongly do you agree or disagree that this should be the mission for all participants in the biosecurity system to work towards?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Q6. Would you like to comment?

The mission statement is by no means perfect, but given it is essentially what was in Biosecurity 2003 and also reflects the Biosecurity Act there is little sense changing it. We actually want to protect New Zealand from pests and pathogens (not just diseases) as the mere presence of pathogens (which can cause disease) can have an impact on trade as well as on investor confidence.

Principles - Please refer to pages 20–21 of the [discussion document](#) for full detail.

Proposed guiding principles for the system

- These principles are intended to guide all system participants and underpin implementation of the Biosecurity 2025 Direction Statement and any subsequent strategies and plans.

Q7. How strongly do you agree or disagree that these are the right principles?

	Strongly disagree	Disagree	Neither	Agree	Strongly agree
Biosecurity is everyone's responsibility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Decisions take into consideration economic, environmental, cultural and social values	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Risk-based decision-making is informed by the best available science and information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Decisions are transparent, taking into account the integrated nature of the system, and ensure resources are prioritised to achieve greatest benefit for biosecurity outcomes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Biosecurity operates in an environment of continuous learning and system improvement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Collaborative approaches and wide participation are enabled and encouraged	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The role of tāngata whenua as kaitiaki, and mātauranga Māori are recognised and provided for	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Biosecurity takes account of our trading context; including the need to facilitate safe imports, support assured exports and meet international obligations.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Q8. Would you like to comment?

It needs to be recognised that while biosecurity is everyone's responsibility, MPI is legally accountable for ensuring that the system works, therefore, there should be a principle that reflects this. Other organisations, such as Regional Councils and GIA partners also have legal responsibility for aspects of the biosecurity system.

There should also be a principle that reflects the importance of being prepared and being able to respond quickly. So a principle around the need for urgency or at least timeliness. Particularly rapid response. Decisions need to be taken quickly!

There should also most definitely be a principle to keep pests offshore! That should be a major focus for the biosecurity system. And perhaps another principle that highlights the fact that biosecurity incursions are often irreversible if they are allowed to happen or if pests are not eradicated. There are numerous examples of this in New Zealand and the numbers continue to increase today. The fourth principle is vague and could certainly be improved.

Strategic Direction 1 – A biosecurity team of 4.7 million

Strategic Direction 1 is described on pages 23–24 of the discussion document. Reproduced below is a high level vision for 2025 for this Strategic Direction. Please refer to the [discussion document](#) for full detail.

Strategic Direction 1 – Vision for 2025

- New Zealanders and visitors are aware and knowledgeable about biosecurity.
 - Biosecurity is a reflex action – thinking about and participating in biosecurity has become fundamental to what we do as New Zealanders.
 - The unique knowledge and perspective of Māori is recognised and Māori actively participate as kaitiaki at all levels of the system.
 - Partnerships and other collaborations enable us to work more effectively towards a collective vision for biosecurity.
 - Tools, rules and processes make it easy to do the right thing.
-

Q9. How strongly do you agree or disagree that this is an appropriate Strategic Direction?

Strongly disagree

Disagree

Neither

Agree

Strongly agree

Q10. Would you like to comment?

The biggest challenges facing effective biosecurity in New Zealand are not around knowledge and technology but are social issues. MPI continues to show a reluctance to carry out incursion response operations in urban environments that require the application of chemicals and there is a major concern that this reluctance could cost both industry and society dearly in the future.

Getting 4.7 million people on board with biosecurity and the need to control incursions is key. Getting MPI staff on board is also key. So perhaps an additional bullet point for Strategic Direction 1 is "MPI has a social license to operate and conduct effective incursion responses in urban, rural and marine environments". There need to be measurable indicators in the following implementation documentation.

MPI will need to increase its resources appropriately to manage the increased public input. The initial MPI interaction needs to be positive otherwise it will quickly backfire.

These first steps have been identified by MPI as actions it can do, alone or in collaboration with others, to get things started. See page 25 of the [discussion document](#) for more information.

Strategic Direction 1 – First steps [high level summary]

Communications

- Undertake surveys to understand public attitudes and understanding.
- Set up a biosecurity communications community of practice.
- Prepare a communications strategy for biosecurity.

Māori participation

- Develop agencies' and Māori capability to work together.
- Establish enduring trusted relationships.

Harnessing the power of collaboration

- Create partnerships between organisations to manage risk.
 - Work with the New Zealand Institute of Directors to build corporate awareness.
 - Develop models for community partnership in pest management.
-

Q11. How strongly do you agree or disagree that these first steps are the right ones to advance Strategic Direction 1?

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Strongly disagree	Disagree	Neither	Agree	Strongly agree

Q12. Would you like to comment?

Agree but - To a large extent we know what is needed in this space, but we seem reluctant to invest in it. Certainly conduct surveys, establish communication networks etc, but more importantly realise that the issue of "social license" is urgent and engage a professional marketing agency to assist with public awareness and acceptance. Everyone knows about zika virus and would ask MPI to spray their neighbourhood if virus-carrying mosquitoes were detected there, but there is an urgent need to convince the population, particularly urban dwellers, that protecting our indigenous biodiversity, and also our primary productive sector from biosecurity threats is also extremely important. MPI will need to make a strong link to people living in urban areas about the benefits of biosecurity to them personally. I suspect this comes down to a governance and leadership question, which is addressed later.

With regard to the step "Create partnerships between organisations to manage risk". This is being done already, e.g., Port of Tauranga Biosecurity Partnership, so the document should recognise that partnerships already exist and use the term "Foster partnerships...."

Q13. What additional first steps could you or others take to usefully advance Strategic Direction 1?

See answer to Q12 - basically, act now. Get professional help.

Strategic Direction 2 – A toolbox for tomorrow

Strategic Direction 2 is described on pages 26–27 of the discussion document. Reproduced below is a high level vision for 2025 for this Strategic Direction. Please refer to the [discussion document](#) for full detail.

Strategic Direction 2 – Vision for 2025

- The best science underpins biosecurity risk management through effective coordination and processes that allow the full value of science to be realised.
 - Continuous improvement ensures we get the very best value from biosecurity tools and technologies.
 - Capitalising on innovation and technology, by proactively seeking out and adopting new tools, transforms the way we do things.
-

Q14. How strongly do you agree or disagree that this is an appropriate Strategic Direction?

Strongly disagree Disagree Neither Agree Strongly agree

Q15. Would you like to comment?

We interpret the vision for this direction statement to mean that appropriate and good science and technology underpins the biosecurity system, which is fine, but where we struggle as a country is to ensure that the science and technologies are socially and culturally acceptable and can be implemented. New Zealand, compared to many countries, including our neighbour Australia, tends to avoid dealing with social acceptability of some technologies, whether it is spraying of BtK in urban areas (such as is conducted in the USA and elsewhere), or the application of GE technologies to reduce pest and pathogen impacts (acceptable in Australia and many if not most other countries, at least to some extent).

So yes, we need to ensure we have sound science, and also technology, to underpin biosecurity risk management, but we also need to do a much better job at communicating the pros and cons of these technologies.

Along similar lines, we also need to ensure we have sufficient expertise in New Zealand that understands emerging technologies, including those that may not even be applied in New Zealand. We are going to be continue to challenged in any attempts to implement some of the new controversial technologies, such as gene editing, and we need to understand the implications of these technologies to New Zealand whether they are legally applied here or not.

We also suggest that better science and technology techniques will mean that less pests escape our attention. This will potentially have resource implications.

These first steps have been identified by MPI as actions it can do, alone or in collaboration with others, to get things started. See page 28 of the [discussion document](#) for more information.

Strategic Direction 2 – First steps [high level summary]

Science

- Develop a whole of system approach to biosecurity science priorities. Early focus areas:
 - Develop a science and evidence plan for biosecurity.
 - Identify high-value research opportunities.
 - Review balances between land and freshwater/marine-focused research, and between discovery science and applied research.
 - Integrate social science and mātauranga Māori into biosecurity science.

New tools

- Establish a research, technology and innovation cell to operationalise new technologies. Early focus area: border processes.
- Trial and implement new tools.
- Develop tools that enhance and enable public participation in biosecurity.

Current tools

- Quicken the pace of improving the Pest Management Toolbox.
- Explore how emerging technologies can be applied to current pest management tools.

Q16. How strongly do you agree or disagree that these first steps are the right ones to advance Strategic Direction 2?

Strongly disagree Disagree Neither Agree Strongly agree

Q17. Would you like to comment?

We agree with this statement. The "whole of system" approach to biosecurity science priorities should not be confined to just MPI, MBIE and research providers but it should be recognised by MPI that primary sectors and also Regional Councils have considerable expertise in biosecurity science and technology and in some cases are ahead of MPI in developing science strategies and research priorities.

We suggest that an early focus should be on understanding and likely changing the culture in MPI (and the country) to be more positive about making use of (or at least considering) available technologies as well as seeking out new technologies that might (or might not be) considered to be more socially acceptable. What has triggered the shift in MPI from previously being willing to spray urban areas with insecticides to the situation today where there is a reluctance to consider large-scale operations? It's not just research on the NZ public that is required, but also research on what's changed in MPI? GIA industry partners are likely to find themselves heavily constrained in response decision making at critical stages in response management.

Q18. What additional first steps could you or others take to usefully advance Strategic Direction 2?

MPI should work with GIA partners and with Regional Councils on biosecurity science strategy and research priorities - as well as with the Biological Heritage NSC.

As a matter of some urgency, MPI should evaluate its existing position on the use of technologies, including the application of chemicals (especially BtK) and also the application of UAV (drone) technology in urban areas. Do permits, for example for BtK need to be renewed because of slight differences in chemical ingredients, and does special permission for UAV, fixed wing, or helicopter application of chemicals need to be obtained in advance of any requirement to spray, especially in urban areas. An external review of MPI should be conducted to understand the background to the apparent reluctance to even consider the use of aerially applied insecticides in urban environments and to understand the roadblocks that may prevent its application in a future incursion.

Strategic Direction 3 – Free-flowing information highways

Strategic Direction 3 is described on pages 29–30 of the discussion document. Reproduced below is a high level vision for 2025 for this Strategic Direction. Please refer to the [discussion document](#) for full detail.

Strategic Direction 3 – Vision for 2025

- Information is shared and open wherever possible.
 - We unlock the full value of information through the best data use and analysis.
-

Q19. How strongly do you agree or disagree that this is an appropriate Strategic Direction?

Strongly disagree Disagree Neither Agree Strongly agree

Q20. Would you like to comment?

Clearly there is a large amount of data collected by MPI that could be better used to evaluate risk, both pre-border and at the border, but also post-border.

There are new, much more efficient ways to collect and process data, and make the information more useful
But MPI and partners also need to understand the risk in making information freely available and manage the situation with regard to potentially serious issues.

These first steps have been identified by MPI as actions it can do, alone or in collaboration with others, to get things started. See page 30 of the [discussion document](#) for more information.

Strategic Direction 3 – First steps [high level summary]

- Identify barriers, opportunities and potential mechanisms for enabling biosecurity data sharing.
- Invest in improving current key systems including for emerging risks, organism information, and intelligence.
- Provide tools to capture and access information remotely.

Q21. How strongly do you agree or disagree that these first steps are the right ones to advance Strategic Direction 3?

Strongly disagree Disagree Neither Agree Strongly agree

Q22. Would you like to comment?

This seems to be regarded as a big problem, but likely one that could be readily fixed by contracting the task to an experienced provider.

Q23. What additional first steps could you or others take to usefully advance Strategic Direction 3?

A quick win would be to put the Emerging Risks database on a website so that stakeholders could readily see what is known and also be aware if they have new information if it needs to be included on the site.

Another first step would be to take a stock take of the various applications that have been or are being developed to capture and access information remotely.

Avoid the temptation to rush in and reinvent the wheel by conducting a thorough review of existing tools which are currently being used to capture and access this type of information. It may be better to tap into an existing tool, like NatureWatch, which is already in wide use, rather than attempting to build a new one with the attendant challenges of actually building the thing (IT issues), creating awareness and encouraging uptake.

Strategic Direction 4 – Effective leadership and governance

Strategic Direction 4 is described on pages 31–32 of the discussion document. Reproduced below is a high level vision for 2025 for this Strategic Direction. Please refer to the [discussion document](#) for full detail.

Strategic Direction 4 – Vision for 2025

- System leadership supports everyone to contribute through an effective distributed leadership model.
 - Everyone has confidence in the system and its continual improvement.
 - Transparent, inclusive and accountable system governance delivers clear purpose, confidence in system performance and assurance to all system participants that their interests are reflected in decision-making.
-

Q24. How strongly do you agree or disagree that this is an appropriate Strategic Direction?



Q25. Would you like to comment?

This is a key issue and perhaps the most important strategic direction in the document.

There is an expectation that GIA partners share readiness and response decision making with MPI, yet there is little recognition by MPI that what happens at the border (and pre-border) can potentially add large costs to incursion responses. GIA partners, and also Regional Councils (as per the Biosecurity Act) should share governance of the biosecurity system, recognising that only MPI has legal liability for managing several aspects of the system - e.g., Import Health Standards etc.

There is also greater scope for including GIA partners earlier in the decision-making process than is currently the case.

These first steps have been identified by MPI as actions it can do, alone or in collaboration with others, to get things started. See page 32 of the [discussion document](#) for more information.

Strategic Direction 4 – First steps [high level summary]

- Develop best practice arrangements for distributed leadership. Early focus area: Pathway Management Plans.
 - Identify, clarify and resolve issues regarding system roles and responsibilities.
 - Consider ways to increase transparency of biosecurity system performance reporting
 - Review biosecurity system governance.
-

Q26. How strongly do you agree or disagree that these first steps are the right ones to advance Strategic Direction 4?

Strongly disagree Disagree Neither Agree Strongly agree

Q27. Would you like to comment?

It's not clear how an early focus on Pathway Management Plans will help towards providing effective leadership and governance. The initial pathway management plan being developed is for marine pathway management and it highlights the need for national leadership, to control the spread of marine bioinvaders, rather than distributed leadership with each region doing its own thing.

Q28. What additional first steps could you or others take to usefully advance Strategic Direction 4?

Involve GIA partners, Maori, Regional Councils and MPI in an early workshop to discuss what is needed in leadership and governance and steps to take to get there.

Strategic Direction 5 – Tomorrow’s Skills and Assets

Strategic Direction 5 is described on pages 33–34 of the discussion document. Reproduced below is a high level vision for 2025 for this Strategic Direction. Please refer to the [discussion document](#) for full detail.

Strategic Direction 5 – Vision for 2025

- The biosecurity workforce is made up of enough people, with the right knowledge and skills, to meet our current and future biosecurity challenges.
- World-class, sustainable infrastructure supports biosecurity system functions.

Q29. How strongly do you agree or disagree that this is an appropriate Strategic Direction?

Strongly
disagree

Disagree

Neither

Agree

Strongly
agree

Q30. Would you like to comment?

It would be useful to provide a description as to what skills are required today and in the future across the biosecurity system.

Determine the skills that are required today and identify any gaps. Anticipate future knowledge and skill requirements and develop a plan to secure them.

These first steps have been identified by MPI as actions it can do, alone or in collaboration with others, to get things started. See page 34 of the [discussion document](#) for more information.

Strategic Direction 5 – First steps [high level summary]

- Undertake a system-wide capability assessment and develop a plan to address capability challenges.
 - Promote biosecurity as a career option through:
 - the Enterprising Primary Industries Careers (EPIC) challenge and the Ambassadors programme.
 - incorporating biosecurity principles and concepts into the national curriculum at primary and/or secondary levels.
 - Careers NZ and careers education and advice at secondary schools and tertiary institutes.
 - tertiary institutes improving formal training options to enable students to specialise in biosecurity disciplines.
 - Implement Royal Society of New Zealand’s recommendations related to taxonomic collections of relevance to biosecurity.
-

Q31. How strongly do you agree or disagree that these first steps are the right ones to advance Strategic Direction 5?

Strongly
disagree

Disagree

Neither

Agree

Strongly
agree

Q32. Would you like to comment?

New Zealand could learn a great deal about risk analysis from the experts in CEBRA and this knowledge could be more widely applied in NZ.

Q33. What additional first steps could you or others take to usefully advance Strategic Direction 5?

Develop a profile as to what skills are currently being applied in the biosecurity system with MPI, industry, councils, Maori organisations etc; identify future needs; identify existing and future capability gaps.

Final comments

Q34. Any final comments?

What happens next?

Thank you for completing the Biosecurity 2025 discussion document submission form. If you have any further comments or questions you can contact the biosecurity 2025 team on biosecurity2025@mpi.govt.nz

Developing a Direction Statement

MPI will consider all the feedback received via the consultation and submission process. This will then inform the development of a Direction Statement for the biosecurity system.

After Cabinet approval, the Direction Statement will be publicly released by the Minister for Primary Industries.

Implementation

A large cast will be involved in implementing Biosecurity 2025. It will be made up of every entity that works in or interacts with the biosecurity system.

Following confirmation of the Biosecurity 2025 Direction Statement, MPI will work closely with participants across the biosecurity system to create a comprehensive implementation plan. This will build on the first steps and will establish a framework for action that will have the buy-in of all.

Exactly how implementation planning will take place is still to be determined, but it will be a collaborative process with wide involvement from central and regional government, industry and other biosecurity system participants.

Biosecurity 2025 process at a glance

