

Submission

FEEDBACK ON THE RISK MANAGEMENT PROPOSAL: REVIEW AND AMENDMENT OF THE IMPORT HEALTH STANDARD: WOOD PACKAGING MATERIAL FROM ALL COUNTRIES

Submission to: Ministry for Primary Industries

Email: Plantimports@mpi.govt.nz

Consultation page and [documentation](#)

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Contact Details

Paul Adams
Chair, FOA/FFA Forest Biosecurity Committee
Forest Owners Association
Level 9, 93 The Terrace, Wellington.
Email paul.adams@rayonier.com
Web www.nzfoa.org.nz

The Forest Owners Association (FOA)

The New Zealand Forest Owners Association Incorporated (FOA) is the representative membership body for the commercial plantation forest growing industry. FOA members are responsible for the management of approximately 1.2 million hectares of New Zealand's plantation forests and over 75% of the annual harvest.

In 2019, the forest growing sector was worth \$6.93 billion in export value and has a 12% share of rural land use.

General comment on the draft Standard

The consultation is simply about extracting details about the ISPM 15 standard from the IHS and providing a link to the current ISPM 15 standard. That's fine and it makes sense.

Some additional comments are below.

Errors in document

<https://www.biosecurity.govt.nz/dmsdocument/38684-wood-packaging-material-from-all-countries>. There are references to Part 2.5 in the Appendix, but there is no Part 2.5. In fact, it would seem that this should like to the ISPM 15 standard.

Pest list

The list of regulated pests is helpful and an improvement over the previous IHS. However, the list needs to be reviewed. For example, *Hylastes ater* appears in the regulated list and the non-regulated list. There are a number of eucalypt leaf feeding insects listed that are not associated with wood. Some important wood invading pathogens are not listed.

Thank you for the opportunity to comment on the proposed standard.



Paul Adams, Chair, FOA/FFA Forest Biosecurity Committee