

# Submission

On

**PLANT PASS CHECKLIST VERSION 2.0**

Submission to:

**Karen Scott**  
Programme Manager  
Plant Pass  
Office@plantpass.org.nz

28 October 2025

# Contents

- Contact Details ..... 2
- Introductory Comments..... 3
- Summary..... 3
- Submitters ..... 3
- Feedback..... 4

## Contact Details

Brendan Gould  
Director Biosecurity and Risk, Forest Owners Association/Forest Growers Levy Trust  
Secretariat for the Forest Biosecurity Committee  
Level 9, 93 The Terrace, Wellington.  
Email [brendan.gould@nzfoa.org.nz](mailto:brendan.gould@nzfoa.org.nz)  
Web [www.nzfoa.org.nz](http://www.nzfoa.org.nz)



## Introductory Comments

1. The Forest Owners Association Incorporated (FOA), the New Zealand Farm Forestry Association (FFA) and the Forest Biosecurity Committee welcome the opportunity to provide feedback on the Consultation on the Draft Plant Pass Checklist Version 2.0.

## Summary

2. **Support for Proposed Changes:** The forestry sector supports the proposed updates to the Plant Pass Checklist, highlighting improvements in clarity, practicality, and flexibility for nursery operators while maintaining robust biosecurity standards.
3. **Recommendations for Improvement:** The submission offers specific suggestions to refine terminology, address feasibility concerns (e.g., container reuse, soil disinfestation), and improve alignment with sector-specific biosecurity risks and practices.

## Submitters

### The Forest Owners Association (NZFOA)

4. The FOA is the representative membership body for the commercial plantation forest growing industry. FOA members manage approximately 1.2 million hectares of New Zealand's 1.8 million hectares of plantation forests and account for over 70% of the annual harvest.

### The Farm Forestry Association (NZFFA)

5. The NZFFA represents small forest block owners, farmers, foresters, investors, growers, and managers. It has around 1,200 members who collectively own or manage approximately 100,000 hectares across New Zealand. The NZFFA also advocates for the interests of approximately 16,000 small forest owners and investors nationwide.

### The Forest Biosecurity Committee (FBC)

6. The FBC provides strategic leadership and oversight for forest biosecurity across the plantation forestry industry. It fosters collaboration among industry, government, and the science community to improve biosecurity outcomes.
7. FBC membership includes representatives from FOA, NZFFA, the New Zealand Forest Nursery Growers Association (NZFNGA), and Ngā Pou a Tāne – National Māori Forestry Association. It also includes representatives from the Ministry for Primary Industries (Biosecurity New Zealand and Te Uru Rākau – New Zealand Forest Service), the Department of Conservation, and key forest health science and service providers.

### The Plantation Forestry Sector

8. In 2024, the forest growing sector generated \$5.87 billion in export value and contributed approximately \$9 billion to GDP across its wider supply chain. The Ministry for Primary Industries projects forest product exports to exceed \$9 billion by 2030.<sup>1</sup>
9. Plantation forestry is a unique primary industry that delivers significant public benefits through environmental services, including soil conservation, air and water quality improvement, erosion

---

<sup>1</sup> <https://www.mpi.govt.nz/dmsdocument/41319-fit-for-a-better-world-background-analysis-on-export-earnings-in-the-primary-sector>

control, carbon sequestration, recreational access, biodiversity enhancement, and conservation. It also provides feedstocks for sustainable energy (e.g., bioenergy) and high-value products that offer alternatives to fossil fuel-based materials. This role will only grow in importance.

10. The sector supports over 40,000 jobs across rural and urban New Zealand.
11. Forestry is essential to the sustainability and viability of key national infrastructure, including railways and nearly all international shipping ports in New Zealand.
12. The sector has long recognised biosecurity threats and has invested in forest health and biosecurity for over 50 years. It remains the only primary industry to lead and maintain a national forest biosecurity surveillance and diagnostics programme. It also invests heavily in readiness and response preparedness, public awareness, and targeted R&D, much of which predates and operates outside the Government Industry Agreement partnership.

## Feedback

### General

13. We support the proposed changes to the Plant Pass Checklist and agree that they offer clearer, more practical requirements that are easier to interpret and apply.
14. These changes provide nursery owners and managers with greater flexibility to demonstrate how they meet biosecurity outcomes in ways that suit their operations, approaches, and risk profiles.
15. We believe the changes will help address concerns or perceptions regarding the practicality and cost of meeting some of the current standard requirements.
16. The proposed levels (Critical, Major, Minor) appear appropriate for each criterion.

### Specific

17. The acronym “GOL” appears in SEQ 1.2, 2.22, and 3.1. Please define this acronym in full.
18. SEQ 2.5 – Recommend defining the acronym “SOP” in full as *Standard Operating Procedure*.
19. SEQ 2.6
  - Consider expanding the wording to: “Are biosecurity risks associated with the site identified and managed?” This may be assumed to be part of management but making it explicit would improve clarity.
  - Clarify that some biosecurity risks (e.g., endemic weeds, pests, pathogens) may already exist on-site and cannot be fully eradicated. We suggest adding to the evidence options: “Current risks or issues are known and, where applicable, are being actively managed to mitigate or minimise any associated risk.”
  - The reference to poor drainage or wet/damp areas may overlap with SEQ 3.10. Consider whether this is truly a biosecurity risk and relevant to this SEQ. If so, additional context may be helpful.
20. SEQ 2.7 – As with SEQ 2.6 consider including “....risks associated with buildings and storage areas identified and managed.”

21. SEQ 2.9 – The note stating this does not apply to container nurseries would benefit from clarification. Contaminated equipment can still pose risks in container nurseries.
22. SEQ 2.19 – There is potential overlap with SEQ 2.3, particularly regarding RPMPs. We propose narrowing SEQ 2.19 to focus on NPPA species, retaining the exclusions, and expanding SEQ 2.6 to specifically include RPMPs. The current wording may incorrectly suggest that industry does not need to consider RPMPs.
23. SEQ 3.1 – Plants sourced from offsite: Should this be considered a Critical level, given that plants are likely the most significant conveyance of biosecurity risks? While inspections and isolation are important, they may not always identify potential risks or infections. Consider expanding to include ongoing monitoring of the health status of introduced plants and ongoing management options.
24. SEQ 3.6 – Reused containers: Cleaning may not always be practical or feasible. We propose expanding the evidence options to include: “...or other measures are put in place to manage and reduce or mitigate any associated biosecurity risk.” For example, risk may be mitigated by managing where containers are unloaded, handled, or refilled to avoid exposure to sensitive nursery areas. This comment is specific to seedling boxes used in the forestry sector and the challenges posed by treating them.
25. SEQ 3.8 – Tool and work surface hygiene appears to duplicate SEQ 2.12 and partially SEQ 2.16. Consider consolidating or clarifying the distinctions.
26. SEQ 3.9 – Reference to “soil”: Consider whether “soil” is the most appropriate term, or if this should be broadened to “potentially contaminated surfaces (including soil, dirt, or other materials that may contain contamination).”
27. SEQ 3.10 – Suggest expanding to include that any poor drainage areas are mapped and monitored”. In bare root nurseries, while most of the land may be suitable, there may be springs or wet areas that are known but cannot be corrected.
28. SEQ 3.11 – Soil and water testing: Consider whether this should apply only to bare root nurseries.
29. SEQ 3.12 – Soil disinfestation: We suggest adding “...where required to manage an identified issue” to address concerns about disinfesting soils that may contain beneficial microbiota (e.g., fungi).



Brendan Gould  
Director Biosecurity and Risk