



**SUBMISSION TO THE  
BIOSECURITY ACT REVIEW**

on the

**Summary of proposals to amend the Biosecurity Act 1993**  
MAF Biosecurity New Zealand Discussion Paper No: 2010/01

By

**DEER INDUSTRY NEW ZEALAND  
THE MEAT INDUSTRY ASSOCIATION OF NEW ZEALAND  
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**12 March 2010**



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Biosecurity Act Review  
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## SUMMARY OF PROPOSALS TO AMEND THE BIOSECURITY ACT 1993

Deer Industry New Zealand (DINZ) is the levy funded industry-good body established under the Deer Industry New Zealand Regulations (2004). One of its key functions is to promote and assist the development of the deer industry in New Zealand.

The Meat Industry Association of New Zealand (MIA) is a voluntary trade association representing virtually all of New Zealand's sheep meat and beef processors and exporters. Collectively our members are responsible for the processing and export of approximately \$6.5 billion per annum of meat and associated co-products. As well as supplying the local market, our members make a very significant contribution to New Zealand's total foreign exchange earnings and to its GDP.

Meat & Wool New Zealand (M&WNZ) is an industry-good body that is funded by livestock producers through a levy on all beef and sheep slaughtered in New Zealand sold under the Commodity Levies Act. Meat & Wool New Zealand's activities aim to increase preference for New Zealand beef and sheep meat internationally and domestically; to maintain and extend trade access for New Zealand beef and sheep meat; and to fund research and development to help improve the profitability of New Zealand farmers.

MIA, M&WNZ and DINZ, along with other primary sector industry organisations have a significant interest in maintaining robust biosecurity measures to preserve productivity advantages, market access and valued perceptions of clean, disease-free and sustainable New Zealand food products for overseas markets. More than any other nation New Zealand's economic well-being is entirely dependent on the absolute integrity of its border protection system.

MIA, M&WNZ and DINZ have been involved in dialogue with MAF Biosecurity along with other primary sector industry groups over several years, principally through SIRWG, but also in other fora concerned with biosecurity (including the workshop on 22 February 2010 covering the discussion paper and intent of the amendments). As such MIA, M&WNZ and DINZ have been following the proposed amendments with considerable interest and wish to voice the following comments and concerns:



- MIA, M&WNZ and DINZ are *supportive of the intent* to allow biosecurity monitoring and enforcement to adapt to changing technology, new pathways for potential incursions and changes in threats.
- MIA, M&WNZ and DINZ also *support imposing clearer obligations* on importers and *appropriate penalties* if obligations are not met.
- MIA, M&WNZ and DINZ *understand* the rationale for seeking flexibility to choose how and what to target as potential biosecurity threats and setting of import rules but consider this has a number of inherent risks:
  - Despite the discussion paper's extensive coverage, MIA, M&WNZ and DINZ are still unclear as to what criteria will be used to move away from prescriptive rules (which offer clarity of responsibilities) to ones that adopt an "outcomes-based approach" (which has the possibility that the method used to try and achieve an outcome may not be appropriate or effective). MIA, M&WNZ and DINZ would need to see some formal process of decision making that rationally justifies moves away from prescriptive regulation towards outcomes-based approaches, and evidence of how those outcomes could be measured and verified.
  - A key concern is that the amendments would enable or encourage a disinvestment by the crown in border security.
  - While the amendments will enable MAF Biosecurity to be flexible in allocating resources to where it considers the greatest risks of threat of incursions are, MIA, M&WNZ and DINZ are concerned that areas that at present are officially subject to a high level of scrutiny and monitoring will suffer, given limited funding and resources. Cost-effective and targeted border control is highly desirable, but pulling back from areas such as inspection of baggage will over time, increase the risk of incursions (either deliberate or unknowingly).

MIA, M&WNZ and DINZ are *strongly opposed* to any change that allows movement away from the present requirement for 100% baggage inspection, notwithstanding that technology may allow this to be undertaken more efficiently than it is currently. We note that much baggage is already screened once at its point of departure.
- MIA, M&WNZ and DINZ *remain concerned* that the amendments enable the creation Government-Industry Agreements (GIAs), which as yet, have not been fully accepted by most primary industry organisations. Although the amendments are aimed at enabling rather than requiring the creation of GIAs, there does not appear to be a need to legislate this. A parallel process is underway whereby industry and government organisations have agreed to evaluate the GIA proposal to determine if there is value to all interested parties in this approach. MIA, M&WNZ and DINZ are of the view that it would be better to *allow this process to reach a logical conclusion before any legislation is amended*. As it appears at the moment, any



amendments would be a rushed attempt to meet a legislative timeline rather than a truly collaborative approach with all stakeholders and affected parties.

- MIA, M&WNZ and DINZ are *supportive of* amendments to allow *more coordinated "Pest Management" between central and local government organisations*. However MIA, M&WNZ and DINZ *do not yet support any moves to adopt a GIA-type approach to pest management* until more detail on how this might work for all pest management stakeholders (as opposed to the GIAs for Biosecurity Preparedness and Response).

At a time when globally more demands are being placed upon (natural) biophysical resources, New Zealand should be able to use its comparative advantages of abundant resources and efficient pastoral production systems to maintain high environmental standards, existing quality of life and contribute to world food production. Maintaining high levels of biosecurity is a fundamental foundation to achieve this and therefore MIA, M&WNZ and DINZ support those amendments that provide clarity of purpose and responsibilities, but do not support amendments which are less specific and therefore introduce subjectivity and uncertainty, or enable processes and structures that have yet to be agreed and endorsed by all relevant stakeholder groups.

We are willing to discuss the comments in this submission or any other aspects of the amendments either individually or collectively and would invite you to contact us if you wish. MIA, M&WNZ and DINZ will continue to engage with MAF on biosecurity matters through the usual fora.

On behalf of the Meat Industry Association of New Zealand, Meat & Wool New Zealand and Deer Industry New Zealand.

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