

Michael Tana

From: Standards
Sent: Friday, 6 November 2015 10:18 a.m.
To: Michael Tana
Subject: FW: Proposed amendments to the IHS for vehicles, machinery and tyres.

Follow Up Flag: Follow up
Flag Status: Flagged

From: Robert Costabile [mailto:Robert.Costabile@mercmarine.com]
Sent: Thursday, 5 November 2015 3:10 p.m.
To: Standards <Standards@mpi.govt.nz>
Cc: Andrew McLean <Andrew.McLean@mercmarine.com>; Andrew Ward <Andrew.Ward@mercmarine.com>
Subject: Proposed amendments to the IHS for vehicles, machinery and tyres.

Proposed amendments to the IHS for vehicles, machinery and tyres.

To whom it may concern;

We receive regular shipments from our supplier Mercury Marine being our head office/ manufacturing & distribution facility in Fond du lac Wisconsin U.S.A, to our branches in Auckland & Melbourne. Our marine engines and parts fall within chapter 84 of the tariff " Machinery", which the Australian government have exempted from their inspection/fumigation measures put in place for the stink bug issue, as all of our products fall outside the targeted tariffs and are not considered a risk. Our supplier Mercury Marine, only ships brand new products, and they ensure all products and packaging are clean and free from any quarantine risk material before loading into the container, which has been inspected for cleanliness prior to loading. Following is a summary of how our supplier handles packaging, storage and shipping.

For engine crating:

1. Packaging supplier only receives sheet materials and lumber at their facility that is properly heat treated and stamped with ISPM15 marking. Physical inspection audit is done monthly (certificate is available from Timber Products Incorporated if needed) to validate that the lumber at the facility is properly handled.
2. All materials are processed indoors at packaging supplier facility.
3. All packaging materials are shipped in covered van from packaging supplier facility to Mercury manufacturing plant.
4. All packaging material is stored and used indoors when at Mercury manufacturing plant.
5. All finished crates are shipped in covered van from Mercury manufacturing plant to Mercury distribution facility (Plt95)

For Parts/accesories pallet:

1. All of the lumber used for our pallet is received by the pallet manufacturer not heat treated.
2. After assembling the pallets, the manufacturer places them into at HT oven to achieve the proper heat treatment
 - a. A certificate is available to certify the HT process has been followed.
3. After HT is complete, the pallets are stamped and moved to the shipping area.
4. The pallets are then shipped to Mercury in a covered trailer.
5. At Mercury the pallets are stored indoors.

For engine & Parts/accesories product receipt/storage/shipping:

1. All inbound finished crates/pallets are transferred directly from enclosed shuttle trailers from Plt15 (manufacturing) to the Plt95 Distribution center without being exposed to environmental elements.
2. All finished crates/pallets containing product are stored in a temperature controlled environment at the Plt95 Distribution center.

3. Upon shipment, all finished crates/pallets are loaded directly from the temperature controlled environment within Plt95 into containers requiring a "7-point inspection" process performed by the dock operators and drivers. A "7-point inspection" form is completed to confirm completion of inspection of all export shipments for containership integrity.
4. All export/import trailers and containers have a "high security seal" applied to the enclosed trailer/container prior to transit.

We believe our product & packaging poses no quarantine risk and should be exempt from your current and proposed measures.

I look forward to your feedback, and please contact me should you require more information.

Thanks and regards

Robert Costabile
Import Co-ordinator
Marine Power International Pty Ltd
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Telephone: +613 9767 6470.

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Dave Nendick

From: Paul Hallett
Sent: Thursday, 29 June 2017 8:22 AM
To: Dave Nendick
Subject: FW: Autohub Submission to MPI on Proposed ammendments to the IHS for Vehicles, Machinery and Tyres
Attachments: AHSubMPI IHS2015.pdf

From: Frank Willett [mailto:frank@autohub.co.nz]
Sent: Friday, 6 November 2015 8:50 a.m.
To: Standards <Standards@mpi.govt.nz>
Subject: Autohub Submission to MPI on Proposed ammendments to the IHS for Vehicles, Machinery and Tyres

To whom it may concerned,
Please find attached our Submission re the above.

Regards,

Frank Willett

NZ Operations Manager



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Autohub Submission to:

Ministry of Primary Industries

On:

Proposed amendments to the IHS for vehicles,
machinery and tyres.

Prepared November 2015

Introduction

Thank you for the opportunity to provide this submission on the proposed amendments to the IHS for vehicles, machinery and tyres.

Autohub

Autohub is a Global Company specialising in the Freight Forwarding of Motor Vehicles.

Our service packages for vehicle importers/exporters includes:

- Freight Booking
- Customs Clearances in both origin and destination countries
- Evidential Documentation for Odometers
- Evidential Documentation for Build, and emission Compliance
- Border Inspection services
- Offshore, and Onshore Bio-Hazard cleaning and Certification services

Some of the services are provided by independent contractors.

Autohub was specifically set up to facilitate the easy importation of used imported vehicles into New Zealand from Japan by providing 'logistics packages' for commercial used import vehicle dealers. This service has been expanded over the last 5 years, and now offers various package and shipping options to exporter and importers around the world. Autohub has representation in New Zealand, Japan, Singapore, Hong Kong, Australia, and UK (where we operate from our own Port Export facility at Felixstowe).

Our main service pathways at present are Japan to New Zealand, Australia to New Zealand, UK to New Zealand and UK to Australia.

Our services provide both exporters and importers a streamlined process which facilitates the receiving of vehicles from suppliers, pre export testing and inspection, shipping and delivery to a customer's designated destination, Customs in the form of a 'Door to Door' service.

Autohub logistic services currently involve the movement of 35 - 40% of the annual NZ total of used imports (42,500 units last year) and 60-80% of the annual total of used imports into Australia (4,000 units) from Japan.

Public Release Disclosure

Autohub has no objection to the release of any part of this statement.

Privacy Disclosure

Autohub has no objection to being identified as the submitter.

Contact

For further contact in relation to this statement:

John Davies

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Executive Summary

Our Submission relates wholly to our business activity which is the movement of used vehicles.

Autohub supports the protection of our Borders from any bio security hazards that may negatively impact our country, however, we maintain that risk control and mitigation must be carried out in such a manner that is commercially viable and sustainable while being successful.

We believe that while the intention of the proposed changes to the IHS go further to mitigate bio security risk, these changes will impact commercial operations and viability of some stakeholders. It also goes a great distance towards creating a monopolistic environment in Japan as there is no longer a choice to use NZ service providers, and very limited/no choice in Japanese port facilities.

Accordingly, Autohub does not support the proposed requirement of 100% pre-clearance of used vehicles in Japan or USA.

Instead, we recommend that the current IHS requirements prevail, with MPI focusing on implementing tighter processes and more onshore resource to meet the desired outcomes.

Import Health Standard (Draft) comments:

Part 2: Clearance Requirements for all vehicles, machinery, and tyres

2.4 (3) - The stated time frame for MPI external inspection of 12 hours for both offloaded break bulk and de-vanned containerised is fair. We see the responsibility of compliance with this sits with MPI. If MPI are unable to carry this out due to its own resourcing issues, then MPI needs to address this directly and not change the 'rules' to cover any shortfalls. It may be timely for MPI to consider the need for onshore appointed approved service providers (and a legislation change if required)

Part 3: Additional Requirements for specified types of vehicles, machinery or tyres from specified countries

3.3 (1)- While the Draft document states "All break bulk used vehicles from Japan..." we understand that MPI is now changing this to "All commercially imported used vehicles from Japan...". This effectively now affects 99% of all used imported vehicles from Japan requiring pre-clearance before shipping. As referenced in the Executive Summary, there is only 1 MPI approved service provider in many ports in Japan. Osaka and Tokyo are the only two areas which have alternatives (across the bays in both at Kobe and Kisarazu respectively), although they are a considerable distance apart and not viable options for many exporters due to their business relationships.

There are also no known treatment facilities in any Japanese ports able to offer heat treatment. Fumigation is not available (the use of Methyl Bromide is prohibited in Japan under the Kyoto protocol).

The net effect of implementing this requirement is the overnight creation of a monopoly service by the current main MPI approved service provider. This is not likely to change as accessing and securing space and facilities on Japanese ports is very difficult and political - in some cases, not possible.

Furthermore, many of the current service providers to the used imported vehicle trade in NZ depend upon volume. Organisations that provide inspection services to NZTA, support services to Ports (and MPI) may be forced to cease due to a lack of volume and viability. This could create an unintended consequence for MPI as 'holes' appear in various areas due to no third party support.

3.4.1 Break bulk vehicles and machinery from the USA must be treated prior to shipment

Given the term "break bulk" for Japanese used vehicles is being changed to "commercial", we assume this will apply to vehicles from the USA also. We are unaware of any break bulk shipping of used vehicles (cars) - most are shipped containerised.

3.4.2 No objections as this is workable.

3.5 No objections provided onshore treatment as required remains an option.

=//=

DRAFT
MPI Import Health Standard for
Vehicles, Machinery & Tyres
(October 2015)

Submission by Auto-Terminal Japan Ltd

1. Background

Auto-Terminal Japan Ltd. (ATJ) is a major player in the compliance and export of used vehicles from Japan to many countries, including New Zealand. ATJ strongly supports the general aim of reducing biosecurity risks to an acceptable level within a robust pre-export focussed risk management regime. Consequently, ATJ has well established, MPI approved procedures implemented to meet New Zealand's stringent biosecurity requirements offshore. ATJ therefore agrees with and supports the general principle to manage biosecurity risks (and other regulatory interventions) offshore where possible.

2. General comments

The (draft) standard is difficult to understand and contains a number of misleading and/or conflicting statements. Not only is it difficult to understand, the way it is set-out and cross-referenced will make implementation and compliance difficult under many circumstances (i.e. depending on how certain sections are interpreted, by whom and under what circumstances).

A major change to the current import regime is that the current offshore pre-shipment programmes are *voluntary* – the proposed new mandatory pre-export measures are *mandatory* but only under some circumstances. ATJ does not disagree with this approach, but there needs to be better rationale and explanation. For example, do used vehicles from the UK and Australia require pre-export cleaning and/or certification or can they arrive with no pre-export measures applied?

3. Consistency issues

With the objective of achieving consistency, countries must avoid unjustified or arbitrary distinctions in the levels of protection it considers to be appropriate under different situations (e.g. within and between pathways of similar risk). This is particularly important if such distinctions result in discrimination or a disguised restriction on international trade. Although the “disguised restriction” issue is unlikely to arise, the resulting measures from the implementation of the revised vehicle IHS may need further consideration to ensure that they are consistently applied across all risk pathways to avoid possible “discrimination” issues. It is apparent that there are a range of different (and sometimes conflicting) approaches within and between countries, the type of vehicles and the method of conveyance. The rationale for some of the differences have not been fully explained.

4. Equivalence of measures

ATJ considers that alternative measures based on a systems approach (i.e. using the principle of Equivalence) can continue to be developed and implemented to meet the risk management objectives of the (draft) standard. Consequently, ATJ strongly supports the use of “MPI Approved Systems” (viz. Section 2.5 of the draft Standard). ATJ will work closely with MPI officials to transition the currently approved ATJ approved systems into an agreed framework to incorporate any necessary changes moving forward.

5. Specific comments

Terminology

In many cases, the use of the term MPI is not useful. MPI is an organisation. For example “MPI is satisfied”, “Inspection by MPI”, “Inspected by MPI” could be replaced by “Inspector” (as defined under the Biosecurity Act). Similarly, where MPI is required to receive something or do something, then a delegated position should be included to steer users to the right person/s in the organisation.

Legal requirements

The reference to Section 39(1A) of the Biosecurity Act appears to out of context. Should the reference be linked to Section 23(3)? Other references to the Biosecurity Act used in the (draft) IHS may also require further scrutiny to ensure accuracy.

Who should read the IHS?

Shouldn't importers “..... read and be familiar with and comply with this IHS” (viz. with reference to Section 16B of the Biosecurity Act)?

Why is this important?

(2) “..... with this IHS may be decontaminated by a means”. This appears to conflict with Section 3.1.1 by providing optional on-arrival measures.

Note: Section 3.1.1 states that “ ... vehicles and machinery must be cleaned and ... documented evidence must be provided to MPI”.

Equivalence

What “Guidelines” or “Directions” currently exist and/or will be produced under this Section? These should be directly referenced under the IHS for clarity.

Other information

Why is it necessary to have a *Guidance Document* as well as including (some) limited guidance material incorporated into the body of the IHS?

Part 2: Clearance Requirements for all vehicles, machinery and tyres

2.3 Table 1: Contaminant thresholds – It is not technically justified to consider all animals (e.g. non-regulated insects) as contaminants.

2.4 (1) Reference to MPI = should be an Inspector?

- How do the clearance activities cross reference to the optional on-arrival procedures (No 2 of “Why is this Important”)?

2.4 (2) Shouldn't Part 2.5 also be referenced in this sentence (and the Guidance box)?

Guidance: What is the definition of “grossly contaminated”?

2.5 Use of MPI approved systems

Who in MPI “reserves the right” to decline, suspend or revoke a systems approval”?
What criteria, circumstances and delegations apply?

Will MPI publish a list of approved systems and/or operators?

Part 3: Additional requirements for specified types of vehicles, machinery or tyres from specified countries

Note: It would be helpful to add a table to summarise the “additional” requirements and the “specified” countries

3.1.1 (1) refers to “must be cleaned” and “documented evidence of cleaning must be provided”. This conflicts with other parts of the standard. Also, what constitutes “documented evidence” of cleaning?

Guidance: What is an approved treatment and/or approved pre-shipment cleaning method and where can these be found?

3.3 Used vehicles from Japan imported as break bulk

3.3(1) Why is this requirement restricted to break bulk vehicles from Japan and not other countries and other modes of transport?

3.4 – Does this section apply to both new and used vehicles?

3.4.2(2) It will be difficult to keep a container sealed and to treat it with an approved knockdown insecticide?

Guidance: “It is advised” – what does this mean?

Schedule 2: Definitions

Should the IPPC definition of “Regulated Article” be included in the definitions section? MPI is effectively managing used (and some new) vehicles as “Regulated Articles”.

Plant Material: “.... blood, bones excretions, feathers, (many) fibres, meat and secretions” are not “plant material” by definition.

Add definitions of “Grossly Contaminated” and “Field Tested”

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AUTOMOTIVE TECHNOLOGIES LIMITED, NIGEL GRINDALL, CHIEF EXECUTIVE OFFICER

6th November 2015

Attn: Biosecurity and Environment Group
Plant, Food and Environment Directorate
Ministry for Primary Industries
PO Box 2526, Wellington
Fax 04 894 0733

Email: standard@mpi.govt.nz

MPI Risk Management Proposal: Review and amendment of the Import Health Standard for Vehicles, Machinery and Tyres – Submission by Automotive Technologies Limited

To Whom It May Concern,

Thank you for the opportunity to comment on the Risk Management Proposal.

Automotive Technologies Limited (ATL) uses a combination of risk management interventions in its vehicle clearance system to ensure that vehicles are decontaminated prior to export from Japan to the Ministry of Primary Industry (MPI) standards as set out in the Import Health Standard for Vehicles, Machinery and Tyres Document (IHS) prevailing at the time.

The outcomes from our system mitigate the likelihood of entry and establishment of high consequence hazards via the imported vehicle and machinery pathway to a negligible level in accordance with the draft IHS.

ATL supports the draft MPI IHS in principal to ensure high risk organisms are kept offshore by requiring all vehicles and machinery are processed through a MPI approved biosecurity system process offshore and prior to entering New Zealand.

In accordance with the proposed draft IHS, ATL will decontaminate using the ATL approved vehicle biosecurity clearance system process for all vehicles and machinery offshore in Japan prior to export.

1. ATL submits that any rejected vehicles that pose a risk will be directed for Heat Treatment or Fumigation in New Zealand at designated transitional facilities on or near ports by approved stakeholders. Separation offshore and on vessels will be maintained between decontaminated, precleared and rejected vehicles and machinery that have been through an MPI approved vehicle biosecurity clearance system process.

The facts supporting this submission:

1.1 Japanese Labour Unions oppose workers being exposed to harmful fumigation chemicals such as Methyl Bromide.

1.2 Even if it was possible to treat vehicles and machinery offshore in Japan the logistics and costs would be prohibitive considering that the risk can be mitigated by shipping processed and rejected vehicles to New Zealand for immediate treatment upon discharge.

1.3 Heat Treatment is currently not available at the main ports in Japan, mainly due to restrictions applied around physical, environmental, and safety constraints by individual port and local authorities. Therefore, offshore Heat Treatment is not a viable option for treating rejected vehicles and machinery in Japan.

2. ATL submits that all vehicles and machinery currently being shipped to New Zealand, whether on Roll On Roll Off vessels (RORO) or in an ISO Container from Japan are considered Break Bulk cargo and be processed through an offshore MPI approved biosecurity system process in accordance with the draft IHS to ensure that the risk of entry of all high risk organisms are mitigated offshore.

3. ATL submits that MPI inspectors allocated to MPI approved system stakeholders in Japan for the purpose of conducting its ongoing audit programme is proportionate to the volume of inspections conducted by that MPI approved system stakeholder, to ensure that high standards are maintained across all stakeholders under the draft IHS.

We endorse the improvements to the draft IHS and are committed to supporting MPI to achieve the best possible biosecurity outcomes for New Zealand.

Yours sincerely,

Nigel Grindall
Automotive Technologies Limited
Level 31 Vero Centre
48 Shortland Street, Auckland 1010



Proposed amendments to the IHS for vehicles, machinery and tyres

My reasons for commenting on the proposed changes stem from my former occupation (Quarantine Inspector/trainer for MAF from 1981-2012) and my current occupation (Accredited Person and Approved Operator trainer for Biosecurity and Training South).

The contaminant thresholds have always concerned me but the proposed change to them will increase biosecurity risk in my opinion.

The table in the proposed IHS (reference 2.3) appears to be contradictory. It states that seeds are always considered a contaminant yet up to five dried fruits are acceptable. In my experience dried fruits usually contain seeds.

The risk of citrus canker in dried citrus has always been considered too high to allow any unprocessed citrus to be imported. Has this changed?

I was pleased to see that pine needles are always to be regarded as a contaminant but surprised that pine cones were not mentioned. If they are not added to the pine needle category, they could be considered loose dead or dry plant material and up to five could be allowed to remain in a vehicle. Not everyone necessarily considers them potential seeds.

A common contaminant in the boots of vehicles has been residues from firewood. This could be an avenue for the entry of pine pitch canker if a tolerance is allowed.

I would imagine that the contaminant thresholds could be subject to review if a new risk is discovered. Therefore I was surprised to see that the new threshold table is in the actual standard as opposed to the guidance document (unlike the current situation where it is covered by appendix 2 of the GD). If a rapid change is required, this would not be easily possible for an IHS whereas it would be if the details were to remain in the guidance document.

Lee Osborn

Trainer
Biosecurity and Training South
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SUBMISSION

Ministry for Primary Industries

Submission

Import Health Standard Vehicles, Machinery and Tyres

Introduction

This submission is from the Customs Brokers and Freight Forwarders Federation of New Zealand Inc. (CBAFF)

President: Glenn Coldham

Executive Director: Rosemarie Dawson

Physical Address: 162 Mokoia Road, Birkenhead, Auckland 0626

Postal Address: PO Box 34-530, Birkenhead, Auckland, 0748

Email Address: ceo@cbaфф.org.nz

Phone Number: 09 419 0042

The Federation represents those companies and individuals who are involved in the business of border logistics facilitation. Membership representation is diverse, covering all facets of service provision for the facilitation of international trade – both import and export. Our nationally based membership is comprised of 120 business members, who make up 80 per cent of the industry. Included in the Federation's aims is the following statement: "To liaise, maintain and develop communication within the industry and between various stakeholders to ensure mutually beneficial strategic partnerships result".

General Comment

CBAFF has reviewed the Standard for Consultation and make the following comment that we believe require further attention:

The requirement for vents to be sealed and a residual spray applied to containers if the required treatment does not take place within 12 hours of discharge at Port of Entry is of concern and in particular in relation to tranship cargoes. This requirement will create delays, add to port congestion, involve additional costs and require ports to make space available for the treatment to take place. We note that South Island containers from the

USA mostly tranship at Auckland or Tauranga. There are also instances of containers transiting via Auckland to Port Chalmers and Bluff but transshipping at Australian ports.

Has the Ministry taken into account the Australian requirements for transship cargoes? We suggest that it is likely that USA imports could face treatment in Australia to meet Australian conditions and again on arrival into New Zealand, thereby adding significant compliance cost.

CBAFF wishes to continue discussion with MPI on the issues that are raised in this submission and others that may arise in the future.

-End-

SUBMISSION

TELEPHONE 0800 327 646 | WEBSITE WWW.FEDFARM.ORG.NZ



To Biosecurity and Environment Group, Ministry for Primary Industries

Submission on: Proposed amendments to the Import Health Standard for vehicles, machinery and tyres.

From: Federated Farmers of New Zealand

Date: 6 November 2015

Contact: Philippa Rawlinson
Arable and Bee Industry Group Advisor
Federated Farmers of New Zealand
p: 03 357 9457
e: prawlinson@fedfarm.org.nz

Federated Farmers wishes to be heard in the matter

SUBMISSION TO MINISTRY FOR PRIMARY INDUSTRIES ON PROPOSED AMENDMENTS TO THE IMPORT HEALTH STANDARD FOR VEHICLES, MACHINERY AND TYRES

1. FEDERATED FARMERS SUBMISSION

- 1.1. Federated Farmers of New Zealand welcomes the opportunity to make this submission to the Ministry for Primary Industries (MPI) on the proposed amendments to the Import Health Standard (IHS) for vehicles, machinery and tyres.
- 1.2. Stringent biosecurity practices and procedures are of the utmost importance to Federated Farmers. It is paramount we operate in a biosecurity system that ensures harmful pests and diseases are kept out of New Zealand.
- 1.3. Federated Farmers welcomes the proposed change to the IHS that stipulates all imports of agricultural, forestry and horticultural vehicles and machinery must be thoroughly cleaned and free from biosecurity contaminants prior to export. This ensures that any biosecurity risks are mitigated in the country of origin rather than in New Zealand.
- 1.4. However, we are concerned with the use of the terminology "MPI Approved Systems" and the potential for the process of cleaning of used agricultural, forestry and horticultural vehicles and machinery being undertaken by a third party with no technical expertise or appropriate experience with cleaning of such machinery.
- 1.5. Once MPI has addressed the concerns of the Federation and the appropriate action has been undertaken, we would support the proposed amendments.

2. CLEANING OF USED AGRICULTURAL, FORESTRY AND HORTICULTURAL VEHICLES AND MACHINERY

- 2.1. The amendment to the IHS proposes that all agricultural, forestry and horticultural vehicles and machinery must now be thoroughly cleaned offshore, prior to export.
- 2.2. While we support the move to ensure all cleaning occurs offshore, we are concerned about the potential for this cleaning to be undertaken by an MPI approved or registered Quarantine Cleaning Service Provider who does not have the expertise or technical know-how or appropriate experience to dismantle the equipment without causing extensive damage.
- 2.3. The exporter is the expert in their field of service and maintenance of such machines, and in most cases likely to be a dealer with extensive workshop facilities. A dealer, service agent or even a farmer will have a much more thorough and complete knowledge of how to dismantle any piece of equipment without causing extensive damage than some third parties.

- 2.4. On the other hand, we are concerned this provision could have the potential to introduce technical trade barrier which provides protection to the franchised new vehicle importers and pushes the purchase of new machinery out of the reach of New Zealand farmers who may in certain circumstances justify the purchase of second hand machinery over new. Clearly a balance needs to be struck to ensure the appropriate cleaning takes place without unduly restricting the market for second-hand machinery.
- 2.5. Sometimes, despite the best efforts and stringent cleaning by dealers, service agents and farmers, not all contaminants are identified and removed. Federated Farmers submits that importers must continue to be able to provide remedial cleaning within the Transitional Facility, a place where when systems are managed correctly any re-cleaning can be undertaken without leading to any heightened biosecurity risk.

3. CONCLUSION

- 3.1. Federated Farmers welcomes the opportunity to submit on the proposed amendments to the IHS for Vehicles, Machinery and Tyres.
- 3.2. Stringent biosecurity practices and procedures are of the upmost importance to Federated Farmers and it is vital that no harmful pests and diseases come to New Zealand.
- 3.3. Federated Farmers submits that, any cleaning of used agricultural vehicles or machinery is undertaken by the exporter, whether they be a service agent, dealer or farmer. They are the individuals with the skills and capability to manage the process appropriately.
- 3.4. Federated Farmers submits that any remedial cleaning is undertaken at a Transitional Facility in New Zealand, where cleaning can be undertaken without leading to any heightened biosecurity risk.

4. ABOUT FEDERATED FARMERS

- 4.1. Federated Farmers of New Zealand is a primary sector organisation that represents farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of farmers.
- 4.2. The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
- 4.2.1. Our members may operate their business in a fair and flexible commercial environment;
- 4.2.2. Our members' families and their staff have access to services essential to the needs of the rural community; and
- 4.2.3. Our members adopt reasonable management and environmental practices.

ENDS



6 November 2015

Submission on the “Risk Management Proposal – Review and amendment of the Import Health Standard for Vehicles, Machinery and Tyres”

Background

1. The New Zealand Forest Owners Association (FOA) is the representative membership body for the commercial plantation forest growing industry.
2. FOA members are responsible for the management of approximately 1.2 million hectares of New Zealand's plantation forests and over 80% of the annual harvest.
3. FOA is submitting on behalf of its membership nationally.

Submission

A: Brown Marmorated Stink Bug

4. While this pest is not regarded as a plantation forestry pest, the FOA recognises that it is a serious biosecurity threat to the economy and lifestyle of New Zealand.
5. The FOA encourages the Ministry for Primary Industries (MPI) to put all practicable steps in place to ensure that BMSB does not establish in New Zealand.
6. In this regard, the FOA encourages MPI to work closely with New Zealand's horticultural and arable crop sectors to ensure that effective standards are put in place to treat imported vehicles arriving from known BMSB sources.

B: Used Vehicle Shipped as Break Bulk from Japan

7. The FOA supports the proposed amendment that all used vehicles shipped as break bulk from Japan should require processing through offshore MPI approved systems.

C: Used Agricultural, Forestry and Horticultural Vehicles and Machinery

8. The FOA supports the two amendments:
- a. That all used agricultural, forestry and horticultural vehicles and machinery, from all countries, must be thoroughly cleaned prior to export offshore.
 - b. The proposed requirement will need to be supported by evidence showing that offshore cleaning meets MPI's requirements.

Rationale

9. The forestry industry has experienced several situations where pathogens, in particular, have caused significant damage to plantation forests and the most likely source of the pathogen has been from used forestry machinery – for example, *Phytophthora pluvialis*, *Neonectria fuckeliana* (to name two).
10. Therefore, we strongly support steps to reduce risk from this pathway and would like to have discussions with MPI officials on what more could be done, including the opportunity for industry representatives to examine used machinery on arrival.

Yours sincerely



David Rhodes
Chief Executive



J J
⑨



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3 November 2015

**SUBMISSION ON
THE DRAFT MPI IMPORT HEALTH STANDARD FOR VEHICLES, MACHINERY AND
TYRES DATED SEPTEMBER 2015, AND THE ASSOCIATED RISK MANAGEMENT
PROPOSAL, AND TECHNICAL ADVICE**

Submitter: Horticulture New Zealand Incorporated
Submitted by: Richard Palmer, Biosecurity Manager
Contact Details: P O Box 10232, The Terrace, Wellington 6143, New Zealand
Ph +64 4 472 3795
Email Richard.palmer@hortnz.co.nz

References:

- A. MPI Technical Advice; The Likelihood of establishment of Brown Marmorated Stink Bug in the New Zealand autumn/winter period dated 16 Sept 2015
- B. MPI Risk Management Proposal; Review and amendment of the Import Health Standard for Vehicles, Machinery and Tyres
- C. MPI Import Health Standard; Vehicles, Machinery and Tyres – draft for consultation dated 24 Sept 2015
- D. MPI Technical Advice; treatments for Brown Marmorated Stink Bug dated 7 Sept 2015

EXECUTIVE SUMMARY

1. Brown Marmorated Stink Bug (BMSB) presents significant biosecurity risk to New Zealand horticulture, agriculture, to New Zealand's native flora and fauna, and as a major nuisance pest to the general populace. There are no acceptable and effective pest control options available for BMSB in New Zealand, and early-warning surveillance methods are extremely limited.

2. HortNZ views very seriously any changes to risk biosecurity management which may result in the establishment of BMSB, and the consequence on food production. In light of this, and as signatories or near signatories to the Government Industry Agreement for

biosecurity readiness and response (GIA), horticulture product groups have been identifying their high priority pests. BMSB sits at the top end of pests of concern to the broad horticultural sector, given its significant production impact, and the lack of detection and control methods.

3. To reduce the risk of BMSB Horticulture New Zealand has engaged extensively with its 5500 member producers across New Zealand to improve awareness of BMSB, and recently committed significant resource to the national BMSB public awareness campaign.

4. HortNZ acknowledges the extensive work undertaken by MPI to mitigate against the risk posed by BMSB, including the implementation of emergency measures for vehicles from USA; a national awareness campaign; and readiness and response preparedness.

5. The IHS, RMP, and treatments technical advice set out the following changes to BMSB/vehicle and machinery risk management:

- Require treatment for vehicles from the USA during 1 Sept to 30 April only (US shipping dates)
- Amended US vehicle treatment requirements for BMSB (time, rate etc.)
- Require all vehicles, shipped break bulk from Japan, to be processed offshore
- Require the cleaning of all used agricultural machinery before export

6. There remains sufficient uncertainty regarding BMSB establishment during the New Zealand autumn/winter. The risk of establishment cannot therefore be substantiated as negligible, and could be determined as higher than is stated in the Risk Management Proposal (Ref B) and BMSB Establishment advice (Ref A). When considered together with the consequence of establishment, and the lack of available controls, the overall risk from BMSB would be unacceptable.

7. Horticulture New Zealand:

- supports the proposal to require mandatory offshore processing for used vehicles, shipped break bulk, from Japan, noting the success of the existing programme and the risks of managing uncleared vehicles on arrival;
- does not support the proposal to remove the emergency measures for vehicles from the USA, and to therefore redefine the BMSB risk period requiring treatment only from 1 September to 30 April each year;
- would support a joint research proposal to eliminate/reduce the BMSB post-diapause survival uncertainty, in order that the suppositions drawn in the RMP, and changes proposed might be concluded;
- does not support the proposed changes to treatments for vehicles and machinery from the USA for the management of BMSB. The proposed treatments lack the scientific evidence demonstrating efficacy that is expected for a pest of such significant concern to New Zealand;
- supports the proposal for a thorough, offshore clean of all used agricultural, forestry and horticultural vehicles and machinery from all countries. The evidence of biosecurity contamination arriving on used equipment underscores the need for this improvement

8. In summary, New Zealand's horticulture sector needs to be assured that New Zealand's imports of vehicles, machinery, and tyres are underpinned by a robust IHS which manages biosecurity risk, especially for such a high impact pest.

CHANGES TO IHS DEFINED RISK PERIOD FOR US VEHICLES

9. There appear to be several factors which have led to the conclusion that establishment of BMSB in the NZ autumn/winter would be 'so low as to be considered negligible' (Ref A). These are:

- Propagule pressure is low
- Biological data suggests BMSB unlikely to re-enter diapause on encountering NZ autumn/winter conditions
- Low likelihood of reproduction from gravid females
- Establishment would therefore require multiple BMSB arriving and surviving together to create a breeding colony, which is considered negligible due to the low numbers of BMSB arriving in this period.
- There is a moderate likelihood of that BMSB could survive, post-diapause, through the NZ winter until reproductive conditions are suitable.

Propagule Pressure

10. Propagule pressure appears the key factor in determining the risk of establishment in the NZ autumn/winter period. Reducing the uncertainty of knowledge of BMSB arrival in this period is therefore critical to calculating the risk. It is acknowledged that the propagule pressure is lower in the NZ winter/autumn period, however.

11. Propagule pressure is likely to be low in NZ autumn/winter and the lack of border interceptions does lend support to this, however there is little evidence to support the effectiveness of border inspections for BMSB. Despite the excellent work of MPI border staff, Ref A does note that detections are 'ad hoc' and *'in the absence of structured sampling, statistically reliable estimates of numbers are not possible'*. The data has enabled areas of particularly high risk to be identified but Ref A notes 'Beyond this, these data must not be used for any quantitative analysis without applying a robust procedure which accounts for their qualitative origins'. BMSB has only been a focus of inspections for a relatively short term, and the exponential increase in detections underscores the relatively unknown BMSB pressure. Until such time as statistical analysis is undertaken of BMSB inspection efficacy, or the BMSB detections stabilise, no firm conclusion can be drawn on propagule pressure.

Post-diapause NZ winter survival

12. The effect of the move of BMSB from north to south into the NZ winter/autumn period, and diapause does not appear to be sufficiently well understood. Ref A notes that BMSB are unlikely to re-enter diapause on encountering NZ autumn/winter conditions, however, *'there is a moderate likelihood that some BSMB may survive in post-diapause quiescence through the New Zealand winter and into a period when suitable conditions occur for reproduction'*. The concerns previously raised about emerging, albeit sometimes anecdotal, evidence of varied BMSB overwintering patterns, and survivability from early emergence, appear to have been partly addressed in reclassifying some of the establishment risk as moderately likely, but sufficient uncertainty remains.

Effect of Uncertainty

13. As a result of this uncertainty we conclude that, when combined with the potential consequence of establishment, and the lack of available surveillance and pest control, removing the mandatory treatment of US vehicles in the NZ autumn/winter is premature, and

not in line with the precautionary principle. Should evidence become available in future that reduces this uncertainty, HortNZ would support revisiting this proposal.

PROPOSED CHANGES TO BMSB TREATMENT MEASURES

14. The RMP (Ref B), and the BMSB Treatments technical advice (Ref D), do not meet the science-based evidential standard required for the effective treatment of such a serious pest to New Zealand. The BMSB risk can be considered equivalent to fruit fly, therefore the expectation is of treatment research with efficacy proven to probit 8.7 (or equivalent). Given MPI's expectation of appropriately robust phytosanitary standards to support market access; the principle of equivalence; and science-support risk management, the lack of appropriate, peer-reviewed science to support these treatments does not meet the acceptability test.

15. The research conclusions drawn from "commercial trials, unpublished data, and 'projected' mortality" do not meet the test for scientific evidence to support the treatment changes. Whilst research ultimately may demonstrate efficacy, the apparent standards applied in this are inconsistent with expectations, with MPI's stated positions, and may serve to reduce New Zealand's standing as a science-supported risk manager in the international trade context. The proposal to add safety margins to treatments further expresses the lack of scientific rigour in support of, and therefore confidence in, these treatments.

16. Accordingly HortNZ does not support the proposed treatment changes at this stage.

Comments and Queries on Changes To Treatment For BMSB (Ref B)

17. The lack of data, research deductions, and application of safety margins raises a number of queries over proposed treatments. In turn these queries raise doubt as to the veracity of the treatments proposed. HortNZ may support changes to treatments provided the appropriate standard of research and data is made available.

18. Changes to Methyl Bromide fumigation.

- a. Para 23 cites unpublished data of commercial fumigation at 16g/m³ for 12 hrs at >15°C providing probit 9 efficacy;
 - i. Does MPI expect the research by Walse, S.S. to be published and available before a final decision is made on changes to methyl bromide treatments?
 - ii. Has MPI reviewed this research, and concluded the research and data is of sufficient standard and the treatments effective, in the absence of peer-reviewed and published research data?
- b. Para 17: are the specified endpoint values for methyl bromide a key reason for large reduction in fumigant rate, and is a straight line decline in concentration valid?

19. Changes to Sulfuryl Fluoride fumigation.

- a. Para 25 cites unpublished data of commercial fumigation at 16g/m³ for 12 hrs at >10°C with 50% endpoint reading, as highly efficacious (probit 9):
 - i. Does MPI expect the research by Walse, S.S. to be published and available before a final decision is made on changes to sulfuryl fluoride fumigation?
 - ii. Has MPI reviewed this research, and concluded the research and data is of sufficient standard and the treatments effective, in the absence of peer-reviewed and published research data?

20. Changes to heat treatment.

- a. Overall the commentary in Ref B suggests many variables in the application of commercial heat treatment are not well understood. Whilst the intent of applying a safety margin is understood, using this approach pest mortality may still not be achieved.
- b. Para 26: the in-publication research by Kuhar and Aigner refers to 'laboratory trials' and 'confirmation by commercial trials' of the $50^{\circ}\text{C} \geq 15$ minutes treatment. Does this trial work meet the required level of efficacy (probit 8.7)?
- c. Does MPI expect the research by Kuhar and Aigner to be published and available before a final decision is made on changes to heat treatment?
- d. What research has been undertaken to determine the coldest location in vehicles being treated, and what conclusions have been drawn to enable appropriate monitoring of heat treatments?
- e. MPI has added a 33% margin to the proposed schedule time for heat treatment to manage inconsistencies in heating rates within vehicles. Does this reflect:
 - i. that the coldest location is unknown? or
 - ii. that there are relatively cold locations which heat at different rates dependent on the vehicle type? or
 - iii. there is a lack of confidence in the research into the coldest location, and consequently any reduction in temperature may be premature?
- a. Para 30: The segregation should be mandatory not recommended to ensure re-infestation does not occur.

Comments and Queries: Treatments for BMSB, MPI Technical Advice September 2015 (Ref D)

- 21. Section 3.1 cites 'projected' mortality between 99% and 99.9968% (LE_{99}). What level of research is available to support these projections, and is there actual treatment mortality research and data to support efficacy?
- 22. Section 3.1 cites 56 separate fumigations with three replicates to confirm mortality – what data is available from these replicates and will it be published and peer-reviewed?
- 23. Section 3.3 cites heat treatment efficacy 'in the laboratory', supported by a 'demonstrated effectiveness' at a commercial facility of the 15min / 50°C resulting in '100% mortality'. Does the research by Kuhar and Aigner meet the required standard?
- 24. Section 3.3 cites the need to add 33% margin of time to reflect the 'difficulty in locating a temperature probe in all locations where BMSB may hide', and the difficulty to 'locate every cold spot for temperature monitoring'. This accords with our questions raised in para 20 (d) and (e) above – there is apparent uncertainty about both the coldest location in any vehicle, how this location is monitored during treatment, and therefore what the actual minimum temperatures are during treatment.
- 25. Kuhar and Aigner's research concludes that adult BMSB are killed after exposure to 50°C for 15 minutes but at 45°C an hour's exposure is required. Ensuring that 50°C is achieved across the entire vehicle is therefore critical to achieving mortality under the proposed treatment schedules. The addition of 50% extra treatment time does not adequately account for the deduced exponential decline in mortality as temperatures fall. If treatment temperatures fell closer to 45°C rather than 50°C would a 30 minutes treatment still be effective? Like the use of cold treatment for fruit fly the simple addition of extra time

does not adequately protect against an unknown or un-prescribed variation in treatment temperature.

CONCLUSION

26. Given the **uncertainty of knowledge about BMSB establishment, the potentially severe consequence, and the lack of pest-control options** there would appear to be ample basis for a more precautionary approach to this pathway from the US. Reinforcing this high level of uncertainty is the lack of scientific veracity in support of both BMSB establishment, and the proposed treatment schedules, which would also likely reduce New Zealand's standing as a science-supported risk manager in the international trade context.

27. This submission is supported by Kiwifruit Vine Health, New Zealand Avocado Growers Association, Pipfruit New Zealand, and Vegetables New Zealand.

28. HortNZ supports the Kiwifruit Vine Health and Pipfruit New Zealand submissions.

29. HortNZ welcomes the opportunity to discuss the concerns raised together with other horticultural industry product groups.



Imported Motor Vehicle Industry Association Inc.

**IMPORTED MOTOR VEHICLE INDUSTRY
ASSOCIATION (INC).**

Submission to:

Ministry of Primary Industries

on:

**Proposed amendments to the IHS for vehicles,
machinery and tyres**

EMAIL: standards@mpi.govt.nz

Prepared: 6th November 2015

1. Background:

The Imported Motor Vehicle Industry Association Incorporated ("IMVIA") is the business association that represents the interests of the wider trade involved in importing, preparing, wholesaling and retailing the majority of used vehicles imported from Japan, Singapore and other jurisdictions.

Our members include importers, wholesalers, Japanese auction companies and exporters, shipping companies, inspection agencies, TSDAs, ports companies, compliance shops and service providers to the trade, as well as retailers.

We provide legal and technical advice to the trade, and liaise closely with the relevant government departments, including New Zealand Transport Agency, Ministry of Transport, NZ Customs Service, MAF, Ministry of Consumer Affairs, Commerce Commission, EECA, MfE etc.

2. Official Information Act 1982:

The IMVIA has no objection to the release of any part of this statement of support under the Official Information Act 1992.

3. Privacy Act 1993:

The IMVIA has no objection to being identified as the submitter.

4. Contact:

For further contact in relation to this statement:

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5. Introduction

IMVIA thanks MPI for their willingness to engage industry in this matter and specifically for the opportunity to provide this submission.

6. Scope

The scope of this submission is limited to our expertise with used motor vehicles and the importation thereof.

7. Submission

IMVIA supports, in principle, MPI's initiative to manage biosecurity risk offshore. The proposed changes to the IHS provide additional mitigation from the risk of biosecurity contamination by requiring 100% pre-clearance of used vehicles. Since import risk analysis shows "used vehicles" are a risk, all used vehicles, for commercial or personal import, should require this clearance.

The practice of re-inspecting for audit and quality control purposes a small proportion of vehicles that upon arrival in New Zealand should continue.

This should also allow the streamlining of port clearance processes for imported used vehicles in New Zealand and hence reduce clearance times.

IMVIA's support in principle for managing biosecurity risk offshore is conditional upon the availability of adequate business operations and facilities in source jurisdictions. This adequacy should include competitive aspects and ultimately be judged by the efficacy, affordability, and timeliness of vehicle inspections.

IMVIA submits that competition is a critical driver of performance and innovation, and that it would benefit the New Zealand public and the used motor vehicle industry by enabling a choice of service provider for this inspection, especially since the efficacy of approved inspectors can be verified (and rated) during re-inspection of vehicles once they arrive in New Zealand.



Proposed amendments to the IHS for vehicles, machinery and tyres.

Submission by:

Peter Webb
Chief Executive
Independent Verification Services

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PO Box 9272, Waikato Mail Centre, Hamilton 3240

Biosecurity Submission: Regarding Clause 3.3 Part (1)

IVS submits that used vehicles from Japan imported within shipping containers should not be included within the requirements of section 3.3 part (1). The current wording of this section should be retained and refer to break bulk vehicles only.

Containerized vehicles have a significantly different risk profile to that of “*break bulk*” vehicles, and there are a number of options available to further reduce the risk, if deemed necessary. Requiring pre-clearance for this pathway would effectively close this option for many New Zealand importers, as pre-clearance facilities are not available at smaller Japanese ports.

Biosecurity risk within the containerized pathway for used Japanese vehicles differs in that:

1. Containerization provides for in-transit containment of both motile and non-motile pests.
2. It allows for vehicles to be held securely while awaiting inspection
3. Provides for safe clean up and removal of any gross contamination that may fall from the vehicle during transit.

Biosecurity risk mitigation measures:

- Containerization provides for possible mitigation measures should they be deemed necessary. *For example: the use of in transit insecticide as a knockdown measure to destroy motile pests.*
- The potential development of an approved system combining in-transit insecticide and on-arrival cleaning.

IVS further submits that, as the establishment of pre-clearance facilities in many smaller Japanese ports is not commercially viable, the requirement to pre-clear containerized vehicles will effectively - and in our opinion unnecessarily - shut down a small but key part of this important pathway.

IVS further submits that, the Japanese used vehicle containerized pathway is financially

important to many of the smaller New Zealand Importers and providers of inspection services (including us). Removal of this pathway could lead to financial challenges for these New Zealand based businesses and will in turn drive monopoly positions for larger organizations that provide international pre-clearance services.

Finally, IVS submits that substitution of vehicles from the break bulk pathway to that of the containerized pathway is very unlikely due to the higher costs of shipment and limited container availability.

Peter Webb
Chief Executive

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JAPAN EXPORT VEHICLE INSPECTION CENTER CO LTD (JEVIC)

4th November 2015

Biosecurity and Environment Group
Plants, Food and Environment Directorate
Regulation and Assurance Branch
Ministry for Primary Industries
P O Box 2526
Wellington

Document Title: DRAFT Import Health Standard: Vehicles, Machinery and Tyres

Mr Euan Philpot
Director and Chief Executive Officer
JEVIC New Zealand Limited

JEVIC Submission

1 Background

Japan Export Vehicle Inspection Center Co Ltd (JEVIC) is an independent inspectorate and approved operator for NZ Ministry of Primary Industries (MPI) Off Shore Used Vehicle Program.

From 2001 JEVIC has facilitated biosecurity decontamination and inspections for MPI at designated JEVIC facilities within Japan. In 2009 JEVIC was appointed as an approved operator for MPI, successfully implementing the JEVIC Biosecurity Inspection System (JBIS) at its facilities across Japan.

The JBIS process was then successfully implemented for cargo from United Kingdom to New Zealand in 2012.



2 Comments on Draft Import Health Standard.

Section 3.1.1 Used agricultural, forestry and horticultural vehicles and machinery from all countries.

Documented evidence – examples of acceptable evidence that can be provided would be beneficial.

Section 3.3 Used vehicles from Japan imported as break bulk

The term “break bulk” should be replaced with “commercial consignments of used vehicle cargo”.

3 Comments on Guidance Document

Section 5.4.11 Offshore/ Onshore MPI approved systems

It is unclear if this section is referring to used vehicles and machinery from countries other than Japan.

4 Summary

JEVIC commends MPI for this review and we acknowledge the policy goal outcome to manage risks at point of embarkation. JEVIC supports the goal of keeping risk off shore.

As a major global pre-shipment inspection specialist, JEVIC is 100% committed to decontamination and biosecurity inspection of cargo prior to shipment to New Zealand.

END

What is the below proposal to manage this process

Is there a reward for compliance to regular imports of the below mentioned cargo types

Would MPI be better to enforce a fine system and introduce regulation by way of import permit so that the continuous offenders are discouraged, and the compliant importers that go to great expense are rewarded. For Example if a freight forwarder has repeatedly brought in clean used machinery, MPI inspects and advises no further cleaning is required – will they be able to move to only having 70% of their clients imported used machinery randomly inspected.

What kind of documentation does MPI propose is adequate for documentary evidence, for example a whole industry was created by AQIS in Australia which saw a huge revenue raising exercise by Australian companies in the recent boom. Within the Port itself a monopoly exists on the import of larger used machinery, anything approx. 30 cbm and greater.....does MPI propose changes to allow greater competition or does it intend to fall more in line with The USA EPA and their recent blocking of any cleaning of any kind at a number of the port facilities. In Southampton, UK for example one of the shipping lines has a wash facility where the other does not, that makes the shipping line without the monopoly less likely to police the Cleanliness of used machinery before climbing on board the ship. If MPI is considering the implementation of documentary Evidence, how will this be verified or is intended to be a simple honesty system with the failure being an expensive import cleaning bill ?

Below Questions in the Draft in relation to the proposed changes.

44. MPI proposes that all used agricultural, forestry and horticultural vehicles and machinery, from all countries, must be thoroughly cleaned prior to export, offshore.

45. The proposed requirement will need to be supported by evidence showing that offshore cleaning meets MPI's requirements.

Mandatory Offshore Cleaning of All Used Vehicles

46. Significant numbers of used agricultural, forestry and horticultural vehicles and machinery arrive in New Zealand with extensive contamination. Some of these vehicles appear clean, but partial dismantling reveals high risk material such as pine needles and soil.

47. The IHS currently requires that used vehicles arrive in New Zealand as clean and free of contamination. However used agricultural, forestry and horticultural vehicles and machinery continue to arrive in New Zealand carrying biosecurity contamination (see *examples below*) and causing major disruptions to importers, shippers, ports and MPI.

48. Under the current IHS, MPI has the ability to re-ship those units that are grossly contaminated but this has been an inefficient and reactive way to manage the biosecurity risks. A requirement to provide evidence of offshore cleaning is expected to encourage more proactive communication prior to shipping and reduce the likelihood of grossly contaminated used agricultural, forestry and horticultural vehicles being shipped to New Zealand.

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6 November 2015



standards@mpi.govt.nz
Ministry for Primary Industries
PO Box 2526
Wellington 6140

To whom it may concern

Re: Kiwifruit industry comments on MPI's proposed amendments to the IHS for vehicles, machinery and tyres

Thank you for the opportunity to make a submission on proposed amendments to the IHS for vehicles, machinery and tyres, including the following documents:

- Draft IHS: Vehicles, Machinery and Tyres
- Draft Guidance Document: Vehicles, Machinery and Tyres
- Draft Risk Management Proposal: Review and amendment of the IHS for Vehicles, Machinery and Tyres
- MPI Technical Advice: Treatments for brown marmorated stink bug
- Technical Advice: The likelihood of establishment of brown marmorated stink bug in the New Zealand autumn/winter period

KVH welcomes opportunity to discuss any aspect of our submission with MPI, and we look forward to your careful consideration of these matters.

Yours sincerely,

Barry O'Neil
CE, Kiwifruit Vine Health

KVH Submission on proposed amendments to the IHS for vehicles, machinery and tyres

Overall comments on proposals

1. In relation to proposed amendments in the 'Risk Management Proposal' (RMP)¹ KVH submits:
 - In support of proposed format changes (as set out in paragraphs 13 & 14 of the RMP)
 - Against proposed changes to new pre-export treatment requirements for brown marmorated stink bug associated with vehicles and machinery from the USA during a defined risk period (paragraph 15. A. of the RMP)
 - In support of proposed changes to require mandatory offshore processing of used vehicles shipped as break bulk from Japan (paragraph 15 B. of the RMP)
 - In support of proposed changes to amend offshore requirements for used agricultural, forestry and horticultural vehicles and machinery (paragraph 15. C. of the RMP).
2. KVH acknowledges the importance of science-based risk assessments to manage the risks associated with international movements of risk goods, and shares MPI's commitment to principles of transparency and evidence-based technical justification for all phytosanitary measures.
3. While KVH supports the majority of proposed changes, at this time we are not able to support proposed changes in relation to pre-export treatment requirements for brown marmorated stink bug associated with vehicles and machinery from the USA, on the basis that these changes are not sufficiently supported by science at this time and expose New Zealand to an unacceptable level of biosecurity risk.
4. KVH does not agree with the overall conclusion that 'the likelihood that BMSB will establish in New Zealand during the proposed autumn/winter period is so low as to be considered negligible'. Rather our view is the likelihood of establishment is low (not negligible), the level of scientific uncertainty surrounding this at this time is high, and that the overall risk to NZ would be moderate given:
 - the severity of consequences should BMSB establish, including impacts on the environment, horticulture and public nuisance impacts;
 - the limited tools for post-border surveillance for BMSB; and
 - the limited options and feasibility for successful eradication of BMSB should it establish post-border.
 - The significant scientific uncertainty relating to risk of BMSB establishment.KVH believes this an unacceptable level of risk, with the level of scientific uncertainty further supporting the case for New Zealand to retain year-round pre-export treatment requirements for BMSB associated with vehicles and machinery from the USA at this time.
5. New Zealand is implementing a wide range of measures to prevent the establishment of BMSB, including considerable action and effort on the part of both MPI and industry. Our view is the current measures and effort can and should be further strengthened, and this should be progressed through joint action under GIA.
6. KVH supports the overall view and matters raised in the Horticulture NZ submission on proposed amendments to the IHS for vehicles, machinery and tyres.

Comments on proposed format changes

7. These changes usefully simplify and streamline the standard and clarify legal requirements.

¹ Risk Management Proposal: Review and amendment of the Import Health Standard for vehicles, machinery and tyres. September 2015. MPI Consultation Document.

Comments on proposed changes to pre-export treatment requirements for brown marmorated stink bug associated with vehicles and machinery from the USA during a defined risk period

8. KVH acknowledges the actions taken by MPI to prevent the establishment and reduce the risk posed by BMSB, including:
 - Rapid establishment of urgent measures to require pre-export treatment requirements for BMSB associated with vehicles and machinery from the USA
 - A national BMSB awareness campaign to increase the level of BMSB reporting at the border and post-border
 - A programme to train detector dogs to detect BMSB
 - A coordinated readiness programme to plan for and understand limitations associated with surveillance and response for BMSB
 - A national programme of research to improve readiness and response.
9. Horticulture industries have, likewise, invested to increase understanding of risks posed by BMSB and to implement measures to reduce that risk. For example, KVH has invested in:
 - The aforementioned national BMSB campaign (as a co-funder of this campaign)
 - An extensive kiwifruit grower campaign to raise awareness and encourage BMSP reporting to the MPI hotline, including distribution of BMSB fridge magnets to every grower.
 - A BMSB campaign at Port of Tauranga in partnership with Port of Tauranga Limited and MPI, including biosecurity training for POT personnel, distribution of BMSB collateral and inclusion of BMSB in a biosecurity calendar.
 - A BMSB campaign with the BOP Freight and Logistics Sector, including distribution of collateral as per PORT.
 - Risk assessment and off-shore research to understand the risk BMSB poses to the kiwifruit sector.
 - Participating in the MPI-led research programme to improve BMSB readiness and response capability.
10. BMSB is one of the kiwifruit industries highest risk ("most unwanted") organisms, given its significant production impacts, that it is extremely difficult to detect early post-border and eradicate, it is a major nuisance pest, and given it's potential to compromise NZ's "low input" horticulture systems and associated market access advantages.
11. KVH recognises there are multiple potential pathways for entry of BMSB, including the US new and used vehicle pathway that has been demonstrated through interception data to be by far the highest risk pathway. KVH also recognises it is critical MPI and industry continue to further strengthen measures that can be applied across all of the potential pathways (this is discussed further below).
12. KVH does not agree with the overall conclusion in the proposal that 'the likelihood that BMSB will establish in New Zealand during the proposed autumn/winter period is so low as to be considered negligible', for the reasons set out in paragraphs 13-18 below.
13. In relation to likelihood of establishment KVH accepts that, based on NZ and Australian interception data, the propagule pressure over the proposed autumn-winter period is lower, with some but very low numbers of individuals intercepted over this period. MPI has acknowledged limitations of interception data, noting that detections are 'ad hoc' and that 'in the absence of structured sampling, statistically reliable estimates of numbers are not possible'. Our experience is that if even low numbers are being intercepted some individuals will slip through the border. The reasonable conclusion in our view is that a low number of BMSB will slip through the border in the absence of treatment as proposed over the autumn-winter period, and these are more likely to be one or several individuals rather than large aggregations.

14. The experience in the US suggests that BMSB resulted from a single introduction of a small population, which could be as small as two individuals². This establishes it is possible for very low numbers of individuals slipping through our border (as low as two individuals) to successfully establish a population of BMSB.
15. The proposal acknowledges that some life stages of BMSB may arrive, survive and establish over the proposed autumn-winter period if they encounter suitable micro-climates, in particular in Northern parts of New Zealand, and including 'sheltered locations depending on the surrounding structures and the architecture of specific host plants'.
16. Considering 13-15 above together, including published evidence based on the US experience, the following conclusion reached in the paper is not supported by evidence:
'...establishment of a population will rely on multiple individuals arriving together, surviving and remaining together. Current interception data indicates that there is insufficient propagule pressure necessary for this to happen'.
17. In our view the following conclusion reached in the proposal is not sufficiently supported by sound science at this time:
'Biological data about reproductive diapause and environmental cues means that US spring/summer BMSB arriving in New Zealand are unlikely to re-enter diapause on encountering New Zealand's autumn or winter conditions'.
In relation to this conclusion the supporting information in the paper extrapolates information gathered for other Pentatomids, and acknowledges uncertainty (e.g., its use of language such as 'may have...' 'it may be possible...'), which is not reflected in the above conclusion. KVH also understands NZ scientists have identified this as a key area of uncertainty as follows:
'It's become apparent to us at B3 that issues surrounding diapause and movement from northern to southern hemispheres are not well understood' (David Teulon pers. comm. 2015).
We also understand there is evidence that BMSB does not enter into diapause in some warmer parts of the US (David Teulon pers. comm. 2015), and note this section of the MPI technical paper does not consider this.
18. Considering the above, we believe it is reasonable to conclude that the likelihood of BMSB establishing over the proposed autumn-winter period is low (not negligible), and that there remains significant scientific uncertainty at this time.
19. In our view the level of risk to NZ in the absence of treatment over the proposed autumn-winter period is moderate. This is because:
- While the probability of establishment is low, the consequences of establishment are high in terms of economic, environmental and socio-cultural consequences.
 - 'Effective surveillance for BMSB is challenging due to the insect's wide host range and behaviour as well as the lack of an effective lure'³
 - Response options are extremely limited, given 'Forward tracing is not considered feasible...', 'Movement control is not considered a viable option...' and 'Control of BMSB in the urban NZ environment will be very challenging from a technical perspective as well as for reasons of public health and safety'³.
 - The science related to BMSB is still in its infancy, and there remain key areas of uncertainty at this time (refer to paragraph 17 above).

² Xu et al. (2014). *Tracing the origin of US brown marmorated stink bugs, Halyomorpha halys*. Biological Invasions (16: 153-166)

³ MPI Response Plan: Brown Marmorated Stink Bug. Working Draft, December 2014

20. KVH believes this is an unacceptable level of risk, with the level of scientific uncertainty further supporting the case for New Zealand to retain year-round pre-export treatment requirements for BMSB associated with vehicles and machinery from the USA at this time.
21. In relation to proposed changes to BMSB treatment measures KVH is of the view that the technical advice to support the proposed changes⁴ does not meet the science-based evidential standard requirement for the effective treatment of a pest as serious as BMSB. This is comprehensively covered in the Horticulture NZ submission, which KVH fully supports, and will not duplicate here.
22. New Zealand is implementing a wide range of measures to prevent the establishment of BMSB, including considerable action and effort on the part of both MPI and industry as outlined in paragraphs 8 and 9 above. KVH is of the view that the current measures and effort can and should be further strengthened, and this should be progressed through joint action under GIA. We propose this include:
- Capturing lessons from the upcoming MPI-led BMSB simulation to be held in December 2015
 - Initiating discussions to explore establishment of an Operational Agreement for BMSB, adopting a pan-horticulture approach as was used for fruit flies.
 - Exploring opportunity for joint-funded research (MPI and industries) to reduce the level of scientific uncertainty, including on issues relating to diapause as set out in paragraph 17.
 - Taking further opportunities to strengthen awareness and report of BMSB at the border and post-border, building on lessons from the proactive approach taken in the Bay of Plenty with the Port of Tauranga, Growers and freight and logistics sector [Noting the BOP region achieved the highest levels of suspected BMSB reporting in 2014-15, which can be substantively attributed to the proactive approach taken by industries in the BOP, supported by MPI]
 - Systematically reviewing, over time, standards and measures applied to reduce the risk of BMSB entry across all relevant pathways (as has been undertaken by MPI for fruit flies).

Comments on proposed changes to require mandatory offshore processing of used vehicles shipped as break bulk from Japan

23. This proposal serves to push risk offshore and is sound given the demonstrated high risk posed by used vehicles, large volume of used vehicles being imported from Japan (95% of total used vehicle imports) and success of the offshore cleaning and inspection programme operated under the auspices of MPI (including MPI verification that has demonstrated this programme is effective).
24. We question why the proposal is limited to vehicles shipped in break bulk from Japan? For example, is this because all used vehicles are imported from Japan in break bulk? KVH would appreciate some feedback on this point/questions? If used vehicles are, or could in the future, be imported from Japan via other pathways (e.g., in containers?), then KVH would support inclusion of these pathways by applying the new mandatory offshore process requirements to all used vehicles shipped from Japan.

Comments on proposed changes to amend offshore requirements for used agricultural, forestry and horticultural vehicles and machinery

25. KVH recognises contaminated agricultural, forestry and horticultural vehicles and machinery pose a significant risk to NZ, that the current level of compliance is inadequate, and that dealing with the risk as vehicles arrive at our Ports is not the best strategy. This proposal serves to push risk offshore by requiring thorough cleaning prior to export and provision of evidence to demonstrate this requirement is met. This represents a significant improvement and KVH fully supports this proposal.

ENDS

⁴ MPI Technical Advice: Treatments for Brown Marmorated Stink Bug, September 2015

15



05/11/15

MPI - Mike Tana

McCullough Ltd response to Proposed amendments to the IHS for vehicles, machinery and tyres

Dear Mike,

We would like to add to the submission for the new Import Health Standard being applied to all imported Vehicles, Machinery and Tyres.

Some of our concerns for commercial importations are as follows:

1. Vehicles ex UK. There is one MPI facility but this is controlled by JEVIC, who have an agreement to solely Pre Clear cars for Autohub only (our main competitor). Plus this facility is 100's of kilometres from where we ship out from.
2. Vehicles ex Australia. 400 units per month from AU to NZ and no Pre clearance facility in place. 400 units from 4 ports in Australia - Brisbane, Port Kembla, Melbourne and Fremantle with no MPI facility there.
3. Vehicles ex USA. No MPI facility and 60 plus cars per month into NZ from West and East Coast.
4. Machinery and equipment from the Pacific Islands returning to NZ. There is no cleaning facility or MPI facility over there, and very lax rules regarding quarantine products.

McCullough Ltd handles 30% of the cars coming into NZ for commercial importers and feel strongly that we should be consulted for any changes to the import health standards. Approx 90% of all imports from Japan are on Roll-On Roll-Off vessels so this is a major tradelane for vehicles into NZ.

We can be reached on 3030075 and look forward to hearing from you.

Yours Faithfully,

A handwritten signature in dark ink, appearing to read "Mike Brough", is written over the typed name.

Mike Brough
Business Manager

16



**MOTOR INDUSTRY
ASSOCIATION**
INCORPORATED

Motor Industry Association (Inc)
2 Brook Street,
Lower Hutt 5010
PO Box 31221,
Lower Hutt 5040
New Zealand

T: +64 4 972 5663
W: www.mia.org.nz

6th November 2015

Plant, Food and Environment group
Regulation and Assurance Branch
Ministry for Primary Industries
PO Box 2526
WELLINGTON 6140

Email: standards@mpi.govt.nz

Re: Draft Import Health Standard: Vehicles Machinery and Tyres

Please find attached the Motor Industry Association (MIA) of NZ's submission on Draft Import Health Standards: Vehicles Machinery and Tyres.

The MIA's submission is covers light and heavy vehicles and the motorcycle sector, including off-road motorcycles, quad bikes and small side by side farm utility vehicles. We have received feedback from members on aspects of proposed changes and our submission reflects member's combined views.

Kind regards

A handwritten signature in black ink, appearing to read 'David Crawford', with a long, sweeping flourish extending to the right.

David Crawford
Chief Executive Officer
Motor Industry Association of New Zealand (Inc)
2 Brook Street, Lower Hutt 5010
P O Box 31221 Lower Hutt 5040
New Zealand

david@mia.org.nz | DDI: +64 4 972 5663 | Cell: +64 27 569 8263 | www.mia.org.nz

Introduction

The Motor Industry Association (MIA) is a voluntary trade association set up to represent the interests of the new vehicle industry specifically the official representatives of overseas vehicle manufacturers. Members account for over 98% of all new vehicles imported and sold in New Zealand across the passenger car, light and heavy commercial vehicle and motor cycle including on and off road (i.e. ATV etc) sectors.

The Association has 35 members (official distributors appointed by vehicle manufacturers) covering 77 different marques (brands). As part of its services to members the Association collects and collates a number of sources of data for the industry and now has a unique and extensive collection covering all facets i.e. sales including official registrations, stock levels, import numbers, employment etc.

MIA Feedback on proposed changes to the Standard and guidance

The MIA supports the proposed changes relating to new vehicles as set out in the draft documents circulated for comment. Specifically:

- Specifying the period of “1 September to 30 April” during which all new vehicles shipped from the USA must be treated offshore for Brown marmorated stink bug (BMSB).
- Extending the post treatment storage period for these vehicles to 96 hours (from the current 72 hours).
- Modifying the existing treatment option of
 - *Methyl bromide fumigation at 48 g/m³ for 24 hrs at 10-15°C; or*
 - *Methyl bromide fumigation at 40 g/m³ for 24 hrs at 15-21°C; or*
 - *Sulfuryl fluoride fumigation at 40 g/m³ for 24 hrs at 16-20°C; or*
 - *Sulfuryl fluoride fumigation at 32 g/m³ for 24 hrs at 21-25°C; or*
 - *Heat treatment at 60°C for 10 minutes for vehicles weighing <3,000kg and 60°C for 20 minutes for vehicles weighing >3,000kg in the coldest location.*

to:-

- *Methyl bromide fumigation at 48 g/m³ for 24 hrs¹ at 10-15°C, 30% end point reading; or*
- *Methyl bromide fumigation at 16g/m³ for 12 hrs at 15°C or above with a 50% end point reading; or*
- *Sulfuryl fluoride fumigation at 16 g/m³ for 12 hrs at 10°C or greater with a 50% end point reading; or*
- *Heat treatment at 50°C for 20 minutes for vehicles weighing <3,000kg and 50°C for 30 minutes for vehicles weighing >3,000kg in the coldest location.*

We also have a question in that there appears to be an inconsistency in the wording between the draft Import Health Standard specifically page 10 section 3.4.2.2 and the Guidance document page 8 section 5.4.9.2 in that the Standard states that containerised untreated vehicles from the USA must be treated within 24 hours of arrival whereas the Guidance document states all untreated vehicles must be treated within 12 hours of discharge.

We would be grateful if this could be clarified in the final import health standards, our preference being that containerised untreated vehicles from the USA be treated within 24 hours of arrival.

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Michael Tana

From: Standards
Sent: Wednesday, 14 October 2015 11:04 a.m.
To: Michael Tana
Subject: FW: The Import Health Standard: Standard for Vehicles, Machinery and Tyres

Follow Up Flag: Follow up
Flag Status: Flagged

From: Brian Hepenstall [mailto:brianh@nutripharm.co.nz]
Sent: Monday, 28 September 2015 1:51 p.m.
To: Standards <Standards@mpi.govt.nz>
Subject: The Import Health Standard: Standard for Vehicles, Machinery and Tyres

I received the above document for comment.

My only comment relates to item 2.2 (1) ...“within a reasonable period of time prior to....”

This is too vague. A specific time period needs to be set out as what is a “reasonable period of time” to you may not be to others.

Thanks

Brian Hepenstall



Submission on the proposed changes to the IHS for vehicles, machinery and tyres

To: standards@mpi.govt.nz
Ministry for Primary Industries
PO Box 2526
Wellington 6140

Submitter:	Pipfruit New Zealand Incorporated
Submitter name:	Roger Gilbertson
Postal Address:	PO Box 11094 HASTINGS 4158.
Phone:	0275415647
Email:	roger.gilbertson@pipfruitnz.co.nz

1. Introduction

The pipfruit sector is currently in an upswing with current export receipts in the range of \$600-650 million/annum FOB. Recent and proposed plantings have meant year on year growth projections in the vicinity of 5-10%, which sets the sector's target of \$1B of export earnings by 2020 well within reach.

As a GIA partner the relative responsibilities of the signatories and understanding of Biosecurity matters in the pipfruit sector has significantly increased.

The increased understanding in Biosecurity measures has meant the elevation of Brown Marmorated Stink Bug (BMSB) as one of the primary biosecurity threats to the pipfruit sector.

Pipfruit NZ (PNZ) thanks MPI for the consultative approach it has taken in the review and development of Import Health Standards that impact the sector.

2. Reference material

The submission is based on the following draft MPI documents:

1. Draft IHS: Vehicles, Machinery and Tyres
2. Draft Guidance Document: Vehicles, Machinery and Tyres
3. Draft Risk Management Proposal: Review and amendment of the IHS for Vehicles, Machinery and Tyres
4. MPI Technical Advice: Treatments for brown marmorated stink bug
5. Technical Advice: The likelihood of establishment of brown marmorated stink bug in the New Zealand autumn/winter period



3. Discussion

3.1 Approach to risk

PNZ supports MPI in taking a risk assessment approach and requiring technical justification for the IHS requirements. PNZ also commends MPI in taking a proactive stance by putting in place precautionary measures for the US car industry.

In the context of the acceptable approach to risk PNZ have a number of concerns it would like noted;

1. BMSB is known to have significant impact on pipfruit production and the resulting socio-economic issues that surround its establishment.
2. The relative ease of establishment in the US based on a single incursion population (Xu *et al* 2014). This appears to be in contrast to MPI consideration that *'...establishment of a population will rely on multiple individuals arriving together, surviving and remaining together. Current interception data indicates that there is insufficient propagule pressure necessary for this to happen'*.
3. MPI considers the propagule pressure is low during the May to August period; however the learning curve for detecting BMSB at the border in New Zealand has been relatively steep. MPI states in the Risk Management Proposal document *'...vehicles and machinery were not identified as a higher risk than other inanimate commodities until late 2014, when large numbers of BMSB were detected arriving in New Zealand on vehicles imported from the USA'*.
 - How confident can MPI be in the interception data?
 - Many of the assumptions in the risk assessment revolve around the interception data and are MPI's assumption about relative number sufficiently low on an ongoing basis to justify the removal of the April-August treatment requirement.
4. The uncertainty from technical experts that BMSB would not survive a second diapause when entering NZ during the autumn, winter periods. MPI state *'BMSB arriving in New Zealand are unlikely to re-enter diapause on encountering New Zealand's autumn or winter conditions'*. David Teulon (*pers. comm.*) considers *'...the issues surrounded diapause and movement from northern to southern hemispheres are not well understood.'*
5. MPI considers there is a moderate likelihood that some BMSB may be able to survive in a state of post diapause quiescence through the NZ winter and into the period when suitable conditions occur for reproduction in the spring summer.

When considering the uncertainties both from MPI and technical experts perspectives it is difficult to see how MPI comes to the conclusion that *'overall the likelihood that BMSB will establish in NZ during the autumn winter period is so low as to be considered negligible.'*

3.2 Consideration of impact if BMSB established in NZ

One aspect that is lacking from the MPI assessment is the impact if BMSB was able to establish in NZ.

6. The experience out of the US indicates that BMSB is extremely difficult to eradicate, let alone monitor and manage.



7. PNZ believe the risk is extremely high that a population would establish quickly forcing the NZ horticultural industry to take drastic measures. These measures are unlikely to be commensurate with the market requirements for export especially under the auspices of Integrated Pest Management (IPM) and the agrichemical options currently available.
 - The resulting impact on market access would be considerable and the gains the industry has made over recent years would be quickly eroded.
8. BMSB isn't a pest where a few markets may put in place some additional requirements until NZ can successfully eradicate it or adopt measures that enable the industry to live with it.
 - There would be substantial ongoing socio-economic impacts to the NZ population.
9. The social impacts of BMSB are significant both as a household pest but also as it has the capability to severely impact horticultural production.

If these impacts of establishment were given due consideration the uncertainties discussed above in 3.1 becomes increasingly concerning and difficult to quantify.

PNZI doesn't support the MPI conclusion and recommendations to reduce the treatments in the US during the April to August period.

3.3 Quantifying the acceptable level of risk (treatments)

Horticultural Industry representatives are currently working with MPI on pre-negotiated requirements (treatments) for a fruit fly incursion in NZ. The project has focused on treatments that MPI can confidently implement to ensure produce can continue to be exported to key trading partners. The key premise in the project is NZ must be prepared to accept the treatment in reverse.

The stated level of acceptance is Probit 8.7-9.0.

10. The MPI technical advice: Treatments for BMSB; is supported by PNZI if the data can be demonstrated to meet the requirements of Probit 9.
 - Based on point 12 (below), MPI hasn't quantified the efficacy of these proposed BMSB treatments on other pests of concern that may be detected on vehicles, machinery and tyres.
11. The HortNZ submission outlines some specific questions on the efficacy and status of the data and reports referenced.
 - PNZ supports the questions raised by HortNZ to gain greater clarity of the robustness of the data that MPI references regarding BMSB.

3.4 Non US car industry pathway risks

PNZ compliments MPI for considering the broader risks involved in the importation of vehicles, machinery and tyres from other countries.

12. PNZ notes that MPI stated that the '*...vehicles and machinery import risk analysis in 2007 demonstrated that many different pests and types of contaminants are associated with vehicles and machinery*'. The current review and recommendations seems to have focused solely on BMSB. Does this mean the other pests are adequately managed and dealt with through this pathway or has MPI focused on the pest of primary concern only?



13. It is pleasing to see a move by MPI to make it mandatory for all break bulk vehicles from Japan to be processed offshore. PNZ does note that other countries that have BMSB present also import vehicles, machinery and tyres into NZ (e.g. Europe, Korea, China) and requests MPI communicate any information that demonstrates why the measures applied in the US or Japan are not replicated in these other countries.
14. PNZ supports the MPI proposed change that all used agricultural, forestry and horticultural vehicles and machinery, from all countries, must be thoroughly cleaned prior to export, offshore. However it is important to note that *'The IHS currently requires that used vehicles arrive in New Zealand as clean and free of contamination'*.
 - PNZ is not clear on how the change in wording will drive a change in behaviours of what is a very high risk pathway and recommends consideration be given to more definitive requirements (e.g. treatments) to ensure any potential phytosanitary issues remain away from the NZ border.

References

Xu et al. (2014). *Tracing the origin of US brown marmorated stink bugs, Halyomorpha halys*. Biological Invasions (16: 153-166).

19

Michael Tana

From: Standards
Sent: Monday, 5 October 2015 11:57 a.m.
To: Michael Tana; Ken Glassey (Ken)
Subject: FW: Proposed amendments to the IHS for vehicles, machinery and tyres

Follow Up Flag: Follow up
Flag Status: Flagged

Jo-Anne Stokes | Senior Adviser | Biosecurity and Environment Group | Plants Food and Environment Directorate | Regulation and Assurance Branch | Manatū Ahu Matua | Ministry for Primary Industries | Pastoral House | 25 The Terrace | Po Box 2526 | Wellington | New Zealand | DDI 04 894 0238 | Mob 029 894 0238 | Email: Jo-Anne.Stokes@mpi.govt.nz | web: www.mpi.govt.nz
Sign up to our email distribution list for all the latest changes to biosecurity standards: <http://www.biosecurity.govt.nz/lists/>

From: Roger Hawthorne [<mailto:Roger.Hawthorne@swirecnco.com>]
Sent: Friday, 2 October 2015 1:35 p.m.
To: Standards <Standards@mpi.govt.nz>
Cc: Ken Glassey (Ken) <Ken.Glassey@mpi.govt.nz>
Subject: FW: Proposed amendments to the IHS for vehicles, machinery and tyres

Afternoon All,

Please see below comments (in red) from my team in USA.

Rgds

From: Andrew Wong <andrew.wong@swirecnco.com>
Date: Friday, 2 October 2015 12:29
To: Roger Hawthorne <roger.hawthorne@swirecnco.com>, Frank Spencer <frank.spencer@swirecnco.com>
Cc: Greg Metcalfe <greg.metcalfe@swirecnco.com>, Sean Barrett <sean.barrett@swirecnco.com>, "Jeremy Sutton (Swire Shipping)" <jeremy.sutton@swirecnco.com>
Subject: RE: Proposed amendments to the IHS for vehicles, machinery and tyres

Roger,

While the reduction of the requirement to be seasonal is positive I have the following questions / comments

3.4 Vehicles and machinery shipped as sea freight from the United States of America (USA) from 1st September to 30th April

3.4.1 Break bulk vehicles and machinery from the USA must be treated prior to shipment

(2) Prior to shipping, treated break bulk vehicles or machinery must be effectively segregated or safeguarded from all untreated materials/cargo to prevent possible cross contamination and distribution of biosecurity contaminants and pests; and

what is classified as "untreated cargo" does this include cargo from other markets (Non US) or cargo not requiring fumigation – ie steel pipe.

(3) Break bulk vehicles or machinery that have been treated must be shipped in a manner that ensures

that the vehicle or machinery remains clean and free of biosecurity contamination.

Can we have a definition of acceptable manners

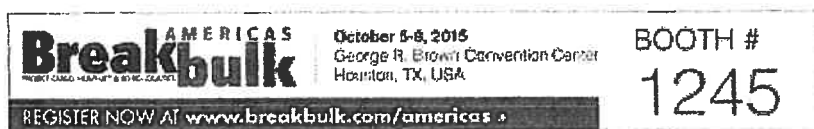
3.4.4 Vehicles and machinery imported as air freight from the USA

(1) All new and used vehicles and machinery imported from the USA as air freight do not require treatment as outlined in 3.4 above, but must meet the general requirements in Part 2 and will be risk assessed by MPI for BMSB and may be treated or inspected or both.

Why is airfreight subject to relaxed requirements? Isn't the risk virtually the same?

Rgds,

Andrew Wong
Commercial Manager – North America
Swire Shipping| The China Navigation Co. Pte. Ltd
Vancouver, Canada
T +1 604 640 7449
M +1 604 351 1729
www.swireshipping.com



-----Original Message-----

From: Roger Hawthorne

Sent: September 27, 2015 5:03 PM

To: Frank Spencer <frank.spencer@swirecnco.com>; Andrew Wong <andrew.wong@swirecnco.com>

Cc: Greg Metcalfe <greg.metcalfe@swirecnco.com>; Sean Barrett <sean.barrett@swirecnco.com>; Jeremy Sutton (Swire Shipping) <jeremy.sutton@swirecnco.com>

Subject: FW: Proposed amendments to the IHS for vehicles, machinery and tyres

Frank / Andrew,

Can you please have a look and let me know if you have any comments ASAP.
(haven't looked at this myself yet)

Thanks

Roger Hawthorne
Line Operations Manager - Trans Tasman
Swire Shipping| The China Navigation Co. Pte. Ltd Auckland | New Zealand

T +64 9 980 9128
M +64 29 980 9128
www.swireshipping.com

**** Please note my email address has been changed to roger.hawthorne@swirecnco.com with immediate effect ****

-----Original Message-----

From: standards@mpi.govt.nz [mailto:standards@mpi.govt.nz]

Sent: Monday, 28 September 2015 12:07 p.m.

To: Roger Hawthorne

Subject: Proposed amendments to the IHS for vehicles, machinery and tyres

The Import Health Standard: Standard for Vehicles, Machinery and Tyres sets out the requirements that must be met when importing vehicles, machinery and tyres into New Zealand to obtain biosecurity clearance.

The associated Guidance Document to the Standard for Vehicles, Machinery and Tyres provides explanatory information to help importers and affected stakeholders meet the requirements of the standard.

MPI would like your feedback on the proposed changes to the standard and guidance, in particular:

new requirements for the management of the brown marmorated stink bug from the USA amended offshore requirements for used vehicles shipped as break bulk from Japan amended offshore requirements for used agricultural, forestry and horticultural vehicles and machinery.

Full details of the consultation, documents and instructions for submission are available on the MPI website:

Proposed amendments to the IHS for vehicles, machinery and tyres <<https://mpi.govt.nz/news-and-resources/consultations/proposed-amendments-to-the-ihs-for-vehicles-machinery-and-tyres/>>

Comments on the draft documents should be sent to MPI by 5pm on 6 November 2015.

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To up-date your details, please visit

<http://www.biosecurity.govt.nz/lists/?p=preferences&uid=f81000e19dcdfd69e1b11fc7af3a62e8>

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From:
Sent: Friday, 30 October 2015 8:02 a.m.
To:
Subject: FW: Submissions on the draft IHS and supporting documents <Toyofuji Shipping>

Follow Up Flag: Follow up
Flag Status: Flagged

Please can you acknowledge receipt of this submission. Thanks

From: Masahiro YAKU [mailto:m-yaku@toyofuji.co.jp]
Sent: Friday, 30 October 2015 12:05 a.m.
To: Standards <Standards@mpi.govt.nz>
Cc: Joanne Wilson <Joanne.Wilson@mpi.govt.nz>; Stu Rawnsley (Stu) <Stu.Rawnsley@mpi.govt.nz>; Blain Paterson <blain.paterson@toyofujinz.co.nz>; Shuichi Miyagawa <Shuichi.Miyagawa@toyofujinz.co.nz>; 磯部 直樹 <n-isobe@toyofuji.co.jp>; 張 韜 <r-zhang@toyofuji.co.jp>; Tetsuya FUKUDA <t-fukuda@toyofuji.co.jp>; Kazue NARUMIYA <k.narumiya@toyofuji.co.jp>; Nami Yuhara <n.yuhara@toyofuji.co.jp>; Mizuki Inaba <m.inaba@toyofuji.co.jp>; KAWAGUCHI Mineo <m-kawaguchi@toyofuji.co.jp>
Subject: Submissions on the draft IHS and supporting documents <Toyofuji Shipping>

Ministry for Primary Industries
 Attention: Biosecurity and Environment Group, Regulation and Assurance Branch
 Dear Madam/ Sir,

It is great to have an opportunity to submit our questions regarding the "Proposed amendments to the IHS for vehicles, machinery and tyres".

We would appreciate your earliest possible reply for this as the proposed changes may cause the change for our current MPI inspection operation in Japan to meet the new standard, and we may seek further inquiry depending on your reply.

Submissions on the draft IHS and supporting documents

1. Overall

It seems MPI is proposing each MPI inspection company in Japan including Toyofuji must have own inspectors instead of inviting inspector from NZ. I tried to find the specific part in the draft, however I was unable to do. This is important part of the amendments for our inspection operation.

2. Part 2 / 2.5 The use of MPI approved systems

- (1) I am assuming "2.5 The use of MPI approved systems" of "Import Health Standard Vehicles Machinery and Tyres" document is the one mentioning this. Does this "system" entail a computer system or a set of organized procedures?
- (2) I clicked the below link, but the "Page not found" message appeared and could not open.
<http://www.biosecurity.govt.nz/files/ihs/vehicles-all-application.pdf>
 When will this link be ready for use?
- (3) Is Toyofuji's current cleaning performance treated as "MPI approved system"?

3. Part 3 / 3.1.1 Used agricultural, forestry and horticultural vehicles and machinery from all countries

- (1) Does the "documented evidence of cleaning" need to be issued by the MPI approved companies?
- (2) Is there a certain form used to document the evidence of cleaning?
- (3) What are the criteria for distinguishing between agricultural, forestry, and horticultural machineries?

4. Part 3 / 3.3 Used vehicle from Japan imported as break bulk

- (1) When this amended IHS is carried out, would all vehicles exported out of Japan need to be inspected in Japan, instead of loading the cargo onto the vessel as NON-MAF cargo and having the inspection in NZ?
- (2) What vehicles apply to "all break bulk used vehicles"? Do all vehicles mentioned in the definition for "vehicle" in the Schedule 2-Definitions page apply?
- (3) If a vehicle is not a break bulk cargo and is in a container, will it be possible to load it on to the vessel as NON-MAF cargo? If a vehicle is shipped on a container vessel instead of a RORO vessel, will the inspection in Japan be unnecessary?
- (4) What would be the procedures for vehicles that do not fit the inspection ramp be?
(As of now, above vehicles are classified as "NON-MAF vehicles", shipped on board, and then inspected in the appropriate facilities in NZ.)
- (5) What would be the procedures for RED Stickered vehicles be?
(As of now, RED Stickered vehicles are shipped on board as "NON-MAF vehicles", fumigated and heat treated in NZ. Due to all vehicles being inspected by the MPI inspectors, pest cleaning, re-examination and clearance in Japan is not necessary. After this amended IHS is carried out, will pest control, fumigation, and heat treatment be required to be performed in Japan before being shipped to NZ?)

5. Others

- (1) Is there a possibility that the MPI inspector in Japan will be sent back to NZ? If so, when?

Thank you very much in advance.
Respectfully,

Masahiro Yaku
Project Manager
Sales Group, Nagoya Sales Dept. Overseas Sales Div.
TOYOFUJI SHIPPING CO., LTD.
7th Floor, DNI Higashisakura Bldg.,
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Fax: +81-52-217-2020
Email: m-yaku@toyofuji.co.jp
www.toyofuji.co.jp

(21)

Michael Tana

From: Standards
Sent: Wednesday, 14 October 2015 11:04 a.m.
To: Michael Tana
Subject: FW: Proposed amendments to the IHS for vehicles, machinery and tyres

Follow Up Flag: Follow up
Flag Status: Flagged

From: Wayne Bray [mailto:Wayne.Bray@valuetyres.co.nz]
Sent: Tuesday, 29 September 2015 8:58 a.m.
To: Standards <Standards@mpi.govt.nz>
Cc: Russell Fish <Russell.Fish@valuetyres.co.nz>; Garry Perriam <Garry.Perriam@valuetyres.co.nz>
Subject: Proposed amendments to the IHS for vehicles, machinery and tyres

Please amend the heading to used or secondhand tyres

Thanks and Regards

Wayne Bray

Manager

Value Tyres Wellington

Address: 9-11 Cornish St , Petone , Wellington

Ph: 0800 825 838 **Fax:** 04 569 8016

Mob: 027 288 7626

Email: wayne.bray@valuetyres.co.nz

Web: <http://www.valuetyres.co.nz/>

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From:
Sent: Thursday, 27 July 2017 11:00 AM
To:
Subject: FW: Review of Vehicle IHS submissions - please keep NZW informed of decisions

From:
Sent: Friday, 1 July 2016 7:41 a.m.
To:
Subject: FW: Review of Vehicle IHS submissions - please keep NZW informed of decisions

Not sure if this made it into the process. Can we ensure NZ winegrowers are on the list of interested parties

Regulation & Assurance Branch
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[SEEMail]

From: Edwin Massey [<mailto:edwin.massey@nzwine.com>]
Sent: Thursday, 14 April 2016 11:21 a.m.
To:
Cc: Philip Manson <pmanson@nzwine.com>
Subject: Review of Vehicle IHS submissions - please keep NZW informed of decisions

Hi Peter

I understand that MPI is yet to make a decision on proposed changes to BMSB management on the imported vehicle pathway as follows:

- Require treatment for vehicles from the USA during 1 Sept to 30 April only (US shipping dates)
- Amended US vehicle treatment requirements for BMSB (time, rate etc.)
- Require all vehicles, shipped break bulk from Japan, to be processed offshore
- Require the cleaning of all used agricultural machinery before export

New Zealand Winegrowers views BMSB as a key risk to our industry. BMSB is acknowledged in the United States as a significant pest of winegrapes which not only can cause production loss by eating fruit and encouraging fungal damage but also has the potential to negatively affect quality by tainting wine after being caught up in Autumn harvest.

NZ winegrowers has been involved in the industry working group reviewing MPI's discussion documents on BMSB response and long term management options distributed on 15 March 2016. We agree with the points raised by MPI in these documents that a post border eradication attempt is extremely challenging and unlikely to be successful. Working with other horticultural organisations (HortNZ, KVH, Pipfruit NZ, New Zealand Avocado, New Zealand Citrus Growers Incorporated) NZW considers that the analysis presented in those response documents is so strong as to conclude that interventions at other parts of the biosecurity system are likely to be more effective at managing risk. We note that these issues will definitely be considered during any GIA Operational Agreement negotiation for BMSB in order to generate the best biosecurity outcome. We anticipate that OA negotiations will begin early in 2016/17.

Given the challenges associated with a successful response we believe that any changes to BMSB management on the imported vehicle pathway should be made with caution, for the right reasons, and using the best available scientific evidence. I apologise for the fact that NZW did not make a formal submission on the changes proposed on the imported vehicle pathway. It was simply a case of not having the resources available at the time.

NZW appreciates that these decisions are difficult and that there are a number of complicating factors. I request that NZW is advised of MPI's decision regarding these changes once the analysis of submissions and scientific evidence has been completed.

Kind regards, Ed.

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