NZ Plant Producers Inc. submission on Improving the system for importing food and fibre plants for planting

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Introduction

New Zealand Plant Producers Incorporated (NZPPI) represents businesses engaged in plant propagation and cultivation for various sectors and our members underpin the success of the country's primary industries.

The plant production sector, also known as nursery production, has witnessed rapid growth due to demand in horticulture, wine, forestry, greenlife/amenity and for native plants, which has been further bolstered by government policies encouraging sustainable production systems.

The plant production industry, estimated to be worth around $500 million annually, is a regional success story, offering skilled jobs and career opportunities where they are needed most.

The current government has clearly signalled its goals for growth, foreign investment, employment, productivity and efficiency gains. Biosecurity New Zealand is aiming to speed up imports of food & fibre plants while ensuring the system is cost-effective, operationally efficient, and effective at managing biosecurity risk.

NZ Plant Producers welcomes the opportunity to provide feedback on the proposal to optimise the quarantine system. We see several short-term opportunities to improve the current settings with longer-term improvements delivered as part of a major overhaul of the entire Plant Imports System, signalled by the stakeholder workshop on 25 March 2025.

Summary

The plant quarantine system uses multiple layers of safeguards to manage biosecurity risk, including pre-border, border and post-border measures. We think an optimal quarantine system considers all layers of risk mitigation / biosecurity protection, including those applied offshore and onshore, and is adaptive and flexible to manage risk in the most cost-efficient way.

NZ Plant Producers supports a balanced quarantine system that:

- Utilises a mix of quarantine facilities at different levels, commensurate with risk
- Maximises total system value through careful cost-benefit management
- Avoids redundant layers of risk protection
- Recognises offshore testing in a layered risk management system
- Is responsive to changing risk and opportunities

The current system needs an overhaul, and a full review was signalled at the stakeholder workshop on 25 March. Short-term improvements could be made in the meantime.

Pest interception data from the past 15 years shows that risk management by offshore facilities is effective, irrespective of their MPI approval status: low numbers of pests were intercepted in quarantine from both 'unapproved' and 'approved' MPI facilities. Pests were effectively managed in all levels of quarantine, from Level 2, Level 3A and Level 3B facilities, either by mandatory testing, or diagnostic testing following symptom observation. This suggests that the requirement for quarantine in Level 3B facilities may be over-managing risk where risk has already been reduced by previous layers in the system.

MPI has concluded (Option 2) that material from 'unapproved' offshore facilities could be managed in a shorter quarantine period in Level 3B facilities (9 months compared to 16-24 months). We think a reduced quarantine time for unapproved facilities would be immediately beneficial. We do not support this option for approved facilities however, as a system that recognises offshore risk management and avoids duplication of testing and higher quarantine costs is ultimately preferred to a rigid onshore quarantine and testing system. We would like to see a future system that enables prior testing and management from all offshore facilities to be included in a layered risk management approach.

We have provided specific responses to the questions in the proposal in Appendix 1.

Recommendations

Short-term

a) Review the changes to the Offshore Facility Standard in 2019 and consider their impact on total system value
b) Reduce the resourcing and frequency of on-site audits of approved offshore facilities
c) Reduce the requirement for Level 3A quarantine for material from approved offshore facilities back to Level 2 (supported by interception data)
d) Reduce the L3B quarantine time for material from unapproved offshore facilities to 9 months (Option 2).
e) Re-allow approval of vineyard facilities, using a systems-approach to mitigate risks of vectors and post-testing security of plant material (Option 3).

Longer term

f) Replace the offshore facility 'approved'/'unapproved' system with a model that recognises competency of high-health providers & diagnostic testing
g) Recognise alternative diagnostic test methods as equivalent to MPI methods, if these are endorsed by the exporting NPPO
h) For "recognised" competent facilities, allow for testing, inspection, PFA and PFPP declarations to be endorsed by the NPPO on the phytosanitary certificate
i) As IHS are reviewed, consider options for managing risk in Level 3A facilities instead of Level 3B.

Submission

NZPPI appreciates that considerable thinking and effort has gone into this review and the development of the proposed alternative options. This proposal seeks to make the system simpler for importers and regulators, while maintaining a high standard of biosecurity risk management.

1. The offshore facility system – status quo

The offshore facility approval system has been in place for nearly 20 years. It needs a comprehensive review in the longer term, but for now a few adjustments would improve the value of this system for users, MPI and offshore facility operators.

The system works extremely well for potato tissue culture from SASA, where all testing is completed offshore, and tissue cultures can be cleared at the New Zealand border.
For other species, the approval system helps lower the overall costs of importation by allowing material into lower quarantine for a shorter period and with less onshore testing.

The figure below compares the costs of importation and onshore risk management for Summerfruit germplasm from an approved versus an unapproved facility. We have used the cost figures from Table 5 in MPI's Appendix to the Consultation.

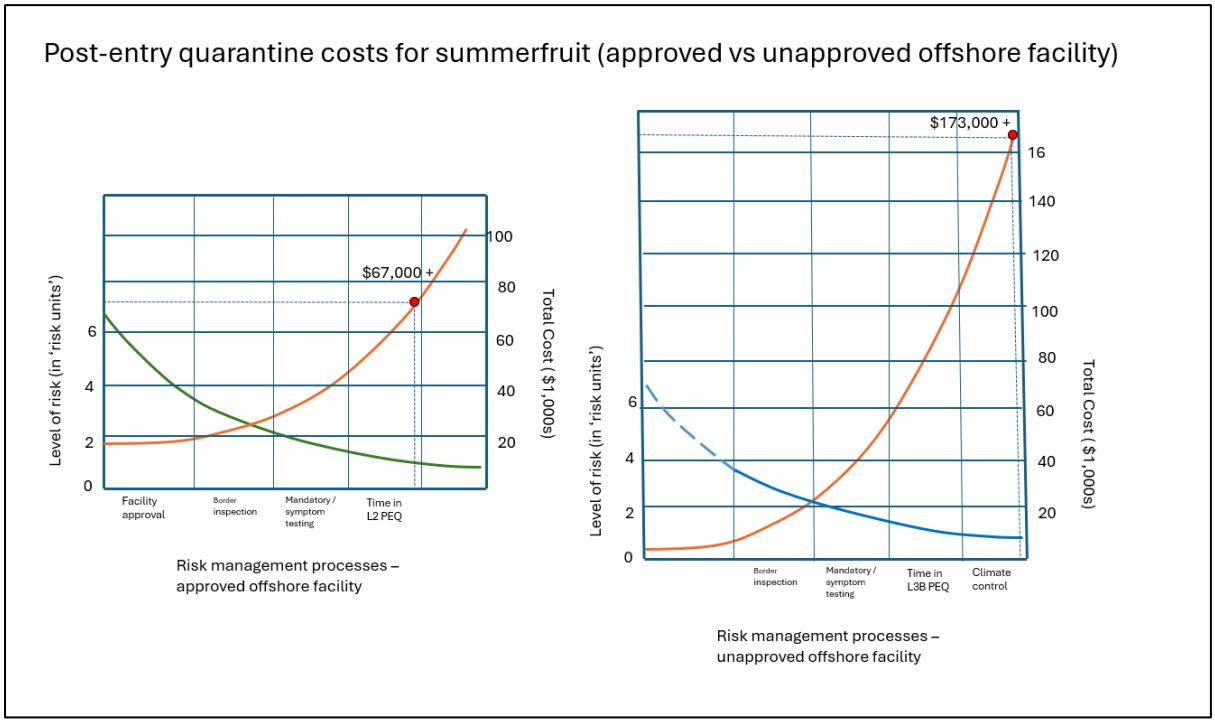


Figure 2. A comparison of the approximate costs of risk management and quarantine for Summerfruit germplasm imports from an approved and unapproved facility.

In the approved offshore pathway, risk management is represented by the green line, and the costs are represented by the orange line. The level of risk units on the Y-axis is arbitrary and we have selected a moderate starting point, as offshore facilities manage biosecurity risk through processes that supply high health plant material to domestic and international customers. Costs start just under $20,000 for this pathway, as it includes the cost of the facility audit and approval process.

In the unapproved offshore pathway, risk management is represented by the blue line, which is dashed up to the point of import as offshore risk management is unassessed. The requirement for Level 3B PEQ and climate control significantly increases the costs of import compared to Level 2 quarantine.

The current system relies on the ongoing audit of approved offshore facilities, which is expensive and time consuming for importers, offshore facility operators and MPI to resource. The proposal notes that critical imports have stopped when key facilities become unable to export to New Zealand or unwilling to meet our import requirements.

Changes to the Offshore Facility standard in 2019 increased the requirements for offshore facilities and included a stricter interpretation of some clauses, which has increased the costs and complexity of the system.
For example, import from open-field vineyard facilities (previously been allowed under Level 2 quarantine) were specifically excluded from the new standard. This significantly increased the importation cost of new grapevine material by requiring the highest level of quarantine and duplicating all the diagnostic testing which has already been done offshore.

We think this change has not improved the management of risk relative to the massive increases in importing cost:

- Using containment facilities (L3B) designed for high-risk pathogens on plant material which has already been certified or tested offshore, leads to higher than necessary costs to manage risk
- Prolonging the post-entry quarantine period, unnecessarily restricts plant movement and reduces cost-efficiency
- Repeating diagnostic tests on plants which have already tested negative increases laboratory workload and costs without proportionate gains.

As well as changes to the standard, the frequency of on-site auditing was increased from once every 5 years to every 2-3 years, sending two auditors instead of one[1]. Facility audits are time-consuming and costly for offshore Operators as well as MPI, and costly to importers. We would like to see a review of the frequency of on-site audits to ensure the system is sustainable for users and regulators.

As noted in the proposal, recent changes have increased the required level of quarantine for material from approved offshore facilities, from Level 2 to Level 3A quarantine for some plants. This has introduced uncertainty and changed the ratio of cost-benefits.

Recommendations
Short-term

- Review the changes to the Offshore Facility Standard in 2019 and consider their impact on system value
- Reduce the resourcing and frequency of on-site audits of approved offshore facilities (the pest interception data supports high compliance)
- Reduce the requirement for quarantine for material from approved offshore facilities, from Level 3A back to Level 2 (supported by interception data)
- Re-allow approval of offshore vineyard facilities, taking a systems-based approach to vector risk mitigation and post-testing security of plant material.

Longer term

- Replace the offshore facility 'approved'/'unapproved' system with a model that recognises competent high-health plant hubs undertaking diagnostic testing
- Recognise alternative diagnostic test methods as equivalent to MPI methods, if these are endorsed by the exporting NPPO

2. Option 2 – less reliance on offshore facilities

While this could massively cut the costs of importation for material from 'unapproved' facilities, it will significantly increase the costs for imports from most of the currently 'approved' facilities, compared to the status quo.

[1] MPI sometimes included a second auditor as part of auditor training, but were not on charging training costs to industry.

MPI have reviewed the risk management of plant material from offshore facilities and consider that risk can be managed within 9 months in Level 3B quarantine. If this is achievable, then the current settings for plant material from 'unapproved' facilities are over-managing risk. Reviewing the current quarantine period requirements for material from unapproved facilities and reducing them to 9 months quarantine in Level 3B would benefit the current system by reducing costs and improving Level 3B capacity.

Level 3B quarantine is the most stringent and expensive layer in New Zealand's biosecurity risk management system. It is the greenhouse equivalent of a containment facility with HEPA filtration on vents to prevent escape of air-borne spores and biological aerosols, wastewater treatment to prevent escape of soil and water-borne pathogens. The PHEL and PHEC Level 3B facilities also include climate controls to meet the operational requirements of several of the newer IHSs.

If the risk of high-impact pests has already been managed in previous layers in the system, containment-level L3B quarantine and climate control is an excessive layer of precaution, contributing little to safety but significantly increasing costs, complexity, and operational inefficiency.

Level 3B provides the top-line of defence to manage worst-case scenarios such as:

- high-impact pathogens that have not been managed by mandatory testing or other prior mitigation, and
- diseases where testing is unavailable, and which are latent in the absence of certain climatic controls, and
- high-impact diseases that are difficult to identify through visual inspection and could release sufficient volumes of spores or biological aerosols into the greenhouse[2].

We do not think that Level 3B is appropriate for material from 'approved' offshore facilities where plants have already been tested offshore and found free of high-impact regulated pathogens. Level 3B may also be overly precautious for material from some 'unapproved' facilities, as shown by the pest interception data. Offshore facilities are repositories for high-health plant germplasm and operators undertake a comprehensive range of diagnostic testing for key global pests and diseases, even if this is not formally recognised by MPI.

If the risk of high-impact pests has already been mitigated in previous layers in the system, containment-level L3B quarantine is an excessive layer of precaution, contributing little to safety but significantly increasing costs, complexity, and operational inefficiency. Option 2 duplicates testing that has already been completed offshore, adding a redundant layer of protection and cost for little benefit.

[2] Is there is a minimum viable threshold for spores/aerosols escaping from greenhouse vents for establishment in the environment, assuming susceptible host species are in proximity?

The option notes that testing results or NPPO declarations *could* be recognised under this option but would not result in a lower level of post-entry quarantine, i.e. this recognition may save on diagnostic costs in New Zealand but not quarantine costs.

Recommendations

- Reduce the L3B quarantine time for material from unapproved offshore facilities to 9 months (Option 2).

- In the longer term, NZPPI supports an alternative system which recognises competent facilities undertaking high-health and diagnostic testing, allowing prior testing to be endorsed by the exporting NPPO.

3. Option 3 – Graduated quarantine

Various pathways are proposed under this option, each with differing degrees of detail. It is hard to see how the combined score has been reached using the evaluation criteria. The main advantage of Option 3 is greater flexibility, and the recognition of offshore risk management measures – which is less duplicative than the 'one-size-fits-all' approach of Option 2.

Pathway 1 from 'unapproved facilities' reduces the costs in Level 3B quarantine compared to the status quo. It proposes to remove the requirement for tightly controlled environmental regimes, which could be beneficial as there are operational challenges with highly prescriptive environmental control and physiological issues for plant material from the northern hemisphere. MPI note that removing controlled environments might result in fewer pests being detected, however there is a lack of data as few plants have been imported and grown under these regimes. The reverse is also true, there is a lack of data that supports the assertion that more pests will be detected in controlled environments, or to support the exact prescriptions set out in the IHS.

We cannot draw a conclusion from historic interception data that risk is better managed in Level 3B compared to Level 2 or Level 3A facilities. Level 3B facilities provide greater 'containment', but this is only critical if symptomatic plants go undetected and produce spores or aerosols in sufficient volumes to 'escape' quarantine before being diagnosed.

Level 3B quarantine is the most expensive layer in the biosecurity system and we think it should be reserved for the highest-risk plant material that requires 'containment' level security and environmental/ climate control. If risk from high-impact pathogens has been managed by earlier interventions in the system, including testing or certification, Level 3B quarantine is a redundant layer of protection. Once a certain level of risk reduction is achieved through layered measures, adding a highly stringent safeguard contributes little to overall safety but significantly increases costs and complexity.

There is much less clarity around the benefit of Pathway 2 for material from approved offshore facilities compared to the status quo. The length and level of quarantine will depend on the risks that have not been managed offshore, with fewer requirements from facilities that manage most risks. This sounds good, but we are not sure where MPI will land on any specific import.

Targeted risk management measures are usually prescribed for high-impact risk organisms, as these generally give greater assurance (confidence) risk is managed effectively. Generic risk management measures are usually acceptable for lower-impact organisms.
Offshore facilities do not test asymptomatic plant samples for a comprehensive range of fungal, oomycete or bacterial pests. They include testing for key pathogens in their protocols and other diseases are managed through symptomatic testing, which is much the same approach that MPI takes in quarantine.

A shift in the past 5 years has increased the level of quarantine for material from 'approved' facilities to require Level 3A rather than Level 2, because of the perceived 'unmanaged' risk of fungi, bacteria and oomycetes. We do not support this approach and would like to see the requirement for material from approved offshore facilities reduced back to Level 2 quarantine. This is supported by the historic interception data.

Pathway 3 – removing the Standard for Approval of offshore facilities and replacing it with an NPPO Export Plan.
As far as we are aware only SASA would qualify as an NPPO-supervised, officially regulated production scheme for Pathway 3, though there may be others. This might be a more cost-effective option than the Offshore Facility Standard approval system. Exporting country NPPOs might prioritise the negotiation of an export plan for larger volumes of plant material, but this is less certain for small volumes.

Recommendations

- Replace the offshore facility 'approved'/'unapproved' system with a model that recognises competency of high-health providers & diagnostic testing
- Recognise alternative diagnostic test methods as equivalent to MPI methods, if these are endorsed by the exporting NPPO
- For "recognised" competent facilities, allow for testing, inspection, PFA and PFPP declarations to be endorsed by the NPPO on the phytosanitary certificate
- As IHS are reviewed, consider options for managing risk in Level 3A facilities instead of Level 3B.

Appendix 1. Responses to specific questions:

1. Do you agree with the summary of the key problems that restrict imports under the existing system, namely:
    a. that Plants for planting are a high-risk import pathway if biosecurity risk is not managed effectively. It can be hard to strike the right balance between managing biosecurity risk well while enabling imports.
    b. It can take a long time to import new plants due to long quarantine requirements, limited quarantine capacity, few up-to-date import health standards and a long wait time for their review and/or development.
    c. Complex and resource-intensive development for new import health standards and offshore facility assessment and compliance management.
    d. The system relies heavily on official recognition and approval of testing done at approved offshore facilities.
    e. People have uncertainty about the existing system, what level of quarantine is needed, the role of controlled environments and impact of changes to IHS requirements.

NZPPI Response

We generally agree with the summary of key problems under the existing system. Risk managers face a significant challenge in deciding the optimal point between the cost of preventing an incursion (avoiding a Type II error) with the cost of managing risk only to the extent necessary to allow trade to occur (avoiding a Type I error).

We believe the challenges that the current proposal is trying to address are symptomatic of increased risk precaution. The high-profile incursion and legal challenges associated with PSA in 2010 has intensified risk aversion and stricter measures have been adopted across all layers in the plant imports system to prevent an incursion from plant importation. Stricter measures and policies have increased costs and system complexity over the past 15 years, making it harder and more expensive to import new germplasm.

A “more is better” approach has prevailed, but pest interception data suggests that risk was adequately managed under previous less-stringent settings. There is little evidence to show that new pests have entered New Zealand through the plants for planting pathway (with the caveat that it’s not always straightforward to trace back. Some stakeholders will interpret no incursions to mean the system is working effectively, but are some of our policies and standards over-managing risk?

According to Pharo (2002), there are two types of errors in biosecurity decision making: Type II (insufficiently cautious) and Type I (overly cautious) errors.

- **Type II** errors occur when there is a failure to implement adequate safeguards, leading to disease incursions or pest outbreaks.

- **Type I** errors occur when overly stringent biosecurity measures are applied that

exceed the justified level of risk, leading to inefficiencies, high costs and missed opportunities.

Type I errors can be harder to spot than Type II errors, because they hide beneath the appearance of effective risk management. However, over-management of risk can lead to inefficiencies, high costs and missed opportunities. Many of these symptoms are noted by MPI as key problems restricting plant imports and impacting overall value of the current system:

- Prolonged quarantine requirements
- Limited [L3B] quarantine space in New Zealand
- Delays in importing
- Slow access to plants
- Discouragement of further investment
- Long-wait times for new/reviewed IHS
- Resource-intensive IHS development and maintenance
- Complex and resource-intensive offshore facility approval system
- Uncertainty about the level of quarantine needed
- Uncertainty about the role of controlled environment conditions

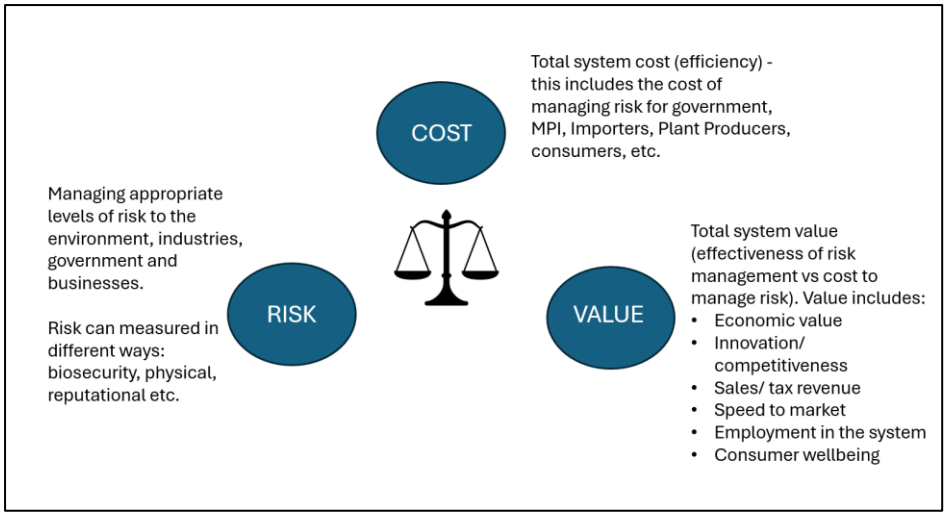
Type I errors need a different set of metrics to identify, measure and manage them. We think it is essential to assess the contribution of each layer to risk management and to calibrate downstream layers to manage the residual risk after earlier controls have been applied.

2. Are there any other key problems with the current system that have not been identified?

NZPPI Response

Ultimately, the goal of the plant imports system is to create value—such as export or domestic revenue, allowing innovation, creating or maintaining strategic advantage, employment, protecting the NZ environment, and customer satisfaction.

An optimised quarantine system maximises the total value of the system by managing risk to an appropriate level in the most cost-efficient way. These factors can be described by the Cost-Risk-Value model below.



A model showing the three factors to optimise in a balanced system.

Beyond a certain investment in risk management, additional layers of precaution which don't achieve any further protection can erode the value of the total system.

For example, we think the pest interception data provides evidence that Level 3B quarantine is not necessary for the detection and management of regulated pests, when risk of high-impact pests has already been reduced by offshore risk management. L3B increases confidence that pests will be *contained* in quarantine, while testing and inspection is carried out. But this is different from the ability to detect and manage pests.

Factors that increase confidence that regulated pests will be detected and managed before exposure/establishment	**Factors that decrease confidence that regulated pests will be detected and managed before exposure/ establishment**
- Offshore risk management (testing, symptom observation) - Pre-quarantine testing - Onshore mandatory testing - Onshore symptom observation / testing - Time in quarantine - Climatic controls - Phytosanitary inspection capability and skills - Post-clearance observation	- Latent infection - Asymptomatic infection - No mandatory testing - Insufficient symptom observation - Insufficient time in quarantine

Factors that increase confidence that regulated pests will be contained in quarantine	**Factors that decrease confidence that regulated pests will be contained in quarantine**
- HEPA filtration (L3B) - Anteroom - Reticulated / treated water systems - Mesh screened vents - Good Quality management processes - Disinfection processes - Separate clothing, tools	- Open field facilities - Wide aperture mesh screens on vents - Poorly maintained greenhouse structure - Poor QM processes to open drains

3. Are there any key criteria (for evaluating the options) that have not been considered?

NZPPI Response

The proposal assesses alternative options against the status quo using five key criteria. We have referenced these criteria to the Cost-Risk-Value model above.

Biosecurity NZ criteria	**Relationship to the cost, risk, value model**
Managing biosecurity risk	Risk
Time taken to import	Cost
System simplicity	Cost
Confidence in the system	Risk
Cost[3]	Cost & Risk

The total value of the plant imports system is derived from the efficiency of cost in managing risk.

Ultimately, value drives business decisions and investment and directly consideration aligns with the purpose, success and sustainability of the quarantine system. We think it would be more informative to assess the alternative options using Value metrics, rather than risk and cost criteria.

4. Are some of the criteria more important to NZPPI than others?

a. Managing biosecurity risk
b. Time taken to import
c. System simplicity
d. Confidence in the system
e. Cost to import

The criteria have been defined from BNZ's perspective, and each criterion needs to be defined by its impact on value.
For example, 'System simplicity' is defined as managing the system efficiently in a way that reduces complexity and is simple for Biosecurity New Zealand to implement and for everyone to understand.
In the Cost-Risk-Value model, this criterion aligns with 'Cost' as it focuses on resourcing and efficiency. In MPI's evaluation, Option 2 is given a higher score because simplifying the offshore facility system makes it a lot easier for MPI to manage. Costs would be reduced for importers from 'unapproved' facilities, but costs for importers from 'approved' offshore facilities would massively increase.
We think this criterion needs to consider value to arrive at a more meaningful comparison,

[3] The Cost criterion definition in the proposal aligns with two objectives in the cost, risk, value model: predictability (risk) and sustainability (cost).

e.g. Will the option manage the system in the most cost-effective way, with the lowest cost measures applied to manage risk to an appropriate level?

5. Does the (status quo) system have any benefits which have not been identified or overstated?

NZPPI Response

The status quo system works very well for potato tissue culture material from SASA. It is also the most cost-efficient option (currently) for import from approved offshore facilities.

6. Does the (status quo) system have any problems that have not been identified or overstated? How do they restrict imports or make managing biosecurity risk more difficult or uncertain?

NZPPI Response

The Offshore Facility approval system (status quo) is a knowledge and confidence system, based on MPI seeing and verifying the specific procedure, policies, and tests that manage risk offshore. Facilities are differentiated according to whether MPI has visited and approved the system.

We think there would be value in reducing the frequency of on-site audits to decrease the resourcing costs for MPI and operators and reduce costs to importers.

There have been relatively few quarantine interceptions in the food & fibre pathways in the past 15 years which shows that offshore measures have been effective at reducing risk. The data shows offshore measures are effective irrespective of whether imports have come from 'approved' or 'unapproved' facilities. It makes sense that importers select reputable suppliers or 'hubs' to import from, because there is zero value in importing diseased material only to have it destroyed in the quarantine stage.

Mandatory testing requirements and symptom observation have also been effective at detecting pests in quarantine before consignments are given biosecurity clearance, and the data shows this occurred whether the material was in Level 2, 3A or 3B facilities.

7. Can you suggest other approaches that would allow BNZ to recognise testing and inspection done at offshore production hubs, while reducing system complexity? If so, how could we be sure that risk would be managed as well as under the existing system?

NZPPI Response

There are other mechanisms to recognise testing and inspection done by overseas exporters. We would like to discuss options with a stakeholder working group on this topic, hearing from others how countries with similar phytosanitary requirements manage costs and risks.

8. Is it more important to access plants faster and manage risk quickly in L3B quarantine, or import more slowly using the existing offshore framework? What are the trade-offs?

NZPPI Response

The question is phrased in a 'Cost' context. We think it is more important to ensure that the quarantine system maximises value and that risk management measures are cost-effectively applied.

In Option 2, the import of material from 'unapproved' facilities would be faster and cost less compared to the status quo. But it would be much more expensive for material from 'approved' facilities and not materially reduce the amount of time in quarantine.

Option 2 duplicates testing that has already been completed offshore, adding a redundant layer of protection and cost for little benefit. We do not think it is appropriate for material from 'approved' offshore facilities to be imported through L3B quarantine, when the current system allows material to come into lower quarantine with less diagnostic testing, for a similar quarantine period.

Option 2 indicates that current quarantine times for material from unapproved offshore facilities is longer than necessary to manage risk. We would like to see this reviewed immediately, with time in L3B reduced to 9 months to improve value in the current system.

9. Do you have any information that makes you think risk will be managed less effectively under Option 3 compared to the status quo?

NZPPI Response

The Offshore Facility standard and system surrounding that has become more rigid and expensive in the past decade. Policy decisions have been made to disqualify 'open field' vineyards as approved MPI facilities, with no flexibility to recognise offshore vector-control and surveillance activities, or any of the testing done prior to import into NZ. Material must come into the highest level of quarantine for 24 months – which completely overmanages the risk from this high-health material.
For this reason, Option 3 may provide an increased flexibility compared to the status quo.

10. Do you have a view on whether we should retain or discard Level 3A quarantine under this option?

NZPPI Response

NZPPI does not support Level 3A quarantine for material from approved offshore facilities, nor the automatic upgrade to Level 3B facilities should Level 3A facilities be unavailable for the following reasons:

- Risk of fungi and bacteria is partially managed through offshore testing and observation. While offshore facilities don't test asymptomatic plant samples for fungi and bacteria, they rely on symptom observation and testing of symptomatic material. This is a similar approach to MPI management of fungi and bacteria in quarantine.
- We cannot conclude from historic interception data that risk is better managed in Level 3A compared to Level 2 facilities. Regulated fungal and bacterial pests have been detected and managed adequately in Level 2 facilities

We would like to see Level 3A quarantine designated for risk material which does not need the same level of 'containment' and climate control, as assessed in import health standard development.

We suggest the little interest in private provision of Level 3A capacity is due to the lack of IHSs which prescribe a Level 3A option alternative to Level 3B.

11. Can you suggest any other approaches for managing risk after plants have been tested and held for six months in L3B?

NZPPI Response

New Zealand's biosecurity system employs multiple layers of risk management to progressively manage (reduce) risk to an acceptable level.

- Pre-border measures: Risk assessments, offshore diagnostic testing and inspection, NPPO certification, treatments.
- Border measures: Border inspection, time in post-entry quarantine, quarantine inspections, pre-determined testing and symptom diagnostics
- Post-border measures: monitoring and early detection systems, surveillance and response.

MPI standards and policy settings target risk management only in the first two layers in the system. But risk management continues post-border, with new germplasm continuously monitored and evaluated in New Zealand conditions. We think this contributes to the effectiveness of the biosecurity system by providing an early detection system if unusual symptoms are observed post-clearance. This layer could be more formally recognised if Food & Fibre IHSs prescribed the use of MPI's Plant Pass system as a post-clearance condition.

12. Will moving plants from L3B to L2 quarantine part way through quarantine have any negative impacts on plant health, or on facility operations?

NZPPI Response

We assume graduated quarantine would be useful, however the logistics of sending

uncleared plant material from Auckland to other parts of the country needs further analysis.

13. How much benefit will this option have relative to the status quo?

NZPPI Response

We think the system needs to shift gears from risk-adverse, tight control to a new perspective that recognises adaptability and responsiveness.