

PPBS Consultation Overview

Purpose of this Paper

To provide a high-level overview of feedback on scheme objectives and the proposed standard, obtained following consultation, feedback and discussion with producers and other stakeholders through June and July.

1. Executive Summary

Major feedback themes include:

- Strong **support for the scheme’s headline objectives** - protecting industry, producers, their customers and the environment.
- That it must **benefit producers** and **mitigate regulatory impact in an incursion**.
- **Support for industry led model**, and the relevance and flexibility it brings.
- The need to **capture all producers**, noting perceived risk from informal nurseries and ability of small producers to engage.
- Overwhelming support for implementation of **compulsory registration** (via regulation if necessary) and the benefits thereof – biosecurity communication channels to producers, facilitation of traceability, rapid and targeted comms in a crisis ...
- **Varied views on other implementation model components** to grow or drive certification participation.
 - On the likely success of sole reliance of commercial drivers for participation: responses varied from highly feasible, to doubtful, to non-effective.
 - Need for direction from MPI as to whether they’re prepared to support/regulate a compulsory scheme/compulsory registration ... if that’s the right approach.
- The need for **strong MPI (and other regulatory) recognition/support** and for participation to accrue regulatory “benefits”.
 - Noting concern over MPI’s handling of recent biosecurity incursions, impact on producers, appropriateness and effectiveness of actions (including NZPPI myrtle rust protocols).
 - Potential for the scheme to be used in a response in a manner detrimental to producers.
- **Enforcement’s an important** component of any regulated component.
- Need to **avoid bureaucracy for no benefit** ... coupled with **concern over costs**.
- Keep engagement and administration as straight-forward as possible.
- **Strong support among influencers and plant buyer groups** who will varyingly encourage or mandate the scheme.
- Build **industry support mechanisms** – people, guidance materials and training engagement.

2. Process

Consultation work and feedback included:

- Six regional meetings attended by 85 individuals representing 62 nurseries.
- Submissions from plant producers.
- Meetings with and submissions from industry bodies with biosecurity standards, other industry sectors and stakeholder, groups with an interest in the natural environment, and several major garden retailers.

3. Aggregated Results

Note – reference is made to Stage 2 in the following table. The scope of the project to date has been to design the Scheme and associated Standards. It is programmed through to the end of August 2018. The next stage (Stage 2) is currently being considered. Included in the proposal is a pilot programme among representative nurseries to refine the standards, work on priority specific modules, technical guidance and training models, traceability scoping, regulatory options, participation drivers and a plant buyer accord, and work to understand and develop system infrastructure. Several feedback themes are encompassed in proposed Stage 2 work.

Feedback	Response
Objectives	
Strong support for the concept noting that it helps producers, protects us all and increases our ability to operate and move plants (and mitigates the risk of our nursery activity being restricted).	
That industry preparedness and response is important, and the scheme will build resilience, trust, confidence and social licence.	
The scheme recognises the threat to producers and through the nursery stock pathway.	
The scheme will maximise the likelihood of early detection but will require a good deal of education and guidance material.	The latter is recognised and is part of the proposal for in Stage 2
Biosecurity is an issue; we need strong response mechanisms and the ability to track plant movements.	Scoping a traceability framework is proposed for Stage 2
It's in my best interest to manage the risk to our nursery from an external threat and provide pest-free plants to customers.	
Biosecurity hazard management is important, but it will not mitigate all risk.	No system can eliminate all risk, but a systematic approach to risk management will provide considerable and improved confidence.

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<p>That in the event of an incursion, a biosecurity scheme should</p> <ol style="list-style-type: none">1. reduce business interruption2. make compensation more forthcoming <p>This proposal does neither.</p>	<p>The scheme will help producers prepare for an incursion, at which time onsite records and documented processes will assist an MPI investigation and speed completion of response work.</p>
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Leadership	
An industry led/governed scheme was favoured. It would ensure relevance and flexibility (for different markets, changed circumstances).	While not yet finalised, an industry led scheme is envisaged.
Concern was however expressed that an industry led scheme may in turn result in government using it to the detriment of producers in the event of an incursion [like MPI’s support on NZPPI’s myrtle rust protocols, considered onerous by some]	Work is underway to develop an understanding of the relationship between MPI and the Scheme, and how the two would interact.
Producer Scope	
Feedback overwhelmingly supported all plant producers being encompassed.	Work is proposed in Stage 2 to advance as wide a participation as possible.
Many commented on the high risk presented by “informal” producers	Reinforcing the need for an inclusive scope.
Some suggested definitions of producers and pests need refinement to avoid unintended consequences – a nursery size limit of 100m2 was suggested by one submitter.	Scheme rules will be modified to address this, and it will also be tested through Stage 2
It was noted that many nurseries had high standards now. They do not need the added bureaucracy. Others who commented in this regard, also noted that many nurseries will not have formal programmes to manage biosecurity risk, and that the scheme will assist them.	Agreed, and for the majority of these the scheme should not be too onerous. Stage 2 pilot will test the scheme’s appropriateness in this regard
It was noted that while many plant producers are well positioned to manage biosecurity risk, there are many, particularly smaller and less formal enterprises, who are not. These are the people we need to influence, recognising that they provide risk, and when industry is viewed as a collective, they may be seen as our weakest links.	The proposal registration stage will enable a conduit for guidance and advice.
Some noted third party risk – soil supplier, hedge trimmers, other plant users, other horticulture sector producers and retailers.	Third parties in our supply chain that carry biological risk are in scope for at least guidance and/or a module. Some risks presented by others are outside the scope of the Scheme and will likely need to be addressed elsewhere and/or by others.
The ability for small producers to effectively engage was noted by some. And that we will need to work hard to assist their participation ... it’s advantageous.	Concern noted, entry level guidance will be developed and engagement with smaller

	producers will be tested in pilot programme.
Some submitted that plant producer scope rules concerning “own use” and proposed exemptions needed work to avoid unintended consequences.	It’s preferred that we retain a broad definition of a “plant producer” and refine engagement as scheme rules are developed and tested through Stage 2.
Pest Scope	
Several submissions spoke to the definition of a pest noting either its broad nature or for some additional criteria.	The definition has been reviewed and currently proposed as “Any species, strain or biotype of plant, animal or pathogenic agent that adversely impacts plants in commercial production or the natural environment.”
Several submissions spoke of the possibility of identifying priority pest risks and/or restricting the scheme to pests not known to be in New Zealand.	It is preferred that all pests that are injurious to nursery production and our customers are included. Both exotic and endemic pests are of concern, and in the case of the latter can still cause problems if populations increase, they become more widespread or are introduced into sensitive environments. Priority pests that are not adequately controlled through the Core Standard can be handled through specific modules.
A question arose as to the need for Specific Modules to rely on the Core Standard. Could they not be standalone protocols and noting that some were urgent to address current threats, eg Kauri dieback.	The Scheme is intended to address a wide range of nursery risk and issues. Modules are intended to address issues that require measure in addition to the Core Standard ... they supplement broad nursery risk management. If they were standalone, they would need to be far more comprehensive and introduce additional complexity and duplication. As to urgency ... identification of

	priority modules in proposed for early in Stage 2.
One submission argued that there should be some rules or penalties for moving of plant stock with pests to other regions.	One of the objectives of the scheme is to facilitate the freedom to move pest free plants. If there are issues as to movement of plants with known or acknowledged pest issues, they should be subject to a specific module.
A meeting of those with an interest in plant supply to the natural environment suggested a natural environment module including traceability, eco-sourcing, post-production issues and a holistic approach to nursery stock husbandry.	Stage 2’s pilot programme will consider these issues and their application through the Core Standard and/or a Specific Module where applicable.
Participation Options	
Registration of nurseries was considered important by most. It would provide a biosecurity information/guidance/advocacy conduit and significantly aid incursion investigations.	
Certification was accepted as a strong risk management tool by many. Note was made that many nurseries adopt most of measures now, while others noted that while laudable, certification may prove too difficult for smaller nurseries (who would none the less benefit from registration and guidance).	Keep the process flexible and supportive. Test through Stage 2 pilot
An intermediate step (between registration and certification) was mentioned by a few, but it was not a strong issue	Stage 2 pilot work will be mindful of this opportunity.
Several comments supported tiered participation levels based on risk profile.	The HACCP model scales to accommodate varying risk profiles
The group certification option was welcomed by several.	A “group” option will be included in nurseries who are part of the pilot programme.
Implementation Options	
There were varied views on the mechanism’s need to grow and drive participation.	Work is proposed in Stage 2 to advance as wide a participation framework as possible.
Many argued for registration to be compulsory (regulated), and some lamented the loss of compulsory (Ag Department) nursery registration several decades ago!	

<p>Several noted that registration should include a requirement to undertake some basic biosecurity management and perhaps utilise an introductory checklist.</p>	<p>To be considered through Stage 2 pilot.</p>
<p>Some saw registration coupled with strong traceability mechanisms as a major step forward and a big step towards mitigating biosecurity risk management.</p>	<p>The Stage 2 proposal includes scoping traceability options and investigating its inclusion in an industry crisis management programme.</p>
<p>In regards how to progress producers to certification, there was no clear consensus.</p> <p>Some argued strong commercial drivers would grow to capture most industry value and volume over 2-3 years, others did not feel this would be equitable (placing participants at a cost disadvantage), effective or sufficient, and if it were, engagement would likely be limited to “formal” plant trade where buyers can specify terms of trade.</p>	<p>A range of options will be developed and considered through Stage 2.</p>
<p>Comments included the need to softly introduce, encourage people in, offer early adopter incentives.</p>	<p>See above.</p>
<p>Some argued that certification compulsion via regulation is essential. It is the only way to capture all risk and create a level playing field among all producers. Others argue that compulsion would unfairly impact smaller producers for little or no gain.</p>	<p>See above.</p>
<p>If regulation (at any level) was considered appropriate, some questioned whether it could be achieved, whether MPI would support/favour it, and others noted possibility of significant adverse reactions.</p>	<p>Regulation and how it might be achieved is among the options that will be considered in Stage 2.</p>
<p>Issues with current MPI response management</p>	
<p>There was significant comment, in meetings and in the email engagement, on producer experience in the broader biosecurity space.</p> <p>Some of this is outside the scope of the scheme but confounded this process (eg the USDA fruit tree issue). Other matters are more relevant (myrtle rust impact, publicity from the M bovis response). Among feedback (directly related to the scheme’s scope and not) was:</p> <ul style="list-style-type: none"> • That MPI should treat PPBS participants more favorably than others • That nurseries are waiting too long for myrtle rust compensation • How would MPI recognise the scheme? 	<p>Work is underway to develop how the Scheme and MPI will interact, and to provide clarity on how MPI and other regulatory bodies will recognise the scheme.</p> <p>Feedback has been provided to MPI and other forums on issues outside the scope of the Scheme.</p>

<ul style="list-style-type: none"> • NZPPI (or the Scheme’s) influence on how MPI reacts • Other risk pathways need to be managed better. • MPI’s reluctance to identify RP’s places my nursery at risk. • Concern over ease of pests getting through the “weak” border and placing industry at risk, and jeopardising our efforts. • Need for MPI investment in future pest risk identification and mitigation. 	
<p>One meeting asked of MPI’s view of industry’s current state of traceability readiness (in light of the myrtle rust experience) and what we might learn from that.</p>	<p>This is included in the Stage 2 proposal to scope a traceability framework.</p>
<p>Costs</p>	
<p>Some considered biosecurity risk management as a necessary cost of doing business, that the scheme was effectively an insurance policy, and that it would in the long run bring advantage for participants.</p>	<p>Some upfront cost for producers is expected. There is however a good body of evidence that investment on a quality management scheme yields a positive medium to term benefit.</p>
<p>Others considered it would add cost, and for some of these people, for little-to-no benefit. It would add a layer of complexity/bureaucracy with little justification.</p>	<p>Pilot work will help identify costs/benefits. We will build case studies from pilot work.</p>
<p>Some argued registration should not incur a cost to the producer (that is, registration provides a public benefit), some that a small fee would be tolerable.</p>	<p>This will be considered later in Stage 2 as part of the considerations for commercial implementation.</p>
<p>There was a comment that any fees should be scaled by nursery size.</p>	<p>This will be considered later in Stage 2 as part of the considerations for commercial implementation.</p>
<p>Audit / Verification</p>	
<p>Practical experience and consistency among auditors noted as essential.</p>	<p>Included in Stage 2 pilot work</p>
<p>There was a view presented that auditors needed to incorporate a coaching role as well as (or instead of) a box ticking approach - at least in the early years.</p>	<p>This will be review through Stage 2</p>
<p>Diagnostics</p>	
<p>Improved access to diagnostic services is essential.</p>	<p>Review of services, gaps and needs in Stage 2 Best Practices work.</p>

Concern was expressed over impact to the nursery if diagnostics at the molecular level was to find new-to-New Zealand pests.	The level of testing required will be considered through Stage 2. However, the Biosecurity Act is clear on the requirement should a new pest be detected.
The need for Government support for diagnostics was discussed at one meeting and noted with respect to the potential move and expansion of MPI’s PHEL facility.	Noted and passed on.
Support for producers	
Growing producer capability is seen as essential for scheme engagement, effectiveness and the desired outcome.	A key part of the early phase of Stage 3
Industry provision of support personnel, training and guidance materials will be essential. Some argued for MPI, and lamented the loss of past MAF, advisory service and officers.	Investigation of industry support options are part of the proposal for Stage 2.
That industry advisory people should follow registration and coach a producer through to certification.	See above.
Other	
Concern over the short consultation notice period and time to make submissions That two industry meetings coincided with Mystery Creek Fielddays.	This is acknowledged and in recognition that it may have created difficulties for some, feedback was accepted well after the formal consultation period. In addition, we will include a broad and inclusive approach to communication through the proposed Stage 2 and continue to accept (and seek) feedback on issues as they arise.
That NZPPI membership (fees) include certification, or at least accrue a cost advantage.	Long-term scheme funding and fee options will be considered later in Stage 2 as planning gets underway for commercial implementation.
How NZPPI’s Farm Management Programme aligns/serves the PPBS	Noted and the subject of NZPPI work outside the Scheme scope at this time.
One submitter proffered the Emergency Operations Centre model as an alternative.	This provides a useful template to help prepare for a biosecurity response.

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Several submissions provided comprehensive feedback on the draft Standard.

This is being reviewed by the Technical Working Group and proposals developed for testing through Stage 2 pilot