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10 February 2021

Submission on proposed changes to the import requirements for aircraft from all countries

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INTRODUCTION

1. Horticulture New Zealand (HortNZ) advocates for and represents the interests of New Zealand's 5,000 commercial fruit and vegetable growers. The horticulture industry is valued at over \$5.5b with over \$3.6b in exports annually.
2. The industry employs over 60,000 people, occupies some 130,000 ha of land and provides critical regional development opportunities in Northland, Auckland, Bay of Plenty, Waikato, Hawke's Bay, Gisborne, Manawatu, Marlborough, Nelson, Canterbury and Central Otago.
3. New Zealand growers supply the majority of fresh and processed fruit and vegetables to domestic consumers, as well as exporting crops to discerning consumers in over 120 countries. Biosecurity is essential to support production, secure market access, and provide confidence for investment – all critical to ensure the horticulture industry continues to prosper.
4. An incursion of an invasive pest or pathogen can result in considerable cost and disruption during the initial biosecurity response. If eradication is not feasible, costs must be borne long-term as growers have to manage the new organism on an ongoing basis. For these reasons biosecurity threats are of significant concern to the horticulture sector.
5. Aircraft pose a biosecurity threat due to their rapid transit to New Zealand, maximising the chance of survival for any hitchhiking pests in the aircraft itself or inadvertently stowed

away in cargo. Appropriately managing biosecurity risk on this pathway is critical for the future success of the horticulture sector.

GENERAL

1. HortNZ understands that the changes proposed in the risk management proposal (MPI 2020) are primarily logistical and will not materially affect any existing biosecurity requirements. We seek confirmation that all aircraft will still need to meet the requirements of the Craft Risk Management Standard for Aircraft from All Countries, or seek to operate under an approved plan that sets out risk management processes that manage the biosecurity risk to the equivalent level of the Standard in a Craft Risk Management Plan.
2. Whilst more time on the ground for International Transfer Aircraft (>8 hours) could theoretically increase the chance of hitchhikers escaping the aircraft, in reality the highest risk of introduction is likely to be during unloading of cargo and disembarkation of passengers on arrival, processes which must be undertaken in a manner that meets strict biosecurity requirements to minimise the risk of a pest introduction. For this reason, HortNZ believes that the additional risk posed by an aircraft staying longer is likely to be minimal, provided they continue to meet the requirements of the Standard for the duration of the time spent in New Zealand.
3. HortNZ requests that audits of International Transfer Aircraft are undertaken from time to time to ensure the standard is complied with for the duration of their time in New Zealand.
4. HortNZ supports inclusion of wording about the requirement to only remove risk goods from aircraft in approved locations via approved systems (4.1.1, MPI 2020). The explicit inclusion of this pre-existing biosecurity requirement provides clarity and should help to avoid oversights or confusion.
5. HortNZ supports the inclusion of guidance in section 1.5 of the standard, particularly the text around keeping the aircraft as clean as practicable “for example free of rodents and other pests, rubbish, soil and spilled cargo”. This guidance should help to ensure expectations around this subjective concept are as clear as they can be.

OTHER

6. HortNZ welcomes the opportunity to discuss the points raised in this submission.
7. This submission is supported by:
 - Boysenberries New Zealand
 - Citrus New Zealand
 - Katikati Fruitgrowers Association
 - New Zealand Asparagus Council
 - Process Vegetables New Zealand
 - Strawberry Growers New Zealand Inc
 - Vegetables New Zealand
 - Potatoes New Zealand

REFERENCES

MPI (2020) Risk Management Proposal: Amendments to the Craft Risk Management Standard for Aircraft from All Countries

ENDS