



This document will be regularly updated as extra questions come up during the consultation period.

### Why is KVH proposing a Pathway Management Plan?

Biosecurity is one of the kiwifruit industry's biggest risks and we must be prepared for pest and disease threats that could make their way here, and potentially establish.

Our biosecurity activities are numerous. They have significantly increased and evolved as we've come to better understand potential risks and their pathways. We can better manage these with a new Pathway Management Plan that gives you better protection, more value for money, and increased simplicity around rules and regulations. It does this by managing risk across the pathways that bring biosecurity risk onto orchards rather than focusing on managing risk associated with individual pests or diseases.

The Plan will also provide KVH with access to a framework and legal basis for strengthened management of pathway risks to the kiwifruit industry.

#### What will the benefits be?

The proposed Plan is fit-for-purpose and makes sure all the right settings are in place so that we can detect anything new quickly enough to stop its spread, limit impacts, and aim for eradication.

Key areas where we will be able to strengthen our management of risk are:

- Surveillance to detect new or emerging risks, for example, to investigate a novel or emerging pest or pathogen issue (that is not new to New Zealand). Regulatory tools may be needed to enter property and take samples for the purpose of establishing whether risk organisms are present or absent.
- Pathway hygiene and traceability, for example, good hygiene limits the potential spread of high-risk organisms like *Ceratocystis fimbriata* and traceability is strengthened through having tracing for all risk goods coming onto the orchard, allowing more rapid management of a new incursion and ultimate eradication.
- Supporting 'area freedom' from risk organisms, for example, to give KVH the power to control pathways into areas that are free of specified risk organisms.
- Containing risk organisms, for example, to give KVH the power to control any pathway within and/or from an area (e.g., an abandoned orchard) that harbours specified risk organisms and creates a risk to other orchards/externalities.

The Plan also aligns with KVH's Strategy for readiness and response (being fully prepared for the next biosecurity event — understanding our risks with readiness, response and contingency arrangements in place) and industry responsibility (the kiwifruit industry hold themselves accountable for overall industry biosecurity and actively manage risk of new and established threats).

## What difference would this Plan make if, for example, something new is detected on an orchard next week?

The key principle of the Pathway Plan is that an improved level of biosecurity practice would exist all the time, to reduce the risk of spreading new biosecurity threats that may already be here but we don't yet know about. It means that if a new detection does occur it is far more likely to be detected early and not spread as far. This gives us the best chance of eradication and reducing the impacts to the industry. The

alternative scenario is that the organism is spread far and wide by the time of detection - in which case eradication is far less likely and the organism is more likely to become an issue for growers to deal with year after year with associated costs.

### What is the step-change? What changes next week/next month?

The step-change is the framework which enables KVH to manage a broader range of risks than only Psa. While this may not look any different to the current state in many aspects, if a new threat were to arise we have a tool to implement measures that would prevent that organism spreading to other part of the industry.

### Will it change the levy cost?

The intent is that the Plan would be funded with a new combined levy (the existing GIA readiness and response levy plus Pathway Plan levy), with the Psa levy removed and replaced with the new Pathway Plan levy. Overall, this would mean that there will not be any increase in total levy paid for biosecurity risk management on-orchard from current levels.

### Why doesn't KVH just focus efforts at the border and ensure nothing comes in?

Management of risk both at the border and pre-border is primarily undertaken by Biosecurity NZ (MPI) and is absolutely crucial to the New Zealand biosecurity system, but it is unrealistic to expect such efforts to stop all biosecurity risks given the volumes of travel and trade that our country receives.

Pre COVID-19 Auckland Airport was recieving just over 18 million passengers each year, and up to 20,000 on busiest days. It is simply not possible to apply mitigation measures at a level that would provide absolute confidence on this pathway, let alone countless other pathways, such as the 227,000 cruise ship passengers that land at the Port of Tauranga each season, the three million mail items that enter New Zealand each month, 72,000 sea containers, and not to mention machinery imports, illegal movements and so on.

It's not only the introduction of new pests that we should be concerned about. Native pests have also been shown to evolve to new hosts, and the longer non-native crops are grown in an area, the more threatened they become by native pests. The New Zealand forestry sector has seen this with native *Phytophthora* which have recently evolved to impact plantation crops, and even kauri dieback, also caused by a *Phytophthora* that is known to have been present in New Zealand for possibly hundreds of years, but only recently causing significant impacts which are evolving into a very serious issue for our most iconic tree.

For kiwifruit growers *Ceratocystis fimbriata* is an example of a native pathogen in Brazil that evolved to impact a new host – see the case study for more information on this (available at www.kvh.org.nz).

Having systems in place post-border is the best measure we can take as an industry to protect our investments.

### How have you consulted so far?

In November and December 2019, a first round of consultation took place with growers and associated industry groups (post-harvest organisations for example) to test a high-level proposal. During 2020 we have developed the plan further and pre-tested it with many key people across the kiwifruit industry before a second round of consultation and roadshows specifically with growers starting in mid-September.

#### When would the new Plan come into effect?

After our second round of detailed consultation is completed the proposed Plan will be finalised and submitted to the Ministry for Primary Industries (MPI) and Minister for Biosecurity. This will be early 2021, and we expect that during the year the Plan will go through relevant Parliamentary processes and we can begin implementation/operational planning.

It is likely that implementation will be from 1 April 2022.

# What happens to the Psa National Pest Management Plan (NPMP) and that levy? When does that officially stop?

The Pathway Plan will replace the NPMP and associated levy.

The NPMP levy has been steadily decreased over the past few years and if the Pathway Plan is supported by the kiwifruit industry it will be set to zero at our 2021 AGM. As there are still reserves remaining (that can only be used for activities under the NPMP) the NPMP will be retained until the end of its term in May 2023. However, KVH will adjust the levies so that the net combined biosecurity levy will remain at its current total level of 1.6c per tray.

### Will this change the Kiwifruit Plant Certification Scheme (KPCS)? In what way?

The KPCS has proven to be an effective approach for managing the movement of rootstock with over 60 nurseries currently certified in the scheme.

This scheme will be retained but the scope will be expanded to include other plant material types such as shelter plants, mature plants, budwood, and pollen. This will provide an easy option for suppliers of plant material to demonstrate compliance with the requirements of the Pathway Plan. By using the KPCS framework across all plant material types we will achieve greater consistency in risk management, but also reduce duplication for suppliers of multiple types of plant material.

### Does this change risk management of Psa? How is it better?

Psa is still an important pathogen to be managed, to protect both non-detected orchards and reduce the likelihood of spreading any new forms of Psa should they emerge (such as those resistant to crop protection products). While Psa presents an ongoing threat to growers, controls will be retained within the Pathway Plan - including a specific rule on movement between the north and south islands.

However, Psa is not the only organism of concern and this represents a shift towards a framework that provides the tools to manage a broader range of biosecurity threats.

### Is this KVH signaling it's starting to give up on managing Psa?

As mentioned above, KVH will retain measures within the Pathway Plan to prevent the spread of Psa to non-detected orchards and regions, and to reduce the likelihood of new forms of Psa being spread. However, it is likely that on-orchard management of Psa will continue to be one of a range of pests that growers manage on a routine basis with technical support from a wide range of business and contracted experts from across the kiwifruit industry.

Will there be more restrictions, or different restrictions, around movements of plant material?

The requirements around plant material movement will be simpler, clearer, and more consistent. Growers sourcing plant material will simply need to ensure that the material is KPCS certified and that

they record traceability information of where they sourced this from. Suppliers will need to acheive KPCS certification but the costs and hurdles associated with this have been deliberately kept to a minimum to ensure we achieve a high level of compliance.

In many cases the requirements of the Pathway Plan will not be much different to the current state under the NPMP, however if new threats emerge we have a framework to introduce additional measures to manage this risk. Where such additional measures have a significant compliance cost associated, KVH will consult with the industry in advance.

### Does any other industry group have anything similar?

There are two regional pathway plans in place focused on the management of marine pests, but no agricultural industry has a national Pathway Managmeent Plan in place currently - many are interested in what we are doing and are often engaging in how we develop ours.

Biosecurity has been undergoing a step-change recently with the Government Industry Agreement (GIA) partnership concept, where government and industry work together to take greater accountability for biosecurity response planning and preparedness.

Psa and *Mycoplasma bovis* are two responses that have demonstrated that the border can and will have slippage, and in both instances had industry had better biosecurity practices in place preemptively, the impacts of these incursions would have been reduced. With industry sharing a cost of the response bill and the long-term impacts of an established pest, it is likely that this trend of industry taking proactive steps to protect these investments will only increase.

Does the Ministry for Primary Industries (MPI) support this? Will it change how KVH works with MPI? Yes, MPI strongly supports the principle of pathway management and will need to be satisfied that all requirements of the Biosecurity Act have been met in order to approve the Pathway Plan. Having measures in place to demonstrate that we are proactively managing biosecurity risk within our industry will strengthen our relationship with MPI, particularly when we advocate for increased measures at the border or offshore. Making such requests carries less weight when your own house is not in order.

# If Zespri support this and are involved, why don't they just take on biosecurity? Why is there still a KVH?

There is a clear mandate from growers and the wider New Zealand kiwifruit industry for KVH to operate and be accountable. Being an independent body, focused purely on biosecurity, KVH ensures that the industry always has strategic and operational preparedness as its top priority.

#### Is this more bureaucratic? Will there be more paperwork?

The Pathway Plan is about implementing practices to manage risk of spreading biosecurity threats. Paperwork is sometimes necessary to demonstrate that such practices have occured, however a key principle that KVH is always considering is to strive for an appropriate balance of risk management and pragmatism.

We are conscious of the increasing compliance load to our industry and we do not wish to add to this unnecessarily. However, there will be instances where new practices and new paperwork are required, and we appreciate this will create work (at least initially) until such practices become routine.

The potential benefit to the industry over the longer term far exceeds the short term costs as demonstrated in the Cost Benefit Analysis (available at www.kvh.org.nz).

### How can I have my say?

The proposed Pathway Plan will be finalised, taking into account the feedback we receive from growers and the wider industry during consultation, once it is submitted and accepted by MPI and the Minister. We strongly encourage everyone to have a say so that we can make sure the Plan is set up to deliver on our goals of ensuring better protection, more value for money, and clear, concise information and standards. You can provide feedback in writing to KVH by emailing <a href="mailto:info@kvh.org.nz">info@kvh.org.nz</a> or by filling in and returning the submission form on our website at <a href="mailto:www.kvh.org.nz">www.kvh.org.nz</a>.