

Profile Series: Transitional

facilities (Border Interventions on Import Pathways)

This series is intended to provide the kiwifruit industry with a greater understanding of how risks are managed at the border. It is important to remember the border is just one layer of the biosecurity system, a summary of the entire system is provided in the report "The NZ biosecurity system and how it operates" which can be found on the KVH website (www.kvh.org.nz/NZ Biosecurity).

Transitional Facilities

Transitional facilities are an important part of New Zealand's border. Transitional facilities hold uncleared risk goods for inspection, secure storage or treatment until they receive biosecurity clearance or are reshipped or destroyed.

This includes imported goods such as fruit and other food products, bulk products such as animal feeds, things made from wood or plant material, sea containers, used machinery or vehicles, and other products that might have some associated biosecurity risk.

Transitional facilities must be approved by MPI for a specific purpose, scope and activities (e.g., approved for specified types of goods that will be held and activities that will be conducted). They must either meet requirements set out in MPIs Standard for General Transitional Facilities for Uncleared Goods, or must meet requirements of a specific MPI standard for transitional facilities where this involves importing specified plants, plant products, animal products or animals (e.g., Standard for Cat and Dog Transitional Facilities).

The relevant standard then sets out the requirements a transitional facility must meet, such as:

- having an approved 'Operator' and having an 'accredited person' available at all times for the unpacking of imported risk goods (both must meet MPI training requirements and be approved by MPI);
- having a system for controlling access to ensure the security of uncleared goods;
- having signage (that meets MPI specifications);
- meeting hygiene requirements;
- controlling pests, vermin and weeds;
- keeping auditable records etc.

MPI Inspectors then carry out external assessments of all transitional facilities, with frequency of such assessments varying between 6-18 months depending upon the compliance history and risk status of any given transitional facility.

What are the biosecurity risks?

The key risks are the arrival of "hitchhiker" pests (i.e. pests that "hitchhike" on or contaminate inanimate pathways, such as, transported containers or their contents, on bulk goods, vehicles or machinery). These tend to be insect pests, and include high risk organisms of concern to the kiwifruit industry, such as, fruit flies, brown marmorated stink bug and white peach scale (see http://www.kvh.org.nz/emerging_risks).

Why is the kiwifruit industry concerned about transitional facilities?

While people often think of the border as a small number of places (airports and marine ports) where clearance activities occur, the reality is very different. Most biosecurity clearance activities are occurring at transitional facilities; MPI Inspectors carry out risk profiling when imported goods first arrive at a marine port or airport, clear a small proportion of such goods at those ports (those deemed to pose the highest risk), and then direct most imported goods to transitional facilities where they receive final clearance by a non-MPI accredited person.

There are approximately 6500 such transitional facilities operating in New Zealand, which means our border is very "diffuse". While these are concentrated in Auckland, they are widely dispersed and operating across all kiwifruit growing regions (see Table 1 below for numbers in each region).

	Number of transitional facilities in relation to the				
	number of consignments cleared per annum				
Region	Very low (0-5)	Low (6-20)	Mid (21-50)	High (51+)	Total
Auckland	1139	950	541	635	3265
Canterbury	318	255	153	140	866
Wellington	113	107	58	75	353
Bay of Plenty	101	87	41	39	268
Waikato	110	84	39	29	262
Hawkes Bay	49	47	25	22	143
Otago	44	30	27	12	113
Manawatu	34	36	16	16	102
Taranaki	43	19	14	8	84
Nelson	22	26	13	8	69
Southland	24	19	6	4	53
Northland	11	9	7	4	31
Marlborough	11	10	3	1	25
East Cape	13	6	1	0	20
Wanganui	1	7	4	4	16
Horowhenua	7	6	1	2	16
Wairarapa	9	3	2	2	16
Kapiti Coast	4	6	1	1	12
Thames	4	4	0	1	9
West Coast	4	1	0	0	5
Rangitikei	2	1	0	1	4
Tasman	4	0	0	0	4
Central Otago	1	0	1	1	3
Counties Manukau	2	0	0	0	2
Total	2070	1713	953	1005	5741

Table 1. Number of transitional facilities, and the profile in relation to scale of imported cargo. This information is based on numbers of consignments from the Quancargo database for the period 1st October 2010 to the 30th September 2013 for those facilities that are approved to the *MPI Standard for General Transitional Facilities for Uncleared Goods* [Note the total does not add up to approximately 6500 because this data does not include facilities operating to specific transitional facilities standards, such as the *Standard for Cat and Dog Transitional Facilities*]

All transitional facilities are not equal. Among these there is significant variation in terms of the scale of operation (e.g., from processing several containers per annum to many thousands). This is illustrated in Table 1, which shows that a large percentage of transitional facilities (approximately 65%) are processing less than 20 consignments per year.

There is significant variation in quality of facilities, systems and capability of operators. In large part this relates to 'scale'; for smaller transitional facilities biosecurity is a minor activity and the 'Operator' or 'accredited person' roles are a minor proportion of a staff member's total responsibilities, while for larger transitional facilities biosecurity is a major activity and the 'Operator' or 'accredited person' roles are the dominant or sole responsibility for staff. Within reasonably close proximity to KVH there are very small transitional facilities where 'controlled access' constitutes a sign, access is open, and facility staff keep an eye out for visitors during the course of their work; while in the other direction is the Port of Tauranga (with multiple transitional facilities) where the boundary is security fenced and patrolled, and access is tightly controlled at gated entry points operated 24/7 by dedicated personnel.

Areas of KVH engagement on this pathway

KVH recognises there are currently too many transitional facilities operating in New Zealand and of variable quality, representing a key vulnerability in New Zealand's border arrangements. Both the pressure on transitional facilities, and importance of the role transitional facilities play within New Zealand's border arrangements, will only grow given New Zealand imports and exports are growing and containerised trade volumes are increasing (for example, container volume in New Zealand is projected to increase by 5% per annum).

KVH recognises the current policy approach and standards for transitional facilities need to be reevaluated and strengthened. For example, to operate a transitional facility the current requirement is to complete a half day training then re-train again every four years. While to be an 'accredited person' one must undertake and pass a half day basic container biosecurity awareness course. Given the level of risk and key role that transitional facilities play in New Zealand's border, it is critical we have highly trained and skilled people operating to carry out clearance activities within transitional facilities.

KVH shared its concerns with the Ministry for Primary Industries (MPI) in early 2014, and is pleased that MPI appears to be seriously looking at this issue and potential solutions. KVH will support a well-designed programme to reduce this number and strengthen biosecurity at transitional facilities.

KVH has also received anonymous complaints about poor operation within specific transitional facilities, which are passed on to MPI. Our growers recognise the importance of good biosecurity at transitional facilities and KVH encourages such reports in the interest of protecting our industry.