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Biosecurity Strategy Submission
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Greater Wellington is the promotional
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Dear Sir / Madam

Submission on Draft Biosecurity Strategy

Thank you for the opportunity to submit on the draft Biosecurity Strategy for New Zealand. The development of this Strategy comes at a time when our country is under more and more pressure from exotic incursions. As we open our borders to more visitors, migrants and imported risk goods, we increase the risk of unwanted organisms arriving uninvited. How much money should we dedicate to surveillance, who should pay for incursions, who should have management responsibility? These are among a number of critical questions raised by the draft Strategy. It is important that those who consider the answers to these questions take a holistic view, not a purely central Government approach constrained by budgets and existing mandates. To be successfully implemented, decisions must consider short and long-term effects on our economy, our environment and our ability to pay.

This Strategy must succeed. We do not get second chances at preventing incursions. To be successful, we will need a seamless approach to managing our biosecurity, from pre-border to individuals managing pests in their backyard. Communication, information sharing and collective decision making are key issues if we desire the retention of our current uniqueness.

The Council looks forward to working further with the Strategy Development Team on this critical issue.

Yours sincerely

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**SUBMISSION ON THE
DRAFT BIOSECURITY STRATEGY FOR NEW ZEALAND**

from

GREATER WELLINGTON REGIONAL COUNCIL

February 2003

1. Introduction

The Greater Wellington Regional Council (GWRC) welcomes the development of the Draft Biosecurity Strategy for New Zealand. Its release is timely considering the increasing number of exotic incursions that have recently invaded our country.

As a nation that relies heavily on primary production industries, we need to be constantly vigilant for any exotic species that may threaten our livelihood. It is interesting that we place greater risks on our production systems by opening our borders to two million tourists annually, many of whom through ignorance attempt to bring foreign food or plant and animal material with them. We also invite the importation of a myriad of used vehicles and equipment, thereby further increasing the risk.

It is ironic that the foreign visitors who come to view our wonderful natural environment are also one of the groups that introduce species that place that environment at risk.

It is clear that if we are to have a successful biosecurity strategy, then education, communication and enforcement must be key components of the implementation plan. The fact that a large percentage of New Zealanders returning from overseas are guilty of introducing foreign material suggests that internal education programmes are an urgent requirement.

Our environment continues to be modified as a result of poor historical biosecurity decisions. Our forebears, mainly through ignorance, introduced a raft of species that we now spend millions of dollars attempting to control. We cannot afford to repeat these mistakes.

2. Biosecurity Vision & Goals

GWRC supports the stated vision and goals. To be realised will require significantly improved co-ordination, awareness, communication, and the focused use of available resources.

3. Key Issues

The Draft Strategy correctly identifies biosecurity as an ever changing problem or potential problem. A flexible, strategic approach is essential. To move forward, we should consider current weaknesses and build on existing successes. From GWRC's perspective, the following areas need emphasis –

- Leadership – to the average New Zealander there is considerable confusion regarding responsibility for biosecurity matters. Responses to recent incursions have involved MAF, MoH, MinFish and DoC. Visitors to our shores are met by Customs and MAF

officials. The Draft Strategy suggests improving the line of responsibility by appointing MAF for terrestrial systems and MinFish for marine systems. Whilst this is a major improvement, we would recommend that a single purpose Biosecurity Authority would provide the best resolution. This would provide a strongly focused organisation with a clear purpose. The current problems of co-ordination between Ministries, resource allocation, and commitment would disappear. New Zealanders could clearly identify which Government organisation had the biosecurity portfolio, an important point if we are to raise awareness of biosecurity issues in this country.

GWRC is concerned that co-ordination with DoC and MoH would diminish if MAF took the lead role for terrestrial systems. MAF have historically been focussed on productive systems. It would take a significant cultural shift for it to adequately consider and account for biodiversity and health concerns. Why create more potential problems when a single purpose Biosecurity Authority would be more suitable?

- New Zealanders lack appreciation of the risks of exotic incursions to our economy, environment and well being. The Biosecurity Strategy must include a commitment to resourcing more awareness campaigns and educational programmes in schools. If we are to make changes in the future then we need to start with the youth of today.
- Lack of a united approach to the management of pests following establishment. There is no evidence of a partnership between central and regional government. The Biosecurity Act does not bind the Crown to regional strategies, despite there being clear evidence of benefit to Crown lands. The Crown has not shown any commitment to the management of recent widespread pests. In many cases, the development of National Pest Management Strategies would be an appropriate mechanism. Why is there an apparent reluctance? If the Act is an impediment then amendments must be made.
- Confusion over responsibilities for the transition from pre-border, border, and incursion response, to ongoing pest management. Regional government input is restricted to pest management, yet decisions made by central government agencies impact directly on regional resource requirements. Future biosecurity decisions concerning incursions should include all agencies that have responsibility through the governance continuum.
- Contingency funds – it appears that a number of recent exotic incursions have not been adequately managed due to lack of funding. Central government needs to show stronger commitment by developing a contingency fund, controlled in the future by the Biosecurity Authority. All New Zealanders eventually pay in some form for pest management. The commitment is usually a continuous one. In many cases, it would be better to invest taxpayer funds on eradicating incursions immediately following detection.

- Availability of management tools – in all cases, agencies need ready access to appropriate management or control tools. These may be herbicides, pesticides or insecticides. Many of these tools are coming under considerable public pressure to be restricted or removed. Some of the public concerns may be justified but many are based on emotive responses with little scientific validation. The Biosecurity Strategy needs to consider these issues carefully. Access to tools in certain situations must be maintained.
- Enforcement – the Draft Biosecurity Strategy indicates that we have significantly improved our border detection systems in recent times. Most of these changes have been reactionary. Central government funds have suddenly been allocated following the breakdown of biosecurity systems in some of our trading nations or a new pest has been identified within our own borders. However, these changes have been positive and we now intercept far more foreign material at our ports of entry. What is now missing is strong enforcement action. Fines and penalties should be significant. They should send a strong message that we are serious about our economy, health and environment. Enforcement funds recovered should be committed to the Contingency Fund for future incursion responses or to assist the procurement of resources to prevent further incursions.

4. Organisational Structures

GWRC supports the development of a single Biosecurity Authority that takes responsibility for national biosecurity management. The structure proposed by the Draft Strategy would still create confusion over roles and responsibilities. A single authority would improve focus, commitment, and enhance communication with other biosecurity agencies, particularly regional government.

GWRC supports the continuation of the Biosecurity Council, but as a representative group of stakeholders, with a responsibility to audit performance and report to, and advise, the Minister.

Participation of regional government is imperative. We currently operate in a vacuum. Participation at a strategic planning level and an operational level is supported.

We are uncertain of the benefits of the proposed Advisory Board. We consider that the Biosecurity Council's role would overlap.

The establishment of a Science Committee is supported. GWRC recommends that the Committee have representatives from all biosecurity agencies to ensure science expenditure is focused and relevant.

5. Implementation Plan

The Draft Strategy has highlighted a number of deficiencies in the current biosecurity management continuum. A large number of recommendations are listed. What is missing is an Implementation Plan that sets out key performance requirements, measures and timetables. The Plan would provide a stronger focus and enable a public reporting process for annual measurement of performance against objectives. A precedent for this process already exists under the Biosecurity Act for Regional Pest Management Strategies (i.e. Annual Operating Plan and Report).

6. Conclusion

The Draft Strategy has successfully highlighted the positives and negatives of current biosecurity management in New Zealand. In doing so, it raises a large number of questions and suggestions to improve current practices. The Draft is, therefore, a progressive step towards a more robust strategy where structural changes, implementation issues, and resource management processes are clearly identified. GWRC recommends that the final Biosecurity Strategy be prepared by December 2004.

Submission prepared by:

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