



29 January 2020

Plant Imports
Plants and Pathways
Ministry for Primary Industries
PO Box 2526
WELLINGTON 6140

Email: plantimports@mpi.govt.nz

Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Risk Management Proposal: Review and amendment of the Import Health Standard: Wood packaging material from all countries – WOODPACK.IHS.***

Yours sincerely

Katherine Rich
Chief Executive



Risk Management Proposal: Review and amendment of the Import Health Standard: Wood packaging material from all countries – WOODPACK.IHS

Submission by the New Zealand Food & Grocery Council

29 January 2020

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the ***Risk Management Proposal: Review and amendment of the Import Health Standard: Wood packaging material from all countries – WOODPACK.IHS.***
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

COMMENTS

The proposal

3. NZFGC’s member-base represents companies that would almost all use wood packaging in some form in their day-to-day operations.
4. In relation to the *IHS: Wood packaging material from all countries, WOODPACK.IHS*, MPI proposes to:
 - update the format of the Import Health Standard (IHS): *Wood packaging material from all countries, WOODPACK.IHS*
 - incorporate the provisions of the International Standard for Phytosanitary Measures (ISPM) relevant to wood packaging (*ISPM 15 Regulation of wood packaging material from all countries*) (ISPM 15).
5. ISPM 15 was adopted by all members of the International Plant Protection Convention (IPPC) in 2002. New Zealand is a member of IPPC and fully embraced the standard at that time. Since then ISPM 15 has been amended 3 times (2006, 2009 and 2013). In 2012, the *Biosecurity Act 1993* was amended to provide for standards to be incorporated by reference. Since 2002, the provisions of ISPM 15 have been replicated in New Zealand’s IHS.

NZFGC Position

6. NZFGC supports consistency across New Zealand’s IHSs and therefore supports the updated format.
7. There are several risks with incorporating material by reference:
 - the material is not available to the public or not available without payment
 - the material is not commonly used
 - the material referenced is updated without notification to the user and non-compliance may occur as a result.
8. The FAO standard ISPM 15 (2017) is available at no charge at <http://www.fao.org/3/a-mb160e.pdf>. This site is difficult to access at times requiring intensive perseverance and replication on the MPI website would be preferable.
9. IPPC has 183 signatories and all signatories apply ISPM 15. MPI notes that ISPM 15 is widely accepted and the options of heat treatment and fumigations are widely used by industry and in any case, alternatives can be used when accompanied by a certificate of treatment (depending on the efficacy of the treatment). ISPM 15 contains provisions about the procedures upon import of packaging materials complying with ISPM 15 thereby

facilitating trade. This and the fact in paragraph 8 address the first two risks in paragraph 7 above.

10. MPI provides no indication of how it intends to advise users that ISPM 15 has been amended in the future. A strategy for this purpose is required together with an undertaking to provide such advice.
11. NZFGC notes that there are several responsibilities of National regulatory organisations in applying ISPM 15 additional to procedure at import and associated with accreditations/authorisations, treatments, application of the ISPM 15 mark (to indicate the international standards have been met) and reuse, repair and remanufacture of such packaging. NZFGC understands MPI has appropriate provisions in place for giving effect to these responsibilities.
12. Overall, subject to adequate notification of future amendments to ISPM 15, NZFGC supports the proposals in the ***Risk Management Proposal: Review and amendment of the Import Health Standard: Wood packaging material from all countries – WOODPACK.IHS.***