Kiwifruit and Kiwiberry Industries' submission on Biosecurity 2025 Discussion Document

September 2016

This submission is prepared by Kiwifruit Vine Health (KVH) on behalf of the kiwifruit and kiwiberry industries, and is supported by Zespri, New Zealand Kiwifruit Growers Incorporated and New Zealand KiwiBerry Growers Incorporated.

Effective biosecurity is fundamental to the ongoing success of the kiwifruit and kiwiberry industries in New Zealand. We welcome opportunity to shape and further improve the biosecurity system through Biosecurity 2025, and commend the Minister and MPI for leading this refresh of strategy for the biosecurity system.

KVH and MPI coordinated a specific Biosecurity 2025 consultation meeting for the kiwifruit and kiwiberry sectors on 22 August 2016, which was open to all industry participants and well attended. This was immediately followed by a specific meeting between MPI leaders and the KVH Board. Our thanks to Julie Collins and her team for working with us to provide such opportunities, which were invaluable.

Overall comments:

We submit in overall support of proposals in the Biosecurity 2025 discussion document, and strongly support the need for Biosecurity 2025 as a Direction Statement that builds upon and refreshes the 2003 *Biosecurity Strategy for New Zealand*. The following feedback further clarifies this:

1. **Greater buy-in will be achieved if the Biosecurity 2025 Direction Statement is framed to build on and refresh the 2003 *Biosecurity Strategy for New Zealand***

   The 2003 *Biosecurity Strategy for New Zealand* was developed collectively by biosecurity system participants, achieved a high level of unity, and still enjoys a high level of system-wide ownership. We believe it is important to further leverage, not lose this.

   While there have been, and will continue to be, changes in risk context (trade and travel patterns etc.), the 2003 strategy established core foundations for an integrated biosecurity system that remains relevant today and for the future. These include the key system leadership role for MPI on behalf of all government departments and simplified institutional arrangements to reduce fragmentation, which are foundations for effective biosecurity.

   We have observed some fragmentation re-emerging in the past five years. This includes re-emergence of some of the institutional tensions that existed prior to 2003, including around the core role of regional government in the biosecurity system. Our particular concern in this regard is the need to ensure parties with key accountabilities in the biosecurity system remain fully engaged, aligned and work effectively together to achieve better biosecurity outcomes. We elaborate on this in our comments on 'Direction 4: Effective Leadership and Governance' that follow.

   Standing alone, a Biosecurity 2025 Direction Statement is more likely to be seen by some key players as a MPI-centric document of lesser relevance, and potentially as a document setting out "what MPI needs to do and be held to account for". Biosecurity 2025 reframed to build on and refresh the 2003 *Biosecurity Strategy for New Zealand* will be seen as an affirmation of 2003 Strategy foundations, will achieve the level of buy-in essential to achieve the Biosecurity 2025's vision elements, and will be recognised and commended as the Minister and MPI exercising leadership in the right direction.

2. **Support for the five proposed strategic directions**

The five proposed directions are supported with particular emphasis on the importance of MPI's government biosecurity leadership role. The accountabilities of each party in the wider biosecurity system, including shared and statutory accountabilities, need to be better recognised and provided for in system governance.

3. **Need for a more focused list of "first steps" complemented by longer term "expectations"**

The proposed "initial steps" go beyond what are realistic and achievable in the first few years (i.e. as true initial steps). And these do not go far enough to guide longer term priorities over a 10-year period out to 2025, limiting strategic value of the document.

And they are a "mixed bag". For example, some are realistic and sensible first steps in the first 12 months (e.g., 'Undertake a review of biosecurity system governance…'), others are not realistic first steps and are more likely to take the full ten-year term (e.g., some initial steps under Strategic Direction 5), and some require strengthening (e.g., "Consider ways of increasing the transparency of biosecurity system performance").

We submit the direction statement include:

- a more focused set of 8-10 "initial steps" to be actioned in the first two years drawn from across the five directions. Establishing new system governance arrangements is an example of one of the key initial steps.
- "expectations" in relation to each of the directions with a time horizon out to 2025.

As well as increasing strategic value of the document we suggest this approach also aligns with building upon and refreshing the 2003 Strategy.

We are prepared to actively contribute to developing this approach with MPI during/following consultation.

4. **Development of an open culture of collaboration, innovation, continuous improvement and the free flow of information is essential**

We recognise that for the full value of the GIA partnership to be realised, GIA relationships must be based on trust, confidence and strong commitment to work together to improve biosecurity outcomes.

From a KVH perspective, we feel trust and confidence has progressively built through GIA engagement to date as we – KVH and MPI - have learned to work together, come to understand each other's contexts better, come to appreciate the sum of the whole is greater than its parts, and where needed managed confidentiality.

We see such underpinning trust, confidence and commitment still developing, and where it is working well this has naturally led toward a more open culture of collaboration, continuous improvement, freer flow of information and, as a result of these, better biosecurity. Indicators of this include that kiwifruit industry confidence in the system is tracking positively, there have been no "Front Page of the Dominion" disruptions (an early fear held by some in MPI), MPI & KVH have combined influence and partnered with others to improve biosecurity (e.g., through "Biosecurity Excellence at Port of Tauranga" initiative), and we have co-invested to make improvements (e.g., BMSB campaigns and readiness activities).

We agree that given strategic issues the biosecurity system faces, we cannot afford to be risk averse or slow to innovate and adopt new technologies. As well as greater investment in innovation (well captured in Direction 2), we need a culture that fosters and rewards innovation.

We submit that "working together to further grow trust and confidence, and to develop an open culture of collaboration, innovation, continuous improvement and free flow of information" be further emphasised in the document, possibly by including several brief case studies that illustrate where this is starting to work as we need it to and the benefits realised.

Specific comments:

5. The mission statement is supported in its current form

We submit the mission statement remain in its current form, being the form derived from the 2003 *Biosecurity Strategy for New Zealand*. [We note minor editorial tweaks have been made to the original wording]

Within our industry discussion on the mission statement we worked through a range of feedback and recommended changes – a significant debate – which eventually came full-circle back to the conclusion that the mission statement should remain in its current form.

The nature of our discussion was illuminating, and we've no doubt MPI will need to consider an even wider range of feedback. A brief summary of how we have considered this issue is offered below to, we hope, assist MPI.

A theme within the industry discussion included the need to adapt the mission to more explicitly identify the balance between "protection" and "trade/business", to sharpen focus on the key role of industries and economic focus, and to achieve greater outcome focus. The meaning of individual words in the proposed form of the mission statement were discussed, with different people interpreting different words in different ways. A number of suggested modifications were offered, each creating new questions and interpretation issues. A change that worked for one person or organisation, created an issue for another. And we recognised by industry seeking its' interests be more explicitly recognised, every other sector and interest would do likewise and the value of a succinct mission statement would be lost.

We also recognised it took a three-year process, from 2000 to 2003, to land on a mission statement that biosecurity system participants were, and remain, broadly supportive of and committed to.

We submit that playing with the mission statement will be too distracting, and instead that it be retained it in its current and succinct form. This has strategic value by connecting to and building upon 2003 Strategy foundations (as covered above). A more constructive focus would be to direct feedback into refinement of principles, directions and expectations.

6. Sharpening of principles

We submit there is value in a focused, clear and crisp set of principles to guide how we operate. Building on existing proposals we submit the following principles be adopted:

A. *Biosecurity is everyone's responsibility*
B. *Accountabilities and decision rights are clear and aligned*
C. *Decisions consider economic, environmental, cultural and social values*
D. *Decisions account for our trade and travel context*
E. *Significant risks will be managed offshore if possible*
F. *Decisions are timely, based on risk and informed by best available science and information*
G. *Decisions are transparent and resources prioritised for greatest benefit*
H. *Decisive action is taken where new risks and opportunities arise*
I. *Operating in a culture of collaboration, innovation, continuous improvement and free flow of information.*

7. Measuring success

We submit the Direction Statement needs to establish a clear basis for measuring success by 2025. The current set of descriptors for 'what would success in 2025 look like?' are not outcomes and are not measurable, so have limited value.

We submit that focused, high level measures and/or milestones (e.g., 10-12 high level milestones covering short term – years 1-3, medium term – years 4-7 and long term – by 2025) be included in the direction statement. This will help all system participants to measure and be responsible for progress towards Biosecurity 2025 Directions.

We are prepared to actively contribute to developing this approach with MPI during/following consultation, and we recognise the Deed Governance Group can also provide a valuable contribution to development of this approach.

We distinguish this from the need for developing a robust approach to biosecurity system performance measurement, including measurable KPIs for all parts of the biosecurity system. This is covered in our feedback on "Direction 4: Effective Leadership and Governance", below.

8. Feedback on Direction 1: A biosecurity team of 4.7 million

We strongly support this direction, which we recognise is fundamental.

Re-stating this as 4.7+ million may help to future-proof this direction.

In relation to the proposed vision we submit this should better distinguish "New Zealander's" from our "visitors"; New Zealander's need to be "committed and engaged", while visitors need to be "informed and compliant".

We submit the vision needs to emphasize the importance of "social licence to operate", such that New Zealander's appreciate and accept the need for biosecurity activities even when those activities affect them (e.g., the need for spraying, movement controls, access to private property etc.).

It may be more useful to focus on "everyone is part of the biosecurity solution" rather than "everyone is a biosecurity officer", which may resonate better outside of government.

We suggest a useful expectation here out to 2025 is:

- *Those with key roles to play in managing biosecurity risk (e.g., port and airport companies, shipping and airline companies, e-commerce businesses, importers and marina operators) are committed and have programmes in place to mitigate biosecurity risks.*

Note we see GIA industry signatories have a key role to play in achieving this expectation, given we have commercial relationships and influence with such parties.

9. Feedback on Direction 2: A toolbox for tomorrow

We submit in support of this direction, which effectively articulates that science and innovation are fundamental to effective biosecurity.

Investment in science and innovation are currently sub-optimal. We believe New Zealand is significantly under-investing in biosecurity science, and that signals to science investors are currently fragmented and confusing. The last major review of biosecurity science investment was undertaken in 2001[1], and the Biosecurity Science Strategy developed in 2007[2] has not appeared to be updated to maintain relevance and clear direction.

[1] *Review of current biosecurity research in New Zealand. September 2001*. Prepared for the Biosecurity Strategy Development by Wren Green.
[2] *A Biosecurity Science Strategy for New Zealand: Mahere Rauta ki Putaiao Whakamaru*. Prepared by MAF Biosecurity New Zealand.

We propose "expectations" relating to this direction include:

i. The Biosecurity Science Strategy is refreshed, including a stock take of current science investment and appropriate benchmarking against globally successful innovators.

ii. A business case for additional investment in biosecurity science and innovation is prepared for consideration by Government.

These expectations should also be a "first step".

In principle we support establishing a "Research, Technology and Innovation Cell" as a mechanism to lift innovation. We recognise the specific role of any such entity/mechanism and its oversight will require careful consideration and development (we are unsure if "Cell" is the right descriptor). It may need to do more than just "assess and operationalise" new technologies, and we suggest its role be described more broadly for now as "to accelerate innovation and facilitate the application of new technologies to improve biosecurity". KVH would welcome opportunity to actively contribute to further development of this concept.

10. Feedback on Direction 3: Free flowing information highways

We submit in support of this direction, and that the proposed Vision 2025 for this direction be strengthened by adding:

- *Cost-effective information technology is used to get timely and fit-for-purpose information in the hands of those who need it, when they need it.*

The biosecurity system needs to be "information driven" rather than "data driven", with renewed focus on understanding the information needs of biosecurity decision makers.

A "step change" is needed, as we are currently a long way from where we can be and need to be. In light of complexity significant expertise is needed to assist with this.

We propose this direction is accompanied by an expectation that:

- *An independent expert assessment is undertaken that recommends how to achieve Vision 2025 for this direction, including assessment of:*
  - *how data is currently collected, analysed and used in New Zealand's biosecurity system*
  - *future biosecurity system information requirements*
  - *A review of information technologies well suited to application in the biosecurity system*
  - *Lessons from other systems, including other biosecurity systems offshore and other disciplines/sectors both offshore and domestic.*

11. Direction 4. Effective leadership and governance

We recognise this as the most critical strategic direction in Biosecurity 2025.

We are unclear on what a "distributed leadership model" means, but clear feedback from our industry was that strong and accountable biosecurity system governance is essential. [Note "system" governance is used here in the broad sense encompassed in the *2003 Biosecurity Strategy for New Zealand*]

We submit that new accountabilities in the biosecurity system need to be better recognised in the final Direction Statement and provided for in system governance. We recognise three key accountabilities in the system:

- MPI's continued biosecurity leadership role within Government, from pre-border to pest management and protecting the full range of biosecurity values, which we fully support.
- Regional Council's statutory leadership roles to provide leadership regionally as set out in section 12B of the Biosecurity Act, which we fully support. [We note the discussion omits any reference to this]
- Industry GIA signatories, with significant new accountabilities for decision making and funding of readiness and response activities, and minimum commitments in terms of engagement in the wider biosecurity system.

We submit that system governance needs to be focused and inclusive of representation from MPI, Regional Council and Industry GIA Signatories.

We are not proposing a specific structure at this early stage, however to assist progress in this key area we propose 'responsibilities' and *'modus operandi'* for system governance as follows:

Responsibilities of system governance

- Ensure biosecurity strategic direction is current and if needed drive refresh
- Oversee implementation of strategy, including identifying new and innovative approaches
- Monitor performance of the biosecurity system using agreed KPIs (includes agreeing KPIs and any capability improvements to achieve measurement)
- Clarifying roles and responsibilities in the system when gaps appear
- Reviewing gaps and areas of non-performance and recommending improvements to respective party(ies) accountable
- Communicate how the system is performing to wider community of interest (e.g., annual report, biosecurity summit), and consider areas for improvement based on feedback

Modus operandi for system governance

- Involves the three core accountable parties (MPI, Regional Councils, Industry GIA signatories)
- Accountable to the people of NZ and the individual groups own members
- MPI representing all government biosecurity interests including DOC, MOH, MFE & EPA
- TOR agreed by parties and Chair elected from within the group
- Operates by consensus, with each party having a veto vote
- Each party pays their own way/costs, and funds equally any associated costs of administration etc.

We recognise the wider community of interest needs a strong and coordinated voice and that a representative advisory forum would be needed to efficiently provide for this, including to enable effective engagement with a system governance body. However, we do not believe such a representative advisory group should be part of the governance body.

The benefits we see of this new approach to system governance include:

- The parties at the governance table have true accountability and skin in the game (compared to BMAC, where this is clearly not the case)
- Achieves greater alignment across the key parties with statutory leadership roles and accountabilities (compared to the current situation between MPI and regional government).

- Those governing the system have greater ability to direct or influence to achieve system outcomes (compared to MPI governing alone, where MPI can effectively control its operations but has far more limited ability to influence local government or industry contributions to outcomes).
- Assists with integrating GIA as key part of the biosecurity system (noting both industry and regional government current question how regional government fit in relation to GIA – this solution addresses that current concern/issue)
- Greater ownership and commitment to better biosecurity.

Further to our comments under "7. Measuring Success", above, we submit the proposed "initial step" number 3 be strengthened by replacing this with the following expectation:

- *System performance measurement, including measurable KPIs for all parts of the biosecurity system, is in place within 24-months of establishing new system governance arrangements.*

We view establishing such measures/measurement and associated timeframes as a function for new "system governance".

12. **Direction 5: Tomorrow's skills and assets.**

We support this direction, which effectively articulates the importance of growing a skilled workforce and infrastructure needed to achieve the mission and other directions.

We submit this direction should also explicitly focus on new technologies, and attracting new skills and innovation the system needs to achieve the other directions.

Several important elements of achieving this direction are ensuring the education system provides the training opportunities needed, and ensuring biosecurity organisations provide the career pathways that will attract and retain talent.

Getting biosecurity included as a subject in the school curriculum has proved challenging in the past. A potential approach to achieve this may be through integrating biosecurity into the curriculum across a range of subjects, such as science (particularly biology), economics, horticulture/agriculture, social studies and maths, rather than establishing biosecurity as a subject in its own right. Appropriate high education opportunities, scholarships and career pathways also warrant careful consideration. Relevant expertise and guidance will be needed to develop the best approach.

Again on behalf of KVH, Zespri, NZKGI and NZKBG, our thanks for the opportunity to contribute to development of Biosecurity 2025, and for your careful consideration of this submission.

We are happy to provide any further clarification on matters covered in this submission, and to otherwise assist MPI in any way we can to strengthen the final Direction Statement and achieve the broad buy-in and commitment needed to achieve its directions and expectations.