Consultation on the Proposed Pathway Management Plan for the kiwifruit industry

Summary

KVH has been consulting on the Pathway Plan for over a year now, and we still have some time to go. However, before the consultation period runs out we want to check-in with the industry on what we've heard so far and how we propose to incorporate this feedback into the proposed Pathway Plan documents to provide confidence that what we finalise and submit for approval is aligned with industry expectations.

This document has been developed to provide an overview on the consultation that has taken place so far. It covers the approach taken to consultation (what we did, how we did it, and who we met with); what we heard and how we responded; and the changes we're proposing to make as a result of the feedback received.

Consultation approach

KVH has been talking about the proposed Pathway Plan for more than 12 months, and although some of our events may have had a low grower turnout we are confident that the cumulative effort of this consultation period has provided sufficient opportunity for the industry to be aware that a Pathway Plan is being proposed for the entire kiwifruit industry and understand what this means for them; and have sufficient opportunity to have a say.

The process began in August 2019 when KVH began pre-testing the concept and high-level principles of the proposal to better manage biosecurity risk to the kiwifruit industry. A key driver is to ensure that we have measures in place to prevent the spread of a broad range of biosecurity threats, rather than our current regulation, which is specific to a single organism, Psa. From mid-November 2019, once a draft of the proposed Plan was fully developed, an initial round of consultation began, and the proposal was discussed with growers in detail during the end-of-year Zespri grower roadshows. During this time and early into the new year the proposal, and updates on feedback, were also being shared with the Industry Advisory Council (IAC) and NZKGI Forum. The feedback we got was supportive, with growers and industry considering the concept of the Plan a logical and sensible way to manage biosecurity risk going forward, especially if it can be fiscally neutral in terms of grower levy.

Development of the Plan advanced during the first half of 2020 and in June a second round of pre-consultation testing started with a wide range of key influencers to test and discuss in detail the proposed Plan and associated rules. From there we published and promoted information about the proposal, hosted presentations, discussions and roadshows. Since September, we have continued to consult with growers and the wider industry and in total (as of 26 November 2020) there have now been:

- 12 roadshows in kiwifruit growing regions with around 117 guest attendees in total.
- 117 different consultation activities including group meetings, one-on-ones, and written advice across the entire industry and wider including with growers, nurseries, Apiculture, the Ministry for Primary Industries (MPI), Zespri, our regional coordinators, post-harvest grower services managers, Chief Executives of post-harvest, our KiwiNet network, IAC, the Maori Growers Forum, Plant & Food Research, merchants like Farmlands, and contractors who move between orchards.
- 20 written submissions - mostly in support of the overall concept and those not we have contacted to discuss the areas of concern raised.

Next steps

Once the consultation phase has come to an end (Friday 11 December) KVH will amend the proposed Plan, taking into account all feedback and discussions, and test these changes with MPI. There will be a legal review of the final version of the proposal and once that is complete we will share it with growers and industry before we submit it to the Minister for Biosecurity and Parliamentary process in early 2021. During 2021 we will develop tools to make implementation easy from 1 April 2022.

Summary of key changes because of feedback

During the consultation period KVH has had overall support for the concept of a Pathway Management Plan, with most people (growers and industry representatives) saying they agree it seems like a logical, sensible and proactive approach to ongoing management of biosecurity risk. A key outcome of these conversations was the realisation that many aspects of the proposal are already being implemented, either as good practice or to meet the requirements of the current National Psa-V Pest Management Plan (NPMP). Therefore, while the Pathway Plan provides the industry with a framework to significantly improve risk management beyond a single organism, for many what this means on-orchard will be little different to the current state.

KVH is in agreeance with the useful and consistent feedback received that when it comes to specific parts of the proposal, implementation must be pragmatic and practical so that it is easy for everyone across the kiwifruit industry to do their bit and protect our collective investments and livelihoods. There is a process to go through to finalise the proposed Plan which includes discussions with MPI, incorporating further submissions received, a legal review and sign off by the KVH Board. The final document and summary of changes made will be available to industry before we submit to MPI in early 2021. However, this document is designed to outline what the concerns raised were and describe how KVH intends to address these, to provide confidence that we are listening and responding appropriately.

The outcome is to keep implementation of the Plan as simple as possible, utilising existing processes and systems where we are able. These specifics are detailed below, in Table one, and include how we have considered each point raised and how we will address them within the text of the proposal document.

Further on, in Table two, we have also detailed more wide-ranging and generic feedback we received about the concept of the Plan and KVH's overall approach to management of biosecurity risk. We feel this is important to note so that readers can have confidence the proposed Pathway Management Plan would not operate in isolation and would be one of many ways KVH continues to ensure biosecurity resilience for the kiwifruit industry within the wider biosecurity system of New Zealand.

In Table three we describe some of the implementation approaches and tools that would be developed during the 2021 year, in parallel with the Plan going through the Parliamentary process

Table one: Specific feedback on the proposed Pathway Management Plan

Specific matters raised about the proposal	How KVH has considered these specifics	Where raised
Key changes for growers: This seems complicated, what is actually changing for growers?	**Proposed approach:** The Pathway Plan provides an improved framework for better risk management, but in many instances, there will be little change from the current state. **Explanation**: The kiwifruit industry already has a risk management framework in place with the NPMP, however this is specific to the single organism Psa. The Pathway Plan provides an opportunity to remove aspects that no longer add value, keep the good and broaden our approach to provide protection from other biosecurity threats. For growers this should mean little changes in most aspects, but significantly improved protection.	Multiple consultation episodes

Reviews of the Plan: How does the industry trigger a review should the Plan turn out to be something we didn't expect/want?	**Proposed approach**: Review periods built into proposal and ability to review or rescind at any point. **Explanation:** The Pathway Plan will have built in non-statutory reviews three and seven years after implementation or at any other time as triggered by the KVH Board. The Plan can be amended or rescinded at any time. Any major amendments would require a parliamentary process, but minor amendments do not.	NZKGI Forum and others
Getting the right balance of risk management and pragmatism: Many points raised in the consultation process relate to getting the right balance of risk management and pragmatism. Some felt that there should be a greater degree of risk management to include suggestions such as the mandatory installation of approved foot baths on all orchards, and washdown facilities as "there seems to be a very low understanding of the potential to distribute soilborne organisms such as *Phytophthora* by this means". Others felt that there should be less risk management requirements, or were confused about what is being proposed, stating that it is not practical for contractors to remove all soil between properties and a more pragmatic approach is required.	**Proposed approach:** KVH is building flexibility into the plan to enable our approach to managing risk across pathways to be scaled relative to the level of biosecurity risk that the industry is facing. **Explanation:** KVH is aware of the increasing compliance burden that growers face and the need to avoid adding to this burden unnecessarily. Our requirements need to be as cost effective and pragmatic as possible. However, we are also aware that biosecurity risk is increasing and there are measures that if implemented could greatly increase the likelihood of successful eradication or reducing the impact to growers – if these are watered down too much their effectiveness will be reduced. Therefore, balancing risk management and pragmatism is a fundamental concept of the proposed Plan and we have achieved this through several approaches: • A scalable model – this enables a minimum level of biosecurity fundamentals (such as traceability and good biosecurity practises such as tool hygiene and vine monitoring) to be in place all the time. However, should risk increase warranting additional measures, these can be introduced. • Outcome based biosecurity plans enable growers and contractors to create biosecurity plans that work for their operation, rather than a prescriptive one size fits all approach. For example, for contractors (which is a broad term that encompasses a wide range of activities with varying degree of risk) the biosecurity plan needs to describe the risks their operation may present and how they will manage that risk. This means a low risk contractor can have a different plan to a high-risk contractor, reducing any unnecessary compliance costs. We recognise that in many instances it will not be practical to remove all soil between orchards, however there are steps that contractors can take to manage risk (such as keeping a record of which orchards they visit and when equipment is cleaned) which provide a record for tracing, should an outbreak occur.	Written submission
Is it necessary that rules apply to all movements? The kiwifruit industry is complex, and requirements must be simple and pragmatic and take account of cost and time. There are aspects associated with the current state	**Proposed approach**: KVH developing options to avoid compliance costs that don't make sense. **Explanation:** KVH recognises that the Pathway Plan needs to manage risk but cannot create barriers to producing kiwifruit. Many growers operate multiple orchards in close proximity and	Roadshows, one-on-one discussions

under the NPMP that no longer make sense, such as having to test and complete paperwork for the movement of plants across a driveway or road. Can exemptions be given to movements within closed loop systems and effectively operating as a single property? Restrictions on these movements have operational impacts to businesses, does the risk being managed warrant this?	there is a high degree of interconnectivity between these orchards. Restrictions may impede business for these operators and need to be carefully considered against the risk being managed. This argument also relates to the risk management versus pragmatism balance and the solutions described above also apply here, such as the ability for biosecurity plans to recognise properties under common ownership operating within a closed loop system and to be tailored based on risk (e.g. only require a higher level of biosecurity practice for movements outside of a loop). KVH has built in a provision for lower risk plant material movements between properties in close proximity and common ownership. This is known as Grow for Your Own Use and the conditions of this can be tailored based on risk. KVH is also seeking advice on how we define a property as a potential solution to situations under the NPMP where restrictions didn't match common sense expectations – such as where two orchards are separated by a road but operate as a single entity.	
The wording "Failure to comply is an offence": The wording "Failure to comply is an offence" within each rule seems heavy handed and puts focus on regulation and compliance rather than biosecurity outcomes.	**Proposed approach**: Wording "Failure to comply is an offence" removed from individual rules. **Explanation**: KVH maintains an educative approach to achieving better biosecurity outcomes with the regulation providing a mechanism to manage the small minority of practices that may put others at risk. Failure to comply with any of the rules of the Pathway Plan would be an offence under the Biosecurity Act (although this doesn't necessarily mean that enforcement action would be warranted in all instances), and therefore this wording for each rule is not needed. It was included for emphasis but has now been removed to avoid unnecessary focus on compliance and regulation.	Roadshows
Contractors: Not all contractors carry the same degree of risk, should we worry about low risk contractors? While it makes sense for some contractors to have a biosecurity plan, many contractors only visit a few orchards per year and this compliance cost could put them off working within the industry, and the risk associated	**Proposed approach:** KVH will take a risk-based approach to contractors to ensure that we are managing risk and reducing the likelihood of any unintended consequences. **Explanation**: KVH agrees with the suggested approach of limiting or at least focusing our efforts to contractors within Zespri's CAV scheme. Utilising an existing scheme is an efficient means of working with most contractors who work with the vines and undertake activities that	Roadshows, one-on-one discussions, written submissions

with these is probably low. Should we focus only on those who present greatest risk like Zespri has done with the CAV scheme?	carry the greatest risk. We are currently exploring some options on the best approach to achieve this outcome within the Plan (such as through definition of contractor etc).	
Budwood: In general, there is recognition that this is a high-risk pathway for the kiwifruit industry and should be included in the Plan and subject to risk management requirements. Specific concerns mostly focused on the level of risk management and not interfering with kiwifruit production. These comments included: • Budwood supply is an important income source for many growers in the South Island. The current compliance is okay but doesn't need to be any more onerous. • Costs associated with testing for resistant forms of Psa when moving budwood between Psa positive orchards is too high relative to risk – considering wind borne spread. Movements will go underground, and we will all lose visibility of traceability. • There may be instances where Psa tests on leaves are not possible as demand for wood only came about post leaf fall. It would be good to have a budwood Psa test as a fallback position. • Occasionally the amount of wood ordered is so small that the cost of a Psa test is disproportionate to the value of the wood. Can we think of a way to not have to test every variety on a KPIN e.g. I wanted to sell some Bruno wood off one vine in my orchard, but it would have cost $85 to Psa test it. Occasionally I will get asked for budwood that I can't supply from my KPIN. If I purchase it from a neighbour and on sell it, I would be deemed to be a distributor and would have to pay $200 (although I don't if I do the same with pollen). I'm not sure that this is what you intended. Can you revisit the definition of a distributor?	**Proposed approach:** Amendments made resulting in a more practical and affordable approach to budwood movements. By enhancing KVH driven industry surveillance schemes, we can seek to better understand risk profiles and only introduce mandatory testing for specific organisms when warranted. The proposed audit fee has been removed. **Explanation:** Budwood is a relatively high-risk pathway for the spread of biosecurity threats and requires a degree of risk management. The principles of good risk management (such as traceability, monitoring and collection from vines without symptoms) already exist in the current budwood protocols and improvements to risk management can be made in how these are implemented, rather than amending the compliance framework. Therefore, the proposed approach is not intended to be more onerous than the current state. <u>Testing</u> – is a robust means of reducing the likelihood of spreading new organisms, however it can be expensive and needs to be balanced against risk. We have taken feedback onboard to amend our proposed approach to budwood testing to manage risk in a more cost effective and affordable manner, summarised as follows: • Testing is only required for the movement of budwood to Psa non-detected orchards. The source orchard must be tested to verify that it is Psa non-detected. • We have changed the sampling protocol for this test to provide more confidence at the same price. We will do this by bulking 100 leaves across the block used to source budwood. This sample can be from multiple cultivars. This means for a single sample we have a higher degree of confidence that the block is free of Psa. • Testing can be done at a single point in time with multiple samples from multiple blocks and used for other purposes also (rootstock, budwood, mature plants, pollen etc) to provide efficiencies while still managing risk. • We are no longer requiring Psa positive blocks to test for resistant strains of Psa. KVH remains concerned about the development of resistant strains, however feedback suggested the costs associated with this test would result in poor compliance and undermine traceability data. Therefore, KVH will enhance industry surveillance for new or resistant forms of Psa and only if we detect it would we introduce mandatory testing in the future. This is a similar approach used for other threats where mandatory testing is not proposed, however should the industry be faced with a new challenge in the future this could be introduced.	KiwiNet workshop, written submissions, one-on-one discussions

	• Significant research has been put into Psa testing wood material rather than leaves for budwood. While technically feasible the results are inconsistent because of the uneven distribution of Psa in the woody material. Audit - A $200 audit fee for non-levy paying entities is no longer being proposed. The original intent of this fee was to create greater consistency in our approach across the different pathways, however we are confident we can achieve this consistency through other means and an audit fee would create unnecessary administration costs. So, it has been removed.	
Pollen: It is not practical to require monitoring pre flower picking as the flower collectors are paid based on collection weight and will not follow guidance. And what are the risks we are looking to mitigate against anyway?	**Proposed approach:** Monitoring requirements no longer required pre flower collection, unless a new pollen transmissible threat was to be identified that would warrant this additional measure. Independent research also commissioned to better understand pollen transmissible threats and their relative risks.	Pollen mill visits, post-harvest visits, KiwiNet workshop
Post-harvest: The requirements for post-harvest biosecurity plans include ensuring that vehicles and equipment are free of soil and plant material when entering orchards, however this is not the case for contractors. Why are these requirements different? A submitter also requested that bin sterilisation and cleaning requirements are retained to reduce potential distribution of organisms.	**Proposed approach:** Amend wording of post-harvest rule to give greater consistency. **Explanation:** The wording of the post-harvest rule will be amended to a more outcome focused approach where post-harvest can develop a plan that works for them to manage risks they bring to a property. This will provide more consistency with the approach used for contractors and will also enable organisations to strive for a higher level of biosecurity risk management rather than meeting a minimum standard. The new wording is expected to include the following: • At an organisational level (or site level), describe risks that you may introduce to an orchard. • Steps to manage these risks (which should include actions such as bin sanitising, reducing risk of fruit contamination, general hygiene, traceability). • Steps taken to raise biosecurity awareness. Bin sanitising requirements have been retained in the Pathway Plan proposal and post-harvest operators have not objected to this stating that the facilities are already in place and this has food safety benefits in addition to biosecurity.	One-on-one discussions, written submission
Shelter belt nurseries: There has been general support for the inclusion of shelter plants in the Pathway Plan, recognising that this is a potential pathway for introducing pests into an orchard, and agreement that there should be biosecurity risk management practices in place. There have been specific questions around the process for	**Proposed approach:** KVH is working with other horticultural sectors and the nursery industry on a pan-sector biosecurity standard for nursery plants. KVH will recognise equivalency of this standard as a means of meeting Pathway Plan requirements. **Explanation:** The proposed approach is that all plants brought into the production area of a kiwifruit orchard are required to meet the requirements of the Pathway Plan – which are largely focused on hygiene and traceability. Home gardens and gullies are outside the scope of the Plan and not subject to these requirements.	Written submission, roadshows

these nurseries to achieve certification and how plants would retain certification if left at an intermediary location for long periods between purchase and planting, the scope to which this applies, and if amenity plants are also included. One submitter had concerns about whether this would limit supply stating; "I don't wish to be told which nurseries I can buy shelter belt plants from, particularly if there are no registered nurseries in my region".	The intent is that before implementation of April 2022, the national Plant Producer Biosecurity Scheme (PPBS) is available as a means for nurseries to demonstrate compliance with the Plan. If this was unable to be achieved or there are unforeseen challenges with the launch of this external standard, KVH could consider mechanisms to provide for a smooth transition. When the Kiwifruit Plant Certification Scheme (KPCS) was introduced in 2016 there were similar concerns about the impact this may have on the availability of kiwifruit plants, which didn't eventuate. We expect that the introduction of the plant sector standard should also not impact the availability of shelter plant species, especially given the interest to date in the scheme and the broad benefits to a wide range of customers.	
Compost and other organic inputs: In general there was support for inclusion of this pathway within the scheme which seemed to be associated with the uncertainty of risk on the pathway and lack of regulation. There also was support for the proposed approach of undertaking research to better understand risk and using this to drive the appropriate risk management practices. Some specific feedback included: • Can the outcomes of the research be shared? • The industry urgently needs an audit process or industry standard to enact the recommendations of this research. This should not be voluntary. • Compost that is documented to have gone through thermophilic heating is certified as an organic input by Bio-Gro and is low risk. Should all composts sold into the kiwifruit Industry have to have documentation to show thermophilic heating?	**Proposed approach:** Research used to support risk management will be made available and KVH will recognise any existing standards, such as Bio-Gro, where possible. **Explanation:** The proposed rule for organic inputs states they must have traceability records and be free of any high-risk organisms. The research will indicate which high-risk organisms we may be concerned about and the inputs which may introduce these into an orchard. The expectation is that some inputs will carry no risk and will not be subject to requirements. Risk associated with other inputs may be associated with additives and manufacturing process. If requirements are introduced, manufacturers would need to provide evidence of how they meet these, and KVH would look to recognise any existing forms of verification to keep the process as efficient as possible.	Written submission, roadshows
Beehives: Where does the movement of beehives fit, and the movement of bees themselves? One submitter said "I may have missed this in the Plan but working with MPI, Biosecurity New Zealand and beekeepers on all matters concerning bee health is also in	**Proposed approach:** As a flying insect, bees themselves are not covered in the Plan. There are no specific requirements for the movement of beehives, however a grower should recognise potential risk of this as an input in their on-orchard biosecurity plan and keep records of who is entering their property. The Apiculture industry have released their own biosecurity plan which we would encourage all beekeepers to follow but is not a mandatory requirement.	Written submission, roadshows

our direct interest, as the incursion of varroa mite example showed."		
Cost Benefit Analysis (CBA): MPI provided feedback on this document after the consultation period began. The most significant of which was to question whether 'Do nothing' is the correct baseline scenario, and whether 'Voluntary action' would better reflect what would happen in the absence of a Pathway Plan.	**Proposed approach**: The CBA was amended and published on the KVH website detailing changes made. **Explanation**: KVH has amended the CBA to address MPI feedback including using 'Voluntary action' as the baseline scenario. These changes do not impact the conclusion of the report that the Pathway Plan provides the highest net benefit of options considered and is recommended to proceed. The amended CBA was made available on the KVH website 29 October 2020 and includes a summary of changes made from previous version.	MPI

Table two: General feedback on the proposed Pathway Management Plan and KVH's work

Matters raised	How KVH has considered these	Where raised
Why don't we just focus on the border? One of the most common themes of consultation is that KVH and the industry should keep pressure on MPI to strengthen the border and keep pests offshore. It is important that KVH don't lose focus of what is happening offshore.	KVH agrees that keeping threats offshore is the most effective approach to managing biosecurity risk. Working in partnership with MPI for biosecurity readiness and response is a key role for KVH, and we have a staff member whose role is dedicated to scanning for offshore threats, ensuring border measures are adequate and identifying knowledge gaps to pursue through readiness. However, focusing only the border with no systems to manage risk across our industry ignores the possibility of slippage at the border, or the possibility of threats already being present in New Zealand undetected (see the *Ceratocystis fimbriata* case study for an example of a native pathogen that evolved to become virulent to kiwifruit). KVH will continue to work strongly on behalf of growers to keep risk offshore, however we feel that an additional layer of risk management within our industry is the most effective approach to protect grower's investments from biosecurity threats and acts to provide resilience across the whole biosecurity system.	Multiple consultation events
Surveillance: Surveillance should be strengthened around ports and airports and if KVH needs a slightly higher levy to do this then don't be afraid to ask for it. Biosecurity New Zealand is doing this in various ways but what is happening on-orchard?	Surveillance is a key component of the proposed Pathway Plan. Monitoring (or testing) plant material before moving it is a cost-effective approach to detecting a new organism early and giving us the best chance at eradication should this occur. KVH will continue other aspects of surveillance at a national level for high-risk threats like fruit fly and Brown Marmorated Stink Bug (BMSB), as well as at an industry level for kiwifruit specific threats with the unusual symptom reporting system.	Written submission

	However, incorporating monitoring as routine practice across the industry would strengthen our surveillance (many growers do this already and there would be no change for them). The other key surveillance programme for the industry is the reporting of unusual symptoms to KVH by growers as soon as they are identified. Early identification of any new risk increases the chance that this can be eliminated or eradicated.	
We have proven we can respond without a Plan: The industry has demonstrated an ability to rally in a crisis, why don't we take a similar approach next time?	KVH has a mandate to undertake biosecurity readiness and response activities on behalf of the kiwifruit industry, to reduce the potential impact to growers of a future biosecurity incursion. There is no question that the industry response and recovery from Psa has been impressive, however we were fortunate to have a tolerant cultivar in the breeding programme. If the industry relied only on Hort16A our situation today would be very different. KVH has identified the Pathway Plan as a framework that will significantly improve our industry's resilience to future biosecurity threats and therefore, we propose a proactive approach to reduce impact, rather than rallying in a crisis. Having a framework in place before the next incursion arrives will significantly improve the likelihood of a successful response.	Written submission
Compliance burden – keep things simple and scale up when required: Compliance is coming at growers from all angles, and while a proactive approach to biosecurity makes sense, it is becoming increasingly difficult to grow kiwifruit under this burden of regulation. KVH needs to keep the plan simple, pragmatic, and cost effective otherwise movements will just go underground.	KVH agrees and is aware of the compliance burden to growers. We are striving to minimise any additions to this workload. We are also aware that our Psa risk profile has changed from where we were as an industry in 2013 when the NPMP was put in place. Therefore, the Pathway Plan is an opportunity to review the current protocols and remove those that are no longer adding value. The proposed Pathway Plan is written so that we can ensure that risk management practices are appropriate for the level of risk, with a minimum level of risk management across pathways as routine practice. KVH has created criteria for high-risk organisms within the Pathway Plan. Currently the only high-risk organism described is Psa. However, should a new organism be identified that is classified as high-risk, having these routine practises in place - such as traceability, good biosecurity principles and monitoring for symptoms - will allow the industry to rapidly scale up from a strong base and decrease the impacts of the new organism and increase the chances of elimination or eradication. KVH is also putting significant emphasis on implementation of the Plan. Currently we are seeking to set the right framework but with implementation not until 1 April 2022, we have	Multiple consultation events

	time to develop tools, workshops and processes to reduce compliance burden as much as possible. A lot of the feedback received relates to how we might implement the Plan.	
Compliance: There have been numerous questions about how KVH would deal with non-compliances under the proposed Pathway Plan. These questions range from asking whether the Act has sufficient clout to serve as a deterrent to those who put the industry at risk, through to fears that KVH might prosecute unreasonably and unnecessarily. One submitter questioned whether the purpose of the proposed Pathway Plan is to protect or penalise growers?	The proposed Pathway Plan and NPMP fall under the same section of the Biosecurity Act. The past seven years of the NPMP serve to illustrate the approach KVH would take to non-compliances – which is primarily an educative approach to deliver better biosecurity outcomes for the kiwifruit industry. We guide investment into tools to better understand and manage biosecurity threats and then work hard to get these messages out to growers through a range of channels, such as our Bulletin and communications/awareness material, workshops, KiwiNet network of biosecurity champions, face-to-face meetings with our extension specialist or through associated channels such as Zespri and post-harvest. By far the majority of growers want to do the right thing and don't want to put themselves or others at risk and therefore where non-compliances exist these can usually be managed with a conversation. Beyond this we have tools available such as issuing a Notice of Direction requiring an activity to be undertaken to manage risk (which has been used on several occasions effectively under the NPMP). The most heavy-handed tool available to us under the current NPMP and proposed Pathway Plan is to prosecute under the Biosecurity Act. This is a major undertaking that we have not used to date. A prosecution would not be taken by KVH but by MPI on our behalf through an agreement between the two organisations, so we would also need to be satisfied that there is a deliberate breach that puts growers and the industry at risk. This should give growers confidence that we do have a tool to deal with significant breaches if required, but there is a robust process and requirements involved prior to this happening. KVH's mission is to create a biosecurity resilient industry and an educative approach, where everyone understands risk and wants to do their part to manage it. Regulation provides a tool to ensure we all operate to the same minimum standard.	Roadshows, NZKGI Forum, written submission
Accountability: It seems like responsibility for biosecurity sits with growers which is not fair. Accountability should sit with others also.	KVH agrees. The proposed Pathway Plan is about providing growers with confidence that inputs to their orchard are clean and not putting their investment at risk. While growers are central to the plan, all stakeholders have accountability for biosecurity risk management, especially those moving risk goods such as plant material, organic inputs or equipment and	Roadshows

	machinery. However, it is ultimately up to growers to manage the level of risk appropriate to their orchard.	
What about other hosts? Many of our biosecurity threats are not specific to kiwifruit and it is concerning that other industries are not following a similar approach. How do we ensure we are not operating in silos, particularly in regions like Hawke's Bay, where there are a range of crops grown in close proximity?	KVH works closely with other horticultural sectors and is sharing our experiences as we progress the Pathway Plan proposal. If successful, our Plan would be the first application of a Pathway Plan at a national level for an industry and would make it easier for subsequent plans to be developed, providing greater risk management for the horticultural sector. We are already working with MPI and other plant sectors on wider initiatives such as the Plant Producer Biosecurity Scheme, a national biosecurity standard for nurseries, which we would recognise as equivalent to our existing KPCS and therefore not require changes for our industry, but provide a more consistent framework for other sectors to operate at the same level.	Roadshows

Table three: Suggestions on how we implement the Plan

Success for KVH is creating an industry more resilient to biosecurity threats. Having a biosecurity framework in the form of a Pathway Plan is a significant step towards this goal, however it is how we implement the proposed Plan that will determine if we get meaningful change and protection for the kiwifruit industry.

KVH has allowed more than a year from when the proposal is finalised and submitted to MPI in early 2021, to when the plan comes into effect in April 2022 to develop tools and transition into the Plan. We want to hear from the industry about what tools will work best for you. We've been collecting ideas on these during the consultation process and will continue to do so going forward. These may be tools, workshops, or ideas to make compliance easy and cost effective, but also meaningful to create this impact. These ideas are not included in the formal proposal itself, and are therefore not noted above, however will form a key component of the Pathway Plan.

Ideas raised	How KVH has considered these	Where raised
Apps and other tools to make entering data easier	The most common suggestion is to develop a COVID-19 style app for traceability, which is simple and easy to use and produces highly reliable data. One submitter suggested, "The app could incorporate the following features: a trouble shooter to help identify pests and diseases; quick info pages on pests and diseases; a form where a grower/manager can fill out information and send photos direct to KVH for a quick analysis of any pests and diseases on-orchard". KVH has also been looking at electronic templates and other tools to make the process as easy and reliable as possible. These tools are intended to be provided as options, so that growers have choices and can use what works best for them.	Multiple consultation events

Use of an alert level system	Use of an alert level system has been suggested so that it is clear what each level means and what the trigger points are for escalating to tighter controls. This worked well in the COVID-19 response and provided some certainty of what lay ahead as well as what actions might be required at higher levels.	Multiple consultation events
Don't duplicate, utilise existing systems where possible	Growers are faced with an increasing compliance burden which is exacerbated by having to enter data in multiple places. There was strong support for KVH to work closely with Zespri and integrate our requirements into GAP or other industry systems in a manner that won't require duplicate data entry.	Multiple consultation events
Is the phase-in period realistic?	The intended start date for the Pathway Plan is **from** 1 April 2022. KVH does not expect that we will meet 100% of our targets on day one and a transitional phase will be required. Our initial efforts will focus on those areas that create the greatest risk.	Multiple consultation events