



Proposed Pathway Plan for the kiwifruit industry

Update: April 2021

Summary

KVH has completed extensive consultation on the proposed Pathway Management Plan (Pathway Plan) for the kiwifruit industry, including conducting 117 consultation activities and receiving constructive feedback that has helped us refine our approach and improve our proposal.

In November 2020 we issued a document summarising our approach to consultation, what we heard during this process, and how we intended to address this feedback (either as changes to the proposal or in our approach to implementing the Plan).

The purpose of this document is to demonstrate that we have delivered upon these intentions and made the changes as previously indicated, where possible. Where changes have not been made, supporting rationale is provided to give confidence that we are listening and responding appropriately.

How we got to this point

Consultation

During the consultation period KVH received 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 (like Psa for example), for many what this means on-orchard will be little different to the current state.

During consultation we heard consistent messages, which we kept front of mind in drafting both the proposal and our plan for implementation. These included:

- Growers support a proactive approach to biosecurity; however, this approach must achieve the right balance between risk management and pragmatism.
- Growers don't want more compliance; compliance pressure is already coming from all angles and it is becoming increasingly difficult to grow kiwifruit.
- KVH mustn't lose focus on the border and keeping risk offshore.
- Keep it simple and easy, without losing effectiveness.

KVH is in agreement with the useful and common 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.

We have taken great effort to strike an appropriate balance between risk management and pragmatism in the drafting of this proposal and will offer support during implementation of the Pathway Plan, providing ways to link in with existing industry schemes and assurance programmes to avoid duplication and make biosecurity a core part of growing kiwifruit.

Complex rules, simple implementation

KVH has endeavoured to keep the Pathway Plan as simple as possible because we want to have a pragmatic and flexible approach to risk management that is simple for growers to understand, and simple for the management agency (KVH) to administer.

To ensure this pragmatic and flexible approach, the wording of the rules themselves have ironically become longer and more complex since the earlier draft we presented to industry in late 2020. This is captured in the independent legal review we commissioned, which states:

“As a general observation we note that although the rules have grown in length/complexity we see this as a sign of the efforts taken to build suitable nuance and flexibility into the rules (rather than taking a one size fits all approach which would likely be more onerous for stakeholders).”

Levy

No extra levy collection

The Pathway Plan will be funded by a levy under the Biosecurity Act 1993. This levy will replace the existing levy for the NPMP which will end in May 2023.

This means that KVH would effectively swap the NPMP levy for that of the Pathway Plan and keep KVH's total levy collection from growers fiscally neutral and within the current total of \$0.016 per tray of kiwifruit.

For most growers we have spoken to this is key, and they support no increase in total levy take. However, it is important that we do spell out the details of this Pathway Plan levy.

Further detail

The cost of administering the Pathway Plan is calculated to be \$970k per annum. A levy struck at \$0.006 per tray of kiwifruit would cover this cost, with a small surplus to allow for business contingency planning (based off the current industry estimate of 172M trays for 2022/23).

As the NPMP doesn't expire until 2023 there will be a one-year overlap with the Pathway Plan from for the 2022/23 year (from 1 April 2022). The NPMP levy will be set at zero for 2022/23.

KVH has Psa reserves, and these can only be used for the purpose for which they were raised – which is the NPMP. There are efficiencies between the NPMP and administering the Pathway Plan, so therefore the Pathway Plan levy will be struck at \$0.004 per tray of kiwifruit for 2022/23 while the overlap with the NPMP exists and Psa reserves remain to be depleted.

For year two of the Pathway Plan, KVH intends to seek a resolution at the 2022 AGM to amend the Pathway Plan levy rate for the 2023/24 year to \$0.006 per tray of kiwifruit to cover the full costs of operating and administering the Pathway Plan. KVH is not allowed to increase the levy beyond the maximum rate which will be set at \$0.007 per tray of kiwifruit. This maximum rate has been set low as there is not a need to build reserves and cover response costs for the Pathway Plan like there is for Biosecurity Readiness and Response activity such as fruit fly or BMSB responses.

In summary:

- The Pathway Plan will have a levy under the Biosecurity Act.
- This levy will initially be struck at \$0.004 per tray of kiwifruit for 2022/23 (from 1 April 2022), will then move to \$0.006 in year two and have a maximum rate of \$0.007 per tray.
- The NPMP levy will be set at zero for 2022/23 while remaining reserves are depleted and will then expire in May 2023.

Next steps

This is a final opportunity for you to review the proposal and ask any questions, particularly if you feel that previous feedback has not been adequately addressed.

This document will be available for a two-week period and is then intended to be submitted to the Minister for Biosecurity and the Ministry for Primary Industries (MPI) so that the parliamentary process can begin. This process is expected to take 8-12 months from the point of submission, with the outcome being an Order in Council (like we have for the NPMP) and an associated levy that would come into effect from 1 April 2022.

If you have any questions about the submission or any material feedback on the proposed content of the Pathway Plan, we welcome them. You can get in touch by phoning 0800 665 825 or emailing info@kvh.org.nz.

If you would like us to print and send to you this document or any other Pathway Plan material (such as fact sheets and case studies for example) please let us know.

Summary of key changes

How to navigate this document

This document provides an overview of key changes to the Pathway Plan proposal, primarily in response to feedback from the kiwifruit industry during the consultation process. It also includes changes that have resulted from legal advice, and advice from the Ministry for Primary Industries (MPI) to meet requirements of the Biosecurity Act 1993.

This document starts with ‘*Table one*’ from the November 2020 paper summarising specific feedback on the proposed Plan. This table highlights the key matters raised and our intended approach to address these matters at the time. For each of the key matters raised, **blue text** indicates if this intended approach has been incorporated into the final document and a page reference to where these proposed changes can be found in the final proposal or supporting rationale for why the intended change was unable to be made.

Tables two and three from the November 2020 paper have not been duplicated here as these dealt with generic feedback on the concept of the Plan, KVH’s overall approach to biosecurity risk management, and our approach to implementation of the Plan – all of which did not require changes in the proposal itself and have been omitted in the interests of keeping this document short. The November 2020 paper is available on the KVH website [here](#) for reference.

This document ends with ‘*Table two*’ which explains changes that have been made due to legal and MPI advice.

This document should be read alongside the final draft of the proposal, and other supporting documents which are available on the KVH website [here](#).

Table one: Specific feedback on the proposed Pathway Management Plan

Specific matters raised about the proposal	How KVH has considered these specifics	Where raised
<p>Key changes for growers: This seems complicated, what is actually changing for growers?</p>	<p>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.</p> <p>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.</p> <p>Final outcome: Incorporated in final proposal. In most instances there is little change from the current state for stakeholders, however as an industry we have a significantly improved framework to manage any new high-risk pests that we may encounter in the future.</p>	<p>Multiple consultation episodes</p>
<p>Reviews of the Plan: How does the industry trigger a review should the Plan turn out to be something we didn’t expect/want?</p>	<p>Proposed approach: Review periods built into proposal and ability to review or rescind at any point.</p> <p>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</p>	<p>NZKGI Forum and others</p>

	<p>amended or rescinded at any time. The Plan can be amended or rescinded at any time. Any major amendments would require a parliamentary process, but minor amendments do not.</p> <p>Final outcome: Incorporated into final proposal. Clarification was requested by one submitter on what constitutes a minor change to the Plan. The definition under Section 100G of the Biosecurity Act 1993, is a change that the Minister is satisfied:</p> <p>a) Does not have a significant effect on any person’s rights and obligations: and b) Is not inconsistent with the national policy direction.</p> <p>This would suggest that changes that increase the obligations of stakeholders are unlikely to be considered minor.</p>	
<p>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.</p> <p>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 <i>Phytophthora</i> by this means”.</p> <p>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.</p>	<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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. 	<p>Written submission</p>

	<p>Final outcome: Incorporated into the final proposal (see the rules on pages 25-46). The scalable model is a key component of this proposal, enabling us to deliver risk management practices appropriate to the level of risk we face. In practice this has been difficult to achieve and one of the key reasons why the wording of the rules has increased for earlier drafts. The reason for this is the requirement to clearly define what constitutes a high-risk pest and associated levels of freedom, to satisfy MPI that KVH won't arbitrarily create rules as we go along.</p>	
<p>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 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.</p> <p>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?</p>	<p>Proposed approach: KVH developing options to avoid compliance costs that don't make sense.</p> <p>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 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.</p> <p>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).</p> <p>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.</p> <p>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.</p> <p>Final outcome: Incorporated into the final proposal. The final proposal includes measures to avoid compliance burden where this has little impact on risk management. The measures outlined above have been included in the final proposal, which are:</p> <ul style="list-style-type: none"> • Definition of orchard: this definition has been broadened so that where multiple orchards are contiguous (or only arbitrarily separated by a road, reserve, driveway or residential dwelling), owned or leased by the same person and managed as a single orchard operation, these can be treated as a single orchard and therefore movements within this orchard would not be subject to requirements of the Plan (see definition of orchard in glossary on page 52). This change will deliver a more pragmatic approach that the current orchard definition in the NPMP. 	<p>Roadshows, one-on-one discussions</p>

	<ul style="list-style-type: none"> Grow for your own use option: a lower level of risk management for the movement of low volumes of plant material under properties under the same ownership. 	
<p>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.</p>	<p>Proposed approach: Wording “Failure to comply is an offence” removed from individual rules.</p> <p>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.</p> <p>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.</p> <p>Final outcome: Not incorporated into the final proposal. While KVH wanted to make this change, MPI has advised that this wording is required for each rule to provide absolute clarity and align with the requirements of the Biosecurity Act 1993. As a result, this wording remains in the rules (pages 25-46).</p>	Roadshows
<p>Contractors: Not all contractors carry the same degree of risk, should we worry about low-risk contractors?</p> <p>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 with these is probably low. Should we focus only on those who present greatest risk like Zespri has done with the CAV scheme?</p>	<p>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.</p> <p>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 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).</p> <p>Final outcome: Incorporated into the final proposal. The wording of the contractor rule in the final proposal (page 29) incorporates this risk-based approach by focusing our efforts on the highest risk contractors who work with vines. The existing Zespri CAV scheme will be used as the primary means of implementation, for efficiency and simplicity. All other contractors outside the CAV scheme will not be exempt from the rule, but KVH will make available a simple pro-forma orchard contractor biosecurity plan. This approach will avoid any unintended barriers for contractors who may only undertake the occasional job on kiwifruit orchards and likely pose little risk. This approach will also accommodate an expansion of the CAV scheme over time, should this occur, whereas granting specific exemptions to certain types of contractor would have been more difficult to accommodate from a policy perspective.</p>	Roadshows, one-on-one discussions, written submissions

<p>Budwood:</p> <p>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.</p> <p>Specific concerns mostly focused on the level of risk management and not interfering with kiwifruit production. These comments included:</p> <ul style="list-style-type: none"> • 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. <p>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?</p>	<p>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.</p> <p>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.</p> <p><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:</p> <ul style="list-style-type: none"> • 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. • 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. <p><u>Audit</u> –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</p>	<p>KiwiNet workshop, written submissions, one-on-one discussions</p>
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	<p>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.</p> <p>Final outcome: Incorporated into the final proposal. All changes indicated above have been incorporated into the final proposal (see rule 8 – safe movement of budwood on page 37).</p>	
<p>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?</p>	<p>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.</p> <p>Final outcome: Incorporated into the final proposal (see rule 9 – safe movement of pollen on page 40). The wording of the rule states that monitoring or testing would only be required in specific instances for specific high-risk pests. KVH is very aware of the practical issues associated with this and would only specify high-risk pests that would require this, in instances where there is a specific risk to be managed on this pathway. In absence of new pollen transmissible high-risk pests these requirements are largely the same as the current state under the NPMP.</p>	<p>Pollen mill visits, post-harvest visits, KiwiNet workshop</p>
<p>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?</p> <p>A submitter also requested that bin sterilisation and cleaning requirements are retained to reduce potential distribution of organisms.</p>	<p>Proposed approach: Amend wording of post-harvest rule to give greater consistency.</p> <p>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:</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>Final outcome: Incorporated into the final proposal. Wording for rule 4 (page 29) has been amended so that the requirements of what constitutes a biosecurity plan is consistent with that of contractors – an outcome-based approach to strive for a higher level of biosecurity risk management, rather than a compliance exercise to meet a minimum base standard.</p>	<p>One-on-one discussions, written submission</p>

<p>Shelter belt nurseries:</p> <p>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.</p> <p>There have been specific questions around the process for 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.</p> <p>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”.</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>Final outcome: Incorporated into the final proposal (see rule 6, safe movement of nursery plants and shelter plants, page 32). KVH has been involved in the development of the PPBS to ensure the scheme is available for the Pathway Plan, comes into effect, and that the KPCS and PPBS are recognised as equivalent standards. This provides nurseries with more than one option to demonstrate how biosecurity risk is being managed.</p>	<p>Written submission, roadshows</p>
<p>Compost and other organic inputs:</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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. 	<p>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.</p> <p>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.</p> <p>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.</p> <p>Final outcome: Incorporated into the final proposal, as per explanation above (see rule 10, page 42).</p>	<p>Written submission, roadshows</p>

<ul style="list-style-type: none"> 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? 		
<p>Beehives: Where does the movement of beehives fit, and the movement of bees themselves?</p> <p>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 our direct interest, as the incursion of varroa mite example showed.”</p>	<p>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.</p> <p>Final outcome: No changes made to final proposal, as per explanation above.</p>	<p>Written submission, roadshows</p>
<p>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.</p>	<p>Proposed approach: The CBA was amended and published on the KVH website detailing changes made.</p> <p>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.</p> <p>Final outcome: CBA amended in October 2020 and no further changes required.</p>	<p>MPI</p>

Table two: Additional changes made to the proposal that were not previously indicated

Several minor and editorial edits have been made to improve the proposal since November 2020. These amendments improve the clarity of wording and robustness of the plan to improve biosecurity practice for the industry, however have no material change from what has been previously consulted upon. The more significant changes are indicated in the table below.

Change to proposal	Explanation
<p>The definitions of nursery plants and orchard plants have been revised and the safe movement of plant material separated into two rules:</p> <ul style="list-style-type: none"> Rule 6 – Safe movement of nursery plants and shelter belt plants Rule 7 – Safe movement of orchard plants. 	<p>The intent of this rule is that all plants entering a kiwifruit orchard meet a minimum biosecurity standard regardless of whether these plants were produced in a nursery or were mature vines being transferred between orchards. However, the operational and risk management practices of a nursery and orchard are very different, and it was challenging to create a single rule that worked for both. Therefore, the movement of plants has been separated into a single rule for the movement of nursery and shelter plants (rule 6, page 32) and another rule for</p>

	<p>orchard plants (rule 7, page 36) and respective definitions for nursery, shelter and orchard plants in the glossary (page 52).</p> <p>This amendment does not have material significance given the requirements of this rule and policy intent remain unchanged, rather this amendment provides stakeholders with greater clarity on what is required for the safe movement of plant material.</p>
<p>The wording of Rule 8 - Safe movement of budwood (page 37) has been amended to include movement onto nurseries as well as orchards.</p>	<p>to clarify that the requirements of this rule include movements of budwood onto nurseries (as well as orchards). A definition of nurseries has also been added and aligned so it is clear it includes but is not limited to any propagation facility licenced by Zespri or holding nursery permitted by Zespri. Note that the rule relating to kiwifruit plants has been split into two separate rules; one that applies to “young plants” and another that applies to “mature plants”, with definitions for these included in the glossary.</p>