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The Ministry for Primary Industries

ON:

BIOSECURITY 2025

MPI Discussion Document No: 2016/23

BY:

Beef + Lamb New Zealand Ltd



Introduction

1. About Beef + Lamb New Zealand Ltd

- 1.1 Beef + Lamb New Zealand (B+LNZ) welcomes the opportunity to provide feedback on the proposals described in the MPI Discussion Document – Paper No: 2016/23 (henceforth the ‘Consultation Document’ or the ‘Proposals’).
- 1.2 Beef + Lamb New Zealand (B+LNZ) is the farmer-owned organisation representing New Zealand’s sheep and beef farmers. B+LNZ is funded under the Commodities Levies Act 1990 through a levy paid by producers on all cattle and sheep commercially slaughtered in New Zealand.
- 1.3 B+LNZ represent around 12,300 commercial farming businesses, creating around 35,000 jobs (wages, salaries and self-employment) in the sheep and beef sector. Around three quarters of pastoral land and just under a third of New Zealand’s total land area is used for sheep and beef farming. Sheep and beef exports are New Zealand’s second largest goods export earner.
- 1.4 The export value of the sheep and beef sector (the sector) was \$8.6¹ billion for the year ending December 2015, making it New Zealand’s second-largest goods export earner, accounting for approximately 18% of New Zealand’s overall goods export earnings for the year.
- 1.5 B+LNZ’s purpose is to help sheep and beef farmers make informed business decisions and promote their collective interests. B+LNZ supports farmers through investing in research and development, developing farm and farmer capability, and delivering knowledge to drive farm performance. B+LNZ advocates on behalf of New Zealand sheep and beef farmers and provides advice on issues affecting the sector, including trade, market access, environment, health and safety, technical and regulatory issues. B+LNZ’s role is to also build sector confidence and profile.
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2. Biosecurity and red meat production

- 2.1 Biosecurity is a top priority for the red meat sector, where the efficiency of sheep and beef cattle production (and in turn the competitiveness of our products in global markets) is dependent upon low input pasture and forage production and the high health status of our stock.
- 2.2 Abundant rainfall, fertile soil and temperate climate make New Zealand well suited to pasture and forage production. Pasture pests and weeds are an ongoing management challenge for the pastoral sector but currently these do not require managing to the same degree as those faced by the other horticultural industries. In 2013, B+LNZ initiated a dialogue with MPI and the other pastoral industries which resulted in a jointly funded review of exotic arthropod threats to pasture production in New Zealand.
- 2.3 The impacts of pests and diseases on sheep and beef cattle in New Zealand are significantly lower than practically every other country for two main reasons. First, all of the most serious infectious diseases of ruminants are absent from New Zealand, either having never been introduced or previously eradicated. Second, the extensive management systems that characterise sheep and beef farms in New Zealand are inherently refractory to the establishment and perpetuation of infectious diseases, partly attributable to comparably low stocking densities.
- 2.4 Consequently, sheep and beef farmers use fewer pesticides and herbicides than any other food producers and drystock farming requires significantly fewer antimicrobials to treat infections than the other livestock industries. The efficiency of red meat production in New Zealand, in part attributable to our

¹ Total from Global Trade Atlas

high biosecurity status, in turn has reduced emissions of greenhouse gases and minimised impacts on water quality.

- 2.5 In addition to posing a threat to efficient production, exotic diseases of ruminants pose a major risk to the access of New Zealand livestock products to overseas markets. Modelling work undertaken in 2012 by MPI showed that the impacts of an FMD incursion on the New Zealand economy may be so severe as to precipitate a national recession.
- 2.6 Accordingly, sheep and beef farmers make significant investment into biosecurity. At the farm level, this can be through animal health planning, vaccination and drenching of stock, identification and recording of animal movements and pest and weed control, among other elements of good on-farm biosecurity practice.
- 2.7 At an industry level, farmer resources and levies fund activities including the National Animal Identification and Tracing (NAIT) scheme, control of bovine tuberculosis, the Johne's Disease Research Consortium, the Wormwise partnership, participation of B+LNZ in the development of the FMD Preparedness Programme and wider input into biosecurity legislation and standards, development of electronic Animal Status Declarations (eASDs) and numerous regional or local groups established to control pests and weeds such as tutsan and Chilean needle grass. In many cases, the costs of meat hygiene inspection and other services undertaken by MPI at meat processors are directly deducted from returns provided to farmers by meat processors in return for stock for slaughter. In other countries that produce red meat that competes with New Zealand beef and sheep meat in global markets, these activities are invariably funded by central government.
- 2.8 B+LNZ welcomes the opportunity *Biosecurity 2025* affords for providing a strategic direction for biosecurity in New Zealand.

3. Considerations of process

- 3.1 B+LNZ wishes to express its dissatisfaction at the limited opportunity for engagement on these proposals, over the 15 months of their development, prior to finalisation for public consultation.
- 3.2 This appears to be reflective of a worrying trend within MPI away from co-development of policy proposals with key stakeholders. Co-development creates a sense of joint ownership and commitment that increases the likelihood that potential benefits of initiatives are realised. It is with some irony that we observe that one of the principles proposed to underpin the biosecurity system is '*Collaborative approaches and wide participation are enabled and encouraged.*', when on this occasion minimal engagement occurred between MPI and its industry partners, some of which are GIA signatories, in developing the proposals.
- 3.3 B+LNZ notes that following release of the Consultation Document, MPI scheduled a roadshow of workshops around the country where feedback from the public has been sought. Our limited experience of these is that much of the information presented is of a very basic nature, i.e. what biosecurity is, with what time is left over being devoted to participants expressing opinions on the extant five strategic directions. From the perspective of industries with a good understanding of biosecurity issues, it is frustrating to have been unable to meaningfully participate in the process by which risks and opportunities for biosecurity were identified, i.e. problem definition, and the proposed solutions (the five Strategic Directions) developed.
- 3.4 B+LNZ recommends that in future, the Ministry should consider holding meetings outside of standard working hours if it wishes to attract members of the public.

Commentary on the Proposals

4. General comments

- 4.1 B+LNZ believes that the Consultation Document is too long and that this has served as a barrier to farmers and others in fully understanding what is intended. Several farmers have suggested that actually, it is only necessary and sufficient to read the *'Principles'*, *'Strategic Directions'* and *'Making it Happen'* sections (pages 20 - 22) to understand everything of substance.
- 4.2 In this instance we understand that lots of additional context has been supplied to make the document more accessible to those unfamiliar with biosecurity but in future, B+LNZ proposes that the Ministry should think harder about the impact this detail will have on the willingness of stakeholders to engage in the first place and their ability to focus on what's important if they do.
- 4.3 Regarding language and pitch, in places the document comes close to being a little too 'feel good' in tone, which among many constituencies risks being seen as lacking in substance. We also suggest that some sections will be hard to understand for lay audiences.
- 4.4 B+LNZ understands MPI is considering publishing the final version of the Direction Statement as a short, simple and pithy document limited to the important parts as described above. We strongly encourage MPI to do so.

5. A Direction for the future

Proposed mission for biosecurity

- 5.1 The mission proposed *'New Zealanders our plants and animals, and our unique natural resources are kept safe and secure from harmful pests and diseases'* is laudable and refreshingly concise, unencumbered as it is by subjective and superfluous references to 'cultural values', 'way of life' etc.
- 5.2 It can be questioned whether this is more appropriately considered a vision rather than a mission, given that a mission is more appropriately a task oriented concept for individual entities rather than an amorphous loosely defined 'system' like biosecurity, but there is unlikely to be much value in splitting hairs over this.

Proposed guiding principles for the system

- 5.3 B+LNZ notes that all organisations must make decisions according to their own principles, which may not include all of those that are proposed for the biosecurity system. However, as the leader of the biosecurity system, B+LNZ believes MPI should firmly commit to how it will seek to lead the biosecurity system by example (described in Section 12 below).
- 5.4 *Biosecurity is everyone's responsibility.* B+LNZ agrees and believes the Ministry and stakeholders should grasp the opportunity to create a culture of biosecurity awareness that makes it clear all have a role to play. This also consistent with Government policy on GIA, where beneficiaries of biosecurity services are being required to contribute towards services from which they benefit. To support this, some form of standardised assessment of public and private benefit delivered by biosecurity activities will need to be developed, which must then be used to inform investment. B+LNZ proposes that this is a requirement for principled implementation of cost recovery for MPI's services, including biosecurity, as presented in Discussion Paper 2016/07.
- 5.5 *Decisions take into consideration economic, environmental, cultural and social values.* B+LNZ agrees.
- 5.6 *Risk-based decision-making is informed by the best available science and information.* B+LNZ agrees and proposes that the concept of 'proportionality' be added.
- 5.7 *Decisions are transparent, taking into account the integrated nature of the system, and ensure resources are prioritised to achieve greatest benefit for biosecurity outcomes.* Resource prioritisation is a major issue for biosecurity, across all participants in the system. B+LNZ would warmly welcome adoption by the Ministry of transparent decision making and feel that in this case, as for many others in the Discussion Document, there is a clear need for MPI to lead by example.

B+LNZ proposes that this principle may be most appropriately split into a two separate principles, one concerning transparency and the other reflecting the need for adequate prioritisation of resources. For the

latter, we like the suggestion ‘*prevention is better than cure*’, offered by Regional Council representatives at one of the workshops.

B+LNZ is uncertain what the qualifier ‘*taking into account the integrated nature of the system*’ means.

5.8 *Biosecurity operates in an environment of continuous learning and system improvement.* B+LNZ agrees.

5.9 *Collaborative approaches and wide participation are enabled and encouraged.* B+LNZ agrees.

5.10 *The role of tāngata whenua as kaitiaki, and mātauranga Māori are recognised and provided for*

Maori are a tremendously important part of the sheep and beef sector and red meat industry. However, these considerations are more appropriately constituent parts of New Zealand public good / social values and not of primary relevance to industry organisations. MPI should be explicit about its leadership role with respect to bringing Maori cultural issues, where appropriate, into biosecurity discussions and not seek to apportion them to other system participants.

5.11 *Biosecurity takes account of our trade and travel context, including the need to facilitate safe imports, support assured exports and meet international obligations.* B+LNZ agrees. Trade is a ‘two-way street’ and maintaining New Zealand’s reputation for integrity and risk-based decision making when developing our own import measures is vitally important for protecting our exports from unwarranted technical and other trade barriers. This principle could be reframed to set out that in delivering biosecurity, New Zealand will honour international commitments, including those to free trade and conservation.

5.12 B+LNZ would strenuously oppose the inclusion of ‘the precautionary principle’, as has been proposed by conservationists on the basis that New Zealand has unique native flora and fauna and, therefore, it will inevitably be unlikely that evidence of impacts from imported pests species will be available. Firstly, B+LNZ believes that this approach is contrary to our international commitments and, in reality, ‘precaution’ is in the eye of the beholder. Second, we observe that every country in the world has unique native flora and fauna and New Zealand is not special in this regard. Finally, we also point out that application of the precautionary principle would be likely to be cited as a reason for prohibiting the introduction of biocontrol species or use of pest control toxins, which are essential for protection of the natural environment.

6. Making it happen

6.1 B+LNZ is pleased that MPI has committed to ‘*detailed implementation planning, involving all biosecurity system participants*’ to follow publication of the Direction Statement. However, we believe far too little emphasis has been placed upon this essential aspect of the proposals than is required.

6.2 In releasing *Biosecurity 2025* with considerable fanfare and including statements such as ‘*drive change where it is needed*’ (page 19) and ‘*The first three strategic directions are game-changers. By focusing our efforts and investment in these areas, there is the potential to usher in transformative change and for our biosecurity system to make big leaps forward*’ (page 21) MPI has set high expectations among its stakeholders.

6.3 However, following the 2003 Biosecurity Strategy, which sat on the shelf for 13 years without any visible reference being made to it nor formal evaluation of its impact, and the Biosecurity Surveillance Strategy, which was heavily criticised by the Office of the Auditor General in 2012, MPI is playing for high stakes with *Biosecurity 2025* – its reputation for delivery in the eyes of its biosecurity stakeholders.

6.4 *Biosecurity 2025* represents a great opportunity for MPI to set the strategic direction for biosecurity and show the public and primary industries that it is capable of delivering on commitments to make a significant difference. This is an essential facet of good leadership and B+LNZ is fully committed to supporting the Ministry in realising this.

6.5 Without a time-bound, well-resourced implementation plan, incorporating some consideration for how performance can be measured, there is a risk that *Biosecurity 2025* will merely serve as a more up to date version of the strategy released in 2003.

6.6 Accordingly, B+LNZ strongly recommends that The Direction Statement be redrafted to include more detail about MPI’s intention to work with stakeholders to develop a formal framework for further developing and implementing progress against the strategic directions, which should include transparent prioritisation of effort, performance measures and, where necessary allocation of sufficient resources.

6.7 For example, this could involve the creation of separate stakeholder assurance groups for each Strategic Direction to collaboratively identify areas for progress or projects (akin to the first steps in the Proposals),

which would then convene on a regular (twice yearly initially perhaps) basis to assess performance and identify ways to assist those entities which have committed to delivering them.

- 6.8 Noting that MPI intends to ‘publish the Direction Statement and work out the details later’, B+LNZ believes that it is unsound to publish any detail surrounding first steps in the final draft of the Direction Statement, including ideas presented in the Proposal or submitted as part of this formal consultation round. This is because we envisage a process where all stakeholders have an opportunity, as part of an open and collaborative discussion, to put forward ideas that are shaped and improved by peer review and challenge. These would then be subject to prioritisation according to the same criteria. If MPI chooses to include some of these from the outset in the Direction Statement, then the decisions about priority will have been taken by MPI alone and in the absence of contributions to be provided by others later.
- 6.9 We are aware that *Biosecurity 2025* has been criticised for being too light on details and B+LNZ would have preferred much more engagement on specific deliverables from the outset. However, the decision has been taken by MPI to adopt the approach of ‘directions first, details later’ which B+LNZ supports in anticipation of what follows. We would be very concerned to see a muddy, compromise eventuate where tentative proposals for improvements to biosecurity are prematurely ‘locked-in’ in the final proposal merely to satisfy stakeholder concern about the absence of specifics.

What will success in 2025 look like?

- 6.10 The picture presented is evidently an informative pictogram aimed at public consumption rather than a serious attempt to identify performance measures or describe meaningful outcomes for the Direction Statement, which we maintain need to be developed during implementation planning following finalisation of the Strategic Directions.
- 6.11 On this basis, we believe that it is not efficient for stakeholders to dwell and provide feedback on each element proposed.

7. Strategic Direction 1: A biosecurity team of 4.7 million

- 7.1 B+LNZ understands that having a ‘team New Zealand’ approach to biosecurity sounds inspirational but it fails to take account of the importance of involving tourists and other visitors and that predicted increases in population will quickly see 4.7 million seem rather out of date in several years.
- 7.2 B+LNZ welcomes the sentiment of this Strategic Direction – increasing and broadening engagement in biosecurity – and will be keen to ensure that future investment to support it is targeted to achieve the most benefit. In many cases, appealing to the public en masse is likely to be inefficient.
- 7.3 It is disappointing that MPI has not taken the opportunity to highlight the example of the eradication of the great white butterfly from Nelson as a shining example of where harnessing the public and novel collaborations can be used to achieve great outcomes for biosecurity. We expect that the Department of Conservation would be very happy to provide its insights into this and would welcome learning more from DoC on this subject during implantation planning, following the publication of the final Direction Statement.
- 7.4 B+LNZ proposes that once the public interest in *Biosecurity 2025* has abated, it would be prudent to retitle this Strategic Direction ‘collaboration and engagement’ (or similar) to cast it in a more serious light free from the perceived frivolity of ‘everyone a biosecurity officer’.
- 7.5 B+LNZ has been actively participating in developing the GIA initiative for a number of years and, with MPI and the other livestock industries, has recently prepared a proposal to establish the ‘Livestock Sector Council’ (LSC) to serve as the forum for discussion of biosecurity issues, including joint priority setting and investment decisions made by members of the Council who choose to join GIA. We suggest that the LSC may serve as a useful forum for early engagement on implementation of *Biosecurity 2025* and similar initiatives in future.

8. Strategic Direction 2: A Toolbox for Tomorrow

- 8.1 B+LNZ notes that this Strategic Direction could be more plainly phrased ‘use science for biosecurity’ – something we would be very surprised to learn if anyone disagreed with.
- 8.2 The frameworks and processes underpinning publicly funded scientific research investment in New Zealand are complicated and fragmented. If implementation of the *Biosecurity 2025* can bring some order

and transparency to investment in biosecurity research then this would be a very good thing. Publication of an annual report of all publicly funded biosecurity research would be a fine start.

- 8.3 In general, we believe that biosecurity is an area where MPI and many other stakeholders already make sensible and cost effective use of existing technologies. B+LNZ is wary of the tendency for research providers and social interest groups to see large opportunities from initiatives focussed on developing and implementing 'more science' which do not in all cases subsequently result in improvements in the real world. B+LNZ believes that the primary production industries, which by nature are focussed on application and cost effectiveness, are well placed to assist MPI in a broader discussion about biosecurity research opportunities and priorities.
- 8.4 Unfortunately, a major challenge that continues to confront biosecurity is the regulatory burden applied to promising new technologies or even to those of proven effectiveness and safety. Belief, rather than science, based objections expressed by small and vociferous interest groups (or mere perceptions that these will become agitated) constrain the ability or willingness to use tools such as sodium fluoroacetate (1080) or aerial application of pesticides to urban areas.
- 8.5 In other cases, regulatory agencies such as the Environment Protection Authority remove or restrict the use of effective pest control tools (for example organophosphates, and diazinon in particular) influenced by trends set by regulators overseas, despite being unable to cite any significant evidence of harm stemming from decades of use in the New Zealand context.
- 8.6 Genetically modified (GM) host species that are resistant to biosecurity hazards or GM biocontrol agents offer perhaps the most promising solutions to some of New Zealand's most intractable established pests (and no doubt those yet to arrive). However, Government policy and the HSNO legislation present the biggest barriers to successful deployment of these technologies for the benefit of the country.
- 8.7 The tensions involved in making choices about the use of socially contentious biosecurity tools require consideration and it is appropriate that Biosecurity 2025 acknowledges this. Surprisingly, the column entitled '*What innovations might science and technology deliver?*' does not include the future potential of GM biocontrol and we wonder if this is an attempt by MPI to avoid the outrage of the uninformed. If so, then this dodging of the issue is a perfect example of a systemic problem where the Government helps perpetuate the uncertainty in the mind of the general public about the safety GM technology (although the same has applied in the past to 1080, vaccines and fluoridation of water) by declining to confront the issues head-on and with confidence. This is not consistent with good leadership.

9. Strategic Direction 3: Free-Flowing Information Highways

- 9.1 B+LNZ expects most will agree that using and sharing information and information technology more widely and in smarter ways is a good thing.
- 9.2 For biosecurity risk analyses, readiness and response it is fundamentally important for good information to be available about the host population(s) at risk. It is self-evidently good to use data that is already collected more efficiently but in some cases additional information may be required to be gathered to facilitate the best outcomes.
- 9.3 An example of this is data on the location of farms in New Zealand. Currently, and with the exception of the USA, New Zealand is the only developed country with any sizable livestock population that does not require livestock farmers to register the location of their farms for biosecurity purposes. Lack of complete and accurate information about this has been a longstanding and unacceptable deficiency in MPI's core capability for biosecurity surveillance and responses. B+LNZ looks forward to continuing the discussion with MPI about improving this situation during the implantation phase of the *Biosecurity 2025* project.
- 9.4 Similarly, B+LNZ is hopeful that realising gains envisioned by this Strategic Direction will precipitate a rethink of MPI's existing position on electronic Animal Status Declarations (eASDs) where currently it is Ministry policy that having access to a central database of all movements of the major livestock species is of no benefit for biosecurity or food safety risk management.
- 9.5 B+LNZ assumes that the Ministry is aware that there are currently several initiatives established for standardising and sharing information across the rural sector, including elements of the Red Meat Profit Partnership (RMPP). Obviously, it will be sensible to see what benefits are available for biosecurity by examining what the RMPP programme and others can offer, as part of implementation of the Direction Statement. B+LNZ will be happy to assist with this.

- 9.6 We are pleased to see that the Proposals recognise that analysis of data is fundamental to it being useful. This is frequently not given the attention required when information gathering systems are conceived and implemented.
- 9.7 B+LNZ suggests that relationships, rather than technology, are probably the most important thing for ensuring the free flow of information. The Direction Statement should place more emphasis on this.

10. Strategic Direction 4: Effective Leadership and Governance

- 10.1 B+LNZ strongly agrees that accountability and good leadership are important for biosecurity.
- 10.2 Unfortunately, we have no idea what '*leading from all sides*' means and have only learned of the concept of distributed leadership from discussions at the workshops MPI held following release of the Proposals. B+LNZ agrees with the sentiment that those involved in taking ownership and leading on biosecurity issues should be supported, with local groups of farmers taking action against weeds such as tutsan and horehound being a great example of this. We look forward to assisting the Ministry in further developing this aspect of the Proposals during the implementation phase.
- 10.3 B+LNZ is encouraged that *Biosecurity 2025* has reiterated the need for performance measures across the biosecurity system, presumably applying to both MPI and other participants. As part of the GIA discussion, the livestock industries have been particularly keen to work with MPI on this area, in part to provide assurance to GIA signatories that all partners are meeting commitments made as part of the agreement. These are likely to be essential components of any value proposition put to farmers by representative organisations seeking a mandate to sign the Deed.
- 10.4 For readiness and response, outcome-based performance measures for Minimum Commitments have been difficult to identify, which has driven the parties down the route of seeking more input based commitments. Owing to our experience with this, B+LNZ recognises the challenges that lie ahead developing biosecurity system performance measures and is keen to help.
- 10.5 B+LNZ has sympathy for the dissatisfaction, expressed at a recent workshop, of Regional Councils at being largely excluded from the development of the Consultation Proposals. The relationship between the Ministry and the Regional Councils has a significant impact on the delivery of biosecurity services that affect sheep and beef farmers, hence we wish to see a fully inclusive process for development of the implementation plan following publication of the Direction Statement. B+LNZ supports the idea that measurement of relationships between participants in the biosecurity system may be useful in future.
- 10.6 MPI has asserted its role as leader of the biosecurity system. B+LNZ believes that it is of utmost importance for MPI to lead by example, as described below.

11. Strategic Direction 5: Tomorrow's Skills and Assets

- 11.1 B+LNZ is very pleased that the Direction Statement recognises the importance skills and expertise play in the operation of the biosecurity system.
- 11.2 Further, it is very encouraging to note that the risk to high priority work that comes from diversion of staff onto urgent responses has been recognised. This has been particularly worrying for the livestock based industries where preparedness for extremely high impact disease outbreaks has traditionally been deprioritised in favour of regular responses to plant pest incursions.
- 11.3 B+LNZ agrees that it is important to attract people with the requisite skills and experience to careers in biosecurity but does not agree that it is sensible to spend resources encouraging biosecurity specifically. The reality is that biosecurity professionals arise from the veterinary, plant and animal sciences. What is required is to ensure that New Zealand maintains its base capability in the life sciences, which will support a wide array of productive industries that are dependent on life scientists, in addition to the niche field of biosecurity.
- 11.4 As well as attracting suitably qualified individuals into biosecurity, it is vitally important to retain them, particularly as it is, by definition, the experienced staff who need to be retained. On this point, B+LNZ shares growing concerns among industry groups about the loss of MPI's expertise in veterinary and animal health, particularly at middle and senior management levels, as discussed further below.
- 11.5 B+LNZ notes that taxonomic collections are clearly an asset for biosecurity, but more important for the animal based industries are parasitologists, histopathologists and other veterinary science experts who

prove so invaluable when new and emerging pests are detected. A key challenge that New Zealand needs to address is how these are productively maintained during 'peacetime'. In countries with more developed state veterinary services and diagnostic capability, these roles frequently form a core part of the competent veterinary authority. In New Zealand, equivalent expertise tends to reside in universities and CRIs and are, therefore, less secure. These roles are frequently not supported by any baseline funding or succession management.

- 11.6 Consequently, the proposal for a system wide capability assessment and subsequent action plan, as described, is very welcome.

Biosecurity within the Ministry for Primary Industries

12. The Need for MPI to Lead by Example

- 12.1 B+LNZ supports MPI in its role of overall leadership of the biosecurity system. With leadership comes the responsibility to live up to the reasonable expectations of those who consent to be led.
- 12.2 Accordingly, and in recognition of MPI's unique position of leader of the biosecurity system, B+LNZ believes that it is appropriate and necessary for MPI to take the opportunity afforded by *Biosecurity 2025* to make a formal commitment to other participants in the biosecurity system about how it will engage in and deliver biosecurity.
- 12.3 B+LNZ recommends that an additional section be added to the *Biosecurity 2025* Direction Statement entitled '*MPI – Leading by Example*' (or similar).

13. The Impact of MPI's Structure on the Delivery of Biosecurity Services

- 13.1 B+LNZ has a legitimate interest in the delivery of biosecurity services that protect the red meat sector. The quality of these services is strongly influenced by the internal structure of the Ministry responsible for delivering them.
- 13.2 Over recent years, the Ministry has been restructured, realigned and, most recently, refined. We observe that continued restructuring is poor for staff moral and retention, which in turn reduces the collective experience of the staff within the Ministry.
- 13.3 Further, and from the outside, the drivers behind these restructuring exercises are unclear and, to our knowledge, the outcomes of these exercises in terms of the performance of MPI in delivering biosecurity services have never been *evaluated*.
- 13.4 It is our understanding that New Zealand is the only country in the developed world where animal health and welfare specialists do not form a coherent branch or directorate general within the wider government department responsible for agriculture and other associated functions. Instead, MPI (as did its forerunners) disperses the teams responsible for delivering the functionality of the Competent Veterinary Authority (as defined by the World Organisation for Animal Health (OIE)) throughout generic, function based directorates.
- 13.5 The generic 'functionalist' approach to biosecurity ignores the technical reality that animal, plant and environmental biosecurity are actually very different, requiring quite distinct expertise, systems and in some cases legislation – not to mention nearly entirely different stakeholder landscapes.
- 13.6 Taking a generic, functionalist approach to biosecurity and the creation of a mega ministry now incorporating food safety, fisheries and forestry, combined with removing specialist groups within MPI, appears to have decreased the perceived value of technical expertise within the Ministry. Indeed, B+LNZ is concerned at the rise of 'managerialism' and the worryingly few senior leaders in MPI who have veterinary technical skills and / or experience in the animal production industries. Not only is this of concern for the soundness of decision making within the Ministry, but we also fear for what message this

sends to junior technical staff or those with the skills and expertise New Zealand needs who may consider employment within MPI in future.

13.7 B+LNZ contends that it is essential that MPI takes steps to address this. As a first step we wish to see the creation of a post of Chief Veterinary Officer (CVO). Internationally, the post of CVO is considered to be very important, serving as:

- chief advisor to the Government on animal health issues,
- external spokesman on the countries animal health status and related matters,
- lead delegate in international forums considering biosecurity and,
- providing a clear point of leadership and accountability for animal health and welfare for the Government.

13.8 B+LNZ believes that creation of a CVO, as the head of a more aligned and recognised 'animal health system' within MPI would significantly raise the profile of animal health and welfare issues, and motivate and help retain existing experts. This would also send an important message to domestic and external stakeholders about New Zealand's commitment to retaining its ability to 'punch above our weight' when engaging on animal health issues internationally.

14. Recommendations

14.1 B+LNZ recommends that MPI proceeds with the five Strategic Directions presented.

14.2 B+LNZ recommends that MPI should revisit the principles presented and, in particular, include the principle that '*prevention is better than cure*'.

14.3 B+LNZ recommends that The Direction Statement be redrafted to include more detail about MPI's intention to work with stakeholders to design a formal framework for further developing and implementing progress against the Strategic Directions. This should include transparent prioritisation of effort, performance measures and, where necessary allocation of sufficient resources.

14.4 B+LNZ recommends that MPI's commitment to leadership of the biosecurity system is reinforced by including a separate section in the Direction Statement where MPI commits to leading by example.

14.5 Noting that MPI intends to 'publish the Direction Statement and work out the details later', B+LNZ believes that it is unsound to publish any detail surrounding first steps in the final draft of the Direction Statement, including ideas presented or submitted as part of this formal consultation round.

14.6 B+LNZ recommends that the Direction Statement should include discussion of how tensions over use of control tools will be approached.

14.7 B+LNZ recommends that the Ministry should formally evaluate its structure and the impacts this has on delivery of biosecurity services to its customers.

14.8 B+LNZ recommends that the Ministry should assess the need for attracting and maintaining scientific and veterinary expertise within MPI.

14.9 B+LNZ recommends the establishment of a formal role of Chief Veterinary Officer, as head of an integrated 'animal health system' within the Ministry.