



MPI interpretation of the GIA minimum commitments for readiness and response

Date: 30 January 2014

DISCUSSION PAPER

GIA Biosecurity Forum, 12 March 2015

Giving feedback on this paper

The GIA Biosecurity Forum on 12 March 2015 will include a workshop on this paper.

In the workshop delegates will be asked to discuss the following questions:

1. Is the interpretation of industry minimum commitments sufficiently scalable for industry organisations?
2. Does the interpretation adequately capture the readiness and response activities that would be cost shareable under an operational agreement?

Signatories and potential signatories are also invited to send written feedback to MPI by 30 April 2015. Please send your feedback to Bing-Ying Lou, GIA Project Team (email: Bing-Ying.Lou@mpi.govt.nz)

Contact for further information

David Talbot, GIA Project Director/Executive

David.Talbot@MPI.govt.nz

04 894 0008

Purpose

1. The purpose of this paper is to:
 - Provide an interpretation of the MPI minimum commitments for all readiness and response activities under GIA
 - Provide a preliminary MPI view of industry Signatory minimum commitments (incorporating Dairy NZ and KVH draft assessments and feedback received from industry to date)
 - Provide a framework to discuss with industry Signatories to inform cost sharing discussions for Operational Agreements.

What are minimum commitments

2. Biosecurity is a shared responsibility and benefits all New Zealanders. The GIA Deed establishes the basis for a transparent, consistent and equitable partnership between MPI and industry to improve biosecurity readiness and response outcomes. Together with what is prescribed in the Biosecurity Act 1993, the Deed also describes the rights, legal obligations, roles, responsibilities and commitments of each Signatory for delivering the GIA outcomes.
3. The minimum commitments (section 3.1 of the Deed) made by Signatories are the means for delivering Deed outcomes. Minimum commitments are drawn from the capacity and capability that Signatories contribute to the biosecurity system and are not eligible for cost sharing under GIA. They set the foundation of MPI and industry commitment to the partnership, and provide certainty and transparency as to the contribution of each Signatory. There is an expectation that all signatories will have, as a minimum, the capacity and capability to participate in Deed governance processes, and provide the specific resources necessary to achieve the outcomes of the Deed.
4. MPI will undertake to review its interpretation of the GIA minimum commitments periodically in line with the reviews of the Deed.

Principles

5. MPI's interpretation of the GIA minimum commitments have been guided by the following principles:
 - A clear distinction between what is a MPI minimum commitment and what is eligible for cost sharing for readiness and response activities in an operational agreement
 - Transaction costs relating to administering the MPI minimum commitments are minimised
 - MPI takes a fair and reasonable stance when interpreting the GIA minimum commitments – acts in the spirit of the GIA Deed and of partnership
 - The total cost to MPI to deliver on its minimum commitments is cost neutral i.e. there is no intention to shed MPI costs onto industry Signatories
 - That the MPI interpretation of minimum commitments cover Biosecurity 'readiness and response' activities only – GIA Deed section 3.2, clauses 3.2.1 and 3.2.2

- The minimum commitments are framed to ensure, where possible, MPI is not constrained in how it manages its business and resources, but at the same time sustainably fulfils its GIA minimum commitments
- MPI to ensure any minimum commitment obligations do not limit MPI delivering on the requirements of the Biosecurity Act or to act as a Competent Authority
- That MPI retains the right to discharge its obligations as a Government ministry and to comply with ministerial matters.

Performance measures

6. There is an expectation that Signatories will hold themselves accountable to their GIA partners for their performance in managing biosecurity risks that are their responsibility (clause 3.1.2a of the Deed). The development of performance measures (where possible) is one way in which to support this. While it will take time, MPI is committed to developing an aligned, sustainable and meaningful performance management system that encompasses both minimum commitments and the wider biosecurity system.

Drafting of this discussion paper

7. To develop this document, the GIA project team undertook the following consultation activities:
 - Draft document prepared by GIA project team
 - Internal consultation with impacted MPI directorates and directors with iterative changes based on feedback received. Endorsement obtained from GIA Project Board (MPI)
 - Preliminary draft provided to the Interim Fruit Fly Council (IFFC) for feedback and to identify the cost shareable readiness and response activities to be included in the Fruit Fly Operational Agreement
 - Draft updated to include IFFC feedback. Including request by IFFC for MPI to include a preliminary interpretation of industry minimum commitments
 - Updated draft resubmitted to IFFC and provided to Pork NZ and Dairy NZ for feedback. Note: Updated document included a preliminary interpretation of industry minimum commitments utilising IFFC feedback and assessments prepared by KVH and Dairy NZ
 - Feedback received from industry incorporated into document – refer to Table 4 for the feedback and subsequent amendments made by MPI
 - Document released to GIA Secretariat as a discussion paper for the 12 March 2015 GIA Biosecurity Forum.

Next steps

8. MPI will update the document to incorporate industry feedback. Following its own internal approval process, MPI intends to submit the document to the Transitional Deed Governance Group for discussion about whether the interpretation is utilised as a MPI view or a combined industry Signatories and MPI view, as a foundation partnership document that will sit under the Deed.

Table 1: Minimum commitments for all Signatories – Deed clause 3.2.1

Minimum commitment (Deed)	Associated MPI implementation actions	Associated Industry implementation actions
3.2.1(a) Maintaining access to technical biosecurity capacity and capability.	MPI will maintain sufficient technical capability and capacity to fulfil its minimum commitments.	MPI will hold separate discussions with each industry Signatory on their minimum commitments, MPI will take a pragmatic approach as to what is reasonable based on current investment. [The below is a preliminary view of industry minimum commitments and drafted at the request of the IFFC (August 2014 meeting) incorporating KVH and Dairy NZ assessments]
3.2.1(b) Maintaining or improving the capacity to recognise and rapidly report the detection of any unwanted organism.	Refer actions under 3.2.2 (a) and 3.2.2 (b).	Identify and prioritise unwanted organisms for its industry. The sector maintains a communications programme (aligned with the Crown public awareness programme) to raise the level of farmer and farm advisor awareness of the importance of on farm / orchard biosecurity and the processes for monitoring, reporting and responding to suspected incursions. Farms / orchards are equipped with on-farm biosecurity plans.
3.2.1(c) Promoting awareness and use of mechanisms to report changes in New Zealand's biosecurity status.	MPI-led public awareness campaigns will include promotion of reporting via the 0800 pest and disease hotline. MPI will promote awareness and report changes in New Zealand's biosecurity status through its quarterly 'Surveillance Magazine'. MPI will maintain mechanisms to promote and deliver intelligence sharing across branches of Government.	Sector biosecurity awareness campaigns include promotion of reporting via the 0800 line. Raise awareness of the benefits an effective biosecurity system brings to New Zealand. Actively promote behaviours that reduce both the risk of entry and the risk of spread of unwanted organisms.
3.2.1(d) Establishing and maintaining mechanisms to communicate between Signatories and with relevant stakeholders.	MPI will hold itself accountable to its GIA partners for its performance in managing the biosecurity risks that are its responsibility. This means that all Signatories, including MPI, are answerable to each other and have an expectation of account giving. It does not confer instructional authority on the Signatories to whom account is being given. MPI will continue to provide and improve mechanisms which may include, and are not limited to establishment and maintenance of, and active engagement with industry and stakeholder forums, joint working groups, newsletters and websites to communicate between Signatories and relevant stakeholders.	Maintain and share with other Signatories, a list of key Signatory contacts across the biosecurity system. Hold themselves accountable to their GIA partners for their performance in managing the biosecurity risks that are their responsibility. This means that the Signatories are answerable to each other and have an expectation of account giving. It does not confer instructional authority on the Signatories to whom account is being given. Communicate with relevant Signatories any significant emerging biosecurity risk they become aware of, either in New Zealand or offshore, that may impact on the industry concerned, and discuss actions that might be warranted to achieve Deed outcomes.
3.2.1(e) Securing and maintaining sufficient resources to meet their commitments for the administration of this Deed including annual meetings, consultation and decision- making.	MPI will establish and maintain systems and sufficient competent staff to meet this Deed commitment.	Sector organisation budget setting processes and establishment of systems and competent staff result in outcomes appropriate to fulfilment of Deed commitments. Industry Signatories will establish and maintain systems and sufficient competent staff to meet this Deed commitment.
3.2.1(f) Establishing or accessing the necessary capacity and capability to engage in processes to implement this Deed, and any operational agreements developed.	MPI will establish and maintain the systems and competent staff required to meet this Deed commitment. This includes: <ul style="list-style-type: none"> • Meeting with industry Signatories annually or as agreed, outside of the biosecurity forum • Provision of MPI representatives to engage in OA negotiations and governance arrangements • Financial processes for Operational Agreements • Ongoing contract management of operational agreements. 	Provision of Industry representatives to engage in OA negotiations and governance arrangements. Meet with MPI annually or as agreed, outside of the biosecurity forum. Discussions may include: a review of the biosecurity risk profile of the industry; analysis of risk management measures in place to mitigate the entry and potential impact of priority unwanted organisms; performance of pre-border, border and post-border actions; new and emerging risks; and additional readiness and response actions that may be implemented through an Operational Agreement.

Table 2: Minimum commitments for MPI – Deed clause 3.2.2

MPI Minimum commitment (Deed)	MPI implementation actions	Examples of cost-sharable activities
<p>3.2.2(a) Maintaining a core competency to deliver effective response and readiness activities, including diagnostics and investigation capability, and to negotiate market access.</p>	<p>MPI will continue to operate, maintain and improve a national biosecurity 0800 number hotline or equivalent to ensure that any new reports of suspect unwanted organisms are captured and can be acted on in a timely and efficient manner.</p> <p>MPI will maintain the systems and sufficient competent staff to:</p> <ul style="list-style-type: none"> • investigate any new 0800 reports of suspect unwanted organisms • provide a decision maker and advisory support to response governance groups • administer regulatory activities associated with the exercise of Biosecurity Act powers • administering activities (eg, policy and processing) associated with compensation claims and payments • provide policy and regulatory advice to the Government (including briefing senior leaders and Ministers) relevant to both readiness and response related activities • manage internal communications and media management to both readiness and response related activities. <p>MPI will maintain a capability (systems and competent people) that can be used to:</p> <ul style="list-style-type: none"> • manage the delivery of biosecurity incursion responses • provide technical support to responses • manage arrangements to deliver field response activity. <p>MPI will maintain reference laboratories and sufficient diagnostic capability (people and systems) either domestically or through agreements with off shore laboratories to:</p> <ul style="list-style-type: none"> • meet incursion investigation requirements • that can be used during biosecurity responses • ensure diagnostics capacity keeps pace with changing risk profiles. <p>MPI will maintain the systems and sufficient competent staff to:</p> <ul style="list-style-type: none"> • maintain and improve the National Biosecurity Response System • identify and prioritise readiness activities • manage the on-going development and maintenance of a National Biosecurity Capability Network (NBCN), including National Response Training (NRT) training for registered members • prioritise, coordinate and facilitate biosecurity response simulation exercises. 	<p><i>MPI will take a pragmatic approach based on current state to discuss minimum commitments with each individual signatory. [The below is a preliminary view of industry minimum commitments and drafted at the request of the IFFC (August 2014 meeting) incorporating KVH and Dairy NZ assessments]</i></p> <p>Readiness activities (including active surveillance programmes):</p> <ul style="list-style-type: none"> • All costs associated with the development and implementation of specific readiness activities negotiated under an operational agreement. For example, contingency (readiness) plans, operational research and development projects that are not funded from other sources, active surveillance and improvement programmes/projects, procurement, development of new diagnostics tests, training for response role holders (including for field operations), biosecurity incursion simulation exercises • Any costs (people and dollars) associated with use of specialists. For example, technical advisory groups, diagnosticians (including costs to process samples) • Any costs (people and dollars) associated with field operations, operational reporting, audit and review, communications and marketing, and contract management. <p>Response activities:</p> <ul style="list-style-type: none"> • All diagnostic facility, personnel and consumable costs • All response related consumable costs • All response personnel costs (including backfill and contract costs) associated with response management. Also with response operations (including deployment of labour resources/capability through the NBCN, including additional training other than minimum commitment training provided to NBCN registered members), logistics, planning and intelligence (except for preparation of policies and briefings) workstreams • Compensation payments (excluding administration costs) that have been agreed within an operational agreement. Includes legal costs related to joint decisions made that result in compensation claim challenges • All response facility related costs (when using non-MPI facilities) • Costs involved with undertaking response debriefs - <i>Signatories to cover their own debrief participation costs.</i> <p>Note: All incursion investigation decisions and costs (including diagnostics) will be covered by MPI.</p>
<p>3.2.2 (b) Rapidly notifying potentially affected Signatories when a suspected unwanted organism is detected in New Zealand.</p>	<p>MPI will maintain and implement the process for notifying potentially affected stakeholders of suspected unwanted organisms in a timely and effective manner.</p>	
<p>3.2.2 (c) Urgently establishing preliminary response arrangements consistent with Deed requirements and any operational agreements that may be in place, including initiating decision making, cost sharing and impact/risk analysis processes.</p>	<p>MPI will maintain the systems and sufficient competent staff to:</p> <ul style="list-style-type: none"> • establish responses to suspect unwanted organisms • preserve options until decisions on specific response action is made. 	

<p>3.2.2 (d) Managing trade and market access issues arising from the detection of an unwanted organism, and meeting international reporting obligations.</p>	<p>MPI will maintain the systems and competent staff required to:</p> <ul style="list-style-type: none"> • maintain government to government bilateral and multilateral trade relations to protect market access, including meeting responsibilities and obligations under international treaties and agreements. For example, WTO/SPS, IPPC, FTAs • notify and provide relevant response information to trading partners • negotiate measures to address any changes in risk that importing countries may require • provide regular progress updates to affected Signatories. 	<p>Readiness activities:</p> <ul style="list-style-type: none"> • Development of protocols for maintaining market access in the event of an incursion of an unwanted organism(s). This may include unwanted organism triggers, eradication zone distances and timeline for when the additional measures (e.g. phytosanitary) will be lifted once a response is under control. <p>Response activities:</p> <ul style="list-style-type: none"> • Implementation of specific protocols during a response to address any changes in risk that trading partners require • Costs associated with re-gaining market access during the response that may have closed as the result of the detection of an unwanted organism. <p>Note: Any market access activities outside the scope of GIA (e.g. pre-negotiation of protocols for maintaining market access in the event of an unwanted organism incursion, regaining market activities when the response ends for an unwanted organism) will be subject to existing cost-recovery or other arrangements.</p>
<p>3.2.2 (e) Representing the interests of non-Signatories and other stakeholders, including Maori.</p>	<p>MPI will maintain systems and sufficient competent staff to ensure that the interests and perspectives of non-Signatories and other stakeholders are appropriately represented in readiness and response decision-making.</p> <p>Note: Other stakeholders include Territorial Local Authorities, Iwi and other government agencies.</p>	
<p>3.2.2 (f) Facilitating access for industry Signatories to Crown loans, as a last resort, to fund response commitments under this Deed.</p>	<p>MPI will:</p> <ul style="list-style-type: none"> • establish and implement the necessary systems and processes, and • maintain sufficient competent staff. <p>to facilitate access to industry Signatories to Crown loans.</p>	

Table 3: Minimum commitments for industry Signatories – Deed clause 3.2.3

Minimum commitment (Deed)	Industry implementation actions
3.2.3 (a) Being aware of the sector biosecurity risk profile and taking measures to manage the biosecurity risks that sector is best placed to manage.	<p><i>MPI will take a pragmatic approach based on current state to discuss minimum commitments with each individual signatory. [The below is a preliminary view of industry minimum commitments and drafted at the request of the IFFC (August 2014 meeting) incorporating KVH and Dairy NZ assessments]</i></p> <p>Baseline industry data for input into a sector contingency plan that may be developed as an OA project, and provision of localised industry data/information in the event of a response.</p> <p>Development of 'on-farm/orchard' biosecurity plans – developed and scaled according to size of the industry and biosecurity risk.</p>
3.2.3 (b) Communicating with Sector membership, including Maori, on biosecurity in general to elicit better biosecurity outcomes.	<p>Communication with members incorporates the general awareness programme outlined above and also the ability to leverage industry communications channels for response messaging. Available channels should include:</p> <ul style="list-style-type: none"> • Websites • Processor emails to suppliers • Regular sector media (organisation publications) • Extension of information via rural professionals • Company call centres • Text messages/email alerts • Field teams • NBCN. <p>The sector has a communications protocol which sets out mechanisms for co-ordination and escalation.</p> <p>Contingency planning for management of business continuity risks in the event of an incursion is socialised before hand.</p>
3.2.3 (c) Working with MPI to integrate sector into response delivery programmes and processes.	<p>The sector, in conjunction with MPI have established how the sector integrates with the generic readiness and response plan for biosecurity, including roles and responsibilities, and communications (internal and between parties, and externally).</p> <p>The sector has formalised, and appropriately trained teams (i.e. familiar with CIMS model), who can be deployed to work with MPI in response situations.</p> <p>The sector has identified lead contacts for engagement in GIA response decision making processes and these contacts hold appropriate delegations</p> <ul style="list-style-type: none"> • Response Strategic Leadership engagement • Policy advice (including briefing senior leaders and boards) • Identifying appropriate industry resources for readiness and responses activities, along with utilising agreed deployment approaches e.g. NBCN • Maintaining business relations with importers at a commercial level to protect market access, including providing information on the response and negotiating measures to address any commercial requirements. <p>Internal communications, stakeholder liaison and communications, and media management</p>
3.2.3 (d) Raising awareness of response arrangements described in the MPI response procedures and policies.	<p>Key sector personal are trained in the response model for biosecurity. The sector biosecurity communications programme includes information to inform sector participants of response procedures and policies relevant to them.</p>
3.2.3 (e) Promoting early reporting of unwanted organisms to MPI.	<p>The sector emphasises the roles and responsibilities for reporting suspected unwanted organisms.</p> <p>Sector biosecurity awareness campaigns include promotion of reporting via the 0800 line.</p>
3.2.3 (f) Securing appropriately skilled and committed people to engage in readiness and response activities, including technical and operational experts.	<p>The sector wide readiness and response plan identifies the necessary human capabilities required.</p> <p>The sector has formal arrangements to identify the specific personal to fulfil necessary roles (including inclusion of responsibilities in job descriptions).</p> <p>Industry are able to provide technical expertise in the event of a response and for utilising on a technical advisory group for readiness activities.</p> <p>Industry provide geographical detailed information to, for example, populate GIS mapping and spatial analysis tools during a response to determine the risk of spread and aid the effectiveness and timeliness of the response such as location data of crops, pack houses and other information that may assist</p>

<p>3.2.3 (g) Raising awareness within their membership, of the GIA and the commitments that have been made through this Deed and any Operational Agreements(s).</p>	<p>Sector biosecurity communications plan incorporates information on formal arrangements and commitments that are in place under the Deed and any subsequent Operational Agreements.</p>
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Table 4: Consolidated feedback from industry on MPI's draft interpretation of GIA minimum commitments for readiness and response

As at 30 January 2015

No	Submitter	Category	MPI draft interpretation	Feedback from Industry	MPI action taken and/or comment
1	Market Access Solutionz ¹	3.2.1(a) Industry	MPI will maintain sufficient technical capability and capacity to fulfil its minimum commitments.	Industry should be the same as MPI statement i.e. will maintain sufficient technical capability and capacity to fulfil its minimum commitment	Agreed if this is suitable to Industry.
2	Market Access Solutionz	3.2.1(b) Industry	Identify and prioritise unwanted organisms for it's industry. Farms / orchards are equipped with on-farm biosecurity plans based on the Risk Management Plan format and the sector engages with key sector suppliers to promote the development and maintenance of similar plans to address the risks associated with the supply of their products and services onto farms.	Wording change to: Identify and prioritise potential unwanted organisms or priority pests for its Industry This is very prescriptive and the first time we have seen this. What is a risk management plan? Agree with the previous conceptual approach to having on farm biosecurity but how that is implemented may not necessarily involve a plan at this stage.	The Deed is explicit that it is for unwanted organisms. Likely to be a regular and ongoing discussion between industry Signatories and MPI on assessment of biosecurity risks and the risk mitigation steps industry may wish to introduce via 'on farm' biosecurity plans or best practice guidance c.f. Beef + Lamb (http://beeflambnz.com/Documents/Farm/Drystock%20biosecurity%20guidelines.pdf) Paragraph shortened to: Farms / orchards are equipped with on-farm biosecurity plans.
3	NZ Pork	3.2.1(b) Industry	Identify and prioritise unwanted organisms for its industry.	Regularly review unwanted organisms.	See above.
4	NZ Pork	3.2.1(b) Industry	The sector maintains a communications programme (aligned with the Crown public awareness programme) to raise the level of farmer and farm advisor awareness of the importance of on farm / orchard biosecurity and the processes for monitoring, reporting and responding to suspected incursions.	What is meant by the crown public awareness programme?	From time to time, MPI runs educational / information campaigns for a variety of pests / organisms.
5	Market Access Solutionz	3.2.1(c) Industry	Actively promote behaviours that reduce both the risk of entry and the risk of spread of unwanted organisms.	Not quite sure what this entails?	Industry has a role in reducing the risk of entry and risk of spread of unwanted organism (within their control) and will be discussed as part of regular engagement discussions between MPI and Signatories.
6	NZ Pork	3.2.1(c) Industry	Actively promote behaviours that reduce both the risk of entry and the risk of spread of unwanted organisms.	Risk of entry is MPI function. What are MPI's minimum commitments.	These will be more fully described in upcoming work to clarify obligations and expectations for partnership in the wider biosecurity system (as set out in clause 3.1.2 of the Deed) – Industry has a role in reducing the risk of entry and risk of spread of unwanted organism (within their control) and will be discussed as

¹ Market Access Solutionz is representing Tomatoes NZ, Vegetables NZ and NZ Buttercup Squash Council on IFFC.

No	Submitter	Category	MPI draft interpretation	Feedback from Industry	MPI action taken and/or comment
					part of regular engagement discussions between MPI and Signatories.
7	KVH ²	3.2.1(d) MPI	MPI will hold itself accountable to their GIA partners for its performance in managing the biosecurity risks that are its responsibility. This means that all Signatories, including MPI, are answerable to each other and have an expectation of account giving. It does not confer instructional authority on the Signatories to whom account is being given.	Applies to MPI as well as industry signatories.	Agreed.
8	Market Access Solutionz	3.2.1(d) Industry	Maintain and share with other Signatories, a list of key Signatory contacts across the biosecurity system.	Not sure this is required until an OA is developed. GIA sec would be the repository for this?	The Secretariat holds a register of key contacts. Further, forums such as the fruit fly council assist industry to achieve this commitment.
9	NZ Pork	3.2.1(d)	MPI will hold itself accountable to its GIA partners for its performance in managing the biosecurity risks that are its responsibility.	MPI need to be accountable for the risk of entry?	Refer to 6 above.
10	KVH	3.2.1(e) Industry	Sector organisation budget setting processes and establishment of systems and competent staff result in outcomes appropriate to fulfilment of Deed commitments.	This statement is not clear.	Need more information to identify issue. It is up to individual industry Signatories to set process and systems and set level of resources required to meet its commitments. Scaled according to size.
11	KVH	3.2.1(f) MPI	Provision of MPI representatives to engage in OA negotiations and governance arrangements.	How many OA negotiations. MPI currently struggling to handle one OA negotiation and putting off all others. Should a minimum number of parallel negotiations be specified here, e.g., six? This may assist MPI to move more quickly to an efficient OA negotiation process.	The current focus is to complete two pilot OAs to assist developing OA processes and identify resourcing required to undertake future OAs. MPI will make resource available but like any organisation it needs to prioritise, plan and budget.
12	Market Access Solutionz	3.2.1(f) MPI	Provision of MPI representatives to engage in OA negotiations and governance arrangements.	Need a time frame for this to assist with MPI resource management?	Refer to 11 Above.
13	Market Access	3.2.1(f) Industry	Meet with MPI annually or as agreed outside of the biosecurity forum.	All needs to be on the MPI side of the page.	Agreed.

² The KVH's feedback is their initial feedback. KVH has subsequently supplied additional comments and feedback arising from fruit fly cost share and Operational Agreement discussions. These will be incorporated into Table 4 in due course.

No	Submitter	Category	MPI draft interpretation	Feedback from Industry	MPI action taken and/or comment
	Solutionz				
14	NZ Pork	3.2.1(f)	Establishing or accessing the necessary capacity and capability to engage in processes to implement this Deed, and any operational agreements developed.	A number of these issues pertain to minimum commitments on behalf of both MPI and NZPork; require clarification and agreement BEFORE OA is scoped.	Noted.
15	KVH	3.2.2(a) MPI	Maintaining a core competency to deliver effective response and readiness activities, including diagnostics and investigation capability, and to negotiate market access.	Ensure industry perspectives are considered during incursion investigations.	Industry is not always consulted with during an investigation and will be on a case by case basis it is therefore not a minimum commitment. Please refer to the response guide for more information.
16	Market Access Solutionz	3.2.2(a) MPI	Manage the on-going development and maintenance of a National Biosecurity Capability Network (NBCN), including National Response Training (NRT) training, Capability and Capacity Assessments, and specialist role training (e.g. restricted place managers, logistics, organism management, movement control, operations managers) for registered members.	Is this different from the training specified in first bullet point other side of page under cost shareable? , training for response role holders (including for field operations).	Bullet point deleted as duplicated, and third bullet point amended.
17	Market Access Solutionz	3.2.2(a) Cost sharable	Compensation payments.	This needs discussion around whether it's under Bio Act or OA prescribed.	MPI Policy has provided information to help Industry decision making in relation to compensation. Refer to GIA Secretariat handbook on www.gia.org.nz .
18	KVH	3.2.2(a) Cost sharable	All costs associated with the development and implementation of specific readiness activities negotiated under an operational agreement. For example, contingency (readiness) plans, operational research and development projects that are not funded from other sources, active surveillance and improvement. programmes/projects, procurement, development of new diagnostics tests, training for response role holders (including for field operations), biosecurity incursion simulation exercises.	Does this include the MPI Operational Research budget? i.e. will MPI pull back on funding biosecurity research related to readiness and response through this budget? BAU and benefit all responses or relate to improvement of response system, therefore should be MPI minimum commitments.	It is business as usual re MPI Operational Research. Noting that the operational research budget is rather modest and used for a wide range of operational activities. MPI will provide response induction for joint decision and NBCN training as part of its minimum commitment. Other training will be subject to potential cost sharing.
19	KVH	3.2.2(a) Cost sharable	Any costs (people and dollars) associated with field operations, operational reporting, audit and review, communications and marketing, and contract management.	What is this referring to? Presumably just surveillance operations? (if so better to say this).	This relates to readiness activities including active surveillance programmes.
20	KVH	3.2.2(a) Cost sharable	Costs related to use of personnel sourced from the National Biosecurity Capability Network (NBCN) and utilised in a response, including additional training other than minimum commitment training provided to NBCN registered member.s	Duplicates bullet above (bullet three under 'Response Activities') All response personnel costs (including backfill and contract costs) associated with response management. Also with response operations (including deployment of capability through the NBCN), logistics, planning and intelligence (except for preparation of policies and briefings) work streams.	Actioned as per comment 16.

No	Submitter	Category	MPI draft interpretation	Feedback from Industry	MPI action taken and/or comment
21	KVH	3.2.2(a) Cost sharable	Costs involved with undertaking response debrief - Signatories to cover their own debrief participation costs.	Happy with signatories covering their own debrief costs, but MPI should cover any other costs recognising debriefs have a system learning focus that benefits all future responses/aligns with MPIs responsibility for maintaining and improving the national biosecurity response system.	A response debrief is an integral part of the response (noting it occurs after the response has ended). Implementation of lessons learnt back into MPI internal response processes to improve would be at MPI cost. Also noted that lessons learnt may lead to MPI and an industry Signatory deciding to pursue an initiative via an OA project.
22	NZ Pork	3.2.2(a) MPI	ensure diagnostics capacity keeps pace with changing risk profiles.	Ensure diagnostics capability keeps pace with changing risk profiles and are fit for purpose for priority exotic diseases.	Capability needs to be fit for purpose for all unwanted organisms keeping pace with changing risk profiles. Noting that specific diagnostic tests that are of joint interest between MPI and a Signatory can be developed via an OA.
23	KVH	3.2.2(d) MPI	Ensure industry perspectives are considered when managing incursion investigation and response related market access related issues.	Sounds like MPI making all the decisions in relation to market access, considering industry perspectives. I would have thought there are some areas where MPI will need to lead market access negotiations (e.g., govt-govt), but there are others where industry will be best placed to lead (e.g., ind-ind), and market access decisions under the response would be joint as per all other aspects of the response?	Correct. Joint decisions are made at RSL therefore bullet removed.
24	KVH	3.2.2(d) MPI	ensure industry perspectives are considered when managing incursion investigation and response related market access related issues.	ensure industry perspectives are considered when managing incursion investigation is important but fits elsewhere.	Industry is not always consulted with during an investigation and will be on a case by case basis it is therefore not a minimum commitment. Please refer to the response guide for more information. This bullet has been removed – see comment 23.
25	Market Access Solutionz	3.2.2(d) cost sharable	Development of protocols for maintaining market access in the event of an incursion of an unwanted organism(s). This may include unwanted organism triggers, eradication zone distances and timeline for when the additional measures (e.g. phytosanitary) will be lifted once a response is under control.	May be a different funding mechanism say for plants – PMAC?	Correct. Existing cost recovery or other arrangements continue for those market access activities that are not cost shareable under an OA.
26	KVH	3.2.2(e) MPI	MPI will maintain systems and sufficient competent staff to ensure that the interests and perspectives of non-Signatories and other stakeholders are appropriately represented in readiness and response decision-making. Note: Other stakeholders include Territorial Local Authorities, Iwi and other government agencies.	Ok – but outstanding questions as to how and what this means in practice?	MPI business as usual. C.f. Yellow Spotted Stink Bug stakeholder engagement that occurred. Stakeholders can be invited to attend RSL as advisers.

No	Submitter	Category	MPI draft interpretation	Feedback from Industry	MPI action taken and/or comment
27	KVH	3.2.3(a) Industry	<p>The sector biosecurity profile, and those of key sector suppliers, should include specific mitigation actions for the high risk categories of concern and consequences of these.</p> <p>Contingency planning for management of business continuity risks in the event of an incursion include;</p> <ul style="list-style-type: none"> • Policy advice (including briefing senior leaders and boards); • Maintaining business relations with importers at a commercial level to enhance market access; • Contingency planning for management of business continuity risks in the event of an incursion; • Internal communications, stakeholder liaison and communications, and media management; • Supporting MPI-led negotiation of market access arrangements 	<p>This is sounding like readiness planning? If so that is identified elsewhere (appropriately) as a joint and cost-sharable activity.</p>	<p>Agree is cost sharable where mutual priorities have been agreed and a sector, pest / organism readiness plan is required.</p> <p>Amend to:</p> <p>Baseline industry data for input into a sector contingency plan that may be developed as an OA project, and provision of localised industry data/information in the event of a response.</p> <p>Development of 'on-farm/orchard' biosecurity plans – developed and scaled according to size of the industry and biosecurity risk.</p>
28	NZ Pork	3.2.3(a) MPI	<p>Being aware of the sector biosecurity risk profile and taking measures to manage the biosecurity risks that sector is best placed to manage.</p>	<p>MPI appropriately covers exacerbators (importers).</p>	<p>MPI will recover costs from exacerbators where it is practical and reasonable to do so.</p> <p>Also 20% exacerbator contribution to cost shares met by MPI.</p>
29	Market Access Solutionz	3.2.3(a) Industry	<p>The sector biosecurity profile, and those of key sector suppliers, should include specific mitigation actions for the high risk categories of concern and consequences of these.</p> <p>Contingency planning for management of business continuity risks in the event of an incursion include;</p> <ul style="list-style-type: none"> • Policy advice (including briefing senior leaders and boards); • Maintaining business relations with importers at a commercial level to enhance market access; • Contingency planning for management of business continuity risks in the event of an incursion; • Internal communications, stakeholder liaison and communications, and media management; • Supporting MPI-led negotiation of market access arrangements 	<p>Need to define sector.</p> <p>Delete contingency planning for management of business continuity risks in the event of an incursion.</p> <p>Change first line to: The sector biosecurity profile, and those of key sector suppliers, should include specific mitigation actions for unwanted organisms and consequences of these. Contingency planning for management of flow on effects from biosecurity risks in the event of an incursion may include;</p> <p>Does this come down to individual commercial business decision making and not prescribed by GIA? Looking at biosecurity risk not commercial risk which is a valid concern but not in this context?</p>	<p>Agree.</p> <p>Refer to 27 above.</p>
30	KVH	3.2.3(c) Industry	<p>The sector, in conjunction with MPI have established how the sector integrates with the generic readiness and response plan for biosecurity, including roles and responsibilities, and communications (internal and between parties, and externally).</p>	<p>What is this? Contradicts what MPI is saying elsewhere, which is that they maintain a generic response system, maintain a very small number of specific readiness plans/operational standards (BMSB, Fruit Flies, FMD), but do <u>not</u> maintain a generic response plan. Rather specific response plans are developed only when there is a specific</p>	<p>This is about industry integrating into response operations. Having industry involved in all levels of a response is considered beneficial and will lead to greater response</p>

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				response – tailored to the specific organism and context.	effectiveness.
31	NZ Pork	3.2.3(c) Industry	Working with MPI to integrate sector into response delivery programmes and processes.	Training required to be followed by review of biosecurity emergency preparedness.	e.g. NBCN exercises via an OA.
32	Market Access Solutionz	3.2.3(c) Industry	<p>The sector, in conjunction with MPI has established how it integrates with the generic readiness and response plan for biosecurity, including roles and responsibilities, and communications (internal and between parties, and externally).</p> <p>The sector has formalised, and appropriately trained teams (i.e. familiar with CIMS model), who can be deployed to work with MPI in response situations.</p> <p>Maintaining business relations with importers at a commercial level to protect market access, including providing information on the response and negotiating measures to address any commercial requirements.</p>	<p>Remove readiness.</p> <p>Resource as it may not be teams. As appropriate to the industry Sig sector it represents.</p> <p>Change requirements to impacts.</p>	Individual industry signatories can scale this according to size.
33	Market Access Solutionz	3.2.3(d) Industry	Raising awareness of response arrangements described in the MPI response procedures and policies.	Change to Key sector personnel are trained in the CIMS response model for biosecurity. The sector biosecurity communications include information to inform sector participants of response procedures and policies relevant to them.	It is up to individual industry Signatories to set the level . CIMS training is a high benchmark and depending on the staffs role in the response may not be necessary.
34	NZ Pork	3.2.3(d) Industry	Raising awareness of response arrangements described in the MPI response procedures and policies.	Training required to be followed by review of biosecurity emergency preparedness.	e.g. NBCN exercises via an OA.
35	KVH	3.2.3(e) Industry	The sector wide readiness and response plan, and its communication to sector participants, emphasises the roles and responsibilities for reporting suspected unwanted organisms.	As above, inconsistency.	Agreed.
36	Market Access Solutionz	3.2.3(e) Industry	The sector wide readiness and response plan, and its communication to sector participants, emphasises the roles and responsibilities for reporting suspected unwanted organisms.	Is this the generic response guide or specific plans which have not been discussed to date or is it an OA?	<p>Industry to put in place systems or promote early reporting of unwanted organisms.</p> <p>Noted that this will be scaled to size of industry and biosecurity risk.</p>
37	KVH	3.2.3(f) Industry	The sector has formal arrangements to identify the specific personal to fulfil necessary roles (including inclusion of responsibilities in job descriptions).	Too specific, and something GIA signatories can encourage but cannot control.	Individual industry signatories can scale this according to size.
38	KVH	3.2.3(f) Industry	Industry are able to provide technical expertise in the event of a response and for utilising on a technical advisory group for readiness activities.	Needs to recognise that some smaller industries in particular will struggle with this – ‘best endeavours’?	Individual industry signatories can scale this according to size.

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39	NZ Pork	3.2.3(f) Industry	Securing appropriately skilled and committed people to engage in readiness and response activities, including technical and operational experts.	Training required to be followed by review of biosecurity emergency preparedness. NZPork can provide location details on commercial Industry. What of non-commercial pig ownership? NZPork has agreed to data share with FoL – awaiting response from MPI.	Individual industry signatories can scale this according to size.
40	Market Access Solutionz	3.2.3(f) Industry	The sector wide readiness and response plan identifies the necessary human capabilities required. Industry provide geographical detailed information to, for example, populate GIS mapping and spatial analysis tools during a response to determine the risk of spread and aid the effectiveness.	Is this the generic response guide or specific plans which have not been discussed to date or is it an OA? Tools this area needs more discussion.	Amended to: The sector emphasises the roles and responsibilities for reporting suspected unwanted organisms. Noted that this will be scaled to size of industry and biosecurity risk.
41	NZ Pork	3.2.3(g) Industry	Raising awareness within their membership, of the GIA and the commitments that have been made through this Deed and any Operational Agreements(s).	Yet to be put in place with MPI.	Noted.