

20 September 2024

Plant Exports

Biosecurity Import and Export Standards

Ministry for Primary Industries

PlantExport@mpi.govt.nz

Consultation: Fixed Dates for the *Arhopalus ferox* (Burnt Pine Long-horn beetle) Flight Season

Thank you for the opportunity to provide feedback on the consultation document: Fixed dates for the *Arhopalus ferox* (Burnt Pine Long-horn beetle) flight season.

As a general statement, we submit in support of the feedback provided by the NZ Forest Owners' Association (NZFOA) submission. Some key comments are provided.

1. General Comment

- 1.1 From a wider industry perspective effective and practical phytosanitary measures are essential to ensure that our members can continue to export their wood products to Australia. As our second largest export destination for sawn timber, it is important that any measures placed on pre-export treatments for pests and diseases are based on science, facts and are sensible as to the information available at the time of treatment.
- 1.2 In the case of the proposed changes to the dates for the *A. ferox* flight season, WPMA submits that the approach lacks rigour, and we do not support a change to the current protocols.
- 1.3 Further background investigation and analysis needs to be completed by MPI to ensure that the proposed new measures meet the government Regulatory Impact Statement (RIS) requirements as signed off by Cabinet on 1 May 2024. An RIS provides a high-level summary of the problem being addressed, the options and their associated costs and benefits, the consultation undertaken, and the proposed arrangements for implementation and review.
- 1.4 We regard this consultation as rushed, i.e. 2 weeks for feedback, and hence it does not meet the industry consultation requirements recommended by Government.
- 1.5 Our core recommendation reflects NZFOA's submission in that MPI undertake a more detailed comparative analysis of the whole-of-system costs and efficiencies to better inform a decision on whether the fixed date approach and the dis-establishment of the longstanding monitoring program will actually deliver a more cost effective and efficient outcome for the industry and MPI. This will provide industry with greater assurance that the proposed approach will in fact be more cost efficient for the industry as well as MPI.
- 1.6 In the interim, we recommend that MPI keep the current systems in place until such a time that the analysis and industry consultation is completed.
- 1.7 We provide some additional detail as follows.

2. Additional Comments

- 2.1 Export of NZ forest products to Australia in 2023 totalled \$547 million, of which \$140 million included sawn timber and sleepers. Our members view Australia as a growth market, with this government working alongside industry to work through current trade barriers, such as joint timber standard requirements around timber flexibility.
- 2.2 Ensuring phytosanitary settings are not overly obstructive for exporters is the key to incentivising growth within our domestic wood processing companies. As the new 'Fixed Dates' proposal reads, this is not the case. As NZFOA aptly refer to the settings within their submission 'While at face value the proposal to disestablish the *Arhopalus fesus* monitoring programme appears to present a more efficient system, the proposal fails to demonstrate any detail in support of this beyond potential process and cost efficiencies for MPI'.
- 2.3 From a specific wood processing specific we reemphasise these points as examples of our concern:
- (i) Section 27 Bullet point 2 – *“Industry will benefit from the removal of the monitoring programme due to the removal of the *Arhopalus fesus* flight season monitoring volume fee that currently stands at \$0.55 per cubic metre.”* While this might be the case, the consultation document fails to consider this potential savings alongside the potential costs of unnecessary fumigation or treatment of what might be a significant volume of product.
 - (ii) Section 27 Bullet point 2 – *“If a fixed date is implemented MPI will monitor any potential *Arhopalus fesus* detections within New Zealand and interceptions found at destination country borders, making changes where appropriate.”* This is an unacceptably a high-risk strategy for which the industry is wearing all the risk. The uncertainty of how Australia might respond in the event of such a situation and the potential resulting additional treatment costs if the goods fail to meet the import requirements. This risk and uncertainty is further exacerbated by changing climatic conditions and weather patterns in NZ due to climate change.
- 2.4 On a final note we encourage MPI to reassess this proposal and engage with industry to ensure that the *Arhopalus fesus* flight season monitoring settings are right for both government and our wood product exporters.

If you require any clarification on our feedback, feel free to contact me at mark@wpma.org.nz

The Wood Processors and Manufacturers Association

About us:

The Wood Processors and Manufacturers Association (WPMA) was established in 2014 through a merger of the Wood Processors Association and the Pine Manufacturer's Association. We are a voluntary funded industry association with a strong focus on promoting wood as the heart of a future zero-carbon economy.

Our members are leaders in the New Zealand wood industry converting harvested logs into a wide range of products including sawn lumber, pulp, paper, panels, laminated products, mouldings, and engineered wood, through to the development of bioenergy solutions.



Total sales of industry products both domestically and globally in 2023 were approximately \$5 billion. The industry employs close to 30,000 staff, mostly in the New Zealand regions.

Australia is a core export market for our members and our focus is on market growth.

<https://www.wpma.org.nz/>

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