



Guidance Document

Guidance for the Import Health Standard for Vehicles Machinery and Equipment.

[Document Date]

A guidance document issued by the Ministry for Primary Industries

New Zealand Government

Title

Guidance Document: Guidance for the Import Health Standard for Vehicles Machinery and Equipment.

About this document

This guidance document primarily provides best practice guidance and recommendations for the importation of vehicles, machinery (including vehicle or machinery components/parts referred to as equipment) and tyres. It has been issued to accompany the Ministry for Primary Industries (MPI) Standard, *Import Health Standard* (IHS) for Vehicles and Machinery and Equipment (the IHS). This guidance document is not legally binding. It may be read independently of the IHS but it should be read in conjunction with it to ensure that all matters relating to the importation of vehicles, machinery and equipment are fully understood.

Document history

This guidance document is subject to review and amendment at any time to ensure that it continues to meet its purpose. Reviews and amendments will be notified to stakeholders and published on the MPI website. Please ensure that the most recent version of this guidance document is used.

Amendment No.	Date	Reference
1	April 2013	MPI-approved Biosecurity Treatments 6, Formatting.
2	September 2015	Certain requirements moved to the IHS.
3	October 2017	Wholly revised guidance document.

MPI is committed to ensuring that feedback is sought and considered from affected stakeholders prior to amendments being finalised. All stakeholders are responsible for ensuring that the most recent version of this guidance document is used. This guidance document and associated IHS are accessible at: http://www.mpi.govt.nz/importing/other/vehicles-and-machinery/requirements/

Contact Details

For all matters relating to the review and amendment of this guidance document contact:

MPI Biosecurity and Environment Group Regulation and Assurance Branch Plants, Food and Environment Directorate PO Box 2526 Wellington 6140, New Zealand Email: <u>standards@mpi.govt.nz</u>

For all matters relating to implementation and operation of this guidance document in respect to meeting the requirements of the IHS (including MPI's offshore programme, treatments, verification inspections of MPIapproved systems, and other related inquiries), please contact the MPI Border Clearance Services through the office below:

MPI Border Clearance Services

Operations

Import Health Standard for Vehicles, Machinery and Equipment

Audits, Inspections and Treatments Contacts:

For all matters relating to the treatment or verification inspection of imported vehicles, machinery and equipment under the IHS, please contact the local MPI office or Phone 0800 00 83 33.

Disclaimer

This guidance does not constitute, and should not be regarded as, legal advice. While every effort has been made to ensure the information in this guidance is accurate and relevant, MPI does not accept any responsibility or liability whatsoever for any error of fact, omission, interpretation or opinion that may be present, however it may have occurred.

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1 Purpose

This document provides best practice guidance, information and recommendations to help you as the importer meet the requirements of the <u>IHS – Vehicles, Machinery and Equipment</u>

2 Background

This document is guidance information only and is not legally binding. However, it provides effective and efficient ways to meet the requirements of the IHS and explains the mandatory requirements.

3 Abbreviations

Acronyms

Act (The Act)	Biosecurity Act, 1993
CTO	Chief Technical Officer
IHS	Import Health Standard
MPI	Ministry for Primary Industries
NZ	New Zealand
Corfurther defini	tiona places refer to the IUC – Cehedule (

For further definitions please refer to the IHS – Schedule 1.

4 General information for importers

4.1 Introduction

This guidance document accompanies the Vehicles, Machinery and Equipment IHS which exists to control, eradicate or manage biosecurity contaminants and regulated pests. This guidance document exists to provide you with expectations, explanatory information and options to assist in meeting the requirements of the IHS, while explaining what actions MPI will take to verify compliance.

4.2 Biosecurity outcome

The desired outcome of the IHS is that clean vehicles, machinery and equipment arrive in NZ. MPI wants to ensure biosecurity contaminants and regulated pests (referred to from this point as biosecurity contamination) associated with these imported items are excluded, removed or treated to prevent establishment in NZ. Establishment of biosecurity contamination could adversely impact the economy, environment, and health and safety of New Zealand's people.

4.3 What happens when there is failure to meet biosecurity requirements (non-compliance)?

Importer failure to meet requirements

The importer is responsible for ensuring that vehicles, machinery and equipment meet the requirements of the IHS. If requirements are not met, biosecurity clearance will not be given and the item will be directed for further action under section 122 of the Act. Non-compliant items may be treated or destroyed as considered appropriate by MPI to manage the biosecurity risk and meet the requirements of the IHS. Items may also be re-shipped without being unloaded where gross contamination provides too great a risk to allow movement to a transitional facility (TF) for cleaning or treatment.

System failure to meet requirements

If an MPI-approved system has been authorised, the system is responsible for continuously meeting the requirements of the IHS by following the approved procedures and processes. If these processes and procedures are not followed resulting in failure to meet biosecurity requirements, the system may be cancelled or verification activities of the system increased. Cancellation may occur whether non-compliance was deliberate or due to negligence by the system operator to work in the manner approved by MPI.

4.4 How do you meet biosecurity requirements for importation?

4.4.1 General

The IHS requires that all vehicles, machinery and equipment imported into NZ are clean and free of biosecurity contamination.

To achieve the clean requirement, vehicles, machinery and equipment should be treated and/or cleaned (both externally and internally), including those areas not easily seen by physical inspection. Where a complete inspection of all areas of the vehicle, machinery or equipment is difficult, dismantle as much as possible to clean or use an MPI-approved treatment to help ensure requirements are met.

When importing some types of vehicles, machinery and equipment, you may be required to carry out specific cleaning and/or treatment activities in the country of origin. MPI prefers this type of offshore risk management for all items as it reduces the amount of biosecurity risk that NZ is exposed to. Even when you are not required to carry out specific offshore cleaning or treatment activities, vehicles, machinery and equipment must be compliant with the IHS and arrive in New Zealand clean and free of biosecurity contamination.

If requirements are not met and decontamination is required, MPI will decide if a suitable treatment will be carried out or if re-shipment or other actions will occur.

 <u>Do not knowingly import contaminated vehicles</u>, machinery and equipment into NZ with the intention of on-arrival cleaning or treatment. You will run the risk of re-shipment occurring and will be responsible for all related costs.

4.4.2 How does MPI assess the level of biosecurity risk of vehicles, machinery and equipment?

MPI acknowledges that achieving 100% removal of all biosecurity contamination can be challenging or difficult. For this reason, clean vehicles, machinery and equipment are verified against contamination tolerance thresholds. Thresholds are specific for various types of biosecurity contamination depending on the associated risk to New Zealand (see Schedule 2, Table 1 of the IHS). MPI will periodically review these levels, and reserves the right to change as required, notifying of amendments to the IHS.

All biosecurity contamination is not equal.

MPI has a nil tolerance (zero) for biosecurity contamination that poses a high-risk to NZ agriculture, environment, horticulture and people. If these biosecurity contaminants are found in or on vehicles, machinery and equipment they will not receive biosecurity clearance. However, contaminants found associated with exhaust systems or radiators that have received prolonged and repeated heating are not considered to be problematic. To ensure clearance is given, MPI recommends you remove all biosecurity contamination from all areas of the vehicle, machine or equipment. Refer to (Schedule 2, table 1 of the IHS for contaminant type thresholds).

Making sure your cleaning or treatment efforts aren't wasted

Clean vehicles, machinery and equipment should be managed in such a way to ensure that once cleaned or treated, recontamination does not occur prior to being presented to MPI for biosecurity clearance on arrival. This may require thought and planning into when, how and where the item(s) are stored prior to shipping and how the shipper manages the risk of biosecurity recontamination of cargo during importation. For example, held in an enclosed, secure area, held securely within an impervious cover, held within a sea container or separated effectively from untreated cargo.

4.4.3 Contamination levels associated with vehicles, machinery and equipment

There are two levels of contamination that relate to vehicles, machinery and equipment that MPI is concerned about. They fall into the following two categories:

1. Non-compliant, contaminated (not grossly contaminated) vehicles, machinery and equipment.

These items do not meet MPI requirements. They exceed the thresholds for biosecurity contamination specified in the *IHS for Vehicles, Machinery and Equipment*, Schedule 2, Table 1. Such vehicles, machinery and equipment will be directed by an MPI Inspector to be cleaned or treated at an MPI approved Transitional Facility (TF). Associated costs will be the responsibility of the importer.

2. Non-compliant, grossly contaminated vehicles, machinery and equipment.

These items significantly exceed the thresholds for biosecurity contamination. Gross contamination is considered to be significant contamination and needs substantial cleaning, decontamination or treatment. An MPI Inspector is likely to prevent unloading of a grossly contaminated item and will direct the importer to reship out on New Zealand. An MPI Inspector will also determine whether live pests (including egg masses) need to be treated on board the vessel before re-shipment. Associated costs will be the responsibility of the importer.

4.4.4 How does MPI manage biosecurity risk associated with vehicles, machinery and equipment once it has arrived in New Zealand?

Under the Act, vehicles, machinery and equipment (including components and parts) are considered risk goods and therefore must be held securely in a TF until biosecurity clearance is authorised by MPI. Items will be directed to a TF that is approved for these risk goods. The *Standard for Transitional Facilities for General Uncleared Risk Goods* (TFGEN) and the associated TFGEN guidance document https://www.mpi.govt.nz/importing/border-clearance/transitional-and-containment-facilities/ contains the requirements and guidance for how biosecurity contamination and regulated pests are managed at TFs in NZ.

4.4.5 MPI-approved treatments and approved systems can be used to meet clean requirements.

The IHS requires that all MPI-approved treatments and systems ensure they are effective for cleaning and/or treating vehicles, machinery and equipment. The MPI approval process requires documented proof of effectiveness when approving cleaning and treatment methods and service providers. MPI also may verify systems and treatments to ensure the process and procedures carried out are those that were approved and documented.

Treatments:

MPI has approved treatments that can be used to meet the requirements of the IHS. These include relevant cleaning, fumigation and heat treatment as specified in the MPI Technical Standard - <u>MPI-Approved</u> <u>Biosecurity Treatments</u> If decontamination or treatment is carried out to address the biosecurity risk and this results in damage, MPI will not be held liable. While MPI may direct treatment or decontamination activities, the arrangement is between the treatment or decontamination provider and the importer. MPI aims to ensure that only suitably qualified treatment suppliers are approved in NZ. If the importer does not wish for decontamination or treatment activities to take place, re-shipping arrangements may be made under some circumstances. MPI reserves the right to direct decontamination or treatment on arrival when biosecurity requirements are not met.

MPI-Approved Systems:

Any person or organisation may request a MPI CTO to approve a system that can be shown to achieve the biosecurity requirements of the IHS.

An MPI-approved system may be used to import vehicles, machinery or equipment and include processes and procedures that collectively meet the requirements of the IHS, producing clean vehicles, machinery and equipment that are free of biosecurity contamination. An example of MPI-approved systems that operate under the vehicles, machinery and equipment IHS are those systems that are approved to export vehicles, machinery and equipment from Japan. The criteria and process for system applications are available on the MPI website, "MPI Approval and Review of Vehicle Systems". Refer to:

http://www.mpi.govt.nz/importing/other/vehicles-and-machinery/ - Go to: Quick Links - Vehicle Systems.

An MPI-approved system may be applied on a smaller scale and involve less processes and procedures to collectively meet the requirements of the IHS. Management of BMSB from countries specified in schedule 3 of the IHS can be achieved by use of an MPI-approved system that ensures the risk of BMSB is adequately managed by importers from pre-production through to arrival in New Zealand. Information for applying for an approved system to manage BMSB is available in schedule 5 of this document.

No system will be recognised as acceptable for meeting the requirements of the standard unless first formally approved by MPI.

4.4.6 What information does MPI require from the importer?

You will need to supply the appropriate information to MPI in order to confirm that vehicle, machinery and equipment requirements have been met. This is needed for MPI to decide on and provide appropriate intervention for your vehicle, machinery or equipment on arrival. It is recommended that you phone 0800 00 83 33 or contact the local MPI office directly for operational details relating to the required documentation.

If the required cleaning, treatment and condition (new or used) information is not presented in the manner required these factors will not be recognised and item may receive greater MPI intervention.

On arrival MPI may verify cleanliness of all types of vehicles, machinery and equipment, irrespective of certification for cleaning and/or treatment(s) carried out.

(1) New Items

If vehicle, machinery and equipment is new (never used), evidence needs to be provided to MPI to support this. If there is no evidence to show the vehicle, machinery and equipment is new, the items will likely be treated as used and be subject to increased intervention on arrival.

(2) MPI-approved vehicle systems

In the case of the MPI CarShips Programme, shipping companies should provide evidence of the clearance type to MPI (in the appropriate format) via manifest into the CarShips Database.

(3) Certificate of cleaning and dismantling – Part 3.1 (1 - 4) of the IHS

Importers must provide certified evidence to MPI prior to shipment that used agricultural, forestry and horticultural vehicles, machinery and equipment (including parts) and used wire cables have been cleaned and treated or have been processed through an MPI-approved system.

Cleaning may include full or partial disassembly and the removal of filters and panels, steam cleaning and/or water blasting. Appropriate certification for cleaned or treated agricultural, forestry and horticultural items and used wire cables as specified in the IHS must include:

- a) The name of the company conducting the cleaning or treatment (or exporting company if it is the same entity).
- b) An identification number or accurate description of the cleaned or treated items.
- c) An official signature from the cleaning or treatment company representative and date of cleaning or treatment.
- (4) Certification of treatment.

Where treatment(s) have been carried out in country of origin, importers must provide evidence to MPI that vehicles, machinery and equipment have been treated appropriately or have been processed through an MPI-approved system. Treatment certification is required as per section 2.1 of the IHS. Refer to checklist tables for quick reference of what treatment is required and where this can be carried out in order for the treatment to be recognised as meeting the requirements for various types of vehicles, machinery and equipment. All treatment of vehicles, machinery and equipment may be subject to MPI verification on arrival.

4.4.7 Vehicles and machinery should not be used to transport other goods (unless associated parts or components of vehicle or machine)

If you have spare tyres on rims, spare parts or tools that are normally associated as part of your vehicle or machinery, these are permitted to be carried as part of the vehicle or machinery. However it is recommended that vehicles and machinery that have been inspected, cleaned or treated offshore are not utilised for carrying uncleared risk goods or unrelated cargo that may require additional cleaning or treatment on arrival in NZ. Potential items could include spare parts, personal effects or used tyres that are not on rims or deflated that could be placed inside the boot/truck or cab space. If these items are accompanying the vehicle or machinery, you need to declare and package them separately so that cleanliness requirement can be verified on arrival. Any unloading, treatment, additional inspection costs or time delay around clearance will be your responsibility as importer.

4.4.8 What are the Biosecurity requirements for new vehicles, machinery and equipment?

New vehicles and machinery must comply with the requirements of the IHS and may be subject to MPI compliance checks such as inspection on arrival. New vehicles, machinery and equipment are subject to the same contaminant and pest thresholds, used for used vehicles, machinery and equipment (refer to Schedule 2, Table 1 of the IHS). If contamination is found in/on new vehicles, MPI may request information on how biosecurity is managed between manufacture and arrival in New Zealand.

If MPI determines that any contamination or infestation is a result of deficiencies in the biosecurity management of the export supply chain or manufacturing processes for new vehicles or machinery, then biosecurity clearance is likely to be delayed due to increased MPI scrutiny. Importers will then have to provide evidence that management has been modified to effectively manage any further biosecurity contamination for future consignments. Note: Part 3.4 of the IHS specifies that all new (and used) vehicles and machinery from the countries specified in Schedule 3 of the IHS must be managed for BMSB as per clauses (1) to (5).

4.4.9 How to ensure your vehicle, machinery or equipment is compliant with the IHS and receives clearance.

The outcome of the IHS is for all new or used vehicles, machinery and equipment imported into NZ to arrive clean and free of contamination to the Schedule 2 (Table 1) of the IHS. If your vehicle, machinery or equipment is found to be contaminated and non-compliant with the IHS, it will not be provided with biosecurity clearance on arrival.

Follow the guidelines below to help ensure vehicles, machinery and equipment will receive biosecurity clearance:

- 1. It is recommended that importers talk to MPI before vehicles, machinery or equipment are imported about requirements and MPI-approved cleaning or management systems. MPI's advice/assistance before export will help to minimise costs and delays.
- 2. MPI wants contaminants and pests to be removed in the country of origin rather than be rejected or treated on arrival in NZ.
- 3. MPI recommends that all used vehicles and machinery are made to look as clean and new as possible, being thoroughly cleaned inside and out, with all rubbish removed, and vacuumed and washed as required.
- 4. MPI wants importers to ensure that any cleaning system used is proven to consistently and effectively meet the contaminant threshold levels (Schedule 2, Table 1 in the IHS).
- 5. MPI wants importers to provide the required documentation or information to identify each vehicle or machine to MPI

Some vehicles and machinery that don't require mandatory decontamination (for example, certified cleaning or treatment) may be considered to be of a higher risk status than usual given the environment used within or the particular type of vehicle or machine. Decisions on whether on-arrival treatment is required will be made by an MPI Inspector on a case-by-case basis depending on the risk posed.

You should discuss with MPI if you have concerns over your vehicle, machinery or equipment being higher biosecurity risk status than usual. MPI may consider the option of sending MPI Inspectors to export countries to supervise cleaning and/or treatment to facilitate compliance; and minimise costs and delays to obtaining biosecurity clearance in NZ.

MPI may also inspect targeted items especially where contamination has been found previously. Items that are more likely to require cleaning or treatment include:

- a) New vehicles and machinery, or vehicles and machinery that have been exposed to biosecurity contamination or infestation during transit to NZ.
- b) New or used vehicles and machinery having used wire cables attached to them such as 4 wheel drive vehicles (other than those associated with used agricultural, forestry and horticultural machinery which must receive mandatory treatment).
- c) Used vehicles or machinery that, by their history, particular nature, source or type of use, have been determined by an MPI Inspector to require specific inspection and subsequent treatment. For example, it is recommended that used garbage and sewerage trucks from any country and used "classic or vintage" vehicles of all types from any country are thoroughly cleaned/treated and decontaminated before export to NZ. Note: Such cleaning or treatment must be certified as being cleaned out.
- d) Vehicles and machinery showing evidence of water pooling or having being partially or fully submerged (showing biofouling or water marks) excluding traces of water remaining as a by-product of an MPIapproved system or treatment.

4.4.10 Contaminant management in the country of origin

Under Part 3 of the IHS, high-risk categories of vehicles, machinery and equipment require additional cleaning activities or treatments in addition to meeting the clean requirements in part 2 of the IHS. In some instances

the IHS requires that decontamination and/or treatment activities are carried out before departure in the country of origin for these higher risk vehicles or machinery which include:

- All vehicles, machinery, equipment (parts and components) and wire cables from all countries that have been used around agricultural, forestry and horticulture.
- All used cars and trucks from Japan.
- All break-bulk or containerised vehicles and machinery from the countries listed in Schedule 3 of the IHS (unless a BMSB management system has been approved by MPI).

After offshore cleaning activities or treatments have taken place, you should ensure appropriate measures are taken to protect or secure items to prevent recontamination prior to shipping. For example, held in an enclosed, secure area, held securely within an impervious cover, held within a sea container or separated effectively from untreated cargo. The IHS also requires that you provide the appropriate documentation for cleaning or treatment carried out.

Importers of vehicles, machinery and equipment must provide MPI with specific verifiable information on the arrival of these items in NZ as specified in Part 2.1 (1) of the IHS. Importers need to provide certification or information to MPI relating to cleaning systems or treatment (and this can include photographic, video and written evidence). While vehicles and machinery cannot receive biosecurity clearance until they enter NZ, confirmation of cleanliness should be provided to MPI in advance of arrival wherever possible. The information required covers approval of MPI systems and MPI-documented verification of assessment and verification inspections or following implementation of required MPI actions.

4.4.11 Contamination management on arrival

Some types of vehicle, machinery and equipment require specific cleaning and treatment with a choice between it taking place in country or origin or treating on arrival. These include:

- Tyres either containerised or imported as break bulk.
- Vehicle and machinery equipment (components and parts) in a container.

If you choose treatment on arrival the IHS specifies conditions and time frames to follow including where treatment activities can take place, securing of the items to prevent live contamination from escaping and application of a dual action insecticide if required timeframes for treatment cannot be met. Specific items and timeframes where post-arrival treatment is an option are listed in Section 4.5 of this document - Treating in country of origin and supplying the necessary documentation to support that treatment is likely to cut down the time in which clearance is given on arrival.

Note: If on-arrival treatment is intended, don't forget that the item(s) must still arrive in New Zealand clean and free of biosecurity contamination.

4.5 Requirement check for vehicles, machinery and equipment (components and parts), tyres and wire ropes/cables.

Quick reference tables for the various types of vehicles, machinery and equipment and the associated requirements are provide in 4.5.1 to 4.5.6. In some cases the requirements are linked to the nature in which the item has been used and others are linked to the country of export. All vehicles, machinery and equipment types fall in to one of the tables below. If you are in any doubt with regards to what you must do to ensure your vehicle, machinery or equipment meets requirements, contact MPI prior to shipping.

Remember, if your vehicle, machinery or equipment doesn't meet clean requirements and is not free of biosecurity contamination (to contamination thresholds), the item may be re-shipped, decontaminated or treated at your expense.

Note: For vehicles, machinery and equipment from those countries listed in schedule 3 of the IHS, the requirements are for <u>new</u> and <u>used</u> items. All other new vehicles, machinery and equipment from any country must be clean and may be verified by MPI on arrival.

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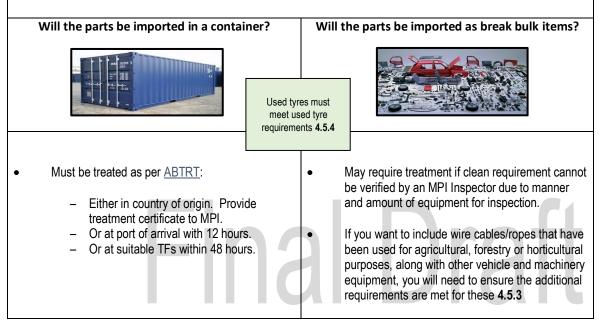
Used Vehicles and Machinery		
Are you importing general use vehicles or machinery?	Are you importing vehicles or machinery that have been used for agricultural, forestry or horticultural purposes?	Are you importing a used vehicle or machinery using an MPI-Approved System?
 Clean vehicle or machinery internally and externally ready for MPI to verify on arrival. 	• You will need to present a cleaning certificate to MPI to prove that internal and external cleaning was completed. MPI will verify on arrival.	 If you're using an MPI- approved vehicle system to import your used vehicle or machinery, the system may be fully responsible for ensuring requirements are
 dismantled during importatio If you're importing a used <u>car</u> or <u>truck</u> from Japan, refer to 4.5.5 If your new or used vehicle is from a country listed in schedule 3 of the IHS, additional requirements apply. Refer to 4.5.6 See schedule 1, 3 or 4 of this compared to the schedule 1, 3 or 4 of this compared to the schedule 1, 3 or 4 of this compared to the schedule 1, 3 or 4 of this compared to the schedule 1, 3 or 4 of this compared to the schedule 1, 3 or 4 of this compared to the schedule 1, 3 or 4 of this compared to the schedule 1, 3 or 4 of this compared to the schedule 1, 3 or 4 of this compared to the schedule 1, 3 or 4 of this compared to the schedule 1, 3 or 4 of the schedule 3 of the schedule 1, 3 or 4 of the schedule 3 of the schedule 1, 3 or 4 of the schedule 3 of	 If your vehicle or machinery is intended for parts either as break bulk (whole or broken down) or as parts in a container, you will need to present a cleaning certificate to MPI in additional to meeting requirements for vehicle and machinery equipment (parts and components) in 4.5.2 Iocument for pictorial guidance to de or machinery is clean. 	 met Or The system may take some responsibility for meeting the IHS requirements along with the importer i.e. importer cleans vehicle and system is used to stop recontamination before arrival in NZ. If you're importing a used <u>car</u> or <u>truck</u> from Japan, a system must be used (4.5.5). The system will ensure the IHS requirement are met in full.
		See MPI website for more info around MPI-approved systems.

Vehicle and Machinery <u>Equipment</u> (Components and Parts)

Vehicle or machinery equipment (components and parts) include whole vehicle or machines that are intended to be broken down for parts.

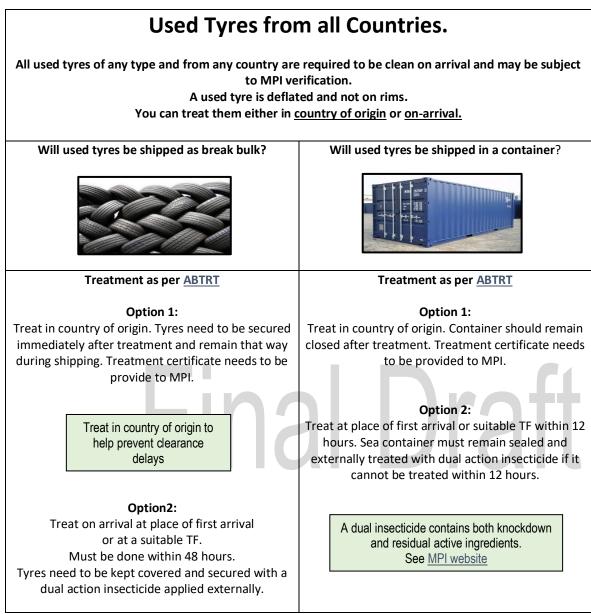
If the equipment has been used for agricultural, forestry or horticultural purposes a cleaning certificate is required – 4.5.1

Parts need to be clean on arrival and may be inspected by MPI for verification.



4.5.3

Importing Wire Cables or Ropes associated with Vehicles or Machinery		
Must be clean and free of biosecurity contamination on arrival May be subject to MPI verification		
	Unravel wire cables/ropes in exporting country to check for contamination.	
Have the wire cables or ropes been used with agricultural, forestry or horticultural vehicles or machinery?	Have the wire cables been used only for purposes not related to agriculture, forestry or horticulture?	
• Must be treated in country of origin as per <u>ABTRT</u> . Provide treatment certification to MPI.	Must be clean on arrival.	



Vehicles, Machinery or Equipment from Japan

Some used vehicles, machinery and equipment from Japan have additional requirements, primarily due to the risk of Asian Gypsy Moth contamination.

You must use an MPI-approved vehicle system which will ensure that requirements are met in full. For definition of cars and trucks see schedule 1 of the IHS.	 You are not obligated to use an MPI-approved vehicle system. The requirements are those listed in 4.5.1 to 4.5.4 The established MPI-approved vehicle systems in Japan may be approved for the particular type of vehicle, machinery and equipment you wish to import and can be used to meet the requirement if you choose. Approved systems may not be approved for the type of vehicle, machinery or equipment you want to import. However, they may offer cleaning services to meet the requirements and may be able to facilitate an offshore clearance by an MPI Inspector who may be based at system sites in Japan. Please discuss your options with an MPI-approved system in Japan.

Importing <u>New</u> or <u>Used</u> Vehicles, Machinery or Equipment from Countries listed in Schedule 3 of the IHS?

Due to the threat of Brown Marmorated Stink Bug (BMSB), there are additional requirements for <u>New</u> or <u>Used</u> vehicles, machinery or equipment imported between 1st September and 30th April, from:

Austria, Bulgaria, France, Georgia, Germany, Greece, Hungary, Italy, Liechtenstein, Romania, Russia, Serbia, Spain, Slovenia, Switzerland or USA. Note: This list is subject to change.



	Will it be held inside a completely enclosed container?	Will it be imported as break bulk?	
•	You must treat in country of origin as per <u>ABTRT</u> and provide the treatment certificate to MPI.	• There are a variety of options that can be used to meet the requirement. See IHS 3.4.1 for these.	
or			
•	Treat in New Zealand as per ABTRT within 48 hours.	h Droft	
I	If you are importing vehicles, machinery or equipment used for agriculture, forestry or horticulture purposes, you will also need to supply a cleaning certificate to MPI 4.5.1		

Appendix

Schedule 1 - Guidance for Cars

Before a new or used motor vehicle arrives in New Zealand, thoroughly them clean to ensure all biosecurity risk material is removed.

While a valet service may make the vehicle look presentable, it doesn't ensure the vehicle will meet the 'clean' biosecurity requirement.

Below are examples of some frequently contaminated vehicle areas and tips to ensure the vehicle arrives in New Zealand free of biosecurity contamination.

Vehicle Interior

Clean Interior areas of a vehicle including the boot, between and under car seats, ceiling areas, floor surfaces, side panels, all compartments, the spare tyre and storage area.



Look for egg masses and insects on spare tyre. Vacuum tyre tray.



Ensure all organic or plant material is removed by vacuuming under and between car seats. Lift rear car seats unless bolted.



Vacuum the boot to remove any contamination.

Vehicle Exterior Clean all exterior surfaces including bumpers, grates, hubcaps, mud guards, trays, tyres and wheels, roof racks and rails.



Remove hubcap, check for contamination, especially eggs masses around tyre and wheel area.



A light road film on the wheel is ok, but more than that is not considered clean.



Look for egg masses, insects and spider webbing around the bumper and grates.



Remove any plant material or pooled water from the vehicle.



Thoroughly check mudguards, tyres and wheel arches. Water blast if required.



If mud guards are covered in felt, thorough scrubbing or water blasting will be needed.

Motor Clean motor area including in and around motor, crevices and bonnet area. Use a torch where required.



Remove contamination around bonnet and grilles.



Wipe down surfaces that may contain plant material, seeds, and soil.



Look in all corners, crevices and hinges.



Look out for reptiles and snakes. They are attracted to warmth and confined spaces such as motors.



If the underside of the bonnet is covered in felt, scrub or water blast to remove plant material and seeds.

Vehicle Underside

Look for animals such as insects, snails, snakes, and spiders; and for plant material, seeds and soil.



Use a bright light to inspect the vehicle underside. A high pressured water hose can help clean what you may not be able to see.

Best ways to remove contamination:

- Animal excrement or soil high pressure hose on exterior.
- Egg masses Remove all traces
- Insect, snail or spider infestation If you can see many insects or spiders in or on the equipment, fumigation or heat treatment should be carried out.
- Insects, snails and spiders remove. Spray a strong residual insecticide over surrounding areas especially where visibility of all components and parts is poor.
- Plant material remove. If found in the interior use high pressure air and/or a vacuum cleaner. If the plant material is on the exterior a high pressure hose or water blaster can be used to dislodge the contamination.
- Seeds hand pick seeds off with sticky tape or equivalent. Loose seeds can be vacuumed from interior or hosed off exterior.

Inspection Checklist:

Below is a check list to follow to ensure all areas of the car have been cleaned prior to importation.

Steps	Area to inspect and clean	Complete 🗸
1	Clean the grille and front of vehicle.	
2	Clean across and under the bonnet and air vents.	
3	Clean front wheel, mud guards and wheel arch.	
4	Clean mirrors and window ledges.	
5	Clean across and around the roof including roof rails.	
6	Clean back wheel, mud guards and wheel arch.	
7	Clean back bumper area.	
8	Repeat the entire process on the other side of the vehicle.	
9	Open bonnet and thoroughly clean motor area. Remember to use a torch to make	
	sure all motor crevices have been cleaned.	
10	Clean all interior areas of vehicle, including all compartments, under carpet if	
	loose, under mats, between and under the seats.	
11	Clean the underside of vehicle.	

Please note: If personal effects are accompanying a vehicle, you need to declare and package them separately as MPI Inspectors must be able to verify the cleanliness of the vehicle on arrival. Any associated unloading or additional inspection costs will be the responsibility of the importer.



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Schedule 2 – Guidance for Trucks

Before a used truck arrives in New Zealand, thoroughly clean it to ensure all biosecurity risk material is removed.

Make sure you thoroughly inspect internally and externally. A bright light will be needed to inspect the underneath of the truck.

Any associated biosecurity risk with a truck needs to be removed. For example, a rubbish truck must arrive with all rubbish or sludge removed and should be stream cleaned. Any removal and quarantine destruction costs will be at the responsibility of the importer and could lead to re-shipping.

Below are examples of some typical areas of a truck and tips for ensuring the truck arrives in New Zealand free of biosecurity contamination.

Wooden trays and decks:

Any wood on the truck needs to be inspected and may required treatment. Surface fungi (mildew) is not considred a contaminant if it can be wiped from a surface, however fungi that is embedded must be treated or the wood removed. Drain any pooled water from these areas.



Check rotten wood for insect infestation, larvae and maggots. Rotten wooden will need to be treated or removed.



If fungal structures (fruiting body) are present, wood will need to be removed or treated.

Exterior of truck

All external surfaces of the truck need to be clean of insects and insect egg masses, plant material, seeds and soil. Exterior surfaces including panels, doors, bumpers, trays, tyres, wheels, mud guards, hubcaps and the whole underside of vehicle.

Tyres, wheels and wheel arch area:

Thoroughly clean areas to remove insects, insect egg masses, plant material, seeds and soil.



Water blast tyres and mud guards. A light road film is ok but anything more than this is not considered clean



Use a bright light to illuminate dark areas behind wheels. Insect egg masses are common in these areas.

Motor area:

The cab of the truck needs to be lifted to inspect the motor for contamination including animals, insects, egg masses, plant material and soil. Care needs to be taken to inspect any other parts that are difficult to access.



Clean the radiator and surrounding area removing all contamination. An air gun or vacuum can help remove contamination from crevices around motor.

External surfaces, panels and frames:

All external surfaces of the truck needs to be cleaned including windows and door frames, railings, sliders, opening to compartments and between panels.



Interior:

All interior areas of the truck including between and under car seats, ceiling areas, floor surfaces, side panels, all compartments, and storage areas.



Lift up seats to clean behind. Look out for insects or insect egg masses.



If motor is accessible from cab, use a vacuum or air gun to remove any contamination.



Removal all rubbish. Pull back all carpet and plastic/rubber mats and vacuum.

Underside of vehicle:

The underside of the truck includes a large amount of surfaces where animals, insects, egg masses, plant material, snakes, spiders and soil may be found.



Use a bright light to inspect what you can of the vehicle underside such as plant material or soil (circled). A high pressured water hose can help clean what you may not be able to see.

Best ways to remove contamination:

- Animal excrement or soil high pressure hose or water blaster on exterior.
- Egg masses Remove all traces.
- Insect, snail or spider infestation If you can see many insects or spiders in or on the equipment, fumigation or heat treatment should be carried out.
- Insects, snails and spiders remove. Spray a strong residual insecticide over surrounding areas especially where visibility of all components and parts is poor.
- Plant material remove. If found in the interior use high pressure air and/or a vacuum cleaner. If the plant material is on the exterior a high pressure hose or water blaster can be used to dislodge the contamination.
- Seeds hand pick seeds off with sticky tape or equivalent. Loose seeds can be vacuumed from interior or hosed off exterior.

Inspection Checklist:

Below is a check list to follow to ensure all areas of the truck have been cleaned prior to importation.

Steps	Area to inspect and clean	Complete 🗸
1	All internal areas of truck including between and under seats, internal walls and surfaces, internal compartments, foot and pedal areas.	
2	External Area: Motor.	
3	External Area: Wooden decks and trays.	
4	External Area: Entire underside of truck.	
5	External Area: Tyres, wheels, wheel arch and mud guards.	
6	External Area: All other exterior surfaces including panels, window and door frames, roof.	
7	Removal of any rubbish, items, liquids etc. that the truck may have been used to transport.	
8	If earth moving equipment is part of the truck (i.e. attached crane), ensure this cleaned also.	

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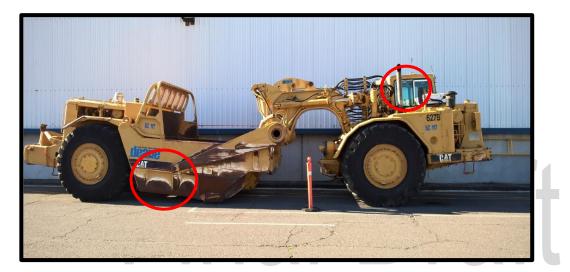
Schedule 3 – Guidance for Earth Moving Machinery

Before used earth moving machinery arrives in New Zealand, thoroughly clean machinery to ensure all biosecurity risk material is removed.

Dismantle and import in parts as much as possible for faster clearance on arrival.

Below are examples of some common machinery areas and tips for ensuring the machinery/vehicle arrives in New Zealand 'clean' and free of biosecurity contamination.

Cleaning machinery/vehicle



Interior:

- Make sure all biosecurity risk material is removed.
- Remove all rubbish.
- Vacuum up any soil or seeds from interior.
- Use an air gun for any contamination lodged in crevices or hard to reach places.
- Check there are no insects or insect masses on any internal surfaces.

Exterior:

- Dismantle machinery where possible to inspect and clean thoroughly.
- Clean all exterior areas of machinery to remove insects, egg masses, plant material, seeds and soil.
- Use a high pressure water sprayer to remove what you may not be able to see underneath.
- Inspect all hinges and components.
- Use a torch to inspect dark areas under or within the machinery.
- If tyres are present make sure the tyre and surrounding areas are thoroughly inspected and cleaned as these are common areas for egg masses.



Inspect the entire boom area. Clean all hinges, swivel points and between the entire lengths of cable bundles.



Inspect and clean filters, grates and grilles for contamination caught within. Where possible remove these parts and leave off during importation.

Machinery tracks Tracks are a high risk area due to being the contact point with soil and other biosecurity contaminant which



Waterblast all track pads, track chains and other cavities to ensure they are free of soil and other contaminants. Deconstruct as much as possible panels and plates off during importation. This includes non-affixed panels, rock guards and motor covers.



Ensure buckets, grabs or other areas that come in contact with soil are clean.



Clean anywhere cables or wires are clustered together.



Inspect all wheel arches/joining for contamination, especially insect or spider egg masses.



Clean small areas where plant material may have collected.



Clean open areas that may contain contamination.



Clean hinges for contamination or insect webbing.

Best ways to remove contamination:

- Animal excrement or soil high pressure hose or water blaster on exterior.
- Egg masses Remove all traces
- Insect, snail or spider infestation If you can see many insects or spiders in or on the equipment, fumigation or heat treatment should be carried out.
- Insects, snails and spiders remove. Spray a strong residual insecticide over surrounding areas especially where visibility of all components and parts is poor.
- Plant material remove. If found in the interior use high pressure air and/or a vacuum cleaner. If the plant material is on the exterior a high pressure hose or water blaster can be used to dislodge the contamination.
- Seeds hand pick seeds off with sticky tape or equivalent. Loose seeds can be vacuumed from interior or hosed off exterior.

Inspection Checklist:

Below is a check list to follow to ensure all earth moving machinery has been cleaned prior to importation.

<u></u>		<u> </u>
Steps	What's Required?	Complete 🗸
1	Full interior clean.	
2	Full exterior clean.	
3	Breakdown of machinery and tracks where possible.	
4	Equipment exported to New Zealand in a dismantled state (as much as possible).	

Schedule 4 – Guidance for high risk vehicles and machinery used with agriculture, forestry or horticulture.

Before used agricultural, forestry or horticultural machinery arrives in New Zealand, thoroughly clean to ensure all biosecurity contamination is removed.

The item must be fully cleaned internally and externally and a cleaning certificate needs to be presented to MPI.

Dismantle and import in parts as much as possible for faster clearance on arrival.

Below are examples of some commonly contaminated agricultural, forestry and horticultural machinery areas and tips for ensuring that items arrives in New Zealand free of biosecurity contamination.

Dismantling:

Dismantle/remove all parts and panels around the internal components of the machinery. Be sure to leave these panels off when exporting.



Break down all possible parts of the machinery to remove all contamination.



Remove panelling to fully clean and leave panelling off during importation where possible.

Exterior cleaning

Dismantle or open all possible compartments. Clean exterior areas of machinery with a high pressure spray. Ensure all animal excrement, plant material and soil has been removed.





Look out for these common areas of contamination



Clean small areas/hollows where contamination may be caught.



Clean between cables for plant material, seeds and soil.



Clean hinges and axels where plant material may be caught.



Open all possible compartments for cleaning. Use high pressure air or a vacuum with an adaptable head where required.



Remove all plant material trapped between small crevices and cables.



Remove all plant material caught in the comb/teeth. Dismantle and clean all internal compartments.



Clean all areas that have had contact with plant material and soil. Check all component hinges. Shine a bright light up any metal structures that are hollow.

Best ways to remove contamination:

- Animal excrement or soil high pressure hose or water blaster on exterior.
- Egg masses Remove all traces.
- Insect, snail or spider infestation If you can see many insects or spiders in or on the equipment, fumigation or heat treatment should be carried out.
- Insects, snails and spiders remove. Spray a strong residual insecticide over surrounding areas especially where visibility of all components and parts is poor.
- Plant material remove. If found in the interior use high pressure air and/or a vacuum cleaner. If the plant material is on the exterior a high pressure hose or water blaster can be used to dislodge the contamination.
- Seeds hand pick seeds off with sticky tape or equivalent. Loose seeds can be vacuumed from interior or hosed off exterior.

Inspection Checklist:

Below is a check list to follow to ensure all areas of agricultural, forestry and horticultural machinery have been cleaned prior to importation.

Steps	What's Required?	Complete 🗸
1	Full interior clean.	
2	Full exterior clean.	
3	Breakdown of equipment/panel removal.	
4	Cleaning certification issued.	
5	Equipment exported to New Zealand in a dismantled state (as much as possible).	
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Schedule 5 - Importer Guide: MPI-Approved Systems for the Management of the Brown Marmorated Stink Bug (BMSB) from Risk Countries

1. Introduction

MPI is responsible for developing and implementing policies and programmes that ensure NZ's environment, and primary industries remain competitive, protected, profitable and sustainable. Regarding the importation of vehicles, machinery and equipment, MPI seeks to achieve these outcomes by working with exporters and importers of vehicles, machinery or equipment. This is to achieve appropriate biosecurity management for those items and minimise the risks of biosecurity contaminants and regulated pathogens and pests entering NZ.

MPI –approved systems involve the MPI's acceptance of detailed, seasonal pest risk management plans and systems in the exporting country as an alternative to mandatory pre-shipment treatment requirements or other regulatory interventions that are applied to vehicles, machinery or equipment arriving in NZ.

2. Purpose and scope of this document

This guide outlines how MPI –approved systems can be used across the commercial and operational supply chain to manage the seasonal threat of the Brown Marmorated Stink Bug (BMSB) from countries specified in Schedule 3 of the IHS – <u>Vehicles, Machinery and Equipment</u>. An MPI –approved system is designed for manufacturers, exporters and importers and service providers to importers of vehicles, machinery or equipment involved in the cargo and shipping pathway from exporting countries to NZ, and provides information about:

- MPI –approved system eligibility requirements;
- The MPI –approved system approval process; and
- Additional resources and support material that is needed to prepare a proposal for MPI –approved systems.

However, this guide does not specify a definitive set of requirements for an individual MPI –approved system. MPI recognises that every importer and manufacturer combination is different and no single set of criteria will meet the needs of all stakeholders, nor will they manage all associated biosecurity risks as may be desirable. In addition, an MPI –approved system will not override other Import Health Standard requirements but an MPI –approved system is designed to support exporters and importers meeting the requirements of the IHS. MPI also reserves the right to decline any proposal submitted or cancel an MPI –approved system.

3. General eligibility and responsibilities

For an MPI –approved system to be approved, the proposal must provide MPI with assurance that the vehicles, machinery and equipment being imported have been effectively managed (such as from the point of manufacture, through pre-shipment storage and shipping to NZ). The MPI –approved system proposal should address the intended arrangements and impacts across the supply chain from the point of manufacture to arrival in NZ. MPI will only accept MPI –approved system proposals from manufacturers or suppliers in exporting countries when a NZ importer is clearly identified in the MPI –approved system proposal. The importer will also be responsible for applying any biosecurity measures at a NZ Place of First Arrival (PoFA) or at TFs as directed by MPI due to a supply system failure or a change in the risk posed by BMSB.

Operating under an MPI –approved system does not transfer MPI's legal powers to importers. It allows MPI to direct importers to implement defined functions, such as administrative or operational management procedures, or pest management, or movement, storage and treatment of vehicles, machinery and equipment without direct supervision by MPI.

MPI will consider MPI –approved systems where:

- Existing importers can demonstrate a good history of compliance with biosecurity requirements.
- It involves integrated components (procedures and processes) that adequately manage imported vehicles, machinery or equipment with regard to BMSB during pre-production, production, postproduction and transportation phases before arrival in NZ.
- The volume or nature of vehicles, machinery or equipment makes the MPI –approved system a viable option for all parties.

Importers are responsible for:

- Complying with the requirements of their MPI –approved system (in order to meet the requirements of the IHS).
- Developing/maintaining business practices that can effectively manage biosecurity risks.
- Monitoring and evaluating the effectiveness of their MPI –approved system.
- Notifying MPI of any expected changes to their circumstances or their practices or procedures once approved.
- Providing MPI with information and evidence to support a request for an MPI –approved system.

MPI is responsible for:

- Evaluating and approving MPI –approved systems.
- Monitoring the ongoing performance and effectiveness of an approved MPI –approved system.

4. The Application Process

Information provided in an MPI –approved system must be accurate and supported by evidence such as maps and photographs of the manufacturing plant, a pest management plan, and storage areas. Evaluation will not commence until MPI is satisfied that all information necessary to make a decision has been provided. MPI also reserves the right to decline any proposal submitted or cancel an approved MPI –approved system. A detailed proposal will enable MPI to better evaluate:

- All processes in the supply chain.
- Changes and improvements that need to be made.
- What is being done or is being proposed to manage the biosecurity risk posed by BMSB across the supply chain.
- What is required and how well these outcomes can be achieved.

4.1 How to apply

For approval to be granted for an MPI –approved system prior to the commencement of the applicable BMSB season, applications need to be received and approved by MPI before the 1st of September of any year. MPI recommends that importers provide an MPI –approved system application well in advance. Where applications are received or approved after the 1st of September, pre-shipment treatment requirements will apply until that MPI –approved system is approved. All applications must be submitted to MPI by emailing standards@mpi.govt.nz with a covering letter outlining the proposal and with appropriate contact information. The following support material is a list of information that should be provided to MPI for assessment of the MPI –approved system application:

4.1.1 Basic information on the organisation.

- A main contact point for person responsible for the system offshore and onshore.
- Product information (vehicle, machinery or tyre data) and other risk goods (for example, containers and packaging or wrapping used in or around the vehicles, machinery or equipment).
- The volume or frequency of vehicles, machinery or equipment being exported to NZ.

4.1.2 Description of the existing or proposed pest management system in the country of export.

- An overview of current (or intended) practices, processes and procedures that will provide equivalent or improved biosecurity controls for BMSB across the import pathway.
- Arrangements for data collection, internal audits, ongoing monitoring and reporting on BMSB.
- Contingency arrangements to manage system failures regarding BMSB.
- Information on how vehicles, machinery or equipment will be stored after manufacture and measures taken to ensure BMSB infestation cannot or will not occur during storage and/or in transit to NZ (such as shrink wrapping and protecting exposed areas, containerising such items if possible, or storing vehicles, machinery or equipment undercover and away from possible BMSB entry points).
- Information on how vehicles, machinery or equipment will be stored after being through the system and prior to loading on board a vessel.
- Other pest management measures including traps in the vicinity of the plant to monitor BMSB. The websites Rutgers (njaes.rutgers.edu/stinkbug) and Stinkbug-info (stinkbug-info.org) have BMSB monitoring information.
- Pest management measures already in place or proposed internally in the manufacturing plant to monitor for incursions of BMSB and other seasonal pests (for example, bug traps, bug zappers, dualaction (knockdown and residual) pesticide management programmes).
- Planned surveillance measures for checking the external surfaces of the plant's buildings for BMSB aggregations in the peak season.

4.1.3 Description and location of vehicle, machinery or tyre production facilities

- How the VMT are to be transported between the manufacturer and the port of loading.
- Location details (metropolitan/rural) and surrounding environment (e.g. proximity to open fields, agricultural land, forest).
- The type of building(s) where VMT are manufactured, and their date of construction.
- Travel distance between the manufacturer and the port of loading, including the type of rural areas the VMT will travel through.

4.1.4 Description of proposed communication activities and staff training

- Awareness training for staff, for example, identification posters on notice boards, company newsletters to staff, other relevant information as required. Note: MPI has information on BMSB that can be requested.
- Liaison with regional biosecurity authorities in applicable countries for updated information on BMSB with sufficient time to modify management of controls as required before the 1st of September of any year.

5. MPI's Approval process

On receipt of a proposed MPI –approved system from an organisation (shipper/manufacturer/importer) with relevant supporting information such as assembly line plans, facility entry points, pest system certification and reports, photographs and storage area maps; MPI will conduct an MPI –approved system evaluation and advise the organisation if any further information or measures are needed. MPI may need to visit any site stated within an MPI –approved system to obtain additional information on the supply chain from the exporting country to NZ on a cost-recovered basis. Approval of the MPI –approved system will be granted once MPI is satisfied that the system is capable of mitigating the risk associated with the supply chain from manufacture to arrival in NZ.

6. BMSB Management Period under MPI – approved systems

MPI –approved systems will apply to all vehicles, machinery or equipment shipped from the specified BMSB countries from the 1st of September to the 30th of April of any year. If there is an infestation discovered in these vehicles, machinery or equipment, emergency measures may need to be reactivated, which may cause

the MPI –approved system to be refined or cancelled depending on the risk assessment at that time, in consultation with the importer.

7. Public Information Regarding MPI – approved systems

A list of approved manufacturers, exporters and importers and the vehicles, machinery or equipment specified under their MPI –approved system will be published on MPI's website. This will provide some surety to the supporting industry (including transport companies and shipping lines, and stevedores) that the vehicles, machinery or equipment in question represent a lower risk of BMSB infestation and will be permitted to be discharged at a PoFA. This is, unless MPI has identified emerging biosecurity threats on the consignment which may result in the cancellation of the MPI – approved system or additional actions required by MPI.

Other information provided by exporters and importers to support their proposal will only be used for evaluation purposes. It will not be used or disclosed to third parties for any other purpose except where consent is provided or MPI is legally required to do so. Importer information will be used and stored in accordance with the Official Information Act (1982).

8. Fees and charges

All costs associated with development and submission of the application is incurred by the organisation seeking approval of an MPI –approved system. Fees will be payable under the MPI Cost Regulations including the assessment of such alternative arrangements, regardless of whether final approval is granted.

9. Monitoring performance

MPI will verify the ongoing performance of any MPI –approved system through verification inspections and surveillance activities. At MPI's request, importers (in association with exporters) need to demonstrate that they can and will continue to meet the requirements of the MPI –approved system. MPI may request, additional information including:

- Administrative requirements such as records of activity or compliance reports, documented quality standards, and staff training documentation.
- Compliance requirements: internal or third party audit results.
- Operational requirements: awareness, contingency plans (if a BMSB is intercepted on or near the premises), documented procedures for staff and technical training.
- Physical requirements: pest management records, scheduled maintenance records.

10. Compliance for Approved Vehicle Clearance Systems

If an approved system is not operational over a 12 month period or fails to be operational within 12 months of the approval, MPI will provide a written notice to the system operator suspend the approval until the system has successfully been through a reassessment process. This includes meeting any re-establishment criteria, which may be distinct from the approval process.

Agreed verification or review processes will inform MPI if the system in place meets biosecurity requirements. If the system does not meet biosecurity requirements MPI may increase assessment or verification frequencies as part of an agreed process, then by written notice to the system operator may suspend approval until specified remedial actions are completed.

MPI may notify the operator of a change to biosecurity requirements due to a new perceived risk associated with a good. If the operator does not provide the required process to manage this new risk, MPI may, by written notice to the system operator, amend the approval for that particular vehicle clearance system to address it.

If MPI is not satisfied with the system, approval may be revoked by MPI via written notice to the operator.