



Review of Submissions:

Consultation on amendments to Facility Standard: Post Entry Quarantine for Plants

Prepared by the Plant Product Imports Team

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1 Introduction

1.1 Consultation overview

The Ministry for Primary Industries (MPI) consulted on the facility standard *Post Entry Quarantine for Plants*.

Consultation took place between 14 December 2021 and 23 February 2022.

1.2 Submissions received through public consultation

MPI received a total of four submissions.

Submissions received through public consultation

#	Name	Organisation
1	Rod Hitchmough Scientific Officer (Biosecurity)	Department of Conservation—Te Papa Atawhai
2	Anna Rathé	Horticulture New Zealand
3	Jude Redington	ArborGen ANZ Limited Partnership
4	Stephen Coulter	Coulter Advisory

The submission from the Department of Conservation – Te Papa Atawhai was generally supportive, with no specific comments on the proposed changes.

The other three submissions addressed one or more specific changes. Those comments are summarised and addressed below.

Comments that were out of the scope of the proposed changes have been collated and will be held on file and taken into consideration for future reviews of the standard.

2 Review of submissions

2.2 Submissions on proposed changes to pressure differential requirements for L3B facilities

MPI proposed revising section 4.4.1.2 of the standard to read:

- (1) *A ventilation system that establishes a negative pressure in the facility must be provided so that there is a directional airflow throughout the facility, from clean (lowest risk) areas toward the potentially contaminated (highest risk) areas.*
- (2) *Each greenhouse room/unit must be maintained at a negative air pressure relative to corridors and/or adjacent laboratory areas within the facility.*
- (3) *The air pressure within greenhouse rooms/units must:*
 - a. *remain at least 12.5 Pa below that of adjacent areas within the facility when door closed, and*
 - b. *remain at least 25 Pa below the atmosphere outside the facility.*

2.2.1 Specific feedback

Horticulture New Zealand commented that the proposed wording is not clear or explicit in what is meant by clean areas (lowest risk) and potentially contaminated areas (highest risk).

2.2.2 MPI response

MPI notes that anyone assessing a facility to determine which areas are of higher risk of contamination will need to consider the layout and operation of the individual facility.

We have added information to the guidance document in response to this submission.

2.3 Submissions on proposed changes to anteroom requirements

2.3.1 Proposed changes

MPI proposed revising sections 4.2.1.2(1) and 4.3.1.2(1) of the standard to read:

- (1) *An anteroom must be installed at each entrance/exit to the facility (excluding emergency exits). The anteroom is part of the facility and must:...*

We proposed revising section 4.4.1.3(1) of the standard to read:

- (1) *An anteroom must be installed at each entrance/exit to the facility (excluding emergency exits). The anteroom is part of the facility and must:*
 - a) *comply with the requirements of section 4.4.1.1 and 4.4.1.2...*

We also proposed that addition of elbow-operated mechanisms for hand basins in anterooms for L3A and L3B facilities.

2.3.2 Specific feedback

Horticulture New Zealand supported the clarification that anterooms are part of the facility.

Coulter Advisory submitted that elbow-operated mechanisms for basins are not best practice, because users tended to use their hands rather than elbows.

2.3.3 MPI response to feedback

The proposed amendment to specify that the anteroom is part of the facility for anterooms has not changed.

MPI noted that while some existing facilities have elbow-operated mechanisms for hand basins, and these do comply with the requirement to be “hands-free”, they are not best practice. While elbow-operated mechanisms are not prohibited, we agree that they should not be included in the standard as an endorsed example.

On further consideration, MPI noted that the proposed change to require anterooms in L3B facilities to comply with the ventilation requirements (section 4.4.1.2) does not take into account facilities where the anteroom opens to the outside environment, such as the stand-alone SmartLabs operated by the Plant Health and Environment Laboratory. If those anterooms are held at negative pressure, it will be difficult to prevent pests entering the facility from the New Zealand environment, which could complicate the quarantine process.

Consequently, we consider that requiring anterooms for L3B facilities to operate with inwards directional airflow is not appropriate for standalone facilities. However, it is necessary to have measures in place to prevent pest and pathogens entering the facility from outside and escaping from within the facility.

We have revised section 4.4.1.3(1):

- (1) *An anteroom must be installed at each entrance/exit to the facility (excluding emergency exits). The anteroom is part of the facility and must:*
 - a) *comply with the requirements of section 4.4.1.1,*
 - b) *be insect proof and free from recesses which may conceal insects or other pests;*
 - c) *be large enough to allow one door to remain closed at all times (including when moving plants and equipment in or out of the facility);*
 - d) *contain an area for storing protective clothing to be worn when in the facility;*
 - e) *contain a hand basin with a hands-free mechanism, paper hand towels and soap. The hand basin may also be located in an enclosed room immediately adjacent to (and connected to) the anteroom;*
 - f) *contain an approved waste container.*
- (2) *Equipment (other than items listed above) must not be stored in the anteroom.*
- (3) *Structural, mechanical and/or operational measures must be in place to prevent the escape of pests and pathogens from inside the PEQ when the anteroom doors are open (i.e., when people/equipment/materials enter or exit).*

We have also updated the guidance document to reflect these changes.

2.4 Submissions on proposed changes to growing medium requirements

2.4.1 Proposed changes

MPI proposed revising the following sections

- Sections 4.2.2.3, 4.3.2.4 and 4.4.2.4 to read:
Growing media may be pasteurised before it enters the facility or in the facility prior to use. Inert growing media is not required to be pasteurised.
- Section 4.4.2.4(2)) to state that growing media must be:
 - a. *stored within the facility in closed containers or sealed bags;*
 - b. *stored away from imported plant material.*

We also proposed defining pasteurisation in Schedule 2 of the facility standard:

Pasteurisation

A process whereby organic materials are treated to significantly reduce numbers of plant and animal pathogens and plant propagules.

2.4.2 Specific feedback on growing medium requirements

Horticulture New Zealand agrees with the rationale for requiring growing media used in PEQ facilities to be pasteurised or inert to avoid introducing any domestic organisms to PEQ facilities. Horticulture New Zealand also suggested adding guidance to explain that if pasteurisation of growing media is undertaken within the facility, it should not take place in room/unit containing viable plant material.

ArboGen requested clarification of what media is considered inert.

Submitters also commented on the proposed definition of pasteurisation:

- The definition of pasteurised should include reference to heat treatment and to sterilization or partial sterilisation (Horticulture New Zealand)
- Specify heat (xxx °C for XX minutes) (Coulter Advisory)

2.4.3 MPI response

MPI notes that some confusion arose from including information about pasteurisation in the standard. We have removed the proposed additions and replaced them with the requirement “*Growing medium must be stored in a manner that protects it from contamination, external elements, and degradation*”. We have added more explanatory information about pasteurisation and storage has been added to the guidance document.

There are examples of inert media in the guidance document.

We are not changing the definition of pasteurisation at this time.

2.5 Submissions on proposed changes to operator inspection requirements

2.5.1 Proposed changes

MPI proposed changing the requirements for inspections by the operator set out in sections 4.1.3.4 (L1 open field facilities), 4.2.2.9 (L2 greenhouse facilities), 4.5.2.5 (L2 tissue culture laboratory facilities), 4.6.2.6 (L3 tissue culture laboratory facilities) and 4.7.2.5 (L2 quarantine aquarium facilities) to remove potential conflicts with requirements in import health standards.

We proposed rewording sections that specify a minimum inspection frequency of at least once per week to read:

Plants must be inspected for signs and symptoms of pests and disease at least once per week as described in section 3.6.1; unless a different inspection frequency is required by the relevant IHS.

2.5.2 Specific feedback

Coulter Advisory submitted that this condition should only apply if the IHS required more frequent inspection, with the facility standard specifying the minimum inspection frequency requirement.

2.5.3 MPI response

MPI notes that, at present, not all schedules in the import health standard *Nursery Stock* specify frequency of inspection by the operator.

The proposed amendment retains weekly inspection by the operator, unless the import health standard specifies a more, or less, frequent inspection for a specific commodity.

The amendment brings those facility types into line with requirements for operator inspection in L3A and L3B facilities (sections 4.3.2.9 and 4.4.2.9), which defer to the import health standard in the first instance.

2.6 Submissions on other proposed changes

2.6.1 References to AS/NZS 2243.3

MPI proposed removing the version (year) of standards incorporated by reference from the body of the facility standard.

Coulter Advisory noted that specific sections of AS/NZS 2243.3 (2010) were referenced in the requirements for L3B greenhouse facilities, and L2 and L3 tissue culture facilities text of the facility standard.

MPI notes that future versions of AS/NZS 2243.3 may result in the sections specified being renumbered, causing confusion for those trying to comply with or audit against the facility standard. We have revised sections (4.4.1.2(5), 4.5.1(1), and 4.6.1(1)) to refer only to AS/NZS 2243.3, removing the reference to a specific section of the 2010 version of that standard.

We have added section 1.2(3) to the standard to clarify that the standards incorporated by reference only apply as specified in the standard (i.e., Parts 2, 3 and 4). This means that the requirements set out in the PEQ standard are not subservient to the incorporated documents and only the specified parts of the incorporated documents are imposed as requirements.

2.7 Update on proposed changes to facility hygiene requirements

2.7.1 Proposed changes

MPI proposed changing the requirement for L3A and L3B greenhouse facilities (sections 4.3.2.7(8) and 4.4.2.7(8)) to read:

(8) *Either:*

a) *The facility must have a footbath filled to a minimum depth of 10 mm, or an absorbent foot mat containing disinfectant, placed at the main entrance to the facility (inside the anteroom) and:*

- 1) *must be used by all persons when entering and leaving the facility;*
- 2) *must have disinfectant replaced as required to maintain efficiency;*
- 3) *the facility must have records retained of replacement of disinfectant;*
- 4) *disinfectant must be stored in accordance with label recommendations;*

OR

b) *All people entering the facility must either:*

- i. *use a change of footwear. The in-facility footwear must be kept inside the facility at all times.*

OR

- ii. *wear protective shoe covers. Protective shoe coverings must be removed and disposed of in a waste bin before exiting the facility.*

2.7.2 Update

After further consideration, we have updated the wording in sections 4.3.2.7(8) and 4.4.2.7(8) to read:

“... Protective shoe coverings must be removed and disposed of in a quarantine waste bin in the anteroom before exiting the facility ...”

We have also updated the requirements (see sections 4.3.2.7(3)(b) and 4.4.2.7(3)(b) of the standard) relating to disposal of gloves used when handling plants to state “quarantine waste bin” to align with the shoe cover disposal requirements.

We have amended section 4.4.2.7(3) to specify that gloves must be changed between use on “each cultivar or species”, not “each plant”.