



## **SUBMISSION**

by

**EMPLOYERS AND MANUFACTURERS'  
ASSOCIATION (N) INC.**

**Submission to  
Bio-security New Zealand**

**On**

**Proposals to Amend the Biosecurity Act  
1993**

Prepared on 12 March 2010

## 1. BACKGROUND

This submission is made by the Employers and Manufacturers Association (Northern) Inc. (EMA).

The EMA is made up of some 8500 member business units covering the New Zealand region north of Taupo. This membership includes approximately 1500 manufacturers ranging from large to SME.

Within our membership there are a significant number of companies and organisations involved in the manufacture, importation, supply, distribution and retail of most product types and the provision of services in a wide range of service sectors including governmental, contractual, tourism, IT, banking, insurance and business advisors.

As an organisation the EMA supports international best practice to be followed and compliance costs are fully addressed in any legislation.

As the leading voice of business in the upper North Island we actively participate in both the submission process and any development of regulatory proposals that may impact on our membership such as those discussed within these proposals

## 2. CONTACT

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### **3. SUBMISSION**

The EMA has participated in the workshops used to develop these proposals and has participated in the workshop on these summary proposals to ensure that our members views have been reflected in the proposals.

We are comfortable that the proposals are consistent with the changes necessary to drive integration of services and systems under the proposed Joint Border Management System and are intended to both bring Biosecurity NZ up to a technical capacity to allow accurate risk assessment and targeting of higher risk areas at the border.

We have signalled at the workshop that we believe the proposals will improve clearance decisions, toughen up on deliberate offenders while providing a reasonable defence for those making a one off error or omission.

The timely clearance of goods at the border is critical for the economy and we signalled at the workshop that resources must be applied to ensure that bottlenecks do not occur with the changes that occur.

Industry members have indicated a willingness to work with Biosecurity NZ to ensure that introduction of changes are facilitated to business friendly procedures while maintaining the optimum level of border security. The EMA endorses those offers and recommends they be taken up.

We note that post border pest management is important and that working with industry is the best option to address such issues once pests have managed to evade our biosecurity measures.

It was raised during the workshop that costs for major operations such as the Painted Gypsy Moth need to be prepared for. While we agree this needs to be done we are concerned that in placing levies or funds aside from border charges this needs to be done in such a way that it does not significant impact on the viability of import costs and once sufficient funds are in reserve that this capture should stop and only a top up be required when those funds are drawn down.

Such funds must not end up in the Consolidated Fund nor be employed for other purposes than the stated purpose. We also believe that they should be accumulated over a long period to reduce the impact on border costs and be clearly defined within those charges for transparency purposes.