



**BARNZ**  
VOICE OF THE AIRLINE INDUSTRY

Submission

Biosecurity 2025 Key Performance Indicators

To the Ministry for  
Primary Industries

29 January 2019

## Introduction

1. The Board of Airline Representatives New Zealand (BARNZ) welcomes the opportunity to provide comment on the proposed Key Performance Indicators for Biosecurity 2025. This submission is made on behalf of our 29 airline and 3 associate members (listed in Appendix A). Some members may make their own submissions.
2. BARNZ's contact person for this submission is:

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## We support biosecurity system health monitoring and reporting

3. BARNZ and our member airlines support MPIs efforts to protect New Zealand from biosecurity risks. We were pleased to present our views on the challenge of maintaining biosecurity protections and the passenger experience in the face of expected high growth in passenger numbers in the coming years to the Biosecurity Forum *Partnering to Protect* in November 2018. We look forward to further discussions with Biosecurity NZ and other stakeholders.
4. BARNZ agrees there is value in monitoring New Zealand's biosecurity system so that we understand how well it is performing. We think the framework set out in the consultation material of defining 'whole of system' outcomes and then the supporting KPIs for each outcome is a sensible approach.

## Biosecurity interventions should be proportionate and, where possible, minimise the impact on other activities

5. New Zealand's biosecurity controls impact upon a range of commercial and social activities. BARNZ believes a few KPIs could be usefully amended or added to improve the balance in the KPIs between protecting New Zealand's unique biosecurity while also minimising, where practicable, the impact on other activities and to promote cost-efficiency and scientific rigour in biosecurity decisions.
6. BARNZ's suggested amendments to the Biosecurity 2025 KPIs are set out in the following table.

Recommended change	Discussion
KPI A1: add the words "proportionate to the risk" after the word "purpose,"	We think there is value in ensuring that risk management interventions are proportionate to the level of risk that is faced.

Recommended change	Discussion
KPI D1: replace the term “safe travel” with the word “travel”	<p>It is not clear what “safe travel” means in the biosecurity context. Aviation safety normally refers to the physical safety of aircraft and other aviation infrastructure, which biosecurity does not have an impact on. Therefore, an outcome which says that biosecurity should facilitate “safe travel” seems likely to confuse and, indeed, be difficult to implement.</p> <p>We consider that the KPI should read “Biosecurity risk management decisions recognise... the need to facilitate... travel”. This makes it clear that it is the facilitation of travel, and not aviation safety, that is the objective.</p>
KPI D3: add the following words at the end – “and by efficiently facilitating passenger flows at the border”	<p>It is important to recognise that biosecurity controls can also support tourism by facilitating efficient and smooth passenger journeys across the border.</p> <p>MPI already has metrics in place that measure the processing time of passengers at airports so this should be a straightforward KPI to measure.</p>
New KPI under System Outcome D: “Biosecurity risk management interventions minimise, to the extent practicable, the impact on other economic or social activities”	<p>When considering the health of the biosecurity system, it is important to consider the impact of the system on other economic and social activities. This suggested KPI would capture that dimension which we believe is missing from the draft set of KPIs.</p>
New KPI under System Outcome F: “Biosecurity risk management decisions and system stewardship arrangements are efficient and cost-effective”	<p>Cost-efficiency is important for all government initiatives, including biosecurity. This perspective should be captured in the KPI outcomes.</p>

Recommended change	Discussion
New KPI under System Outcome I: "Biosecurity risk management decisions are supported by the best available scientific information and evidence"	This new KPI is suggested as the current KPIs do not appear to include a clear statement that biosecurity decisions have a sound scientific basis. We would assume all interventions will have a sound scientific justification and this should be captured in the KPIs.

## Appendix A – List of BARNZ Members

Airline Members	
Air Calin	Air China
Air New Zealand	Air Tahiti Nui
Air Vanuatu	Airwork
American Airlines	Cathay Pacific Airways
China Airlines	China Eastern Airlines
China Southern Airlines	Emirates
Fiji Airways	Hainan Airlines
Hong Kong Airlines	Jetstar
Korean Air	LATAM Airlines
Malaysia Airlines	Philippine Airlines
Qantas Airways	Qatar Airways
Sichuan Airlines	Singapore Airlines
Tasman Cargo Airlines	Thai Airways International
Tianjin Airlines	United Airlines
Virgin Australia Airlines	
Associate Members	
Menzies Aviation (NZ)	OCS Group NZ
Swissport	