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Ministry for Primary Industries
Wellington

Via Email: vmp.consultation@mpi.govt.nz

Otago Regional Council Submission on the Ministry for Primary Industries' "Review of the Vehicles, Machinery and Parts Import Health Standard"

Otago Regional Council (ORC) welcomes the opportunity to submit on the proposed changes to the *Import Health Standard for Vehicles, Machinery and Parts*. Our submission specifically responds to section 2.2 (1) -2.2 (3) concerning watercraft and addressing risk vectors for invasive species, which has been reviewed by ORC's biosecurity specialist staff.

1 General Comments

ORC acknowledges the Ministry for Primary Industries (the Ministry) for further recognising the biosecurity risks associated with the import of used watercraft and for proposing standards to address these risks. The inclusion of used watercraft in the import health standard is a significant and welcome step forward in managing pest pathways for invasive freshwater species.

2 Scope of the Proposal

While the proposed standard addresses ballast water systems in used watercraft, ORC is concerned that the scope may be too narrow to effectively mitigate biosecurity risks. We welcome the opportunity to support the Ministry with the following offered amendments to further reduce risk.

Invasive aquatic species can survive in various parts of a vessel beyond ballast tanks. Therefore, we recommend broadening the standard to apply to **all used watercraft**. Further, we recommend that MPI requires treatment of the following components in addition to the ballast systems:

- **Engine cooling systems**
- **Storage compartments**
- **Bilge areas**

There is a growing body of evidence that these areas can retain moisture and organic material, providing suitable conditions for the survival and transport of invasive species.

3 Stand-Down Period Recommendation

In addition to physical treatments of, we strongly recommend the implementation of a **minimum stand-down period** for all used watercraft prior to importation. This period should be informed by published desiccation survival data for high-risk species. For example:

- *Corbicula fluminea* (freshwater gold calm) can survive up to 5 days at 20 °C and > 10 days at 4 °C under high humidity conditions (Guareschi & Wood 2020).
- *Dreissena polymorpha* (zebra mussel) can survive up to 500 hours/20 days at 15 degrees and high humidity (Ussery and Malcom 1995)
- *Dreissena bugensis* (quagga mussel) is less tolerant than zebra mussels but still poses a risk under similar conditions with survival of up to 300 hours/ 12 (Ussery & Malcom 1995)

A generalised stand-down period could be tailored to environmental conditions in storage facilities, particularly **temperature and humidity**, to ensure effective mitigation of biosecurity risks.

4 Specific Feedback on Section 2.2

- **2.2(1)**: ORC supports the definition of watercraft, and the general requirements outlined.
- **2.2(2)**: ORC does not support limiting cleaning requirements only to watercraft fitted with ballast systems. This approach overlooks other vessel types and other high-risk areas of used vessels that can harbour invasive species.

5 Conclusion

ORC appreciate the opportunity to provide feedback on this important standard. Strengthening the scope and treatment requirements for used watercraft will significantly enhance New Zealand's ability to prevent the introduction and spread of invasive freshwater species. We are happy to provide further input or clarification if required.



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References

Guareschi, S., & Wood, P. J. (2020). Exploring the desiccation tolerance of the invasive bivalve *Corbicula fluminea* (Müller 1774) at different temperatures. *Biological Invasions*, 22(9), 2813-2824.

Ussery, T. A., & McMahon, R. F. (1995). *Comparative study of the desiccation resistance of zebra mussels (Dreissena polymorpha) and quagga mussels (Dreissena bugensis)*. US Army Engineer Waterways Experiment Station.