



**Fish and Game New Zealand Submission on:
Proposed changes to the Vehicles, Machinery and Parts Import Health
Standard – Consultation. Closing date 10 October 2025**

[Review of the Vehicles, Machinery and Parts Import Health Standards](#)

Email submission to: ymp.consultation@mpi.govt.nz

We have provided a copy of this submission to the office of the Minister for
Hunting and Fishing.

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A handwritten signature in cursive script that reads 'Richie Cosgrove'.

on behalf of

Richie Cosgrove, Chief Operations Officer

New Zealand Fish and Game Council

Summary

Fish and Game New Zealand submits that the proposed standard on importing used boats should also apply to new boats that have been water-tested. Many factory-produced boats are tested on rivers or lakes before export and therefore pose a comparable biosecurity risk to used boats. Fish and Game recommend strengthening the definition of “Ballast treatment system” and “Used” to ensure treatment systems can address all aquatic invasive species and to clarify that any boat operated outside of New Zealand is considered used. In addition, importers should have the option of a 30-day quarantine or stand down period as a decontamination option.

The proposed standards this submission relates to are:

- 2.2 Watercraft
- 4.1 Used Watercraft
- Schedule 1 – Definitions and exclusions to this HIS Part A: General definitions used

1. Key Issues and Concerns

3.1 Many ballast systems consist of bags and internal tanks. Sections 2.2 (2) c) and 4.1 (2) c) currently state that *“The ballast system consists of ballast bags, and these have been removed before export”*. This wording creates ambiguity and could allow an importer to remove bags and leave untreated internal tanks. To address this, both sections should explicitly require the removal of all ballast tanks and clarify that the vessel can only be considered free of a ballast system once all components have been removed.

3.2 The current definition of “used” listed in Schedule 1 Part A may allow new boats that have been water-tested in infected waterbodies to be imported without appropriate treatment. For example, [Mastercraft tests all of their boats on the Little Tennessee River](#), including ballast tanks, making their new boats just as dangerous as “used” boats. The definition of “used” currently reads *“Has left the standard manufacturing logistics supply chain for use, field testing, demonstration or other purposes”*. This wording does not adequately protect New Zealand

waterways as it does not capture factory water-testing, as most importers do not consider this process to be outside the standard manufacturing supply chain. “Used” should include any boat new or used that has been in water outside of New Zealand including factory testing. It would be safer to consider all wake boats with ballast tanks to be considered “used”.

3.3 The definition of “Ballast treatment systems” listed in Schedule 1 Part A requires strengthening to ensure effective biosecurity protection. The current definition “*An integrated treatment system installed in some watercraft designed to inactivate or remove aquatic organisms from ballast water*” does not exclude screens that are common on many wake boats and are not effective for most aquatic invasive species. To address this, the exemption for ballast treatment systems should be removed or require the systems to be specifically designed for high-risk species such as Zebra and quagga mussels.

3.4A A 30 day stand down should be added as an alternative to decontamination for imported boats in section 2.2 Watercraft. Most US states offer a 30 day stand down as a cost effective alternative to expensive treatment options. New Zealand does not have an established decontamination system in place and there is no way to evaluate the effectiveness of overseas decontamination making the 30 day stand down a useful stopgap measure in addition to a lower cost option for importers.

Attachments

Attachment 1 – About Fish and Game

What does Fish & Game do?

Who are we? Fish & Game New Zealand manages, maintains and enhances sports fish and game birds and their freshwater habitats in the best long-term interests of anglers, hunters and all New Zealanders.

Our vision

A New Zealand where freshwater habitats and species flourish, where game bird hunting and fishing traditions thrive and all Kiwis enjoy access to sustainable wild fish and game resources.

Together, let's ensure a thriving future for fishing and game bird hunting!

What we do

- Manage fishing and hunting regulations
- Conduct research to monitor fish and game bird populations
- Collaborate with communities to protect natural habitats
- Provide educational programmes and resources
- Advocate for valued habitats and species
- Negotiate and maintain access for anglers, hunters and all New Zealanders

fishandgame.org.nz

#ReWild



What does Fish & Game do?

Species management: We monitor and survey species populations; set season regulations; and manage pressure on the resource.

Habitat protection: Advocate and take action to protect and enhance lakes, rivers, streams and wetlands; and secure 'national park' status to important rivers through Water Conservation Orders.



Access and participation: Negotiate and advocate so all New Zealanders can access our natural places; maintain access signage, information and brochures; organise fishing and hunting events and classes.

Public awareness: Maintain public advocacy; schools programmes; website and newsletters; community liaison; promote the right of licensed anglers and game bird hunters to pursue their chosen pastime.



Compliance: Recruit, train, equip and coordinate warranted rangers, and enforce regulations to ensure the fish and game resource is sustained.

Licensing: Provide a nationwide licensing system with a range of licence categories and sales channels that makes it easy to buy a licence. We are fully funded by licence holders.



Council: Hold public meetings of elected councillors to approve regulations and budgets, set policies and provide governance for the Fish & Game system.

Coordination and planning: Provide research, planning and reporting; financial management and general coordination across Fish & Game New Zealand.

