Ministry for Primary Industries
Manatū Ahu Matua

Guidance Document

Health, Safety and Wellbeing Guidance Document

Related to the Standard for Transitional Facilities for General Uncleared Risk Goods

TFGEN-GD-HSW

2 October 2025

A guidance document issued by the Ministry for Primary Industries

Te Kāwanatanga o Aotearoa
New Zealand Government

Title

Guidance Document: HSW Guidance Document to the Standard for Transitional Facilities for General Uncleared Risk Goods

About this document

This document primarily provides best practice guidance and recommendations for the safe operation of transitional facilities (TFs) with specific examples.

In general, guidance is indicated as where a Transitional Facility Operator (TF Operator) should conduct certain actions and have certain resources to ensure the safety of both MPI staff attending the TF and their own staff when carrying out biosecurity-related tasks. This document also provides references to, and quotes the Standard for Transitional Facilities for General Uncleared Risk Goods (the standard) where certain actions must be conducted, certain requirements must be met, and specific resources must be held by a TF Operator.

It is recommended that TF Operators are familiar with the standard and relevant regulations under the Health & Safety at Work Act (2015) (HSWA) and any other relevant regulations that may apply to the nature of their facility, for example the Hazardous Substances and New Organisms Act (1996). It is also recommended that TF Operators are familiar with health and safety guidance produced by agencies such as Worksafe, the Ministry for Business, Innovation and Enterprise (MBIE), the Environmental Protection Authority (EPA), Maritime New Zealand, the Civil Aviation Authority (CAA) as relevant to the nature of their site.

Document history

Version Date	Section Changed	Change(s) Description
2 October 2025	New Document	New Document

Contact Details

For inquiries regarding this Guidance Document:
Contact the local MPI Office - http://www.mpi.govt.nz/
Biosecurity Import and Export Standards
Biosecurity New Zealand
Ministry for Primary Industries (MPI)
Email: standards@mpi.govt.nz

Disclaimer

This guidance does not constitute, and should not be regarded as, legal advice. While every effort has been made to ensure the information in this guidance is accurate, the Ministry for Primary Industries does not accept any responsibility or liability whatsoever for any error of fact, omission, interpretation or opinion that may be present, however it may have occurred.

Copyright

Table of Contents

1 Purpose

(1) This document provides a practical guide to safely implementing the requirements set out in the facility standard - Standard for Transitional Facilities for General Uncleared Risk Goods - TFGEN (the standard) prepared by MPI.

(2) This document is aligned with MPI's approach to its HSWA obligations and is issued in MPI's role as a PCBU whose HSW duties overlap with those of approved TFs.

(3) This document provides information on how a TF Operator may ensure the safety of MPI staff attending their TF, and of their own staff when carrying out biosecurity-related duties.

(4) This guidance is intended to assist, but does not replace, the TF Operator's duties under the HSWA. TF Operators are expected to meet the requirements of the Health and Safety at Work Act (2015) and other relevant legislation, such as the Hazardous Substances and New Organisms Act (1996).

(5) TF Operators are also expected to be familiar with relevant guidance produced by other regulatory agencies such as WorkSafe, the Ministry for Business, Innovation and Enterprise (MBIE), the Environmental Protection Authority (EPA), Maritime New Zealand and the Civil Aviation Authority (CAA).

(6) Not all information within the Guidance Document will be practical or relevant for every TF, due to the presence of different risks and operational factors across approved facilities. Each TF Operator should assess which risks and controls apply to their site. The Guidance Document supports this process in a biosecurity context.

2 Background

(7) The Biosecurity Act 1993 (the Act) provides requirements for the effective exclusion, eradication and management of pests and unwanted organisms in New Zealand. Such organisms are able to cause harm to natural and physical resources and human health in New Zealand. Under the Act, any imported uncleared risk goods must receive biosecurity clearance before such uncleared risk goods can officially enter New Zealand.

(8) As a part of this process uncleared risk goods can be sent to a TF upon arrival and be held there until biosecurity clearance is obtained. TFs hold uncleared risk goods for inspection, processing, secure storage or treatment until they receive biosecurity clearance or are re-shipped or destroyed. Under section 39(3) of the Act, the Director-General of MPI may approve a place as a TF. Under section 40(3) of the Act, the Director-General may approve a person as a TF Operator. These functions are also delegated to MPI managers under the Director-General of MPI's authority.

(9) Work at TFs can involve exposure to a number of critical health and safety risks. It is important that these risks are effectively managed to ensure the safety of those working within the biosecurity system.

(10) MPI has a duty to its staff to ensure that they are able to work safely. In some cases, this could mean that MPI staff cannot attend sites such as TFs where there are uncontrolled health and safety risks present. This could impact on the TF's ability to fulfil its role within the biosecurity and import system.

(11) MPI and TFs have a shared duty to ensure that health and safety risks related to the biosecurity system are being appropriately managed.

(12) TFs retain the primary responsibility for the safety of their staff in line with the HSWA 2015. This means that the TF is responsible for ensuring procedures are in place and effective, and for incorporating information provided by MPI and other Persons Conducting a Business or Undertaking (PCBUs) such as MPI Approved Treatment Providers (MATPs) and importers.

(13) This document sets out the guidance and information for identification and control of these health and safety risks, to enable effective and safe operation of a TF.

(14) Some risks and controls within this document will be crucial to the safe operation of some facilities and irrelevant to others. In line with the HSWA and its regulations, each individual TF should determine which risks apply to their site, and which controls are reasonably practicable to mitigate these risks effectively.

3 Definitions and Interpretation

(15) Refer to Schedule 1 of the standard for Definitions.

(16) In this document, 'must' is used to indicate a legal requirement under applicable New Zealand legislation (for example, the Biosecurity Act, HSNO Act, or HSW Act).

(17) The use of 'should' in this document indicates a recommendation, guideline, or a desired action rather than a mandatory obligation. It reflects best practice, while allowing discretion to take a different but comparable approach to managing risk.

4 Safety of MPI staff working at TFs

4.1 Induction to site and communication with MPI

4.1.1 Induction to site

(18) An up-to-date site induction should be in place every time an MPI staff member attends a TF.

(19) Site inductions can take several forms depending on the size, complexity and safety risk profile of the site, the frequency of MPI staff attendance, and the level of supervision the TF is able to provide. TFs are responsible for determining and enacting an induction process appropriate for their facility's operations.

(20) Common methods of site induction include, but are not limited to:

a) An in-person meeting on arrival to site:

   i) takes place on arrival, every time
   ii) Content is determined and can be updated instantaneously by the site representative meeting the MPI staff.
   iii) There is no formal record. MPI staff and the site representative agree together that the information has been delivered and understood.
   iv) This may be appropriate for small facilities where one person can accurately represent the full range of onsite activities. MPI staff are often accompanied.

b) A manual printed/handwritten sign-in and induction process:

   i) takes place on arrival, every time
   ii) Content is maintained by updating the written induction information or by supplementation with signage or verbal information.
   iii) A written record demonstrates that the information has been delivered and understood.
   iv) This may be appropriate for small/medium-size TFs.

c) A single-entry digital sign-in/induction process:

   i) takes place on arrival, every time.
   ii) Content is maintained by updating the digital slides, documentation or by supplementation with signage or printed or verbal information.
   iii) A digital record demonstrates that the information has been delivered and understood.
   iv) This may be appropriate for medium/large-size TFs, or where MPI staff are regularly in attendance.

d) A multi-entry digital induction programme linked to named individuals:

i) takes place prior to arrival, usually via a specified digital training course attached to an individual's name, and lasts for a specified duration.
ii) Content is maintained through an online programme, and participants are notified of updates, changes and induction period expiration directly or via the regional MPI office.
iii) Induction confirmation is usually via individually issued swipe cards that are linked to training records and revalidation periods, that prevent access to site if induction requirements are not met.
iv) This is usually seen at large, complex facilities that host MPI staff working autonomously on a regular basis.

(21) Site inductions should cover (but are not limited to) the following:

a) hazardous substance storage or use within biosecurity areas or access points.
b) any significant onsite hazardous substance storage and associated emergency procedures.
c) any unusual or particularly hazardous vehicles onsite.
d) site- and task- specific inductions covering pedestrian safe zones, evacuation routes, identification of key plant operators for the task or location, vehicle blind spots (if these exist) and hand signals to communicate with operators.
e) emergency procedures for fire and all foreseeable extreme natural events.
f) relevant information about other activities happening on the same site, including work by other PCBUs.

(22) If the requirements or environment of a job change once the induction has taken place, MPI and TF staff will discuss the changes and adapt the controls or task accordingly, if possible.

4.1.2 Communication with MPI

(23) TFs should communicate any consistent and unusual hazards that are specific to their TF to their local MPI office prior to MPI staff attending site. For example:

a) any significant onsite hazardous substance storage.
b) potential limiting factors for use of equipment located at a TF
c) machinery as part of the core biosecurity functions of the site
d) work in environments maintained at temperatures below 10°C or above 25°C.

(24) TFs with consistent and unusual hazards present at their sites should work with MPI to agree on a Safe System of Work to manage MPI staff's interactions with these hazards.

(25) In addition, TFs should inform MPI of any task-specific hazards and/or requirements when booking services, or earlier if possible. These may include:

a) hazards associated with an unusual part of the site
b) a task-specific need for specific PPE or equipment
c) tasks associated with an unusual or unique consignment or configuration
d) tasks where the TF believes that exceptions to MPI's safety policies may be necessary
e) tasks associated with the Other Relevant Risks listed in Section 6 of this document.

(26) Where task-specific hazards and/or requirements cannot be managed under MPI's existing safety policies, a Safety Analysis of the tasks and activities involved in a specific inspection will be completed, and controls agreed, before the task can be undertaken.

(27) TFs may be required to provide MPI with information to support the Safety Analysis, or to facilitate provision of information from other parties such as agents and importers.

4.2 Management of critical health & safety risks

4.2.1 Hazardous substances

(28) If consignments requiring inspection have been treated with non-biosecurity hazardous substances (e.g., sulphur dioxide pads used for ripening in grapes), TF Operators should ensure that the consignment is properly ventilated prior to inspection.

(29) When ventilation instructions are included in the Biosecurity Authority/Clearance Certificate (BACC), they should be followed and confirmed to MPI staff upon arrival.

(30) Ventilation for comfort is not the same as ventilation required to ensure dispersal and/or extraction of residual treatment material or other harmful substances. If MPI Inspectors are required to inspect treated material, the TF is responsible for ensuring that the goods are properly ventilated so that any hazardous substances have dissipated away from the goods prior to inspection. This should take place in a location where biosecurity controls can be maintained, while allowing sufficient airflow to ensure any substances dissipate.

(31) If ventilation takes place within the inspection area, that area should have sufficient airflow to ensure that any hazardous substances will dissipate away from the goods and out of the inspection area prior to the inspection taking place.

(32) When requested, the TF should be able to provide MPI with records to confirm that ventilation has occurred, including the method and duration of ventilation.

(33) Non-biosecurity hazardous substances should not be stored or used within the biosecurity area if avoidable. For example:

a) Any hazardous substances that are stored or used within the biosecurity area must be managed in line with relevant legislation.
b) The TF should inform MPI of the hazardous substance storage and its location.
c) The hazardous substance and its location should also be communicated to MPI staff when they attend site, as part of their induction.

(34) Where there are significant volumes of hazardous substances or highly hazardous substances stored or used on site, even if these are not within the biosecurity area:

a) The presence of these substances should be communicated to MPI and be included in the site induction for MPI staff.
b) MPI staff should be made aware of any emergency procedures associated with these substances.

4.2.2 Moving vehicles and mobile plant

(35) There should be a clearly marked pedestrian access route from the TF entrance to the MPI work area and to any other parts of the site that MPI staff are likely to need access to. Where this is not possible, or if MPI staff need to access parts of the TF where clearly marked pedestrian routes are not available, a TF staff member should escort MPI staff.

(36) Where possible, movement of vehicles or mobile plant, such as forklifts, should be ceased while MPI staff are moving around the site.

a) For larger sites, it may be more suitable to cease movements in an area of the site.

(37) There should be an appropriate traffic management plan in place onsite, covering traffic direction, delivery/turning areas, safe zones, exclusion zones, no-entry zones and pedestrian zones.

(38) MPI staff should be advised of any unusual or particularly hazardous vehicles onsite on the day of their visit, as part of the site induction.

(39) Use of moving vehicles and/or plant within or adjacent to the MPI work area while the area is in use should be limited to those strictly needed to support the activity taking place.

a) In some cases, it may be appropriate for some or all of the MPI work area to be established as a static work site, with fencing, barriers and safety rails to provide physical separation from plant operating in adjacent areas.

(40) Positive contact and communication should take place between MPI staff and any plant operators working within or adjacent to the MPI work area.

(41) If MPI staff are working/observing a dynamic task outside the usual MPI work area e.g., a supervised container de-van, appropriate designated zone(s) for MPI staff should be identified, clearly separated and communicated to all adjacent workers and plant operators.

(42) Moving vehicles/plant within or adjacent to the MPI work area should be appropriate for the space and task being carried out.

(43) All loads moved within or adjacent to the MPI work area should be appropriately secured via straps, chains, wrapping or similar.

4.2.3 Driving

(44) TFs should provide a clear entranceway for vehicle access onto to the TF site, and appropriate, safe and clearly marked parking for MPI and others. Where possible, vehicle access to site should not cross heavy vehicle access.

a) If heavy vehicle and visitor access is not able to be separated, there should be measures in place to ensure mutual awareness of other vehicles using the same accessway and prevent collisions and near misses e.g., clear sight lines, alarms, visual alarms, mirrors.

(45) If the TF itself is within a risk or restricted area, there should be a clear process and/or accessway for MPI staff to safely navigate the risk area to reach the TF.

(46) If TF vehicles are used to transport MPI staff around site, drivers should hold appropriate licenses, and the vehicles should be appropriate for their intended use and up to date on their warrant of fitness or certificate of fitness.

(47) If vehicles need to be moved into an inspection area for inspection, there should be a clear traffic management plan in place to enable safe transit of vehicles to the inspection area.

(48) Vehicles should be separated from MPI and TF staff at the inspection area.

4.2.4 Working around machinery

(49) Where possible, machinery should not be in use within or adjacent to the MPI work area while MPI staff are working onsite.

(50) If machinery is to be used within or adjacent to the MPI work area during normal operations, a Safe System of Work should be in place and agreed between the TF and MPI to ensure controls protect MPI staff.

(51) If machinery is to be used within or adjacent to the MPI work area as a one-off, MPI should be advised so that a Safety Analysis can be conducted if required.

4.2.5 Fatigue

(52) TFs must ensure that they adhere to the below fatigue reduction requirements included within TFGEN Standard section 3.10:

a) General worksites are to be lit appropriately. Lux levels are specified for TFs – 600 lux for general inspection, 1000 lux for close inspection.
b) Worksites must have sufficient ventilation for tasks.

(53) TFs should provide appropriate anti-fatigue flooring for inspections where MPI Inspectors are required to stand at a workstation for over 30 minutes.

(54) TFs should consider ergonomic needs when providing equipment for MPI staff to use. Ergonomic needs will vary between facilities and will depend on the workspace, the tasks required by the facility, and the duration of the tasks. Ergonomic needs should be discussed with the local MPI office.

4.2.6 Confined space entry

(55) MPI Inspectors will not enter laden shipping containers to inspect goods. TFs should ensure goods are accessible to Inspectors without them needing to enter containers.

(56) In unusual events where MPI staff need to enter a container for a specific biosecurity reason related to a particular consignment, a Safety Analysis will be conducted before entry.

4.2.7 Working at height

(57) Where the tops of containers or other elevated surfaces need to be inspected, TFs should provide MPI Inspectors with suitable means to access the tops of containers for inspection purposes.

a) For example, an appropriate temporary work platform with guardrail protection and stable grounding.

(58) Elevated access means should meet the appropriate NZ or Australia Standard, for example AS1657:2018 Fixed platforms, walkways, stairways and ladders

(59) Where there is no relevant standard, TFs should be prepared to provide maintenance records to demonstrate structural integrity in support of safety.

4.2.8 Working around small and/or venomous animals

(60) TFs must adhere to the onsite small animal control requirements within TF-GEN section 3.8.

a) Pests, vermin and weeds must be effectively managed in/around the TF.
b) Other organisms, animals that are not part of a consignment being imported into NZ are not permitted in the controlled areas of a TF.

4.2.9 Dusts

(61) Where possible, TFs should prevent dust from being produced or stirred up while MPI staff are on site.

(62) If dust production is not preventable, such as dust that is blown onsite due to work on adjacent properties, dust within inspection areas, devanning areas, and access routes should be managed:

a) in the air, e.g., via water suppression
b) by preventing or clearing of dust accumulation on surfaces where MPI staff need to work e.g., work bench.

(63) TFs which store commodities that produce potentially flammable dusts, such as coal, grains, and other organic powders, special consideration should be given to proactive suppression of dusts and monitoring of any potential ignition sources.

4.2.10 Extreme natural events

(64) TFs should communicate emergency procedures to MPI staff onsite via induction for all foreseeable extreme natural events.

(65) TFs should ensure visitors, including MPI staff, are accounted for in any evacuation via a sign in mechanism

4.2.11 Fire risk

(66) TFs should communicate fire emergency procedures to MPI staff onsite via induction.

(67) TFs should ensure visitors, including MPI staff, are accounted for in any evacuation via a sign in mechanism

4.2.12 Extremes of temperature

(68) TFs must adhere to temperature control requirements within TFGEN Standard section 3.10:

a) Inspection areas must not be subject to unsuitable temperatures (below 10°C and above 25°C) and must be well ventilated to enable MPI Inspectors to work comfortably.

(69) The TF Operator should communicate the job requirements at the time of booking to ensure MPI can properly equip Inspectors for the task.

(70) In some circumstances, an agreed Safe System of Work or one-off Safety Analysis should be in place to establish mitigation measures for unusual inspection conditions, including work where unsuitable temperatures are necessary for consignment.

4.2.13 Manual handling

(71) TFs must adhere to the requirement to provide labour necessary to assist with inspections, per TFGEN section 3.10.

4.2.14 Slips trips and falls

(72) TFs must adhere to hygiene management controls within TFGEN Standard section 3.7.

(73) TFs must prevent accumulation of debris, packaging, soil, waste, surface water and other hygiene and slip/trip/fall hazards within the control area and any access routes to the control area.

4.2.15 Non-mechanised handheld tools and equipment

(74) Equipment provided by the TF for use within the inspection area should be well maintained, suitable for the nature of the task provided, and inspected for function and safety as appropriate for the type of item.

4.2.16 Noise exposure

(75) If noisy work occurs, (e.g. operating machinery), TFs should consider testing to understand the noise generated by operations at their site.

(76) Where possible, noise from onsite operations is to be reduced to safe levels while MPI staff are onsite.

(77) If there is a noise risk at a TF that cannot be reduced, including noise produced on adjacent properties, the TF should either:

a) communicate the noise risk to MPI when booking work so that staff can be provided with appropriate MPI-issued hearing protection; or
b) provide appropriate hearing protection for MPI staff.

4.2.17 Working around overhead items/suspended loads

(78) Where possible, items should not be stored at height within or adjacent to the MPI inspection area and accessways.

(79) Any racking within or adjacent to the MPI inspection area should be:

a) of good mechanical construction, made from sound material, have adequate strength, and be maintained according to the manufacturer's instructions;
b) installed upon an appropriate, level surface and fixed securely to the floor;
c) installed with consideration to existing building fittings and exits.

(80) Racking should be loaded appropriately in accordance with manufacturer and industry guidance.

a) i.e., appropriate pallets should be used, loaded appropriately, and only loaded according to the withstandable weight.

(81) Particular attention should be paid to controlling the risks present when vehicles, containers, and grain are stacked or suspended overhead as part of biosecurity operations.

Vehicle inspections

(82) Vehicle ramps, pits, and hoists used for vehicle inspection should be certified by an engineer as being structurally sound to AS/NZS1418.9:1996 Cranes (including hoists and winches, of suitable height, and facilitates safety.

a) Proof of certification should be clearly visible to MPI Inspectors.
b) Maintenance checks should be carried out regularly and recorded.
c) Hoist operators should be appropriately trained.

(83) If a hoist is used for lifting non-standard vehicles, for example caravans/campervans or trailers, it should be fitted with permanent structures that can support the weight of the vehicle at appropriate contact points e.g., stabiliser legs.

a) Engineering alterations to accommodate variance in vehicle types should be certified.

(84) Where possible, different MPI Inspector heights should be accommodated. For example, a static vehicle ramp/pit may not be appropriate for use by very short or very tall Inspectors.

a) If height is a potential limiting factor for safe use of tools available at a TF, this should be discussed with MPI.
b) Where the height range for use of a pit/ramp is extended via use of platforms or similar, the TF should ensure these are stable, appropriate for the environment and the task, and do not introduce any additional risk for the user.

Stacked containers

(85) Where possible, MPI worksites should be located away from stacked containers, whether the containers are within or adjacent to the TF.

(86) If site layout or the nature of tasks makes it unavoidable that MPI staff will be carrying out work near stacked sea containers, either on or adjacent to a TF, the TF should take measures to ensure that the inspection or devanning area is safe for use.

a) Measures may include thorough site inductions, evaluation of weather forecasts, and observations of onsite wind gusts prior to and during a task.

(87) Lifting and/or stacking operations should not occur within or adjacent to the MPI inspection area or devanning area while MPI staff are onsite, unless directly related to the biosecurity task.

a) Ideally, lifting/stacking of goods should take place prior to or following inspection.
b) If the volume of goods requires lifting/stacking to take place e.g., to clear space for further inspection, or during a supervised de-van, then the MPI staff, the supervisor of the task, and the lifter/stacker operator should agree on safe areas where MPI staff will remain while the lifting/stacking is occurring.

Grain storage

(88) MPI staff should not be present when a grain tip or similar operation is carried out.

(89) If MPI staff are required to be present during a grain tip for a specific biosecurity reason:

a) an agreed Safe System of Work or one-off Safety Analysis should be in place prior to the tip
b) a safe area should be identified where the MPI staff will remain for the duration of the tip.

(90) MPI staff should receive a site- and time-specific induction upon entering a grain storage shed where grain is in piles and/or faces and there is risk of inundation.

a) The TF Operator or an appropriate representative should discuss the current layout of the warehouse, identify hazards associated with specific piles, identify areas where MPI staff may and may not go, and discuss evacuation procedures.
b) Because grain piles can change on a daily basis, this should happen at every visit and in every new shed, no matter whether or not the MPI staff member has attended the site before.
c) If the risk profile changes while MPI staff are present within a grain storage shed, the new risks are to be communicated to them with urgency.
d) Where possible, work on grain piles should cease while MPI staff are onsite to prevent potential destabilisation of existing piles.
e) If this is not possible due to the nature of the work to take place, the MPI staff and TF staff should agree on controls to prevent exposure of MPI staff to destabilised piles.
f) If there is a need to take a grain sample from a face, this will be facilitated by TF staff with appropriate training, through initial removal of a larger sample using grain shifting machinery, until the sample can be taken from a pile of a size that is safe to approach. MPI staff will not approach a grain face due to the risk of inundation.
g) MPI staff may direct the location on the pile from which a sample is taken to ensure the sample is fit for purpose. This should be done in collaboration with the TF staff and should consider any increased risk associated with a particular location.
h) Temporary inspection areas within grain sheds should be set up beyond the potential reach of an inundation.

5 Keeping workers safe during interactions with the biosecurity system

5.1 Managing critical risks

(91) This information about critical risks is provided to enable TFs to develop their own systems to manage health and safety risk in biosecurity-related work. It is not an exhaustive list of health and safety risks and controls.

(92) MPI expects TF Operators to have their own health and safety critical risks and critical controls that are relevant to the health and safety risks TF Operators identify in the work and environment of their facility.

5.1.1 Hazardous substances

(93) TFs should ensure that biosecurity-specific insecticides are stored and used according to label instructions.

(94) When any biosecurity fumigation treatment is to take place onsite at a TF, TF Operators should:

a) assist treatment providers with planning of fumigation (i.e., enabling a job risk assessment, working together to produce or update site-specific maps and emergency plans).
b) work with treatment providers to manage the risks and implement controls relevant to the treatment.
c) follow all treatment provider instructions prior to, during, and after each fumigation.
d) ensure all TF staff are aware of risks and controls for the duration of the fumigation and any post-application ventilation.
e) facilitate communication between the treatment provider and the importer or any other businesses who may interact directly with the consignment after fumigation.
f) facilitate communication between the treatment provider and any entities who may need to be notified of the fumigation as specified by regional councils, WorkSafe, the EPA or other regulators. Entities requiring notification may include neighbouring businesses, community facilities, and emergency services.
g) request clarification if anything is unclear.

(95) TF Operators with regular fumigations taking place on site or who are receiving high volumes of fumigated consignments should:

a) Ensure that they have a working familiarity with the fumigation process, including ventilation, off-gassing, and characteristics of the fumigants used on their sites.
b) Complete a risk assessment process to determine which control measures may be reasonably practicable for them to implement for the safety of their staff.
c) These controls may include:

i) workplace or personal exposure testing;
ii) onsite monitoring equipment and associated training to enable staff to use it;
iii) health monitoring; and
iv) pre-prepared risk assessment and emergency plan templates that can be easily adapted for specific fumigations.

(96) Accredited Persons (APs) or other TF staff interacting with goods post-fumigation should have a level of training that enables them to understand the risks associated with fumigated goods and the controls in place to manage these risks.

(97) Alternatively, APs and TF staff interacting with goods post-fumigation should work under supervision of the TF operator or someone who has the appropriate level of training.

(98) When receiving and devanning containers that have been fumigated overseas within a recognised international treatment provider programme, or containers that have no fumigation guidance attached but may still have been fumigated beyond the scope of official biosecurity requirements, TFs should:

a) have a protocol to enable a case-by-case risk assessment, based on information available about the consignment.
b) TFs should note that commodity and country of origin can indicate higher likelihood of undocumented fumigation in some cases but is not likely to be a consistent predictor of health and safety risk.
c) be able to adjust their devanning procedures in response to any change in health and safety risk.
d) as biosecurity risk is negligible for goods known to have been fumigated by reputable providers, fumigation ventilation takes priority.
e) when a consignment's fumigation history is uncertain, health and safety still takes priority, but biosecurity requirements must also be followed. TFs should consider how their site and resources may allow them to ventilate these containers while maintaining biosecurity outcomes.
f) ensure TF Operators and APs are familiar with and following relevant industry guidance.
g) not rely on the use of MPI gas detectors as a control, because health and safety risk still exists when MPI staff are not on site.

5.1.2 Moving vehicles and mobile plant

(99) Where a vehicle or plant is a crucial part of a biosecurity task, for example during six-sided inspections, a safety procedure should be in place and communicated with MPI Inspectors when they are present.

5.1.3 Driving

(100) When moving vehicles for inspection, TFs should ensure that they have:

a) a clear traffic management plan in place to enable safe transit of vehicles to the inspection area
b) separation of vehicles from MPI and TF staff at the inspection area. Physical separation using fixed guards or barriers should be used so far as reasonably practicable.

5.1.4 Working around small and/or venomous animals

(101) TFs should have a process in place for APs and other employees to follow if they encounter small and/or venomous animals within the TF, including both health and safety considerations and biosecurity protocols.

6 Other relevant risks

(102) TFs whose operations may bring MPI staff into contact with any of the risks below should ensure that they contact MPI proactively to discuss the risks and controls that are appropriate for the work and produce a Safe System of Work or Safety Analysis if needed:

a) aggressive interactions with external parties;
b) working around large, live animals;
c) biological hazards and unknown organisms;
d) working in or adjacent to water;
e) remote and isolated work;
f) using aircraft to undertake work activities;
g) working at heights;
h) entry to confined spaces;
i) use/presence of firearms;
j) drugs and alcohol;
k) infrastructural integrity;
l) radiation;
m) solar UV radiation;
n) radiation from X-rays;
o) sharps; and
p) exposure to infectious diseases.