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## Submission: Review of the Vehicles, Machinery and Parts Import Health Standard (VMP IHS)

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**From:** Imported Motor Vehicle Industry Association (VIA)

**To:** [vmp.consultation@mpi.govt.nz](mailto:vmp.consultation@mpi.govt.nz)

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#### 1. About VIA

VIA represents New Zealand's independent used-vehicle import supply chain—exporters, logistics providers, inspection/compliance organisations, and retailers—primarily sourcing finished vehicles ex-Japan.

#### 2. Scope and consultation context

We support MPI's effort to modernise the VMP IHS (e.g., aligning used parts/machinery, adding post-treatment requirements for certain goods, updating definitions and format). We note MPI's explicit request for feedback on readability and on potential operational impacts were year-round treatment for Japanese used vehicles to be required in the future (MPI states this is **not** currently proposed).

#### 3. Year-round heat treatment: our position (balanced, evidence-led)

- **Industry sentiment today:** There is no settled consensus. Members see commercial gains from predictability and smoother operations that a 12-month setting could bring. We also acknowledge that heat treatment may act as a barrier against a **range** of hitch-hiker organisms beyond BMSB (industry stakeholders have recently highlighted practical risk from multiple taxa, not only stink bug).
- **Economic reality:** The used-import supply chain faces compounding cost pressures (including escalating Clean Vehicle Standard penalty impacts). New mandatory treatment, if poorly targeted or unsupported by evidence, would add cost and delay to lower-value vehicles relied on by everyday households.
- **What VIA asks of MPI:** If MPI contemplates a 12-month requirement, it should be based on a **robust, transparent, pest-specific risk case**, published for industry scrutiny, that:
  1. identifies the target organisms (beyond BMSB if applicable) and demonstrates why a year-round setting materially reduces risk versus the current seasonal regime;
  2. confirms **vehicle-safe** heat parameters for modern vehicles (incl. hybrids/BEVs, ADAS sensors, airbags, adhesives/sealants) and sets out an audited QA/traceability and claims process;
  3. evidences **capacity and SLAs at origin** (especially Japan) to avoid a de-facto import throttle, with multiple approved providers to deter monopoly pricing; and
  4. includes **risk-based application** (high-risk profiles treated mandatorily; conditional/waived pathways for verifiably low-risk profiles) plus staged rollout and review triggers.

#### 4. VIA's stance at this time

Given present market fragility, **if a year-round mandate is not scientifically necessary for biosecurity, it should not proceed**. If MPI's analysis shows a genuine biosecurity need covering a broader suite of hitch-hiker

organisms, VIA is open to a targeted, evidence-based approach that meets the safeguards above and is implemented in a staged, audited manner.

#### **5. Readability of the rewritten standard**

The reformatting and clearer structure are improvements. We encourage MPI to maintain plain-language summaries alongside the legal text and to publish flow-charts covering common scenarios (e.g., ex-Japan finished vehicles, used parts consignments, and re-exported vehicles) to reduce interpretation variance.

#### **6. Improving compliance for used vehicles outside “system” pathways**

VIA supports targeted education and enforcement that focuses on risk: publish checklists aligned to the IHS, expand approved-system pathways for small consignors, and consider a light-touch secure-supply accreditation for proven low-risk operators (with audit).

#### **7. Closing**

We appreciate the opportunity to comment and would welcome a technical workshop to review the evidence base should MPI explore year-round treatment further.

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**Greig Epps**

Chief Executive

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