

Fresh Vegetable Product Group of Horticulture New Zealand submission on the “Draft Import Risk Analysis: Onion (*Allium cepa* Liliaceae) Fresh Bulbs for Consumption from China”.

1. Introduction

This submission is made on behalf of the Fresh Vegetable Product Group of Horticulture New Zealand. The product group represents the interests of 1200 growers and specifically 107 onion growers in NZ. The combined value of the onion industry is approx \$120 million, being \$100million in exports and \$20million for the domestic market.

The NZ industry questions the economic viability of importing onions into New Zealand where the domestic market for brown onions is supplied year round and the majority of supply is exported. However, we recognise that this process is not related to economic viability and have supplied comment on a technical risk basis only.

Overall comments:

- We feel that MAF has undertaken a thorough risk assessment and in general has adequately assessed the risk associated with onions imported for consumption.
- Our comments focus on the overall risk management measures that are suggested for onions imported from China rather than the specifics of each pest risk assessment.
- We strongly believe that any risk management measures must be easily verified on arrival in New Zealand and should not rely only on documentation to prove compliance.

2. Comments on Section 2 – Commodity and pathway description

Section 2.2.1 – NZ Onion Industry

We request that the first paragraph would be of more value if it was shortened to the following wording *“The area in NZ planted in fresh market onions (browns & reds), averaged over the last 5 years (2004 – 2008) is 4754 hectares.”*

We also request that the second paragraph be replaced with the following wording *“The total production of onions averages 185,000 tonnes per year. The average export tonnage is 130,000 tonnes, the domestic market tonnage is up to 35,000 tonnes and the balance of 20,000 goes to other uses; e.g. processing, stock feed and waste.”* We disagree with the sentence regarding the Japanese market and suggest that it be removed as it is not relevant.

Section 2.2.4

We consider this information to be inaccurate. NZ grown brown onions are supplied from storage all year round. Red onions are imported (from the USA) because they don't keep in storage as well. The import window is at the end of the red storage ability; i.e. Sep – Dec (main months Oct and Nov). Industry considers that within 2 years that import requirement will no longer be needed because of the new varieties and technology being adopted here. The 2nd sentence reflects the errors in 2.2. The size of the domestic market is 30 – 35,000 tonnes and is supplied all year round from NZ grown brown onions. There may be occasions, bought on by stock holdings, climatic conditions during a growing season and trading conditions (e.g. people 'taking a punt' in our domestic market) where some brown onions are also imported from the USA or Australia.

3. Comments on Section 3 – Potential hazards and mitigation options

We support risk mitigation that requires onions to be peeled before import. There is no specific physiological definition of what constitutes a peeled onion in the risk assessment although there is a picture (Figure 3.1b). We consider it is important that a specific **definition** of what is meant by 'peeled' be included in the Import Health Standard.

We assume that peeled means: **all of the outer skins down to the flesh of the bulb and the roots and tops completely removed.**

On this basis we would agree that the likelihood of onions imported for consumption being planted at either a commercial or household level is minimised. However, if whole unpeeled onions were to be allowed entry, we would request further consideration and monitoring of this. We are aware that Chinese garlic imported for consumption is planted by both commercial and household users and this places the onion/garlic industries at considerable risk of new pests and diseases.

We therefore request that this Import Health Standard be limited to **whole peeled onions**; i.e. all skins, tops and roots removed, and fit only for direct consumption; e.g. in no fit state for planting.

In this section we have provided general comments on the suitability of each of the proposed mitigation options.

- **Pest Free Area** – we support the use of this measure only when it relates to country freedom from a pest and is supported by surveillance information. The use of area freedom as a measure when it relates to partial country freedom would need to be carefully considered to ensure that all the requirements of ISPM 4 were met in a documented and auditable manner. We also believe that an annual review of the information should be undertaken by MAF.
- **Pest free place of production** – we do not support the use of this measure as the sole phytosanitary risk mitigation for Chinese onions. We feel that verification of this measure would be extremely difficult in China and would be difficult to monitor on arrival in New Zealand.
- **Production based** – we do not support the use of this measure as the sole phytosanitary risk mitigation for Chinese onions. We support the use of low pest prevalence prior to harvest as part of a systems approach as long as this is suitable for the biology of the organism. We do not support on farm pest control measures given the difficulty of verification of these activities.
- **Post harvest** – we support the use of post harvest processing as part of a systems approach but not the sole measure. In particular we support the peeling of onions to remove contaminating pests and consider that a post peeling sanitising dip is important to ensure bulbs are not re-contaminated after peeling. We expect that MAF will ensure that the Chinese systems include appropriate segregation and that traceability requirements are in place to ensure bulbs are not re-contaminated before export and can be traced if there are system failures.
- **Methyl Bromide fumigation** – we support the use of this measure as part of a systems approach but not as the sole measure. We are aware there have been some difficulties with verification of methyl bromide treatment prior to export. MAF would need to ensure that the treatment had been applied correctly to the full consignment or if this cannot be achieved, fumigation on arrival in NZ should be required.
- **Irradiation** – we have no comment on this treatment at this time as it is not approved. Should the situation change, we would appreciate the opportunity to further consider this treatment.

- **Cold Treatment** – this treatment has not been proposed as appropriate risk mitigation in this PRA so we have not considered it further.
- **Heat treatment** - this treatment has not been proposed as appropriate risk mitigation in this PRA so we have not considered it further.
- **Chemical treatment** – we consider a sanitising wash to be an essential element of a systems approach for peeled onions. MAF will need to ensure that appropriate systems are in place in China to monitor the concentration of the wash to ensure efficacy is maintained. Should bulbs entering NZ show surface fungi or bacteria contamination, an audit of the sanitising treatment should be initiated.
- **Physical treatment** – we consider that removal of all outer layers (Figure 3.1.b) is an essential risk management measure and underpins the systems approach suggested in the risk assessment. We do not believe that removal of the outer loose skin layers is sufficient as this increases the likelihood of pest/disease presence and there would still be considerable waste generated from the imported onions. We support inspection of the peeled onions and removal of any bulbs showing signs of pest and disease infection. This measure is easily verified on arrival in New Zealand and provides NZ industry with some confidence that the risk of pests and diseases from trade in Chinese onions will be managed.

4. Comments on the Risk Assessment

In general, we agree with the risk assessment undertaken by MAF. The risk assessment is detailed and would require significant resources to fully assess. We believe that the risk mitigation options proposed will compensate for any areas where the risk assessment lacks information (see comments above).

5. Comments on suggested Risk Management

The risk assessment document gives multiple choices for risk management of each pest. As stated above, we have concerns about the use of the Pest Free Area or Pest Free Place of Production as risk management options because of the difficulty of verifying these measures. There are significant and justified concerns over the integrity of some countries export phytosanitary systems and we believe it is paramount that this is taken into account when risk management decisions are made. The measures need to be easily verifiable on arrival in NZ. We believe the following minimum risk mitigations must be met as a minimum:

5.1 Fungi/Bacteria

In combination as a systems approach, the following treatments:

- Low pest prevalence (where indicated in the risk assessment)
- Removal of all outer leaves and root material so that the onions are considered peeled (Figure 3.1b in the PRA)
- Post peeling sanitisation to remove surface contamination from the peeling process
- Inspection and discard of any bulbs showing disease symptoms (including discolouration)

For additional risk management, it would also be good policy to restrict re-packaging of onions to metropolitan areas although the risks associated with peeled onions are less than those with skins still attached. We do not consider it is appropriate for any onions to enter NZ with any of the hard skins, tops and root material still attached.

5.2 Insects

As alternatives:

- Methyl bromide fumigation
- or
- Low pest prevalence (where indicated in the risk assessment)
 - Removal of roots, tops and outer skin layers
 - Inspection and removal of any bulbs showing disease symptoms (including discolouration)

5.3 Specific comment on thrips mitigation

We believe that further consideration needs to be given to the thrips mitigation section. The risk assessment indicates that removal of outer skin layers is one of the measures that would reduce the risk of thrips entering with onions.

However, we do know there is clear evidence that thrips infest further into the onion bulb and may lie in between the fresh soft layers and therefore removal of the hard outer skins would not solely mitigate the risk. Consideration needs to be given as to when thrips infest the onion bulb and whether the inspection for low pest prevalence at harvest would be sufficient to detect internal infestation. We question whether Methyl bromide fumigation would be sufficient to treat thrips which are present internally in the onion.

5.4 Mites

In combination, the following treatments:

- Low pest prevalence (where indicated in the risk assessment)
- Removal of all outer skins, tops and root material so that the onions are considered peeled (Figure 3.1b in the PRA)
- Post peeling sanitisation to remove surface contamination from the peeling process
- Inspection and removal of any bulbs showing disease symptoms (including discolouration)

We note that the risk assessment notes that no phytosanitary measures may be required if the level of risk (assessment at very low) is considered acceptable. *Rhizoglyphus* mites are known to cause phytosanitary problems due to the difficulty of identifying them to a species level. The establishment of a new *Rhizoglyphus* species in New Zealand is undesirable and we do not consider the level of risk is acceptable.

Risk mitigation for *Rhizoglyphus* mites should be required.

5.5 Nematodes

Removal of all outer leaves and root material so that the onions are considered peeled (Figure 3.2b in the PRA)

5.6 Phytoplasma

No measures required.

We are uncomfortable with the level of uncertainty surrounding the risk assessment of this pest. However, if only peeled onions are imported due to risk management required for other pests, we feel that the risk from this pest would be minimised.

If the risk management for other pests changes so that unpeeled onions are considered for importation, we consider risk management for this pest would need to be re-evaluated.

5.7 Weeds

Removal of all outer skins, tops and root material so that the onions are considered peeled (Figure 3.2b in the PRA)

5.8 Viruses

No measures required.

We suggest that China be asked to provide active surveillance results for OMbLB as with symptomless infection it would be difficult to know if the virus was present. With the vector present in China, the virus would spread quickly and unnoticed and could potentially be introduced to NZ through trade in onion bulbs.

6. Conclusion

While we do not consider that there is an economically viable market in New Zealand for fresh onions imported from China, we recognise that this is not taken into account when developing import conditions.

Without the appropriate phytosanitary measures, we believe the importation of fresh onions from China would pose a significant phytosanitary risk to the \$120 million New Zealand onion industry. Therefore we consider strict phytosanitary conditions to protect our industry are imperative and that they must be appropriately enforced by MAF.

In reviewing the risk assessment we consider that restricting the import of Chinese onions to peeled onions in addition to other measures in a systems approach is necessary to protect our industry from new pests and diseases. We therefore do not accept that an Import Health Standard should be for "Fresh Bulbs for Consumption from China". We consider that it should be for "Whole peeled fresh bulbs for Consumption from China".

The industry's experience in consulting with MAF regarding Iris yellow spot virus has influenced our thinking going into this submission. Over several years the industry provided evidence to MAF that imported onions presented a risk of introduction of IYSV into New Zealand, however the import measures remained insufficient and IYSV is now established in NZ. The industry wishes to ensure that a similar situation does not arise with other pests of onions imported from a country such as China.

We appreciate the work MAF has done to develop this risk analysis and look forward to further consultation before the Import Health Standard is issued.

Thank you for the opportunity to make this submission.



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