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Submission on the proposed amendments to the Import Health Standard for Cut Flowers and Foliage from Malaysia

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INTRODUCTION

1. Horticulture New Zealand (HortNZ) advocates for and represents the interests of New Zealand's 5,000 commercial fruit and vegetable growers. The horticulture industry is valued at over \$5.5b with over \$3.6b in exports annually.
2. The industry employs over 60,000 people, occupies some 130,000 ha of land and provides critical regional development opportunities in Northland, Auckland, Bay of Plenty, Waikato, Hawke's Bay, Gisborne, Manawatu, Marlborough, Nelson, Canterbury and Central Otago.
3. New Zealand growers supply the majority of fresh and processed fruit and vegetables to domestic consumers, as well as exporting crops to discerning consumers in over 120 countries. Biosecurity is essential to support production, secure market access, and provide confidence for investment – all critical to ensure the horticulture industry continues to prosper.
4. An incursion of an invasive pest or pathogen can result in considerable cost and disruption during the initial biosecurity response. If eradication is not feasible, costs must be borne long-term as growers have to manage the new organism on an ongoing basis. For these reasons biosecurity threats are of significant concern to the horticulture sector.

GENERAL

5. Imported cut flowers and foliage can inadvertently harbour a number of pests and pathogens that would significantly impact on New Zealand fruit and vegetable crops if they were to arrive and establish here. For this reason, it is important that biosecurity risk on this relatively high-volume pathway is appropriately managed.
6. *Thrips palmi* is classified as a high impact economic pest (MPI 2021) and a significant concern to a number of important crops in New Zealand such as melon, tomato, cucumber, beans, capsicum and eggplant. Overseas crop losses of up to 90% have been reported (MacLeod et al 2004). It is a cryptic species that is difficult to see via visual inspection.
7. HortNZ understands that an emergency measure (on arrival fumigation) was introduced for imported cut flowers and foliage from Malaysia in response to repeated interceptions of regulated pests, including *Thrips palmi* (MPI 2021).
8. HortNZ acknowledges that there are multiple different ways to manage biosecurity risk, ranging from treatments through to a systems approach and we appreciate that there may be more than one type of intervention that can reduce biosecurity risk to an acceptable level.

PROPOSED IMPORT REQUIREMENTS - Malaysian Phytosanitary Certification Assurance (MPCA) Scheme

9. HortNZ considers the systems approach being proposed (the Malaysian Phytosanitary Certification Assurance (MPCA) Scheme) is an appropriate alternative to on arrival fumigation or import in accordance with the Singapore Assurance Scheme (ACS), provided that all independent and dependent measures within the scheme (listed in table 3, MPI 2021) are carried out effectively every time.
10. HortNZ strongly believes that managing risk offshore is preferable, and the MPCA scheme provides for offshore management of risk. HortNZ requests regular audit of the MPCA Scheme to ensure compliance.
11. The RMP states that the chemical dip that will be used to remove/kill any undetected pests will be “rotated to avoid pesticide resistance and targeted to the pests that are most prevalent at certain times of year” (Table 3, MPI 2021). HortNZ would like confirmation that chemical dips will be used year-round, and that all chemicals used will be efficacious against *Thrips palmi*, due to its cryptic nature, high impact economic pest status and its known resistance to commonly used insecticides.
12. Table 3, dependent measure ‘c’ is expected to remove diseased and infested material from the production system (MPI 2021). HortNZ believes that any diseased material should be tested to ensure that removal and destruction alone is an adequate mitigation. It might be that removing symptomatic material does not adequately mitigate the risk if the infection is caused by a pathogen that could have spread within the production system.
13. Hort NZ believes that pathway monitoring (4.3.2, MPI 2021) is important and request that the scope is extended to include all regulated pests, not just *Thrips palmi*. We would also appreciate clarification about how long pathway monitoring will take place. Will it be ongoing, or for a set period when the MPCA scheme import option is implemented?

OTHER

14. HortNZ welcomes the opportunity to discuss the points raised in this submission.

15. This submission is supported by:

- Katikati Fruitgrowers Association
- Process Vegetables New Zealand
- Potatoes New Zealand
- Vegetables New Zealand Inc

REFERENCES

MPI (2021) Risk Management Proposal: Amendments to the Import Health Standard for Cut Flowers and Foliage from Malaysia (155.02.04)

MacLeod A, Head J, Gaunt A (2004) An assessment of the potential economic impact of *Thrips palmi* on horticulture in England and the significance of a successful eradication campaign. Crop Protection 23 (2004) 601–610

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