



PO Box 10232, The Terrace,
Wellington, 6143

Level 4, Co-operative Bank House

20 Ballance Street, Wellington, 6011

Phone: +64 4 472 3795

Fax: +64 4 471 2861

Web: www.hortnz.co.nz

Email: info@hortnz.co.nz

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Submission on the use of irradiation to manage fruit flies on strawberry, scallopini, melon, and zucchini from Australia

Submitter: Horticulture New Zealand Incorporated
Submitted by: Anna Rathé, Biosecurity Manager
Contact Details: P O Box 10232, The Terrace, Wellington 6143, New Zealand
Ph: +64 4 494 9980
Email: anna.rathe@hortnz.co.nz

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. New Zealand is fortunate to be free of the Tephritid fruit flies associated with the import pathways under consultation, including *Bactrocera cucumis*, *Bactrocera tryoni*, *Bactrocera neohumeralis* and *Ceratitis capitata*. This country freedom status allows New Zealand produce to be exported to other countries around the world who also wish to remain free of these pests. An established population of Tephritid flies would cause significant production and market access issues for the New Zealand horticulture sector. For these reasons, it is essential that biosecurity risk is appropriately managed for produce imported from countries that have established populations of Tephritid flies, such as Australia.
6. HortNZ supports alignment of New Zealand phytosanitary measures with the International Plant Protection Convention's international standards for phytosanitary measures (ISPM) and guidelines.
7. HortNZ acknowledges that there are different ways to manage biosecurity risk in an equivalent manner, 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.

IRRADIATION TO MANAGE FRUIT FLIES

8. Irradiation of fruits and vegetables as a treatment for fruit flies is well established under ISPM 18: *Guidelines for the use of irradiation as a phytosanitary measure* and ISPM 28, *Annex 7: Irradiation treatment for fruit flies of the family Tephritidae (generic)*. Irradiation prior to export from Australia is consistent with our preference for biosecurity risk to be managed offshore whenever possible.
9. As long as the irradiation treatment is applied to zucchini, melon, scallopini and strawberries from Australia in accordance with *ISPM 28; Annex 07* and *ISPM 18*, HortNZ expects that the risk of fruit flies on these commodities should be appropriately managed.
10. HortNZ would appreciate explicit mention of the need to apply treatments in accordance with ISPM 18 and ISPM 28 in the regulatory documents. At present, it appears that the relevant IHS's (MPI a,b,c 2021) are silent on these two pertinent ISPMs.
11. HortNZ requests that treatment and pathway auditing is undertaken to ensure that irradiation is being undertaken appropriately and in accordance with the relevant ISPMs.
12. HortNZ believes that pathway monitoring is important, particularly when a new commodity/treatment pathway has been opened. HortNZ requests that consignments of strawberries, melon, zucchini and scallopini imported from Australia via the irradiation treatment pathway are closely monitored to ensure the risk of economically significant Tephritid flies is being appropriately managed by the new measures.

OTHER

13. HortNZ welcomes the opportunity to discuss the points raised in this submission.
14. This submission is supported by:
 - Citrus New Zealand
 - Katikati Fruitgrowers Association
 - NZ Persimmon Industry Council
 - Potatoes New Zealand

- Process Vegetables New Zealand
- Strawberry Growers New Zealand Inc
- Te Awanui Huka Pak Ltd
- Vegetables New Zealand Inc

REFERENCES

MPI (2021a) Import Health Standard 152.02: Importation and clearance of fresh fruit and vegetables into New Zealand

MPI (2021b) Import Health Standard Commodity Sub-class: Fresh Fruit/Vegetables Melon (*Cucumis melo*) from Australia

MPI (2021c) Import Health Standard Commodity sub-class: Fresh fruit/vegetables Zucchini (*Cucurbita pepo*) from Australia

MPI (2021d) Risk Management Proposal: Irradiation as a phytosanitary measure for the management of Tephritid fruit flies on fresh melon (*Cucumis melo*), scallopini (*Cucurbita pepo*), strawberry (*Fragaria sp.*), and zucchini (*Cucurbita pepo*) from Australia.

ENDS