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Submission on the Proposed amendments to specific import requirements for *Cannabis sativa*, *Capsicum*, *Chrysanthemum coronarium*, *Petunia*, *Phaseolus*, *Pisum*, *Solanum lycopersicum* and *Vicia* seeds for sowing

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INTRODUCTION

1. Horticulture New Zealand (HortNZ) advocates for and represents the interests of New Zealand's 6,000 commercial fruit and vegetable growers. The horticulture industry is valued at \$6.39b with \$4.2b 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 130 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.

GENERAL

4. HortNZ believes that seed pathways need to be carefully managed to prevent infected seed being inadvertently imported, distributed and grown at sites around the country. It is critical that imported seed is free from unwanted pathogens that would jeopardise New Zealand grown crops if they were to arrive and establish.
5. Plant viruses often have multiple modes of transmission which means that if they were to arrive in New Zealand, they would be very likely to spread. HortNZ strongly believes that taking steps to keep risk offshore and prevent arrival of new viruses and viroids is the best course of action.

COMMENTS ON THE PROPOSED CHANGES

6. Given the risk and the availability of a new, more sensitive test, HortNZ supports removal of the ELISA test for *Tomato brown rugose fruit virus* and inclusion of the requirement to test using an NPPO-approved PCR test (section 1.5 MPI 2021b). It is essential that the tests that are used for high impact viruses such as this are able to detect low viral titres.
7. HortNZ believes that, at a minimum, onshore testing should be required during the proposed one-month transition period (Section 4.1 MPI 2021b). Whilst we acknowledge that importers may need time to implement the new requirement, the risk needs to be appropriately managed in the interim.
8. HortNZ supports inclusion of measures to manage the risk of Potato spindle tuber viroid on *Crysanthemum coronarium* (*Glebionis coronaria*) and *Petunia*, given that the viroid is now known to be seed transmitted in these hosts (section 1.7 MPI 2021b). Providing a range of risk management options (sourced from a Pest Free Area, sourced from a Pest Free Place of Production with parent plant testing and seed testing using PCR) allows exporting countries to choose from a range of pathways whilst appropriately managing the biosecurity risk posed by the viroid. However, these measures should be supported by an evidence base in alignment with international standards before trade commences.
9. HortNZ requests that even if Hemp mosaic virus and hemp streak virus are removed from the seed for sowing import health standard, the diseases of unknown aetiology (hemp streak and hemp mosaic disease) should remain regulated. This would retain the option for response action under the Biosecurity Act 1993 if these diseases were detected post-border in later years, as they would still be classified as Unwanted Organisms.
10. HortNZ requests that the Kovachevsky 1978 paper on seed transmission of *pea enation mosaic virus* (PEMV) that is not published in English (section 6.3, MPI 2021b) is translated before changes are made to the Import Health Standard (MPI 2021a). This may reveal critical information that will help to inform conclusions about the risk associated with imported seed and PEMV.

OTHER

11. HortNZ understands that any imposed measures need to be evidence-based and justifiable. We also understand that there is often a scarcity of literature on seed transmission, and that decisions need to be made based on the evidence available. We request that all literature is given appropriate consideration – to provide confidence that biosecurity risks are not overlooked due to limited evidence, where some evidence does exist.

12. HortNZ would like clarification on what constitutes sufficient evidence for requiring measures to manage a virus on seed import pathways. For example, is it evidence of seed transmission in the host genus? evidence that the virus is seed-borne? records of seed transmission in historical publications vs modern publications? examples of the same genus of virus being seed transmissible? Whilst we acknowledge that every situation is different, approaches to the available evidence need to be consistently applied.

CONCLUSION

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

14. This submission is supported by:

- Potatoes New Zealand
- Process Vegetables New Zealand
- Tomatoes NZ
- Vegetables New Zealand Inc

REFERENCES

Kovachevsky, I. 1978. Investigations on the pea enation mosaic virus. Rastenievud. Nauki 15:108-114.

MPI (2021a) Draft Import Health Standard 155.02.05: Seeds for Sowing

MPI (2021b) Risk Management Proposal: Amendments to the specific requirements for *Cannabis sativa*, *Capsicum*, *Chrysanthemum coronarium*, *Petunia*, *Phaseolus*, *Pisum*, *Solanum lycopersicum* and *Vicia*.

ENDS