

31 August 2021

Submission on the draft Import Health Standard for importing personal consignments of products for human consumption and personal effects

Submitter: Horticulture New Zealand Incorporated
Submitted by: Richard Palmer and Anna Rathé
Contact Details: P O Box 10232, The Terrace, Wellington 6140, 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 6,000 commercial fruit and vegetable growers. The horticulture industry is valued at \$6.73b with \$4.55b in exports annually.
2. The industry employs over 60,000 people, occupies some 80,000 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 overseas. 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. Biosecurity is paramount for the horticulture sector and HortNZ's preference is to keep risk offshore wherever possible. We acknowledge that the border is the next line of defence. Strong pre-border and border biosecurity are critical parts of the system.

General comments on the proposed Import Health Standard

5. There are many exotic pests and diseases that would threaten the horticulture industry if they were to arrive, which we therefore seek to keep out of New Zealand. A range of the high priority pests are noted in the Risk Management Proposal (MPI 2021b) that underpins the procedures set out in the import health standard (IHS). Examples of some that are particularly high priority biosecurity threats for horticulture are:

- Fruit flies such as Queensland fruit fly (*Bactrocera tryoni*) and Mediterranean fruit fly (*Ceratitis capitata*). It is important that fresh fruit or vegetables do not come into New Zealand via the passenger or mail pathway as these could be infested with exotic fruit fly eggs or larvae.
 - Brown Marmorated Stink Bug (*Halyomorpha halys*). This pest moves into homes and sheds overseas to overwinter and can inadvertently be packed by passengers if individual insects are hidden in clothes, tents or other items.
 - Lepidopteran pests such as Asian Gypsy Moth (*Lymantria dispar*) and Fall Army Worm (*Spodoptera frugiperda*), species with eggs that can be associated with inanimate objects.
 - Spotted Lanternfly (*Lycorma delicatula*) which can lay well camouflaged egg masses on personal effects such as outdoor furniture.
 - Exotic fungal pathogens that can be transported in soil on dirty footwear are also of concern.
6. HortNZ supports efforts to consolidate the requirements for the importation of personal consignments of products for human consumption (whether for food or medicinal purposes) and personal effects, some of which have been covered in a range of other standards. This IHS (MPI 2021a) provides clear expectations for exporters, importers, and border staff.
7. HortNZ consider a weight limit to delineate commercial from personal consignments is appropriate. HortNZ would like MPI to further consider whether biosecurity risk and inspection time/resources should also be taken into account when determining the permitted weight limit for personal consignments of food products. At the passenger border the weight limit will set a cap for the amount of food material requiring biosecurity inspection and also reduce inconvenience to other passengers due to lengthy screening timeframes. This could be reduced further with a smaller weight allocation set.

Plant Products

8. The proposed IHS provides clarity about biosecurity expectations and sets out explicit requirements for a range of high-risk plant products. HortNZ expects that this clarity will aid understanding of the requirements, and therefore compliance with the requirements.
9. The reference of the IHS to existing requirements and standards (MPI 2021a) for both consistency and application is supported, including:
- Clarity that fresh fruit and vegetables are only permitted for import if they meet the requirements of the existing commodity standard or are imported under an MPI-approved system. HortNZ understands that this means fresh fruit and vegetables will not be able to be brought in with passengers or in personal effects (unless part of a Pacific Island Food Programme package that has gone through an MPI-approved system to mitigate any biosecurity risk).
 - Stored plant products are to be in a processed state, free of pests, not classified as 'Prohibited Entry', and not be a weed.
 - Where treatment is required, this is to be an MPI Approved Biosecurity Treatment.
10. HortNZ expects MPI to ensure that people cannot use this IHS to bring in products for uses other than human consumption, for example utilising this IHS to bring in seeds that the importer/passenger intends to plant rather than consume.

11. HortNZ suggests that a general statement should be included in a guidance box to make it clear that any plant products used as supplements/medicines are captured within 'for human consumption'.

Personal Effects

12. HortNZ supports the clear requirement for personal effects to be 'be cleaned and free from regulated pests and biosecurity contamination' (MPI 2021a).
13. We suggest the guidance provided in this section requires some work to ensure the expectation of 'cleaned and free from regulated pests and biosecurity contamination' is not diluted through the guidance indicating that 'a reasonable effort' to clean is sufficient.
14. HortNZ believes that implementation will be important, and that efforts should be made to ensure that parties such as international moving companies that are involved in packing household items and personal effects for transport to New Zealand are aware of the requirements.

Conclusion

15. HortNZ welcomes the opportunity to discuss the points raised in this submission.
16. This submission is supported by:
 - Central Otago Fruitgrowers Association
 - Citrus New Zealand
 - Katikati Fruitgrowers Association
 - New Zealand Asparagus Council
 - Process Vegetables New Zealand
 - Strawberry Growers New Zealand Inc
 - Summerfruit New Zealand
 - Tomatoes NZ
 - Vegetables New Zealand Inc

References

MPI (2021a) Draft Import Health Standard: Personal Consignments of Products for Human Consumption and Personal Effects. 19 July 2021.

MPI (2021b) Risk Management Proposal: Personal Consignments of Products for Human Consumption and Personal Effects IHS. 19 July 2021.

ENDS