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Submission on the proposed new import requirements for *Citrus* plants for planting imported into New Zealand for propagation.

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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 $6.73b 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. Enabling access to new germplasm is important for the future success of the horticulture sector. Effective management of any potential biosecurity threats that may be associated with imported germplasm material is equally critical.

GENERAL

5. As noted in *ISPM 32 Categorization of commodities according to their pest risk*, plants for planting is one of the highest risk pathways (FAO 2009) and it is important that biosecurity risks are managed accordingly.
6. A number of high impact pathogens have been identified as potentially being associated with Citrus material for planting (MPI 2021b). Some are restricted to citrus hosts, and therefore the risk is restricted to the Citrus industry, whilst others such as *Xylella fastidiosa*, *Ceratocystis spp* and *Spiroplasma citri* have the potential to cause significant losses to other crop hosts if they were to arrive. For this reason, the citrus import health standard (IHS) is of interest to the broader horticulture sector.
7. HortNZ is supportive of setting phytosanitary measures for bacteria, fungi and oomycetes appropriate to their level of risk. New Zealand's appropriate level of protection (ALOP) must be consistently applied for organisms that have a similar level of risk, regardless of the class of the regulated pest.

COMMENTS ON THE PROPOSED AMMENDMENTS

Part 1: Requirements

8. HortNZ recognises MPI has used transitional arrangements in the past to allow industry to adapt to new requirements when immediate adoption is not possible or feasible, however it is important that residual biosecurity risk is managed during this transitional period. For this reason, HortNZ is supportive of the conditions set out in section 1.7 of the IHS (MPI 2021a), with the exception of the option of sweeping up debris in 1.7 (1) (e). We request that it is removed to minimise the chance of spores becoming airborne through the action of sweeping.

Part 2: Specific Requirements

9. HortNZ has a strong preference to keep risk offshore wherever possible. Whilst the IHS states that treatments must be applied prior to export (section 2.1 (1), MPI 2021a), the Risk Management Proposal states that *"MPI recognises that some of the prescribed insecticide and miticide treatments are not always able to be applied prior to export. MPI will assess alternative treatment options or allow plants to be treated in New Zealand by an MPI-approved treatment provider before plants enter post-entry quarantine" (*section 1.3 (25) ii), MPI 2021b). HortNZ requests that prescribed insecticide and miticide treatments are always applied prior to export and would like confirmation that this will be the case. Insects are often highly mobile and there is a risk that they could enter the New Zealand environment prior to treatment if on-shore treatment is allowed.
10. HortNZ supports adoption of post-entry quarantine (PEQ) requirements that will maximise the chance of symptom expression and pathogen titres sufficient for detection during testing. For this reason, HortNZ are supportive of subjecting imported citrus material to pre-determined environmental conditions in PEQ (section 2.4.1, MPI 2021a).
11. HortNZ supports the requirement for level 3a post entry quarantine for plants from approved sources rather than level 2. Level 3a will allow application of the temperature requirements and will more likely to contain pathogens such as *Phytophthora* spp. and

Ceratocystis spp. that HortNZ understands are not specifically tested for prior to export (MPI 2021b).

12. HortNZ acknowledges that the phytosanitary status of citrus material from non-approved sources is unknown and this material is assumed to have had no or very little previous intervention. HortNZ supports the requirement for material from non-approved sources to go into level 3b post-entry quarantine (MPI 2021a). Without any assurances about the phytosanitary status of material it is sensible to place it in a setting that will contain any unwanted pests or pathogens while testing and observations are undertaken.
13. HortNZ agrees with the need to ensure that the PEQ period for material from non-approved sources allows for two growth flushes. This will maximise the chance of detection of pests with prolonged latency periods (3.1.1 (62), MPI 2021b).
14. HortNZ is supportive of removal of biological indexing requirements for viruses for which a sensitive and validated PCR test exists (section 4.4 (98) MPI 2021b).

Part 3: Inspection, verification and documentation requirements

15. HortNZ requests that MPI regularly audits any export plan or offshore facility in which Citrus plants for planting are produced under section 1.6 of the Import Health Standard (1.6 Options for Import (MPI 2021a)). Regular auditing will provide assurance that phytosanitary measures will be effectively applied offshore.
16. HortNZ supports the provision for audit testing on arrival for Citrus plants for planting produced under an export plan or in an offshore facility (2.2.2 (46) MPI 2021b). The ability to audit test in New Zealand means there is an additional mechanism to check requirements completed offshore, if required.

CONCLUSION

17. HortNZ welcomes the opportunity to discuss the points raised in this submission.
18. This submission is supported by:

- Citrus New Zealand
- TomatoesNZ

REFERENCES

FAO (2009) ISPM 32 Categorization of commodities according to their pest risk.

MPI (2021a) Draft *Citrus* plants for planting Import Health Standard.

MPI (2021b) Risk Management Proposal: *Citrus* plants for planting. July 2021.

ENDS