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Submission on the proposed changes to the import health standards for *Prunus* and nursery stock

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INTRODUCTION

1. This submission is supplementary to HortNZ's original submissions on the draft Import Health Standard for *Prunus* Plants for Planting dated 7 August 2019 and 3 December 2019, and our submission on the partial review of *Malus* import requirements in the Importation of Nursery Stock Import Health Standard dated 18 December 2020. This submission has been prepared in response to additional information provided by MPI in November 2021 (MPI 2021c).
2. Enabling importation of new germplasm while effectively managing biosecurity risk is critical for the future success of the horticulture sector.
3. 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.

MALUS

4. HortNZ understands that MPI no longer believe that listing *Malus* as a *Phytophthora ramorum* host is justified (MPI 2021c). While HortNZ does not have any evidence to dispute this conclusion, we would like to know whether the inspection, testing and treatment requirements for oomycetes in the *Malus* schedule of the Import Health Standard (IHS) (MPI 2021a) would detect or manage *P. ramorum* if it were present? *P. ramorum* is a Notifiable and Unwanted Organism. As such it would provide some comfort to know that the risk management requirements for the *Phytophthora* species named in the *Malus* pest list (MPI 2021a) are likely to manage *P. ramorum* if it were present.

PRUNUS

5. HortNZ recognises MPI has used transitional arrangements in the past to allow industry to adapt to new requirements when immediate adaption is not possible or feasible. We are generally supportive of this approach, provided it is only for a transitional period and residual biosecurity risk is managed using a set of interim measures during this period.
6. HortNZ notes that the expected commercial decisions to enable the establishment of level 3A post entry quarantine (PEQ) capacity have not occurred (MPI 2021c). It is unclear what has caused further delay in new 3A PEQ since the revised IHS was issued.
7. Whilst we recognise that level 3A quarantine capacity limitations remain a barrier to importing new genetic material under this IHS (MPI 2021c), HortNZ feels that an extension that more than doubles the original two-year period (MPI 2021b, MPI 2021c) is not in the spirit of a transitional (i.e. temporary) arrangement.
8. If MPI *does* decide to extend the transitional period for material from an offshore facility, HortNZ requests that:
 - The interim measures in section 1.7 *Transitional arrangements* (MPI 2021b) remain in place in full to minimise residual biosecurity risk, with one exception - HortNZ asks that the option of sweeping up debris in 1.7 (1) f). is removed to minimise the chance of spores becoming airborne through the action of sweeping.
 - MPI conducts audits of the interim measures. We request that this is written into the IHS, including the options for addressing non-compliance so that it is clear to anyone implementing the interim measures that they will be checked and held to account. HortNZ believe auditing is important to ensure compliance and minimise residual risk during the transitional period.
 - The transitional period pathway is removed from the IHS as soon as 3A capacity exists, even if this is before the 2025 end date that is proposed to be included in the IHS.
 - Consideration is given to what will happen should 3A capacity not be available by the end of the extended transition period.

CONCLUSION

9. HortNZ welcomes the opportunity to discuss the points raised in this submission.
10. This submission is supported by:
 - Citrus New Zealand

- Kaikati Fruitgrowers Association

REFERENCES

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

MPI (2021a) Ministry for Primary Industries Standard 155.02.06 Importation of Nursery Stock. September 2021

MPI (2021b) Prunus Plants for Planting MPI.IHS.PRUNUS.PFP. August 2021.

MPI (2021c) Risk Management Proposal: Amendments to the import health standards Importation of Nursery Stock (155.02.06) and Prunus Plants for Planting (MPI.IHS.PRUNUS.PFP)

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