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17 December 2021

Submission on the draft import health standards for importing fresh Citrus fruit for human consumption

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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 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. An incursion of an invasive pest or pathogen can result in a significant financial cost and cause considerable 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, management of any biosecurity threats associated with imported fresh produce is of significant interest to the horticulture sector.

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5. A number of unwanted pests and pathogens have been identified as potentially being associated with fresh Citrus (MPI 2021). Some are host-specific to citrus, and therefore the risk is restricted to the Citrus industry, whilst others such as fruit flies have the potential to cause significant losses to other crop hosts if they were to arrive. As a result, the citrus import health standard (IHS) is relevant to the broader horticulture sector. Risks associated with the commodity must be appropriately managed to protect all potentially impacted crops.

COMMENTS ON THE PROPOSED STANDARDS

6. HortNZ believes that commercial production practices are important to minimise the risk of crops for export being contaminated with unwanted pests, pathogens or weeds in the country of origin. As such, we appreciate the explicit wording in each IHS stating that the commodity must be sourced from a production system that uses standard commercial production methods (MPI 2021a). This is supported by the clear explanation of commercial production in the IHS definitions schedule (MPI 2021a).
7. For example, the Pest Risk Assessment reports that *Drosophila suzukii* is only associated with overripe or damaged citrus fruit, which would not meet the commodity description (MPI 2021b). If overripe or damaged citrus fruit were to be imported from a country where *D. suzukii* is present there would be a risk of introduction. This example shows the importance of the commodity description being very clear and unambiguous, as well as the critical need for imported goods to meet the commodity description every time so that risk is managed.
8. Compliance with the export plan (bilateral arrangement) is critical to ensure biosecurity risk is adequately managed. HortNZ would like confirmation that compliance with the export plan (bilateral arrangement) will be audited.
9. Hort NZ believes that pathway monitoring is important. We would appreciate clarification about how long pathway monitoring will take place. Will it be ongoing, or for a set period after trade commences? And will pathway monitoring be undertaken for each commodity and country combination? HortNZ believe that monitoring at the country:commodity scale is important to understand whether biosecurity risk is being adequately managed on all traded pathways.
10. HortNZ is supportive of using MPI specified measures to manage the risk of exotic fruit flies on this pathway (section 5.3, MPI 2021c). Fruit flies are considered a high priority pest for many crops in the horticulture sector and response costs for fruit flies of economic significance are borne in part by industry. It is important that the risk is managed appropriately.
11. HortNZ supports the application of phytosanitary measures in the country of export to keep risk off-shore.
12. HortNZ acknowledges that there are multiple different ways to manage biosecurity risk, 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.
13. However HortNZ would like to query the suitability of *Appropriate pest control activities* as a targeted measure (in the pest reduction chapter of section 4.2.2., MPI 2021c). Is this option supported by an ISPM, as all of the other targeted measure options are? If not, is it a robust risk management option? And how does it differ from a systems approach, which seems more robust due to the need for two independent measures?
14. HortNZ understands that MPI intend to manage vectored pathogens via their insect vectors (section 1.4.2, MPI 2021c), and only if:

- the vector is associated with Citrus spp; and
- both the vector and the pathogen are present in the same citrus-exporting country

Use of this approach means it is very important that MPI are quickly aware of any pathogen range expansion into new countries, especially those with established vector populations that export citrus. Pathogen detection can be very difficult, especially at the early stages of an incursion into a new country and it is possible for new infections to go undetected for some time. HortNZ seeks assurance that MPI has systems in place to ensure timely notification of pathogen spread so that emergency measures for the vector can be quickly implemented if necessary.

15. HortNZ notes that the risk management proposal (RMP) frequently mentions that *residual risk from citrus waste is likely to be mitigated by the usual low risk methods of waste disposal, i.e., bagged waste in landfills or being run through kitchen disposal units* (MPI 2021c). The RMP argues that these methods of waste disposal reduce the chance of pests and pathogens being exposed to a suitable host, which has informed the risk management conclusions. HortNZ would like to challenge the assumption about ‘usual’ methods of waste disposal. WasteMINZ commissioned food waste audits in 2014/15 and again in 2018 which included a household survey. In 2014/15 42% of households claimed to compost or worm farm food scraps (Sunshine Yates Consulting, 2018). In 2018, 39% responded that they compost or worm farm food waste (Sunshine Yates Consulting, 2018). If the survey respondents are representative of New Zealand households, then it appears likely that a significant amount of domestic fruit and vegetable waste is composted. HortNZ encourage Biosecurity New Zealand to test their assumptions about waste when undertaking and risk management analysis in the future.
16. HortNZ understands that some pests and pathogens associated with fresh citrus will have more stringent measures than they did in previous IHS's, while some will have less stringent measures. HortNZ would appreciate an explanation about why the risk profile for *Chrysomphalus aonidum* and *Chrysomphalus dictyospermi* has changed? We would like to understand the rationale for the drop from tier 2 (the equivalent of targeted measures) to basic (the equivalent of their 1) (Table 19, MPI 2021c).
17. It has been proposed that a number of ‘risk group 1’ pests detailed in existing import health standards are not listed in the new standards or on the online pest database (App. 3.2, MPI 2021c). The rationale provided is that these pests are considered adequately managed by basic measures and did not meet the criteria for assessment for additional measures in the import risk analysis. In contrast, App 1.1. states that the online pest database provides a list of pests that were assessed in the import risk analysis and determined to be managed by basic measures (MPI 2021c). HortNZ's preference is that all pests from the previous IHS that are considered managed by basic measures are listed in the online database for completeness. If these pests do not feature on ePest there will be no way for users to know that they are unwanted, but have been considered (with the outcome that basic measures are considered sufficient to manage risk on this pathway).

CONCLUSION

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

- Citrus New Zealand
- Kiwifruit Vine Health Inc

- New Zealand Apples & Pears Inc
- Process Vegetables New Zealand
- TomatoesNZ

REFERENCES

MPI (2021a) Import Health Standard: Fresh Lemon (*Citrus limon*) for Human Consumption

MPI (2021b) Import Risk Analysis: Citrus (*Citrus* spp.) fresh fruit for human consumption. October 2021.

MPI (2021c) Risk Management Proposal: Fresh citrus fruit (*Citrus* spp.) for human consumption. October 2021.

Sunshine Yates Consulting (2018.) New Zealand Food Waste Audits. WasteMINZ.