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Submission on the Draft Import Health Standard 155.02.05: 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 appreciates Ministry for Primary Industries (MPI) acting on emerging risks. HortNZ supports work to improve the Seed for Sowing Import Health Standard (MPI

2021a) in order to manage the biosecurity risk posed by *Melon necrotic spot virus* (MNSV) which was identified via the emerging risk system (MPI 2020b).

5. 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.
6. MNSV has multiple modes of transmission: via a fungal vector (though it is unknown if this vector is present in New Zealand), seed and mechanical transfer via contaminated tools (MPI 2020b). This means that if the virus were to arrive in New Zealand, it may spread. HortNZ believes that taking steps to keep risk offshore and prevent arrival of this pathogen is the best course of action.
7. MNSV is a risk to melon, watermelon and cucumber crops - production impacts have been reported in these crops overseas. New Zealand produces fresh cucumber, watermelon and melon primarily for the domestic market, but also exports melons.

COMMENTS ON THE PROPSED CHANGES

8. HortNZ agrees that, given the risk, measures for MNSV are required.

9. The Risk Management Proposal presents an analysis of four risk management options:
    - Pest Free Area (PFA),
    - Sourcing from a country that MNSV is absent from or not known to occur in
    - Testing of mother plants
    - Seed testing

10. HortNZ considers Pest Free Area (FAO 2017) and sourcing from countries in which MNSV is absent/not known to occur are both appropriate risk management options provided that countries using these options have a regulated system for sourcing clean plant material, in alignment with international standards. Contaminated seeds are symptomless, and due to the widespread global distribution of MNSV there is a need to ensure suppliers source clean plants and seeds for planting.
11. HortNZ agrees that visual inspection alone is insufficient to have confidence that MNSV is absent from a place of production given the variability of symptom expression. Therefore, HortNZ supports testing of mother plants. HortNZ would like clarification about whether the mother plant testing option is to be implemented under an official Pest Free Place of Production framework (PFPP) (FAO 2016), which is currently absent from the proposed new schedule (appendix 1, MPI 2021b).
12. HortNZ requests that the IHS's require that any PFA (or PFPP) measures relate to the country of origin of the seed or plants, as opposed to the country of export. In some instances, the country in which the seed or nursery stock is grown and the country it is exported from differ and can significantly differ in terms of their risk profile.
13. HortNZ supports inclusion of both onshore and offshore seed testing options, although it is always our preference that risk is managed offshore when possible. Allowing for onshore seed testing provides an option for exporting countries that may not have ELISA or PCR testing capability for MNSV. This should provide a pathway that is accessible to all countries whilst still managing biosecurity risk.
14. Paragraph 78 e) (MPI 2021b) mentions that chemical disinfestation may reduce titres below the detectable threshold. HortNZ would like further information on how this risk will be managed if the virus is still present in seed at an undetectable level. The primary

consideration here is that if the virus load later increased to a level of disease expression and detection, this would likely trigger a biosecurity response.

15. HortNZ would like further information on confidence of detection of MNSV using ELISA, which generally has lower sensitivity than PCR.
16. HortNZ would also like clarification on the statement in paragraph 83 b) of the risk management proposal. The statement reads “The efficacy of the sampling system for testing is uncertain”. This is concerning as a well-designed sampling system is essential for detection of viruses. We request further information of the nature of the uncertainty that is referred to.

CONCLUSION

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

2. This submission is supported by:
   - Potatoes New Zealand
   - Process Vegetables New Zealand
   - Tomatoes NZ
   - Vegetables New Zealand Inc

REFERENCES

MPI (2021a) Draft Import Health Standard Seeds for Sowing 155.02.0515. February 2021

MPI (2021b) Risk Management Proposal: Measures for *Melon necrotic spot virus* on *Cucumis melo* (melon), *Cucumis sativus* (cucumber) and *Citrullus lanatus* (watermelon) (Import Health Standard 155.02.05: Seeds for Sowing)

FAO (2017) ISPM 4 Requirements for the establishment of pest free areas.

FAO (2016) ISPM 10 Requirements for the establishment of pest free places of production and pest free production sites.

ENDS