SUBMISSION

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Amendments to the Import Health Standards for Fresh Lychee, (*Litchi chinensis*) from Thailand

7 December 2022

To: The Ministry for Primary Industries

Name of Submitter: Horticulture New Zealand

Contact for Service:

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INTRODUCTION

- 1. Horticulture New Zealand (HortNZ) advocates for and represents the interests of approximately 5,500 commercial fruit and vegetable growers in New Zealand. These growers supply fresh and processed fruit and vegetables to domestic consumers, as well as exporting crops to discerning consumers overseas. The horticulture industry is valued at \$7b with \$4.6b in exports annually.
- 2. The national and regional economic benefits associated with horticultural production are important. The industry employs more than 40,000 people and provides critical regional development opportunities in Northland, Auckland, Bay of Plenty, Waikato, Hawke's Bay, Gisborne, Manawatu, Marlborough, Nelson, Canterbury, and Central Otago. The rural economy supports local communities and primary production defines much of the rural landscape.
- 3. HortNZ's purpose is to create an enduring environment where growers thrive. This is done through enabling, promoting, and advocating for growers in New Zealand.
- 4. HortNZ notes that the fruit flies *Bactrocera dorsalis* (Oriental fruit fly) and *Zeugodacus cucurbitae* (melon fly) are high risk pest organisms with over 100 horticultural host species e.g., apple, avocado, citrus, stone fruit, tomatoes. Both organisms are widespread in Thailand (MPI Risk Management Proposal, 2022).
- 5. MPI's Import Risk Assessment (MPI 2007) concluded that the likelihood of entry of these two flies is high, it is highly likely that both species could establish in New Zealand, and this would have significant impacts on New Zealand's horticultural sector and economy. HortNZ also notes that adult longevity of these species is up to 222 days with no shortage of host plants all year round (MPI Risk Management Proposal, 2022).
- 6. It is therefore imperative that the pathway is adequately managed to prevent the arrival of oriental fruit fly and melon fly.

COMMENTS ON THE PROPOSED AMENDMENTS

- 7. In point 4 of the risk management proposal (MPI 2022), MPI makes a very clear statement that the existing cold treatment schedule does not manage the biosecurity risk of these two flies entering on this pathway.
- 8. This implies that the risk of fruit flies entering New Zealand on fresh lychee from Thailand is currently not adequately managed.
- 9. HortNZ would like confirmation that the cold treatment pathway is not and will not be used until an efficacious treatment is in place.
- 10. HortNZ is broadly supportive of the proposed amendments to the import requirements for fresh lychee from Thailand. The aim of these amendments is to strengthen the management of the high risks posed by *B. dorsalis* and *Z.*



- *cucurbitae* on this pathway by extending the duration of cold treatment to 17 and 20 days.
- 11. While HortNZ supports the premise that holding lychee at 1°C for longer periods of time is more likely to kill all life stages of fruit flies that may be present (and therefore increasing the holding time to at least 17 days would be expected to decrease the residual risk of entry of these high-risk pests) the body of evidence provided by MPI relies on a single published paper from the 1990s together with the fact that USDA and DAFF use the 17 days at 1°C or 20 days at 1.38°C regimens (USDA 2022; MPI 2022). HortNZ suggests that there is considerable uncertainty regarding the minimum duration of time that lychee should be held at 1°C to effectively manage these fruit fly risks.
- 12. HortNZ requests MPI provide the evidence that supports the cold treatment regimens of 17 days at 1°C or 20 days at 1.38°C.

CONCLUSION

- 13. HortNZ urges MPI to ensure effective management of the risks posed by this pathway as soon as possible. While this pathway has not been active since 2015, it is still an open pathway, and it is important that the risks of high-impact pests entering on fresh lychees from Thailand are adequately managed.
- 14. HortNZ welcomes the opportunity to discuss any of the points raised in this submission.
- 15. This submission is supported by:
 - Citrus New Zealand
 - New Zealand Apples & Pears Incorporated
 - New Zealand Avocado



REFERENCES

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Accessed: 22 November 2022

MPI (2022) Risk Management Proposal Amendments to the import health standards 152.02: Importation and Clearance of Fresh Fruit and Vegetables into New Zealand, and Commodity Subclass: Fresh Fruit/Vegetables Lychee, (*Litchi chinensis*) from Thailand

https://www.mpi.govt.nz/dmsdocument/54130-Draft-Risk-Management-Proposal-Thai-Lychee-cold-treatment-for-consultation

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