

# SUBMISSION ON

## Proposed measures to manage phytoplasmas on ornamental plants for planting

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**To:** The Ministry for Primary Industries (MPI)

**Name of Submitter:** Horticulture New Zealand

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# OVERVIEW

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## Our submission

Horticulture New Zealand (HortNZ) thanks the Ministry for Primary Industries (MPI) for the opportunity to submit on the proposed measures to manage phytoplasma on ornamental plants for planting in the Import Health Standard: Importation of Nursery stock. We welcome any opportunity to work with MPI to discuss our submission.

The details of HortNZ's submission to the proposed risk management measures are set out below.

This submission is supported by:

- New Zealand Apples & Pears Incorporated
- Onions New Zealand Inc.
- Potatoes New Zealand
- Summerfruit New Zealand
- Tararua Growers Association
- Te Awanui Huka Pak Ltd
- Tomatoes New Zealand
- Vegetables New Zealand Inc.

# HortNZ's Role

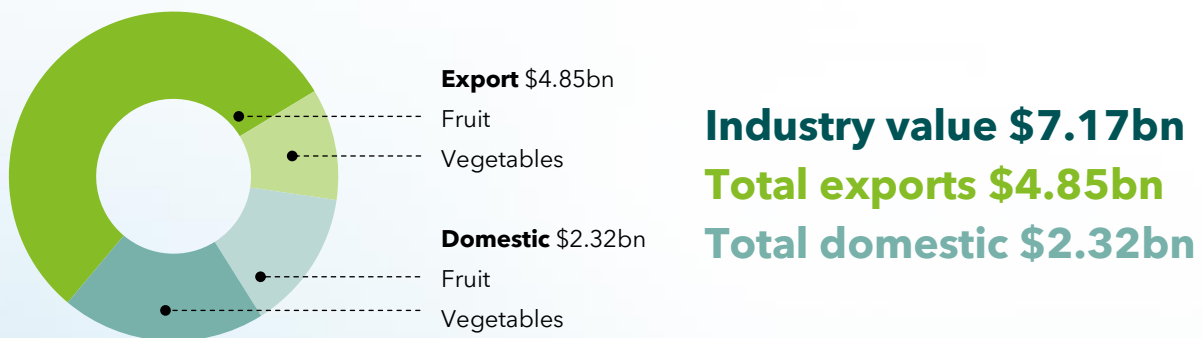
## Background to HortNZ

Horticulture New Zealand represents the interests of 6000 commercial fruit and vegetable growers in New Zealand, who grow around 100 different crop types and employ over 60,000 workers.

There is approximately 80,000 ha of horticultural land in New Zealand on which fruit, berries and vegetables are grown.

It is not just the economic benefits associated with horticultural production that are important. The rural economy supports local communities and food production defines much of the rural landscape. Food production values provide a platform for long term sustainability of communities, through the provision of food security.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting, and advocating for growers in New Zealand.



## HortNZ's Biosecurity Involvement

On behalf of its grower members, HortNZ takes a significant interest in biosecurity regulations, planning, and operations. As well as advocating on behalf of growers in discussions with MPI and other regulators, HortNZ and other industry groups also work to raise the awareness of fruit and vegetable growers about the roles they themselves can play in helping to keep their farms, orchards and wider New Zealand protected from unwanted pests and diseases.

# Executive Summary

**ON BEHALF OF NEW ZEALAND'S FRUIT AND VEGETABLES GROWERS, HORTNZ DOES NOT SUPPORT THE PROPOSED RISK MEASURES TO MANAGE PHYTOPLASMA ON ORNAMENTAL PLANTS FOR PLANTING, AS THEY ARE CURRENTLY WRITTEN.**

- HortNZ has concerns about MPI's long-term strategic vision for the future of New Zealand's primary horticultural industries.
- Your risk assessment indicates that the risks to the horticulture industries from all 11 target phytoplasmas of concern are moderate to very high. However, you are proposing to remove all phytosanitary measures from all types of ornamental plants that enter New Zealand on 'high certainty pathways' without implementing active and ongoing verification.
- Further to this, the proposal to drop all diagnostic testing requirements for less frequently imported pathways ('low certainty pathways') is also concerning.
- We question the approach that has been taken to balance the risks and benefits to NZ Inc. across different sectors.
- The current and future value of the horticulture industry to New Zealand is high and a more precautionary approach is merited.

**HORTNZ STRONGLY REQUESTS THAT MPI INCLUDES A VERIFICATION SCHEME IN THE IMPORT HEALTH STANDARD FOR THIS PATHWAY.**

# Submission

## Introduction

Horticulture New Zealand (HortNZ) thanks MPI for the opportunity to provide feedback on the proposed measures to manage phytoplasmas on ornamental plants for planting - Risk Management Proposal.

HortNZ understands that the consultation is on the Risk Management Proposal (RMP) and proposed risk mitigation measures but not the draft IHS, which will be consulted on separately. However, submissions during this consultation will be considered and will influence the development of the draft IHS.

The proposal describes the risk mitigation measures to manage the risk of the 11 target phytoplasmas on ornamental plants for planting. The proposed measures would enable the importation of high volumes of ornamental plant germplasm with minimal import requirements.

Further, the proposal introduces a new approach, the 'Level of certainty' approach, to identify the degree of measures to be applied on a commodity or pathway based on the history of trade.

HortNZ understands that MPI seeks to achieve a balance between biosecurity risk mitigation measures and the facilitation of trade. However, the risks posed by all 11 target phytoplasmas to the horticulture industries have been assessed as moderate to very high; therefore, the removal of critical verification systems for pest freedom is unjustifiable.

## Horticulture has the potential to provide more support to New Zealand

### **HORTNZ REQUESTS THAT MPI CONDUCTS APPROPRIATE ECONOMIC WELLNESS ANALYSES AND USES THESE TO UNDERPIN THEIR DECISION MAKING ACROSS THE BIOSECURITY SYSTEM.**

To be prioritising the importation of exotic, ornamental plants above protecting the commercial viability of the nation's horticulture industries makes no economic sense.

If any of those 11 unwanted phytoplasmas were to enter New Zealand on the ornamental plant pathway this would be of major concern to the growers of fruit and vegetables. They would incur the costs of response and/or having to manage the disease into the long term. The margins in horticulture are narrow and cannot accommodate the costs of unnecessary risks being taken in other sectors.

As a reminder, MPI helped to develop the Aotearoa Horticulture Action Plan<sup>1</sup> (AHAP) released in February 2023. This strategic plan was developed in partnership by industry, government, Māori, and research providers. It sets out a vision for horticulture that was shared by those partners. This vision included a goal to double farmgate value of the

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<sup>1</sup> [Aotearoa Horticulture Action Plan | Horticulture New Zealand – Ahumāra Kai Aotearoa \(hortnz.co.nz\)](https://hortnz.co.nz)

sector to \$12 billion by 2035 and an action plan for the four partners to follow to collaboratively achieve this.

Doubling the farmgate value is important to New Zealand Inc. The infrastructure of this country needs a major upgrade, and this will require massive investment. To be able to afford this, the country's economy needs to grow. There is little growth left in the pastoral livestock industries, so while they will remain an important contributor to New Zealand's GDP, economic growth must be sought elsewhere.

Given the correct government support, the horticulture sector can grow in a sustainable manner. However, the people who grow the fruit and vegetables for our domestic market and for export face constant challenges due to inappropriate policy settings in this country. It is becoming increasingly difficult and expensive to grow food here and people are leaving the industry.

At a time when New Zealand could seize the opportunity to support other countries to maintain their food security in the face of climate change, it is perverse that the New Zealand government departments are making it increasingly difficult for growers to remain commercially viable.

HortNZ would like MPI to reconsider and strengthen two aspects of the protective measures being suggested in this RMP.

## **1.1. Active and ongoing verification system needed**

### **HORTNZ REQUESTS THAT A SUITABLE VERIFICATION SYSTEM IS INCLUDED TO ENABLE MONITORING THE PROPOSED 'HIGH CERTAINTY PATHWAYS'.**

MPI utilises a new approach, the 'Level of certainty' approach, to identify the degree of measures applied to the imported commodity, based on history of trade. A commodity pathway with a high import volume and frequency and without positive detection of phytoplasma over a minimum period of 10 years is considered a 'high certainty pathway'. MPI proposes that these 'high certainty' pathways will not require any additional risk mitigation measures above the basic import requirements for ornamental plants for planting. Commodities on the 'high certainty' pathway will not be tested for the presence of potentially asymptomatic infections.

HortNZ is concerned that MPI proposes importation of high volume of commodities that have the potential to asymptotically carry phytoplasma with the potential to adversely impact the food-producing horticulture industry without any verification system that can assure long-time pest freedom.

We consider the sole reliance on the emerging risk system (ERS) and notifications from the national plant protection organisation (NPPO) of the exporting country as insufficient level of protection. This transfers the responsibility of detecting and notifying the presence of these high-risk organisms to the ornamental nursery sector. Due to the nature of some of the 11 target phytoplasma groups, detection of disease symptoms may not occur until months after introduction by which point costly and highly disruptive biosecurity responses will be required to mitigate the risk retrospectively.

## 1.2. Maintaining options for diagnostic testing

### **HORTNZ REQUESTS THAT THE OPTION OF DIAGNOSTIC TESTING FOR PHYTOPLASMA USING PCR IS NOT REMOVED FROM THE STANDARD.**

HortNZ questions MPI's justification of removing the option for diagnostic testing using PCR for phytoplasma on all imported ornamental plants for planting. HortNZ is concerned about hosts genera that can asymptotically harbour phytoplasma and will circumvent testing.

MPI concluded that neither has there ever been a positive phytoplasma detection at the border or has there been a phytoplasma-triggered biosecurity incursion in New Zealand. However, this conclusion is based upon testing results of imported plants of the genus *Rosa* genus, while other ornamental hosts have never been tested.

HortNZ also questions the statistical validity of extrapolating the test results from a single genus to all ornamental plant genera.

### **Conclusion**

HortNZ is concerned that the strength of the measures being proposed in this RMP are insufficient to maintain an appropriate level of protection from unwanted phytoplasma groups and subgroups with the potential to adversely impact the horticulture industry.

It is not valid to extrapolate from the historical data available to assess the current risks posed by all ornamental plants. On top of this, the only checks being proposed to monitor changes in future risks are completely passive in nature. Under this current proposal, it would not be possible for MPI to support a claim that the measures in place were adequate to protect New Zealand from unwanted phytoplasmas.