

SUBMISSION ON

Import health standard for fresh cut flowers and foliage for decorative purposes

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To: Ministry for Primary Industries (MPI)

Name of Submitter: Horticulture New Zealand

Supported by: Kiwifruit Vine Health, NZ Persimmon Industry Council, Onions NZ, Strawberry Growers NZ, Summerfruit NZ, Tomatoes NZ, Vegetables NZ Inc.

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OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Executive Summary
- 3 Part 3: Our Submission

Our submission

Horticulture New Zealand (HortNZ) thanks the Ministry for Primary Industries (MPI) for the opportunity to submit on the proposed import health standard (IHS) for fresh cut flowers and foliage for decorative purposes. We welcome the opportunity to discuss our submission with MPI and collaboratively work to good biosecurity outcomes.

The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

HortNZ's Role

Background to HortNZ

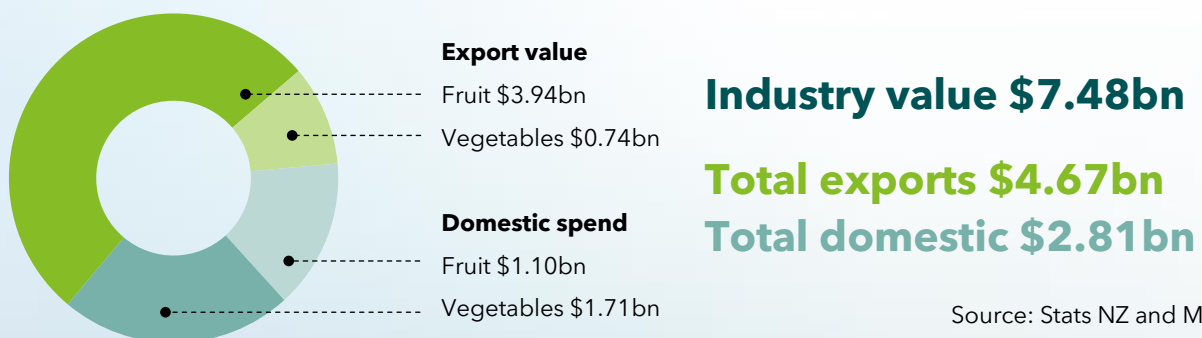
HortNZ represents the interests of approximately 4,200 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs and is valued at ~\$7.48 billion (2023/24).

There are approximately 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain; and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

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 Act 1993 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 can play in helping to keep their farms, orchards and wider New Zealand protected from unwanted pests and diseases.

Executive Summary

HortNZ considers that the proposal reduces the import requirements and associated level of protection for pests and diseases, if the Ministry for Primary Industries (MPI) moves prematurely to adopt a compliance-based verification system without a suitable and robust pathway monitoring system supported by accurate information.

Through this proposal, the cut flower and foliage import industry can reduce compliance costs, but they do not have to live with the consequences of the impact should that pathway bring in pests or diseases. On the other hand, the horticulture sector will have to live and manage the impact, which could be significant, should a pest or disease get established.

If MPI is confident and comfortable with the level of risk posed by the cut flower and foliage import pathway and satisfied with the proposed changes to the import requirements, we expect that MPI fully accepts the financial liability that may arise if a biosecurity response eventuates.

We expect an appropriate level of protection by MPI, proportionate to the value of the New Zealand horticulture sector, and expect actions that prevent risk and long-term impact in favour of market access demands.

HortNZ acknowledges that there are multiple different ways to manage biosecurity risk to an acceptable level. We accept the recognition of offshore risk management through a systems approach with oversight by the national plant protection organization (NPPO) of the exporting country as sensible. However, we request a high level of pathway monitoring system with mandatory identification of intercepted pests at the border for a prolonged period of time, especially for new import pathways (e.g., new country access), to compile an accurate picture of the pathway performance and compliance.

HortNZ requests that known host plants for high impact pests like *Xylella fastidiosa* must meet equivalent biosecurity import conditions to that of the *Ralstonia solanacearum* species complex, which includes intervention using 'targeted measures' and excludes eligibility of wild-harvested known host plants.

HortNZ questions the quality of evidence and rationale to justify the removal of devitalisation as effective biosecurity risk mitigation measure. HortNZ expects MPI to conduct a full assessment on the suitability of the methodology. We request that MPI consults with industry on that assessment, the result and the possible implications.

Submission

1. The risk to the horticulture industry

Biosecurity is the responsibility of all New Zealanders, but poor biosecurity practice has a more profound and immediate impact on some sectors, such as horticulture. The cumulative impact of the proposal could have significant consequences for New Zealand's horticulture industry.

The revision of the cut flower and foliage import requirements and the proposed changes under this consultation are unlikely to directly impact the horticulture industry, given that fruit and vegetable growers are not involved with and do not benefit from any aspect of the importation, distribution, sales and disposal of cut flowers and foliage.

However, it is possible that this import pathway indirectly causes unacceptable impacts through inadvertently introducing hitchhiking pests and/or asymptotically diseased plant material into New Zealand. These possible pests include numerous thrips, mite and moth's species, which are an emerging risk to various horticultural crops like onions, capsicums, tomatoes, other vegetable crops and fruit trees.

As the risk of pests and disease increases, our sector is losing access to efficacious crop protection and pest management tools, which further increases the cumulative risk to the sector. Also, the possible introduction and exposure of asymptomatic host plant material for pathogenic bacteria and viruses increases that level of risk to susceptible host material of economic importance. For example, the proposal does not require targeted measures for management of the high impact pathogen *Xylella fastidiosa* due to the assumed probability of feeding preference of possible vector insects, an assumption neither founded in scientific assessment nor evidence. The introduction and possible establishment of any high impact pest or disease would significantly impact New Zealand fruit and vegetable crops. It is important that biosecurity risks on the relatively high-volume import pathway of cut flowers and foliage are appropriately managed.

While we understand that the cut flower import industry or the exporting entities seek to minimise compliance costs, there is little to no liability over the possible adverse impact of any pests they may introduce to New Zealand. On the other hand, domestic plant producing industries, especially the New Zealand horticulture sector, who have no lever in this import pathway, are bearing the full risks and potential consequences of any pest incursion or resulting biosecurity response.

New Zealand's horticulture industry is a significant contributor to the nation's GDP through export activities and is essential to the domestic supply of fresh fruit and vegetable to all New Zealanders. This value far surpasses the value of the import industry for cut flowers and foliage for decorative purposes. The potential adverse impact of risks out-weigh the subjected benefit. We expect an appropriate and proportionate level of protection by MPI.

If MPI is confident and comfortable with the level of risk posed by the cut flower import pathway and the changes to the import requirements, we expect that MPI fully accepts any and all financial liability that may arise if a pest incursion eventuates.

2. Technical assessment of the proposal

2.1. More evidence is needed to support the proposal

HortNZ acknowledges that there are multiple different ways to manage biosecurity risk and more than one type of intervention to reduce biosecurity risk to an acceptable level.

Recognition of a systems approach and relevant oversight of the exporting countries' national plant protection organization (NPPO), as introduced under the Malaysian Phytosanitary Certification Assurance (MPCA) Scheme or Singapore Assurance Scheme (ACS), may be an appropriate methodology for managing biosecurity risks in theory. However, border interception data between November 2022 and October 2023 on the cut flowers and foliage import pathway show a persistent level of pest interceptions from Malaysia (12% of lines intercepted with pests and 15% of lines were treated), the second largest exporter of this commodity to New Zealand. Cut flowers imported from India, mainly *Rosa spp.*, show an even higher interception rate with 18% of lines being intercepted with regulate or non-assessed regulated pests, resulting in 80% treatment rate at the border.

Based on the annual report, 'Monitoring biosecurity risks to the New Zealand vegetable sector' (Market Access Solutionz), show that regulated pests are frequently intercepted on most import pathway for cut flowers and foliage. As the intercepted pests are often not assessed (identified to species level) and treated on-arrival upon importers choice, we lack the necessary insight and certainty whether regulated pests are managed appropriately in the exporting country, like under Malaysia's system approach.

These findings warrant the necessary level of caution to maintain or even elevate the level of scrutiny at the border until an acceptable level of compliance has been achieved, rather than moving to a compliance-based verification methodology too quickly. Especially newly added exporting countries with little to no track record of compliance performance would require a much higher level of scrutiny and on-arrival biosecurity inspection rate to ensure mitigation of risk until these import pathways achieve a set minimal level of compliance and trust.

HortNZ requests that a high level of pathway monitoring and compliance verification of the imported cut flower and foliage commodities for freedom of regulated pests are conducted over a prolonged period for each import pathway before biosecurity management requirements may be adapted. These monitoring periods should include mandatory pest identification of all intercepted pests, to build an accurate picture of the pathway and how pests are managed in the exporting country. The level of compliance following the prolonged monitoring period should be made available to the public prior the that import pathway gaining a degree of trust.

If MPI wants to justify amending import requirements based on evidence, then this evidence must be collected accurately, also in form of appropriate pathway monitoring and verification systems before an exporter can be seen as trusted.

2.2. High impact pests require targeted risk mitigation measures.

We understand that MPI's risk assessment does not deem possible asymptomatic host plants for the bacterial pathogen *Xylella fastidiosa* as a major risk on this pathway. This is based on the presumption that possible insect vectors may not feed on cut flowers and prefer live plants, therefore posing no risk that justifies targeted risk mitigation measures. The 'semi-contained' nature of end-use, display, is widely used throughout MPI's risk assessment for reduced requirements to manage risk on this import pathway. MPI concluded this irrespective of the possible degree of impact, including for high impact pests and disease where the economic impact may be significant.

There is no scientific evidence supporting the claim that a possible vector will not feed on asymptotically infected fresh cut flowers or foliage and will not transmit any diseases to economically important susceptible host plants in proximity. The possible presence of any unwanted high impact pathogen New Zealand, like *X. fastidiosa*, without any monitoring or mitigation system in place on the import pathway, unnecessarily and avoidably increases the risk to all plant producing sectors.

HortNZ does not support the provided justification by MPI and requests a higher level of biosecurity scrutiny in the form of targeted risk mitigation measures for high impact and sector priority pests. Our industry contributes significantly to readiness and response programmes to counteract a possible pest incursion for high impact organisms like *Xylella*.

HortNZ requests that known host plants of *X. fastidiosa* must meet equivalent biosecurity import conditions than those for the *Ralstonia solanacearum* species complex. These requirements should also include the exclusion of wild-harvested known host plants. We are not opposed to risk management offshore and could consider specific action applied in the exporting countries or testing options.

2.3. Questionable evidence that justifies the removal of devitalisation as effective risk mitigation measure

In this consultation, MPI has failed to provide convincing arguments or evidence for why devitalization of plant material, especially of fresh cut flower and foliage, is no longer considered a justifiable and effective biosecurity risk mitigation tool.

The use of suitable devitalization methodology does not only render propagatable plant material non-viable and therefore mitigate the risk of unintentional growth of invasive plant species but can also kill pathogens and pests not visible during inspection. The elimination of viable plant tissue reduces the risk of growth and propagation of possibly infected plant material if harbouring viruses, bacterial or fungal pathogens that do not display disease symptoms at the time during production, post-harvest, handling and export.

We question the robustness of evidence that MPI used to justify the removal devitalisation using glyphosate. The ease of how the reversal of this devitalisation methodology is meant to be achieved presumes a certain level of understanding of plant biology, chemistry and working under laboratory-like conditions. This would suggest intentionally

illicit behaviour by professional plant propagators and scientists to utilise this plant material outside of its intended purpose.

We would welcome a full assessment conducted by MPI on all available devitalization methodologies as suitable or effective biosecurity risk mitigation measures for all plant material commodities and consult on the outcome.

We would also welcome MPI's alignment with the Australian biosecurity import system (Department of Agriculture, Fisheries and Forestry of the Australian Government), that currently maintains devitalization as suitable biosecurity risk mitigation measure, until robust evidence supports the amendment or removal of this option.