

SUBMISSION ON

Draft International Plant Protection Convention Standards

7th August 2026

To: Ministry for Primary Industries

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 2026 draft country consultation for the International Plant Protection Convention and welcomes any opportunity to continue to work with MPI and discuss our submission.

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

HortNZ's Role

Background to HortNZ

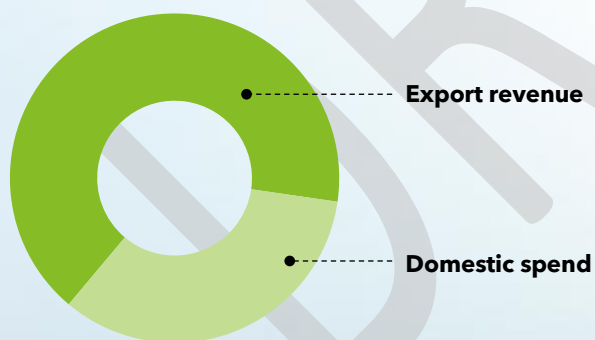
HortNZ represents the interests of approximately 4,300 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

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.



Industry value \$7.54bn

Farmgate value \$4.89bn

Export revenue \$4.99bn

Domestic spend \$2.55bn

Source: HortNZ Annual Report 2025

Submission

1. General comments on draft International Plant Protection Standards

HortNZ supports the development and harmonisation of international phytosanitary standards where these are based on sound science, transparent risk assessment processes, and facilitate safe international trade. International standards play an important role in improving consistency, reducing unnecessary trade barriers, and supporting effective pest risk management.

While HortNZ generally supports the standards under consultation, we consider there are several recurring themes across multiple draft documents that warrant further consideration.

Along with this submission, we also provide individual comments within the documents as track changes.

1.1 Transparency around pest inclusion and exclusion

HortNZ considers the standards would benefit from more clarity and transparency on reasoning why which pest organism were excluded from the standards pest lists. Across a number of commodity standards, the focus is understandably on pests directly associated with the commodity pathway. However, the absence of globally significant pests and diseases may be misinterpreted by readers as indicating that such organisms are of limited biosecurity significance or are not a concern on that commodity.

HortNZ recommends that commodity standards include, where practicable:

- a list or annex identifying significant pests excluded from the standard and the rationale for their exclusion; and
- acknowledgement that absence from a commodity-specific pest list does not indicate that a pest lacks biosecurity significance or an NPPO cannot request intervention measures for imported commodities.

This would improve transparency and assist users in understanding the scope and limitations of commodity standards.

1.2 National sovereignty and importing countries Appropriate Level of Protection

HortNZ strongly supports the principle that importing countries retain sovereign rights to determine their own appropriate level of protection (ALOP) consistent with international obligations.

Several standards could be strengthened by explicitly recognising that:

- the phytosanitary measures listed within the standards represent options that may support pest risk management;

- recognition that NPPOs may apply additional phytosanitary measures consistent with their national ALOP;
- importing countries may adopt additional, alternative measures, or a combination of measures, were justified through technical assessment and pest risk analysis; and
- commodity standards do not replace national pest risk assessments or commodity-specific import requirements.

HortNZ considers this clarification important to ensure standards are interpreted as guidance rather than universally sufficient measures.

1.3 Systems approaches

A recurring issue throughout multiple commodity standards is the presentation of systems approaches as "options" for phytosanitary measures.

HortNZ considers this wording potentially misleading.

Systems approaches are typically combinations of independent risk management measures whose combined efficacy has been demonstrated through technical assessment and agreement between trading partners (e.g. export plans, bilateral agreement). The individual components of a systems approach are not necessarily effective as stand-alone measures.

Accordingly, HortNZ recommends:

- replacing references to "Options for systems approaches" with "Examples of systems approaches"; and
- clearly stating that systems approaches require validation and agreement between trading partners before implementation.

This change would improve clarity and avoid unintended interpretations regarding the effectiveness of individual measures.

1.4 Recognition of existing international standards: ISPM 8 Determination of pest status in an area

Given its relevance to pest freedom, pest distribution, surveillance and regulatory decision-making, HortNZ considers ISPM 8 should be referenced where appropriate throughout the consultation package.

2. Specific comments on draft International Plant Protection Standards

2.1. Draft annex to ISPM 46: Movement of fresh *Citrus* spp. fruit in international trade (2023-019)

HortNZ broadly supports the draft commodity standard.

However, we request:

- inclusion of explanatory information regarding significant pests excluded from the pest lists, as standalone table withing the standard or as annex;
- clarification regarding whether areas of low pest prevalence may be used as stand-alone measures or as part of the systems approach;
- clarification that systems approaches must be supported by demonstrated efficacy and bilateral agreement.

HortNZ also notes that some pests associated with citrus production may require stronger measures in the New Zealand context than those outlined as minimum international options.

Additions are indicated by bolded underline, and deletions by strikethrough text

Provision	Reason	Decision sought
[99] Scope Alternatively that could be incorporated under [102] 3. Pests associated with fresh Citrus spp. fruit	Seeking more clarity and transparency regarding pests excluded from the commodity standard	Addition of annex table that lists pests and diseases that were associated with the commodity but excluded and should also include a short reasoning for that exclusion.
[654] Options for phytosanitary measures	Seeking a clear restatement for a country's sovereignty on setting import regulation and meeting IPPC obligation. This is also in relation to [702] Table3. Pest-specific options for phytosanitary measures	Include an explanatory note or statement that states: " <u>The importing NPPO may choose to accept or expand the necessary phytosanitary measures to align with the NPPO's ALOP, or defines how that ALOP can be met.</u> "
[658] Table 2. General options for phytosanitary measures. [660] References	Seeking inclusion of other international standards	Include " <u>ISPM8: Determination of pest status in an area</u> " into the reference list

Table. Options for systems approaches (SAs)	Seeking renaming title for system approaches to reflect the ambiguous nature of SA and indicate that these are not options to be chosen but only examples to be negotiated with the importing NPPO and depends on the countries ALOPs.	Renaming title " Options for systems approaches " to " <u>Examples of systems approaches</u> ".
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2.2 Draft annex to ISPM 46: Movement of Phaseolus vulgaris seeds in international trade (2023-019)

HortNZ broadly supports the draft commodity standard, however would suggest inclusion of additional references such as the internationally recognises database ISF ([ISF Home - International Seed Federation](#)) listing seed associated pests and disease (seed transmissible).

We recommend:

Additions are indicated by bolded underline, and deletions by strikethrough text

Provision	Reason	Decision sought
[106] Scope Alternatively that could be incorporated under [114] Table 1. Pests considered to be associated with Phaseolus vulgaris seeds	Seeking more clarity and transparency regarding pests excluded from the commodity standard	Addition of annex table that lists pests and diseases that were associated with the commodity but excluded and should also include a short reasoning for that exclusion.

[110] Pests associated with <i>Phaseolus vulgaris</i> seeds	Expand internationally harmonized resources for effective risk assessment	Addition of <u>internationally recognized databases for pest association and risk assessment: International Seed Federation</u>
[311] Table 2. General options for phytosanitary measures. [313] References	Seeking inclusion of other international standards	Include " <u>ISPM8: Determination of pest status in an area</u> " into the reference list

2.3 Draft annex to ISPM 46: Movement of *Malus domestica* fruit in international trade (2023-024)

HortNZ generally supports the draft standard.

We request:

Additions are indicated by bolded underline, and deletions by strikethrough text

Provision	Reason	Decision sought
[132] Scope Alternatively, that could be incorporated under [140] 3. Pests associated with fresh <i>Malus domestica</i> fruit	Seeking more clarity and transparency regarding pests excluded from the commodity standard	Addition of annex table that lists pests and diseases that were associated with the commodity but excluded and should also include a short reasoning for that exclusion.
[636] Options for phytosanitary measures	Seeking explicit recognition that importing countries may adopt additional measures to achieve their ALOP where technically justified. This is also in relation	Include an explanatory note or statement that states: " <u>The importing NPPO may choose to accept or expand the necessary phytosanitary measures to align with the NPPO's ALOP, or defines how that ALOP can be met.</u> "

	to [690] Table3. Pest-specific options for phytosanitary measures	
[640] Table 2. General options for phytosanitary measures. [642] References	Seeking inclusion of other international standards	Include " <u>ISPM8: Determination of pest status in an area</u> " into the reference list
[1457] Table. Options for systems approaches (SAs)	Seeking renaming title for system approaches to reflect the ambiguous nature of SA and indicate that these are not options to be chosen but only examples to be negotiated with the importing NPPO and depends on the countries ALOPs.	Renaming title "Options for systems approaches" to " <u>Examples of systems approaches</u> ".

2.4 Draft annex to ISPM 46: Movement of fresh Musa spp. fruit in international trade (2023-028)

HortNZ generally supports the development of this commodity standard.

However, we recommend:

- stronger explanation of exclusion criteria for pests and phytosanitary measures;
- inclusion of explanatory statements regarding the exclusion of significant pests such as Tropical Race 4 (TR4), Banana Bunchy Top Virus and Banana Streak Virus;
- acknowledgement that some indirectly associated pests and diseases may still have pathway relevance;

HortNZ also notes that irradiation treatment tables should more clearly identify that all listed treatments are pest-specific and supported by validated efficacy data.

We recommend:

Additions are indicated by bolded underline, and deletions by strikethrough text

Provision	Reason	Decision sought
[90] Scope Alternatively, that could be incorporated under [97] 3. Pests associated with fresh <i>Musa</i> spp fruit	Seeking more clarity and transparency on pest and disease exclusion from the standard	Addition of annex table that lists pests and diseases that were associated with the commodity but excluded and should also include a short reasoning for that exclusion.
[96] Options for phytosanitary measures	Seeking explicit recognition that importing countries may adopt additional measures to achieve their ALOP where technically justified. This is also in relation to [343] Table3. Pest-specific options for phytosanitary measures	Include an explanatory note or statement that states: " <u>The importing NPPO may choose to accept or expand the necessary phytosanitary measures to align with the NPPO's ALOP, or defines how that ALOP can be met.</u> "
[305] Table 2. General options for phytosanitary measures. [307] References	Seeking inclusion of other international standards	Include " <u>ISPM8: Determination of pest status in an area</u> " into the reference list
[524] Table. Options for systems approaches (SAs)	Seeking renaming title for system approaches to reflect the ambiguous nature of SA and indicate that these are not options to be chosen but only examples to be negotiated with the importing NPPO and	Renaming title " Options for systems approaches " to " <u>Examples of systems approaches</u> ".

	depends on the countries ALOPs.	
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2.5 Draft annex to ISPM 46: Movement of fresh *Colocasia esculenta* corms (Taro) in international trade (2023-023)

HortNZ has no concerns with this draft standard.

No significant risks to New Zealand horticulture have been identified from adoption of this standard.

We recommend:

Additions are indicated by bolded underline, and deletions by strikethrough text

Provision	Reason	Decision sought
[89] Scope Alternatively, that could be incorporated under [96] Table 1. Pests considered to be associated with fresh <i>Colocasia esculenta</i> corms	Seeking more clarity and transparency on pest and disease exclusion from the standard and inclusion of information regarding indirectly associated pests and diseases (e.g. soil pathogens)	Addition of annex table that lists pests and diseases that were associated with the commodity but excluded and should also include a short reasoning for that exclusion.
[161] Table 2. General options for phytosanitary measures. [163] References	Seeking inclusion of other international standards	Include " <u>ISPM8: Determination of pest status in an area</u> " into the reference list

2.6 Draft annex to ISPM 28: Cold treatment for *Ceratitis capitata* on *Actinidia deliciosa* and *Actinidia chinensis* (2024-023)

HortNZ supports adoption of this phytosanitary treatment.

The standard is supported by published efficacy data demonstrating effective management of Mediterranean fruit fly risk and provides confidence in both the treatment regime and supporting scientific evidence.

We would welcome the addition of more recent supporting scientific data and publications once they become available.

2.7 Draft annex to ISPM 28: Irradiation treatment for *Liriomyza huidobrensis*, *Liriomyza sativae* and *Liriomyza trifolii* (2018-001)

HortNZ supports adoption of the proposed irradiation treatment.

However, HortNZ recommends consideration be given to harmonising irradiation doses across the three *Liriomyza* species at 176 Gy.

Although available evidence demonstrates efficacy at lower doses for certain species, a harmonised treatment rate would:

- reduce the risk of species misidentification;
- simplify operational implementation;
- improve consistency across markets;
- strengthen confidence in treatment outcomes; and
- support practical uptake by industry and regulators.

HortNZ therefore supports adoption of a precautionary harmonised treatment approach.

2.8 Draft specification on Revision of ISPM 3 (Guidelines for the export, shipment, import and release of biological control agents and other beneficial organisms) (2025-010), priority 1

HortNZ supports the review and updating of international guidance relating to biological control agents and other beneficial organisms.

However, we note that within New Zealand, the Environmental Protection Authority (EPA) has primary expertise and statutory responsibility for assessment and approval of new biological control agents.

Accordingly, HortNZ recommends that MPI engage directly with the EPA throughout development of New Zealand's position on this specification.

HortNZ also supports the development of proportionate, risk-based international guidance that avoids unnecessary duplication with established domestic regulatory systems.