SUBMISSION ON

Proposed import requirements for fresh blueberries for human consumption

15th June 2026

To: Ministry for Primary Industries
Name of Submitter: Horticulture New Zealand
Supported by: New Zealand Vegetable Council, Strawberry Growers New Zealand, Summerfruit New Zealand

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Ahumāra Kai Aotearoa

OVERVIEW

Submission structure

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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 import requirements for fresh blueberries (Vaccinium spp.) for human consumption and welcomes any opportunity to continue to work with MPI and the biosecurity imports and exports standards team, and to discuss our submission.

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

PART 1

HortNZ's Role

Background to HortNZ

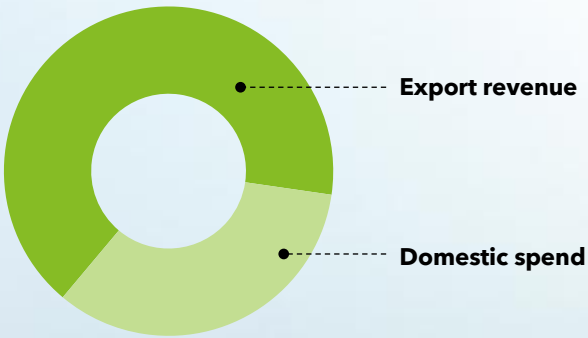
HortNZ represents the interests of approximately 4,300 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

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

HortNZ's involvement with the Biosecurity Act 1993

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

PART 2

Executive Summary

Horticulture New Zealand (HortNZ) supports trade that is underpinned by robust, science-based biosecurity settings.

HortNZ considers the proposed draft Import Health Standard (IHS) for fresh blueberries for human consumption is not yet ready for finalisation. The current proposal does not provide sufficient assurance that risks – particularly from economically important fruit fly species and other high-impact pests - are managed to New Zealand's appropriate level of protection (ALOP).

HortNZ's primary concerns are:

- Reliance on the systems approach as a standalone risk management measure for high-impact pests, despite known detection limitations and uncertainty in pest status (e.g. Spotted Wing Drosophila in Peru).

- Underestimation or risk from undermanaged downstream exposure pathways, including retail handling and disposal of contaminated fruit, increasing the likelihood of pest establishment.

HortNZ requests that the IHS be strengthened by:

- Removing the systems approach as option under MPI-specified measures to manage the risk of fruit flies, South American fruit fly (*Anastrepha fraterculus*), Mediterranean fruit fly (*Ceratitis capitata*), Spotted wing drosophila (*Drosophila suzukii*) and Blueberry maggot (*Rhagoletis mendax*).

- Implementing mandatory phytosanitary end-point "kill-step" treatments (e.g. fumigation, irradiation, or temperature-driven disinfestation) for high-impact organisms, where the pest-freedom cannot be assured.

- Applying enhanced monitoring and verification requirements, with zero-tolerance thresholds for high-impact organisms until sustained compliance is demonstrated.

- Considering significant economic and system impacts more broadly when developing biosecurity import requirements.

HortNZ believes that these changes are necessary to ensure biosecurity protections are proportionate to the significant economic and long-term risks to New Zealand's horticulture sector.

PART 3

Submission

1. Core concerns about the proposed IHS

The current proposal does not provide sufficient assurance that biosecurity risks, are reduced to New Zealand's appropriate level of protection (ALOP).

1.1. Fruit fly risk is not reduced to an acceptable level

While MPI reflects the high-impact status of fruit flies as a top-tier biosecurity risk, MPI only requires *"at least one of the MPI-specified measures – country freedom, pest free area, systems approach, phytosanitary treatments - must be applied"*.

This provides an option for the exporters to choose system approach over more reliable phytosanitary end-point treatments, given potential impacts on fruit quality and shelf life[1]. A systems approach that relies on the cumulative effect of multiple imperfect measures is not appropriate to manage such high impact pests.

HortNZ request MPI to remove the system approach from the options under MPI-specified measures.

1.1.1. COMMERCIAL PREFERENCE FOR SYSTEMS APPROACH

Where a systems approach is offered as an alternative to end point treatment, overseas producers and exporters are likely to have strong commercial incentive to choose it.

Verifiable end-point treatments such as fumigation or irradiation are known to adversely affect fruit quality and shelf life of blueberries shortly after application reducing marketability and profitability[2,3]. Given these commercial considerations, offering the systems approach as an option effectively makes end-point treatment the path of last resort. This shifts reliance away from a directly verifiable intervention measure and towards a series of cumulative controls.

1.1.2. LIMITATION OF SYSTEMS APPROACH FOR PEST RISK MANAGEMENT

HortNZ considers that the systems approach for pest risk management alone is insufficient in providing the necessary level of risk mitigation and assurance for high-impact pests.

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[1] Effect of Electronic Cold-PasteurizationTM (ECPTM) on Fruit Quality and Postharvest Diseases during Blueberry Storage

[2] Effect of phytosanitary irradiation and methyl bromide fumigation on the physical, sensory, and microbiological quality of blueberries and sweet cherries - PubMed

[3] "Comparative Evaluation of the Effect of Methyl Bromide Fumigation and " by Tamar Serapian and Anuradha Prakash

The systems approach relies on the cumulative effect of multiple - at least two - independent measures, each of which may be imperfect on their own[4]. The effectiveness of those measures may derive from the combination of multiple interdependent and independent risk mitigation measures. Failure or underperformance at any point undermines the overall system and level of risk intervention.

Strong reliance on cumulative effectiveness of the systems approach introduces compounding uncertainty. The level of protection builds on redundancy and combinations to compensate for variability and uncertainty and depends on consistent implementation, robust verification and clearly defined and auditable performance thresholds. In lieu of transparency into MPI's auditing and verification systems for overseas production systems and exporters, the risk reduction capability remains presumptuous and industry confidence low particularly in managing high-risk, high-impact pathways.

For this pathway and commodity reliance on the systems approach alone for adequate risk mitigation seems inappropriate, considering the level of impact from high-risk pests like fruit flies. Fruit flies (*Tephritidae*, *Drosophila suzukii*) are acknowledged among the most damaging horticulture pests globally.

Infestation of fresh produce - recognised as the primary pathway for introduction – occurs in maturing fruit and is internal, inherently difficult to detect through inspections and difficult to manage through common commercial practices[5]. The risk of fruit fly remains unacceptable due to detection limitations and the severity of impact to New Zealand's horticulture sector.

1.1.3. UNCERTAINTY IN PEST STATUS OF SPOTTED WING DROSOPHILA REDUCE CONFIDENCE

The industry is concerned regarding a lack of certainty on the pest status of Spotted Wing Drosophila (SWD), *Drosophila suzukii*, in the proposed exporting country of Peru.

The presence of SWD in directly neighbouring countries is widely reported[6,7], and Peru's suitable climate conditions and abundant host availability warrants strong concerns about undetected or not reported pest presence[8,9].

Considering SWD's ability of causing significant impact to New Zealand's horticulture sector, an equivalent level of risk mitigation measure and stringency in line with other fruit fly species is appropriate. Mandatory end-point treatment measures for other fruit fly species present in Peru (i.e. South American fruit fly, Mediterranean fruit fly) would sufficiently increase confidence on MPI's appropriate risk management.

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[4] ISPM 14. The use of integrated measures in a systems approach for pest risk management
[5] Papadopoulos-et-al_2024.pdf
[6] Drosophila suzukii. [Distribution map]. | Distribution Maps of Plant Pests
[7] Drosophila suzukii (DROSSU)[World distribution]| EPPO Global Database
[8] Mapping the Potential Presence of the Spotted Wing Drosophila Under Current and Future Scenario: An Update of the Distribution Modeling and Ecological Perspectives
[9] Current and future global potential distribution of the fruit fly Drosophila suzukii (Diptera: Drosophilidae) | The Canadian Entomologist | Cambridge Core

1.1.4. UNDERESTIMATED RISK IN POST-BORDER DISPOSAL PATHWAY

The disposal of imported fresh produce presents a material, under-recognised, and non-negligible biosecurity exposure risk. Domestic distribution and disposal are integral parts of the import pathway and supply chain of fresh produce yet lack consistent controls once risk goods have passed border inspections. Without pre-export "kill-step" measures, where residual risk is not fully mitigated, infested fruit entering general waste or compost streams can enable pest survival and establishment. The current risk assessment underestimates this pathway, despite evidence that fruit fly and similar pest and disease (e.g. latent fungal pathogens) can persist in typical disposal environments.

Evidence indicate that disposal of infested fruit remains an under-considered and undermanaged pathway that can act as a viable pathway for pest establishment[10]. Fresh fruit imports are a primary pathway for high-impact pests such as fruit fly and latent pathogens, which are difficult to detect through visual pre-export and border measures and can establish from small populations. Discarded fruit waste provides a viable breeding substrate for pests such as fruit fly, with larvae capable of surviving and emerging under typical residential composting conditions[11]. Global interception data further demonstrate that existing phytosanitary measures do not fully eliminate risk[12].

Improper disposal of imported produce - in commercial or public settings – therefore constitutes an undermanaged risk pathway. Urban waste volumes, composting practices, and proximity to home garden host plants increase establishment risk. This risk is further elevated in semi-urban and rural settings due to proximity between disposal sites and host plants (e.g. gardens, orchards).

We acknowledge that post-border waste management sit outside MPI's regulatory scope, however, HortNZ notes that this largely unmanaged pathway is critical and recommends it be properly reflected in risk assessments and the stringency of import measures.

1.2. Stronger risk mitigation measures are required

Given that the proposed import pathways are new, untested, and high-risk, stringent import settings are warranted, to mitigate residual risk and maintain a high level of protection. Underestimated and undermanaged residual risks – like through retail handling and disposal of risk goods - materially increases cumulative biosecurity risks. Considering the detectability limitation of high-impact pests like fruit fly, and their capacity to establish from small populations, stronger, risk-proportionate mitigation is required. Import settings must reflect both pre-border and downstream risks to prevent significant economic consequences.

HortNZ considers that only validated, auditable phytosanitary end-point treatments – such as fumigation, irradiation or cold disinfestation[13]- provide sufficient assurance of pest

[10] View of Residential Composting of Infested Fruit: A Potential Pathway for Spread of Anastrepha Fruit Flies (Diptera: Tephritidae)
[11] View of Residential Composting of Infested Fruit: A Potential Pathway for Spread of Anastrepha Fruit Flies (Diptera: Tephritidae)
[12] Papadopoulos-et-al_2024.pdf
[13] ISPM 28. Phytosanitary treatments for regulated pests

freedom for high-risk imports. Mandatory "kill-step" measures, applied alone or within a systems approach, are consistent with comparable pathways (e.g. mango, papaya and some citrus fruit), follows international standards[14], and proportionate with the potential economic consequences[15],[16].

Further, increased inspection rates, larger samples size, intensified monitoring and verification, and a zero-tolerance threshold for high-impact pests must be implemented on novel pathways. ISPM20 supports more stringent measures where risk is elevated, particularly until sustained compliance confidence has been achieved[17].

Therefore, HortNZ requests an adequate stringency for fresh produce import settings and recommend MPI implements mandatory end-point treatments as a standalone or in combination with systems approach and elevated monitoring and verification system until proven compliant sustainably.

1.3. Economic and long-term consequences

A biosecurity failure in this import pathway could impose significant, long-term costs on New Zealand, particularly on domestic horticultural producers. HortNZ emphasises the need to protect production, maintain export market access, and support sustainable sector growth.

Fruit fly incursions already create material economic impacts. Even without establishment, single fruit fly detections trigger costly responses—four incidents in the past two years have cost around NZ$8 million, including NZ$ 2.4million[18] for a single fly response in Auckland in 2025. These expenses—covering surveillance, movement controls, compliance, and public communication—occur before any direct production or trade losses and are shared by industry and government under the GIA framework, therefore born by domestic growers.

Repeated low-probability incursions increase the likelihood of establishment, particularly in high-risk areas. If any economically significant fruit fly species were to be established, impacts would escalate rapidly. For example, a single incursion in Bay of Plenty could cost the kiwifruit industry NZ$200 - $695million[19] in one season alone, excluding wider sector losses. Over time, establishment could cost the horticulture sector billions through production losses, control costs, supply chain disruption, and loss of New Zealand's fruit fly-free status.

[14] ISPM 2. Framework for pest risk analysis
[15] Full risk assessment for importing blueberries
[16] ISPM 11. Pest risk analysis for quarantine pests
[17] ISPM 20. Guidelines for a phytosanitary import regulatory system
[18] Papatoetoe fruit fly response cost $2.4 million
[19] Economic impact of a fruit fly incursion in the Bay of Plenty on the New Zealand kiwifruit industry - ishs, KFJ-Fruit-fly-incursion.pdf

1.4. Industry Growth Aspirations

Under the Aotearoa Horticulture Action Plan[20] (AHAP), New Zealand's horticulture sector collaboratively aims to double its value, but biosecurity failures jeopardise these growth aspirations.

Incursions drive high response and compliance costs, restrict exports, and reduce profitability, undermining New Zealand's premium market position and the sustainability of key Tier 1[21] crops such as kiwifruit and apples, and their value contribution to the New Zealand's economy.

These risks also weaken investor confidence at a critical time for sector expansion. Emerging crops like blueberries (Tier 2[22]) and strawberries (Tier 3[23] transitioning to Tier 2) depend on stable, low-risk production environments. However, strawberries already face strong import competition and are particularly vulnerable to pests like fruit fly, materially impacting the sectors viability if present. Increased biosecurity risk from poorly managed import pathways discourages investment, innovation, and growth across these developing sectors.

1.5. Comments on the consultation process

HortNZ acknowledges the work undertaken by MPI in developing the draft standards and supporting risk assessments and early stakeholder engagement. However, we expect that all necessary information, including the full pest risk assessment document and any supporting information is made available from the beginning of the consultation period, not three weeks before the submission deadline.

2. Recommendations

HortNZ supports the facilitation of trade where this is supported by robust, science-based biosecurity import settings that achieve New Zealand's ALOP and must not come at the expense of New Zealand's biosecurity system and the long-term sustainability of the horticulture sector.

HortNZ recommends that MPI strengthens the draft IHS from its current form to ensure risks are managed in line with New Zealand's ALOP. This should include removing the systems approach as a standalone measure for economically significant fruit fly species under MPI-specified measures, mandating validated end-point "kill-step" treatments (e.g. fumigation, irradiation, or cold treatment) for high-risk pathways, and applying enhanced inspection, monitoring, and verification requirements until sustained compliance is demonstrated. The IHS and underlying risk assessment should also explicitly account for downstream exposure risks, including disposal pathways. These changes are necessary

[20] Aotearoa Horticulture Action Plan | Horticulture New Zealand – Ahumāra Kai Aotearoa
[21] Tier 1: generate close to or over $1 B annual FOB value (large, sophisticated, world-leading, with strong integrated pest management and proprietrary cultivars)
[22] Tier 2: generate more than $100 M annual FOB value (great potential to emerge as world-leading)
[23] Tier 3: generate less then $100 M annual FOB value (emergeing and small-scale crops)

to provide a level of assurance proportionate to the potentially severe and long-term consequences for New Zealand's horticulture sector and export markets.

HortNZ emphasises that the concerns outlined in this submission must be considered in the broader context of New Zealand's biosecurity system and long-term implication of our economic growth capability and sustainability.