



PO Box 10232, The Terrace,
Wellington, 6143

Level 4, Co-operative Bank House

20 Ballance Street, Wellington, 6011

Phone: +64 4 472 3795

Fax: +64 4 471 2861

Web: www.hortnz.co.nz

Email: info@hortnz.co.nz

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Submission on the proposed changes to the draft Import Health Standard for Sea Containers, dated 3 April 2019

Submitter: Horticulture New Zealand Incorporated
Submitted by: Anna Rathé, Biosecurity Manager
Contact Details: P O Box 10232, The Terrace, Wellington 6143, New Zealand
Ph: +64 4 494 9980
Email: anna.rathe@hortnz.co.nz

INTRODUCTION

1. Horticulture New Zealand (HortNZ) represents the interests of New Zealand's 5,000 commercial fruit and vegetable growers. The horticulture industry is valued at over \$5.5b with over \$3.6b in exports annually.
2. The industry employs over 60,000 people, occupies some 130,000 ha of land and provides critical regional development opportunities in Northland, Auckland, Bay of Plenty, Hawke's Bay, Gisborne, Manawatu, Marlborough, Nelson, Canterbury and Central Otago.
3. New Zealand growers supply the majority of fresh and processed fruit and vegetables to domestic consumers, as well as exporting crops to discerning customers in over 120 countries. Biosecurity is essential to support production, secure market access, and provide confidence for investment – all critical to ensure the horticulture industry continues to prosper.
4. An incursion of an invasive pest such as the brown marmorated stink bug (BMSB – *Halyomorpha halys*), could potentially cause significant economic impact to the New Zealand horticulture industry. BMSB has proven to be a devastating pest in its invasive range due to feeding damage that reduces fruit and vegetable quality and increased pest management and production costs.
5. Brown marmorated stink bug not only presents a significant biosecurity risk to New Zealand horticulture, but is also a major nuisance pest to the general public, and may

negatively impact native flora and fauna. There are currently very few pest control options available for use against BMSB in New Zealand, and early-warning surveillance methods are extremely limited.

6. The commercial crops in New Zealand currently identified as a host, and therefore at risk from BMSB, have collective sales value in excess of \$4 Billion p.a. (free on board value for export). It is estimated that BMSB establishment in New Zealand, if not managed, would result in average yield losses of 26% for eighteen host crops after 10 years (NZIER, 2017). This is a significant cost to the horticulture industry and New Zealand.
7. BMSB interceptions are increasing year on year, which is evidence to support the need for New Zealand to take the threat from this pest seriously.

PROPOSED AMMENDMENTS

8. HortNZ acknowledges the extensive work undertaken by the Ministry for Primary Industries (MPI) to manage the changing risk profile of BMSB.
9. Risk profiling is very difficult for BMSB due to the insect's association with a wide range of goods. For this reason, Hort NZ supports, in principle, the majority of the proposed additional and amended measures on the sea container pathway to manage the significant and increasing risk of BMSB, subject to the below feedback being considered.

Section 2.3

10. HortNZ welcomes the proposed change to section 2.3 to require the mandatory treatment of sea containers and cargo from Italy prior to arrival in New Zealand. This aligns with the core principle of managing biosecurity risk offshore wherever possible. Offshore treatment is also likely to alleviate some of the capacity issues currently faced by onshore treatment providers, therefore reducing the risk of treatment delays and short-cuts.
11. HortNZ asks that offshore Approved Treatment Providers are audited on a regular basis to ensure that approved treatments are being applied correctly.
12. Section 2.3 (2) b) outlines that sea containers with cargo that is determined to be sensitive to treatment may be inspected by an MPI inspector instead of treatment. The terminology '*may be inspected*' implies that inspection is not mandatory if treatment is not conducted. Hort NZ asks that all untreated containers are inspected, due to the range of goods that BMSB can be associated with. A record of compliance on the pathway does not necessarily mean that the goods will not be infested and just one introduction event poses a risk to New Zealand.
13. HortNZ asks that MPI considers whether BMSB interception records indicate that these measures are appropriate for other countries in addition to Italy. If interceptions on the sea container pathway from another country increase, HortNZ would like assurance that there is a mechanism to include them in section 2.3 of the sea container IHS to ensure the risk is managed in a timely and appropriate manner.

14. HortNZ is supportive of the intention to have the amended IHS in place in time for the next risk season (1 September 2019). HortNZ would like to encourage MPI to notify importers of the final IHS prior to 1 September 2019, so that they have time to prepare and communicate the changes to trading partners to ensure compliance with the sea container IHS.

CONCLUSION

15. In principle, HortNZ supports the majority of the proposed amendments to the VME IHS to manage the risk of BMSB, providing MPI consider the following feedback:

- a. Auditing of offshore Approved Treatment Providers.
- b. Mandatory inspection of untreated (sensitive) sea containers from Italy.
- c. The ability to apply section 2.3 requirements to additional countries quickly and effectively, if the evolving risk situation requires it.

16. HortNZ welcomes the opportunity to discuss the concerns raised in this submission, together with other horticultural industry product groups.

17. This submission is supported by:

- Central Otago Fruit Growers Association
- Hawke's Bay Fruit Growers' Association
- Katikati Fruit Growers Association
- New Zealand Asparagus Council
- New Zealand Feijoas Growers Association
- NZ Persimmon Industry Council
- Onions New Zealand Inc
- Potatoes New Zealand
- Process Vegetables NZ
- Pukekohe Vegetable Growers Association
- Strawberry Growers New Zealand Inc
- TomatoesNZ
- Vegetables NZ Inc

REFERENCES

MPI (2019a) Draft Import Health Standard for Sea Containers (SEACO), dated 3 April 2019

MPI (2019b) Risk Management Proposal associated with the Review and Amendment of the Import Health Standard for Sea Containers (from All Countries), dated 3 April 2019

NZIER (2017) Quantifying the economic impacts of a brown marmorated stink bug incursion in New Zealand: A dynamic computable general equilibrium modelling assessment. New Zealand Institute of Economic Research.

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