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 Vehicles, Machinery and Equipment, 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. Hort NZ supports measures to prevent the arrival of pests such as Asian gypsy moth (*Lymantria dispar*), brown marmorated stink bug (*Halyomorpha halys*), yellow spotted stink bug (*Erthesina fullo*) and polished green shield bug (*Glaucias subpunctatus*).

9. In particular, HortNZ acknowledges the extensive work undertaken by the Ministry for Primary Industries (MPI) to manage the changing risk profile of BMSB.
10. Risk profiling is very difficult for BMSB due to the insect's association with a wide range of goods, however interception records show that vehicles are a frequently contaminated import. For this reason, HortNZ supports, in principle, the majority of the proposed additional and amended measures on the vehicles, machinery and equipment (VME) pathway to manage the significant and increasing BMSB risk, subject to the below feedback being considered.

Part 2

11. It is possible that BMSB could establish in New Zealand from the arrival of just one aggregation. There have been a number of BMSB aggregations associated with air-freighted goods. Airfreighted goods travel to New Zealand quickly, maximising the chance of hitchhiking BMSB arriving alive and healthy. For the above reasons, HortNZ strongly believes that air freighted vehicles, machinery and equipment should not be excluded from measures in parts 3 and 4 of the IHS. The additional measures set out in parts 3 and 4 would more appropriately manage the risk of BMSB arrival via the airfreight pathway, compared to part 2 alone.

Part 4

12. HortNZ is supportive of expanding the list of actionable BMSB countries (schedule 3) in line with recent spread and increasing population numbers overseas. The timeline of events listed in schedule 2 (MPI 2019b) illustrates how reactive measures and MPI chief technical officer (CTO) directions have been used to manage the evolving risk in the past. The more proactive approach of adding countries to schedule that either a) already have established BMSB populations or b) have a highly suitable climate for BMSB

establishment and are in close proximity to a region/country with significant number of BMSB (MPI 2019b) is commendable.

13. HortNZ would like to request that MPI add China and South Korea to schedule 3 for consistency, as they meet the criteria of having 'already established BMSB populations' (MPI 2019b). The justification to exclude China and Korea based on low interception numbers is questionable, as this was also the case for Japan until the population increased unexpectedly in 2017 resulting in large aggregations being intercepted on new and used vehicles and machinery during the 2017/18 BMSB risk season. This example illustrates how quickly the BMSB situation in a country can change, and shows that endemic populations (not just invasive populations) can pose a risk to New Zealand. There have been numerous interceptions on goods from China during the 2018/19 risk season.

14. HortNZ welcomes the proposed mandatory before-arrival treatment in Part 4, including removal of the on-arrival treatment option for break bulk tyres in section 3.4 of the IHS. This aligns with the core principle regarding managing biosecurity risk offshore wherever possible. Mandatory 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.

15. There have been a number of instances of treatment failure or incorrect treatment application on import pathways associated with BMSB in previous years. Treatment failure seriously jeopardises New Zealand's ability to effectively manage the risk posed by BMSB. HortNZ strongly supports MPI officials being stationed offshore during the risk season to provide training and technical advice to treatment providers. This should provide additional confidence that the treatments are being carried out appropriately and minimise the chance of treatment failure. HortNZ has raised concerns in the past about implementation and verification of measures and treatments (see 2018 VME submission) and commends MPI's intention to allocate resources to help achieve good practice and compliance.

16. The inclusion of additional, proven, treatment options (heat treatment and fumigation with Methyl Bromide or Sulfuryl Fluride) for aircraft and water craft from Schedule 3 countries in section 4.4 is supported. More options for treatment make it easier for importers to comply, minimising the risk of shortcuts being taken.

17. HortNZ supports the removal of time extension for west coast ports in the United States of America in section 4.6 of the IHS. Reducing the time that VME is held post-treatment and pre-shipping minimises the risk of infestation by aggregations of overwintering BMSB, and aligns with the requirements for other locations.

General

18. HortNZ commends MPI's intent to align BMSB risk management with Australia when appropriate. This will reduce confusion and makes complying easier for those shipping goods to both countries.

19. BMSB interceptions in this risk season (2018/19) have continued into April, whereas last season (2017/18) interceptions declined in March. HortNZ acknowledges that this may be due to a range of factors such as changes in weather or the timing of the seasons at

the point of origin, varied import patterns and BMSB population numbers. Regardless, this tail of interceptions is of interest to New Zealand. It is understood that Australia defines the end of season as 30 April in the country of origin (DAWR 2019) whereas New Zealand uses 30 April arrival in New Zealand as the end of the season. HortNZ asks MPI to consider whether alignment with the Australian definition might be sensible given the tail in interceptions seen in the 2018/19 risk season.

20. HortNZ is supportive of the intention to have the amended IHS in place in time for the next risk season (1 September 2019). Hort NZ 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 VME IHS.

CONCLUSION

21. 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. Parts 3 and 4 of the IHS should apply to air freight, a known interception pathway.
    b. The expanded list of actionable BMBS countries is supported, though the status of China and South Korea should be reviewed.
    c. Alignment with the Australian definition for the end of the risk season should be considered.

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

23. 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 Vehicles, Machinery and Equipment (VEHICLE.ALL), dated 3 April 2019

MPI (2019b) Risk Management Proposal associated with the Review and Amendment of the Import Health Standard for Vehicles, Machinery and Equipment, 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.

DAWR (2019) Proposed 2019-20 Seasonal measures for Brown marmorated stink bug (BMSB). http://www.agriculture.gov.au/import/before/brown-marmorated-stink-bugs/proposed-2019-20-seasonal-measures

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