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SUBMISSION ON THE RISK MANAGEMENT PROPOSAL FOR ROSE (*Rosa* spp.) NURSERY STOCK

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References:

- A.** MPI Risk Management Proposal; Rose (*Rosa* spp.) nursery stock from: Australia, Austria, Belgium, Denmark, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Japan, Luxembourg, The Netherlands, Norway, Portugal, Spain, Sweden, Switzerland, United Kingdom. MPI Discussion Paper 2016/06
- B.** MPI Import Risk Assessment on Rosa Nursery Stock dated 2013
- C.** MPI Standard 155.02.06, Importation of Nursery Stock dated May 2016

EXECUTIVE SUMMARY

1. Horticulture New Zealand (HortNZ) represents the interests of New Zealand's 5,500 commercial fruit and vegetable growers. The horticulture industry is valued at \$5.5 billion including nearly \$3 billion in exports.
2. The industry employs over 50,000 people, occupies some 130,000 ha of land and provides critical regional development opportunities in Northland, Auckland, Bay of Plenty, Hawke's Bay, Marlborough, Nelson, Canterbury and Central Otago.
3. The industry relies heavily on New Zealand's excellent biosecurity status to protect productive capacity, and provide for significant market access opportunities internationally. This status is also key to the industry's drive towards Integrated Fruit Production and

Integrated Pest Management that reduce agrichemical inputs while maintaining product quality and meeting the exacting standards of our international consumers.

4. Effective biosecurity is a key part of industry risk management. Biosecurity supports production, secures market access, and provides confidence for investment – all key to the horticulture industry continuing to make a strong contribution to the Government’s ‘Export Double’ goal.

5. Ref A, the RMP, identifies significant threat to a broad range of species in New Zealand from pathogens in *Rosa* spp. nursery stock, many of which are key commercial horticultural crops, including: grapes, onions, apple, potato, tomato, brassica, corn, carrots, citrus, stonefruit, berryfruit. HortNZ commends MPI for undertaking this review and identifying the risks posed by the pathogens noted in Ref A. HortNZ appreciates that there is limited information on many of the *Rosa* spp. nursery stock hazard organisms identified in Ref B, some of which are new to science.

6. Horticulture New Zealand:

- supports the proposal to amend the IHS to ensure the risk posed by the identified pathogens is managed
- does not support the proposal to allow on-arrival fungicide treatment, given the principle to manage risk offshore wherever possible, such as would be possible with pre-export treatments in this case.
- seeks further discussion with MPI about the decision not to include the hazard organisms from Ref B, chapter 4 as risk organisms, notwithstanding the precautionary principle has been applied to one of these already (*Xyella fastidiosa*) due to the potential economic impact on wine grapes.
- seeks a discussion with MPI on the potential risk posed by these pathogens on other pathways, in particular the cut flower pathway, and whether offshore testing for the risk pathogens is required before certification by the NPPO.

HAZARD AND RISK ORGANISMS OF ROSA NURSERY STOCK

7. Ref B, section 4.1, identified 51 organisms that present a hazard (“hazard organisms”) on the *Rosa* spp. nursery stock pathway. Of these 29 were excluded, mostly due to presence in New Zealand, or lack of *Rosa* association. A further 17 were not considered due to insufficient information. Therefore only five hazard organisms are identified as actual “risk organisms”. Of note two of the hazard organisms not considered a risk in Ref B have subsequently been carried forward into Ref A (*Ca. Phytoplasma prunorum* and *Xylella fastidiosa*).

8. Tomato Tospovirus (ToTV) (synonym: Tomato fruit yellow ring virus) is an example of one of the hazard organisms not identified as a risk in Ref B, which does pose potential risk to commercial horticulture, in particular tomatoes.

9. The hazard organisms are mentioned very briefly in Ref A, with just one paragraph (9) identifying that “due to limited information of the epidemiology or limited distribution (of) these pathogens, specific measures have not been proposed...” HortNZ encourages MPI to reconsider the status of these hazard organisms as further information becomes available. As Ref B notes; “If further information becomes available about any one of the following organisms ... then it may be necessary to conduct further risk assessment, which may alter the current status of the organism *i.e.* a hazard organism may become a risk organism.”

10. HortNZ notes that *Raspberry ringspot virus* was added to Ref A from the emerging risk system, having not been considered in Ref B. This addition, by use of other MPI processes for risk management, is commended.

PROPOSED CHANGES TO IMPORT HEALTH STANDARD

11. Ref A proposes the following changes to the importation of *Rosa* nursery stock for the management of phytoplasmas - specifically *Candidatus Phytoplasma asteris*; *Ca. P. aurantifolia*; *Ca. P. prunorum*; and *Ca. P. rubi*:

- a. Level 2 Post Entry Quarantine (PEQ) for minimum growing period of six months (including tissue cultures)
- b. PCR test for all phytoplasmas (nested or real-time PCR using universal primers which is capable of detecting all phytoplasmas)

12. Ref A proposes the following changes to the importation of *Rosa* nursery stock for the management of the viruses – specifically *Blackberry cholortic ringspot virus*, *Raspberry ringspot virus* and *Rose rosette virus*:

- a. Sourced from a pest free area (certified declaration by NPPO) **OR**
- b. PCR testing whilst in PEQ

13. Ref A proposes the following changes to the importation of *Rosa* nursery stock for the management of fungi – specifically rust fungi of the Pucciniales order:

- c. Pre-shipment treatment with an suitable broad range fungicide approved by the NPPO and certified as such **OR**
- d. On-arrival treatment with the fungicide propiconazole at an MPI approved treatment facility.

14. HortNZ supports the proposed IHS measures with the exception of allowing for the on-arrival treatment for fungi. The policy for risk management offshore does not support the on-arrival fungicide treatment, and HortNZ asserts that treatment must be undertaken offshore and supported by NPPO certification, and MPI's assurance regime. HortNZ does support remedial fungicide treatment on-arrival should concerns exist about the offshore treatment, or post-treatment contamination/infection.

LEVEL 2 PEQ REQUIREMENTS

15. HortNZ supports the intent for Level 2 Post Entry Quarantine (L2 PEQ) facility as the appropriate facility to prevent transmission of the risk phytoplasmas, given that transmission occurs by insect vector.

16. Likewise for viruses a L2 PEQ facility mitigates the risk of virus transmission which is mechanical (seed and graft), and nematodes. It is noted however that two of the risk viruses (*Blackberry cholortic ringspot virus* and *Raspberry ringspot virus*) may be capable of transmission by pollen, however removal of flowers in PEQ will mitigate this risk.

17. HortNZ requests further information from, and discussion with, MPI on whether the six months' time in PEQ is sufficiently adequate to allow expression of Phytoplasma symptoms or for the titre (concentration of Phytoplasma in the plant tissues) to build up to a level where they can be detected by PCR.

RISK PATHOGENS ON OTHER PATHWAYS AND OTHER RISK PATHOGENS

18. As noted, HortNZ seeks a separate discussion with MPI about the risk posed by these risk pathogens on other pathways, in particular roses on the cut flower pathway. HortNZ understands, from discussions with MPI, that the risk from viruses is managed through the devitalisation of the plant to prevent propagation in NZ, which destroys the plant reproductive capability, and also mitigates the risk of virus transmission by limiting the plant hosting viability. Fungi are managed by visual inspection both pre-export and on-arrival. HortNZ welcomes further discussion on the residual risk posed by these pathogens, in particular those potentially vectored by pollen from cut flowers.

19. HortNZ is also cognisant of other risks posed by the introduction of bare-rooted plants in this nursery stock IHS, with roots harbouring other pathogens and nematodes. HortNZ requests the opportunity to discuss with MPI whether the current IHS (Ref C) measure of production “from seed or cuttings in soil-less rooting media in containers maintained out of contact with the soil” is sufficient to mitigate against root-borne risk organisms.

CONCLUSION

20. HortNZ supports the proposed changes to the IHS with the one exception - not supporting the general acceptance for on-arrival fungicide treatment.

21. HortNZ encourages MPI to actively review the hazard organism list when new information comes available, as has commendably occurred with *Raspberry ringspot virus* being added as a risk organism through the MPI emerging risk system.

22. HortNZ seeks a further discussion with MPI on the risks posed by these risk organisms on other pathways. HortNZ seeks to better understand the offshore testing requirements for pathogens (risk group 2) required for cut flower certification.

23. This submission is supported by Vegetables New Zealand Inc, Process Vegetables New Zealand, New Zealand Wine Growers Inc, Kiwifruit Vine Health, Tomatoes New Zealand Inc, New Zealand Citrus Growers Inc, and Summerfruit New Zealand.

24. HortNZ supports the submission made by Kiwifruit Vine Health.

25. HortNZ welcomes the opportunity to discuss the matters raised, together with other horticultural industry product groups.

ENDS