

SUBMISSION ON ADDITIONAL IMPORT REQUIREMENTS ON TABLE GRAPES FROM CHILE, REPUBLIC OF KOREA AND THE USA

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To: The Ministry for Primary Industries

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Our submission

Horticulture New Zealand thanks the Ministry for Primary Industries (MPI) for the opportunity to submit on the proposed amendments to the import health standards for fresh table grapes from Chile, the Republic of Korea and the USA – California.

The horticulture sector welcomes any opportunity to continue to engage with MPI and to discuss this submission.

This submission is being made by Horticulture New Zealand and is supported by the following organisation:

- New Zealand Apples and Pears Incorporated

HortNZ's Role

Background to HortNZ

Horticulture New Zealand (HortNZ) advocates for and represents the interests of approximately 5,500 commercial fruit and vegetable growers in New Zealand. These growers supply fresh and processed fruit and vegetables to domestic consumers, as well as exporting crops to discerning consumers overseas. The horticulture industry is valued at \$7b with \$4.6b in exports annually.

The national and regional economic benefits associated with horticultural production are important. The industry employs more than 40,000 people and provides critical regional development opportunities in Northland, Auckland, Bay of Plenty, Waikato, Hawke's Bay, Gisborne, Manawatu, Marlborough, Nelson, Canterbury and Central Otago. The rural economy supports local communities and primary production defines much of the rural landscape.

HortNZ's purpose is to create an enduring environment where growers thrive. This is done through enabling, promoting and advocating for growers in New Zealand.

Submission

General

1. HortNZ broadly supports MPI's proposed amendments to the three import health standards for fresh table grapes from Chile, the Republic of Korea and California, USA.
2. HortNZ notes the proposed amendments are largely additional phytosanitary requirements to manage:
 - *Drosophila suzukii* (spotted winged *Drosophila*)
 - *Guignardia bidwellii* (grape black rot)
 - *Lobesia botrana* (European grapevine moth)
 - Regulated spiders (*Latrodectus* spp. and other spiders).
3. HortNZ notes the specified regulated pests have the potential to cause significant adverse impact on the horticulture industry (MPI, Risk Management Proposal, 2022):
 - *Drosophila suzukii* has a host range of over 84 species and is a serious economic threat to numerous horticultural crops including berries and stone fruit (Kenis et al. 2016; Bal et al. 2017).
 - The European grapevine moth is a significant pest of berries and berry-like fruit across Europe, Middle East, and northern and western Africa (Venette et al. 2003).
 - Like most spiders, *Latrodectus* species are generalist predators that consume a range of insects. *Latrodectus* spiders can cause harm to humans due to their venom containing a neurotoxin (Thatcher & Janes, 2012).

It is therefore important that these pests and pathogens are adequately managed on the fresh table grape pathway.

4. HortNZ broadly supports the inclusion of the proposed additional treatment options of stand-alone cold disinfestation, ozone fumigation and methyl bromide fumigation for these regulated pests, provided they are efficacious as supported by robust evidence in the scientific literature. Inclusion of a range of efficacious disinfestation treatments will provide importers with flexibility to select the treatment option of their preference.

Proposed measures for *Drosophila suzukii*

5. HortNZ requests MPI provide the scientific references that support the proposed *D. suzukii* treatments in paragraphs 44(a) and 44(b) of the Risk Management Proposal. We would like to have the opportunity to review these references before the proposed treatments are added to the Import Health Standard.
6. HortNZ would like to understand why the stand-alone cold treatment is different to the cold treatment in combination with ozone (paragraph 44a and 44c, MPI, Risk Management Proposal, 2022). Does the use of ozone treatment first mean the cold treatment doesn't need to be as cold or applied for as long to achieve the same efficacy?

7. HortNZ would like the pathway to be audited and monitored to ensure the treatments are achieving the desired outcome. This will be important to provide confidence that the treatment, including the more complex combination treatments, are being applied correctly.

Proposed measures for *Guignardia bidwellii*

8. HortNZ seeks clarification on the 'appropriate pest control activities' which MPI and the Republic of Korea have agreed to (paragraph 48, MPI, Risk Management Proposal, 2022). Will these activities take place under an agreed export plan?
9. HortNZ would like to understand whether these pest control activities maintain the same level of biosecurity effectiveness as the existing phytosanitary measures (i.e., pest-free areas (PFAs)). HortNZ does not support the removal of pest-free areas of grape production in the Republic of Korea IHS (paragraph 54, MPI, Risk Management Proposal, 2022) unless the proposed alternative measures manage risk to an equivalent level.

Export plan summary request

10. HortNZ requests MPI audit the table grape pathway and provides a summary of the export plan to provide confidence in the appropriate application of the pest control activities. HortNZ requests this information is provided prior to trade commencing.

References

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