

SUBMISSION ON

Proposed amendments to the import health standards for fresh citrus (Citrus spp.) for human consumption

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To: The Ministry for Primary Industries (MPI)

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OVERVIEW

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Our submission

Horticulture New Zealand (HortNZ) thanks the Ministry for Primary Industries (MPI) for the opportunity to submit on the amendments to Import Health Standards for fresh citrus for human consumption and welcomes the opportunity to continue to work with MPI to discuss our submission.

The details of HortNZ's submission and the requests we are making are set out in our submission below. Our submission is supported by:

- Citrus New Zealand
- Kiwifruit Vine Health
- New Zealand Feijoa Growers Association
- Onions New Zealand
- Passionfruit New Zealand
- Persimmon Industry Council
- Summerfruit New Zealand
- Tomatoes New Zealand
- Vegetables New Zealand

HortNZ's Role

Background to HortNZ

HortNZ represents the interests of approximately 4,200+ commercial fruit and vegetable growers in New Zealand who grow around 100 different fruit and vegetables. The horticultural sector provides over 40,000 jobs.

There is 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.

Submission

1. Introduction

The Ministry for Primary Industries (MPI) seeks to amend the Import Health Standards for fresh citrus for human consumption. Horticulture New Zealand (HortNZ) welcomes the opportunity to provide feedback to MPI on the proposed amendments to the IHSs for fresh citrus.

Some of the proposed amendments are based on previous risk analysis for IHSs consulted on between 2020-21 and HortNZ does not submit further comments on these.

HortNZ has, however, several concerns regarding changes to pest risk assessments and phytosanitary measures, as well as the process and risk assessments for the addition of Morocco to the mandarin and orange IHSs. These concerns and our related requests are detailed below.

2. Comments on the consultation process

1. HortNZ requests that MPI makes the supplementary risk analysis for the importation of fresh citrus fruits from Morocco available on its public website.

HortNZ is concerned that technical documents key to understanding the risks being mitigated by the proposed measures were not provided to the parties being consulted. We note this concern has been raised by HortNZ and multiple other industry groups in previous consultations, but we are obviously not being heard and our frustration is increasing. In this case, we simply were not given sufficient information to understand the potential risks associated with granting market access to Morocco under the mandarin and orange standards.

As noted in the Risk Management Proposal (RMP), Morocco was not one of the countries included in the scope of the 2020-21 citrus Import Risk Analysis (IRA) process. Therefore, we do not think it adequate to simply state that “no new targeted [pests] or MPI-specified measures pests” were identified in a supplementary risk analysis for Morocco. HortNZ did request that the supplementary risk analysis for Morocco be provided but were told that it had not gone through the required process within MPI to be publicly released. A reaffirmation that HortNZ would like a copy did result in risk analyses for two specific pests being provided by email two working days before the consultation period closed. Unfortunately, these materials were received too late to materially alter this submission or to reduce the amount of time required to prepare it.

A second request to be provided with the full list of all pests and diseases identified as potential risks associated with Moroccan citrus fruits was also unsuccessful. High-level reassurance was provided that the two pests outlined in the RMP were the only ones identified that were not already being managed within the existing IHSs, but no supporting evidence has been provided for that claim.

HortNZ and the wider horticulture industry groups recognise and appreciate the good work that MPI does to develop and implement Import Health Standards. However, we regretfully suggest that this consultation, and previous ones, have not been aligned with the principle of availability laid out in s5 of the Official Information Act 1982 that clearly states *information shall be made available unless there is good reason for withholding it*.

HortNZ firmly believes that as part of meaningful IHS consultations MPI should provide full access to the scientific analysis upon which the RMP and IHSs are based. In this instance, not having adequate access to the supplementary risk analysis resulted in an excessive and unsustainable resource burden on HortNZ and industry product group representatives as we are required to perform our own rapid risk assessments to assess the technical and scientific bases for proposed IHS amendments on behalf of the horticulture growers of New Zealand.

3. Comments on the proposed amendments

The following section contains comments primarily based on the evidence that was provided at the start of the consultation process.

3.1 New countries added to the scope of the standards

AUSTRALIA, MEXICO, AND PERU

HortNZ acknowledges the extensive and well-conducted consultation carried out by MPI in 2020-21 in relation to citrus from multiple countries. HortNZ supports the addition of new country:commodity combinations for those countries that were included in the scope of the 2022 Import Risk Analysis.

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2. HortNZ requests that MPI does not release an IHS for Morocco until a full import risk analysis (IRA) for fresh citrus fruits from Morocco has been made available and this should include all pests and diseases present in Moroccan citrus orchards.

HortNZ is concerned that the proposed IHSs for Moroccan mandarins and oranges are potentially inadequate to prevent the incursion of an unwanted pest or disease that could cause damage to citrus and other crops being grown in New Zealand. The supplementary risk analyses that were made available at the very end of the consultation period, do not constitute a full supplementary risk assessment of citrus fruits from Morocco.

The RMP does contain comments about two pests that have not been previously assessed and that could be imported with fresh citrus fruit from Morocco. HortNZ does not agree with some of the statements of risk made about these two pests in the RMP. Our specific comments are provided below.

Ectomyelois ceratoniae (carob moth / locust bean moth)

3. HortNZ requests that the risks of entry and establishment for *Ectomyelois ceratoniae* on consignments of fresh citrus fruit are re-estimated.
4. HortNZ requests that the potential scale of impacts of this pest across all horticulture sectors in New Zealand are re-estimated.

5. HortNZ requests that MPI proposes suitable targeted or specified measures to prevent the accidental importation of *Ectomyelois ceratoniae* on fresh citrus fruits from Morocco and other countries.

HortNZ is concerned that the biosecurity risks associated with this pest have been underestimated by MPI and regards the proposed risk management measures to be inadequate. Several bold assertions have been made in the RMP that HortNZ refutes:

- 1) HortNZ does not agree that *E. ceratoniae* poses low risks that will be successfully managed by basic measures alone.
- 2) HortNZ does not agree that *E. ceratoniae* has an infrequent association with commercially produced citrus fruit.
- 3) HortNZ does not agree that all infested fruit will prematurely ripen and drop off the tree.
- 4) HortNZ does not agree that commercial production practices are likely to identify and remove larvae.

Our reasons for these refutations are provided below.

Ectomyelois ceratoniae is **a highly polyphagous pest** that could have widespread impacts were it to arrive in New Zealand. This is because it can feed on a wide range of fruits (including citrus, stone fruit, and pip fruit), nuts (including walnuts, almonds, and macadamias) and other seed-producing crops (including beans, capsicum, and pumpkin) (Duenas-Lopez, 2022).

Ectomyelois ceratoniae is native to India and the Middle East but **has been accidentally introduced to, and consequently spread within, multiple countries** and states in the Americas, Europe, Africa, Asia, and Australia (Duenas-Lopez, 2022). It is highly likely that trade in host crop commodities is accountable for much of this transmission. The CABI compendium for this pest describes *E. ceratoniae* as a pest that is “highly likely to be transported internationally accidentally” and reports that this pest has been frequently intercepted at US ports (including on oranges) (Duenas-Lopez, 2022). However, we note that visual inspection alone may lead to confusion between this species and the false codling moth (Morland, 2015).

The RMP asserts that “*E. ceratoniae* has an infrequent association with commercially produced citrus fruit”. HortNZ disagrees with the definitiveness of this assertion. There are **multiple recent reports of this moth causing damage to citrus fruits, including reports from North African countries** (Hached, Romdhane, Sahraoui, & Grissa-Lebdi, 2018; Glazer, Mendel, & Ment, 2023; Morland, 2015; Duenas-Lopez, 2022). We do not believe there is sufficient evidence to dismiss the possibility that trade in commercial citrus fruits from Morocco may be a pathway by which this pest could enter New Zealand. A lack of information from a google search does not directly equate with a lack of risk.

The RMP states that “infested fruit prematurely ripens or drops off the tree”. However, **many infested fruits remain on the tree** (Hached, Chakroun, Naffeti, & Grissa-Lebdi, 2023) **and these could feasibly be harvested and exported.**

The RMP also suggests that washing, grading, brushing, or waxing processes are likely to identify infested fruit and remove eggs and larvae. However, **the larvae of *E. ceratoniae* feed and develop inside the fruit so brushing, washing, and waxing are unlikely to**

remove them, and phytosanitary inspection may not detect early-stage larvae (Hached, Chakroun, Naffeti, & Grissa-Lebdi, 2023).

The only basic measure that is listed within the IHSs for fresh oranges and mandarins is the requirement for these commodities to “be sourced from a production system that uses standard commercial production methods”. HortNZ is highly concerned that, in the absence of any targeted or specified measures for this pest, the biosecurity risks it poses to New Zealand would effectively be unmanaged and whether it arrives here or not is being left to chance.

***Eutetranychus orientalis* (citrus brown mite / Oriental spider mite)**

6. HortNZ requests that the risks of entry and establishment for *Eutetranychus orientalis* on consignments of fresh citrus fruit are re-estimated.
7. HortNZ requests that MPI proposes suitable targeted or specified measures to prevent the accidental importation of *Eutetranychus orientalis* on fresh citrus fruits from Morocco and other countries.

This species of spider mite can **feed on a wide range of plant species present in New Zealand** including citrus, pip fruit, stone fruit, capsicum, eggplants, maize, avocado, beans, cucurbits, numerous flowering plants, some ornamental trees, and many common weeds (EFSA Panel on Plant Health, 2013). The main impacts of this pest are usually cosmetic, but plants stressed by factors such as adverse environmental conditions (e.g. water-logged soils, prolonged warm winds) can suffer larger infestations and more severe damage can occur. Citrus and woody ornamentals may be especially prone to higher infestations with this mite. In Australia all citrus varieties are attacked by this pest with significant damage being recorded in some mandarin orchards (EFSA Panel on Plant Health, 2013).

While these mites are most commonly spread via the movement of plants for planting, they **can contaminate fruit and they have been intercepted at international borders on consignments of fruit**, including citrus (EFSA Panel on Plant Health, 2013; Biosecurity Australia, 2005).

The RMP proposes that basic measures alone (i.e., standard commercial production methods) are sufficient to manage the risk of *E. orientalis* but simultaneously acknowledges that commercial production practices may not remove these mites. Therefore, under the proposed RMP, MPI’s effective management of the risk of *E. orientalis* entering the country would rely on in-transit mortality. HortNZ considers **the evidence for the efficacy of in-transit mortality as a biosecurity control measure as far from conclusive**. The EFSA risk assessment concludes that the survival of this pest during transportation and storage of fruit is high because:

- i. Fruit can be infested with all stages of the mite except eggs.
- ii. Quiescent stages of the pest are expected to be more resilient to adverse environmental conditions.
- iii. Cold conditions in transport will additionally prolong survival due to slower development.

In addition, **spider mites are not easy to detect by phytosanitary inspection**, which makes visual inspection unreliable as a phytosanitary measure and as a means of monitoring compliance in this import pathway.

HortNZ does not agree that basic measures will effectively manage the biosecurity risks associated with this pest. Given its polyphagous nature it could cause damage to multiple crops if it did arrive. Therefore, HortNZ are requesting that targeted or specific measures are put in place to minimise the risks of this pest entering New Zealand on fresh citrus fruits.

3.2 Presence of *Ectomyelois ceratoniae* and *Eutetranychus orientalis* in other citrus exporting countries

8. HortNZ requests that MPI conducts a full import risk assessment for these two pests from all countries from which fresh citrus fruits may currently be imported.
9. HortNZ requests that MPI discloses whether either of these two pest species have previously been intercepted at the New Zealand border during on-arrival inspection from any country, including incompletely identified interceptions of these genera or families.

Ectomyelois ceratoniae and *Eutetranychus orientalis* were not included in the 2022 IRA for citrus, despite their presence in several countries covered by this IRA and the citrus IHSs. It is of concern to HortNZ that although these pests are present in countries currently approved to export citrus to New Zealand, they do not appear to have been subject to risk assessment and there may be unmanaged risks on these pathways.

3.3 Proposal to reduce measures for *Planococcus minor* (passionvine mealybug / Pacific mealybug)

10. HortNZ requests that MPI does not remove the targeted measures for *Planococcus minor* from the fresh citrus IHSs.
11. HortNZ requests that MPI makes publicly available the revised risk assessment they have used to support their proposal to remove the requirement for targeted measures for this pest.
12. HortNZ requests that MPI identifies where previous impact assessments have been downgraded and provides robust technical justification for the proposed measures in the RMP.

Planococcus minor is a polyphagous pest with **a wide host range that notably includes citrus but also asparagus, brassicas, cucurbits, avocado, passionfruit, maize, macadamias, capsicum, tomatoes, potatoes, and grapes.**

MPI has conducted two recent Import Risk Analyses (IRA) for fresh fruits that have included this pest: the 2022 IRA for fresh citrus fruit for human consumption (Ministry for Primary Industries, 2022), and the 2023 IRA for decrowned pineapples for human consumption (Ministry for Primary Industries, 2023). The measures for this pest in the current citrus IHSs are based on the 2022 citrus IRA, MPI is now proposing to remove targeted measures for *P. minor* and rely on basic measures alone to manage this pest. **The justification for this downgrade is does not appear to align with either of the recent IRAs.**

The RMP states that MPI has revised its assessment of the economic and environmental impacts of *P. minor*. However, the 2023 pineapple IRA clearly states that **this pest has the potential to cause direct harm to plants of economic importance and taonga species, indirect harm to New Zealand’s environment, and indirect harm to human health** due to the relationship that can develop between this pest and populations of harmful ants.

The RMP states that MPI has not found any scientific evidence of economic impacts attributable to *P. minor*. This is despite the scientific evidence cited in MPI’s 2022 IRA:

- “*Planococcus minor* is considered a major pest on *Citrus* in Taiwan (Ho et al. 2007)”.
- “High density of the mealybug can even kill perennial plants”.
- “It is also reported as a serious pest of grapevine in California and occasional pest of citrus (Wistermann et al. 2016)”.

The 2022 citrus IRA noted that *P. minor* has been intercepted 321 times at the New Zealand border, including 29 records on fresh citrus fruit in the preceding decade. It is therefore clear that **basic measures are NOT adequate to prevent the arrival of *P. minor* at the New Zealand border**. Given that not all intercepted pests are identified to species level, HortNZ believes the level of consignment infestation and non-compliance is likely to be even higher. HortNZ notes that in 2016 the California Department of Food and Agriculture assessed the consequences of introduction of *P. minor* as high (Leathers, 2016). At that time *P. minor* was not present in California and its subsequent establishment in the state has led to it becoming a serious pest.

HortNZ has not seen any information that justifies the proposed change in phytosanitary measures for this pest. As the measures being proposed in the RMP do not appear to be based on either of the two IRAs that are available to consulted parties, is there a third risk assessment that is the basis for these proposals? With the information that is available, **HortNZ does not support the removal of targeted measures for *Planococcus minor***.

3.5 Change in the requirement to sample a “homogeneous grower lot” to instead sample a “homogeneous lot

13. HortNZ does not support this change in sampling specifications due to a lack of assurance in the information currently being provided.
14. HortNZ requests that MPI clarifies the reasons why a “homogeneous grower lot” was previously specified in New Zealand’s import health standards and provides the evidence being used to suggest that this specification is no longer required.
15. HortNZ requests that MPI clarifies how each of the export countries defines a lot and ensures homogeneity, and how MPI verifies that the countries covered by citrus IHSs are meeting the requirements of the ISPMs.
16. HortNZ points out that the draft IHSs are currently requesting that the sample size table for small lots in ISPM 31 is applied to all lots regardless of size. HortNZ requests that this is amended as it could lead to insufficient units being sampled in large lots.
17. HortNZ requests that MPI adjusts the wording in the draft IHSs to emphasise the importance of homogeneity in inspection lots.

18. HortNZ requests that the citrus IHSs specifically direct the NPPO of the exporting country to use ISPM 31 to determine homogeneity, sampling method, and sample size for pre-export phytosanitary inspections.

HortNZ understands and supports MPI's intention to align terminology and methods with International Standards for Phytosanitary Measures. However, **the reasoning provided in the RMP has raised some concerns that HortNZ would like to discuss.**

Homogeneity within a sampled lot is vital to obtaining the 95% confidence level that no more than 0.5% of the units in a lot are infested with quarantine pests that MPI stipulates in its standards. This level of confidence is based on assumptions that: i) the pest is uniformly distributed through the lot and not aggregated into certain areas within the lot, and ii) random sampling is used (as stated in ISPM 31). Truly random sampling of a consignment, which is likely to be packed and palletised for export, may be difficult to achieve for operational reasons. If in addition the lot is not homogeneous in nature, then the sampling regimen may require a larger number of fruits to be sampled to provide the required 95% confidence that the lot is not infested.

The RMP states that "MPI may prescribe the homogeneity factor for inspection (such as grower) in a standard when risk analysis indicates a greater level of confidence is necessary to support exporting country phytosanitary assurance". HortNZ would like to know the reasons for previously prescribing grower as a specific factor for homogeneity and **what evidence is being used to now suggest that "grower" no longer needs to be specified?**

HortNZ does not agree with the statement in (34)b that specifying a homogeneity factor for inspection (such as grower) will achieve "a greater level of confidence" as ensuring **homogeneity is necessary to meet the already-required level of confidence.**

HortNZ thanks MPI for only permitting the importation of citrus from countries "where the National Plant Protection Agency (NPPO) has provided evidence to the satisfaction of a chief technical officer that the exporting country has a phytosanitary certification system that complies with ISPM 7. Phytosanitary certification system". Further to this, ISPM 7 requires the NPPO to "verify that appropriate phytosanitary procedures have been established and correctly applied". Therefore, **HortNZ requests that MPI provides details of the processes it uses to verify that the pre-export phytosanitary procedures of countries** covered by the IHSs under consultation are being correctly applied. We would like to understand:

- i) How each of the export countries defines a lot and ensures homogeneity?
- ii) How MPI verifies that the sampling and inspection methodology of every country covered by citrus IHSs meets the requirements of the ISPMs incorporated by reference into these IHSs?
- iii) How frequently MPI engages in verification activities to ensure that the standard of pre-export phytosanitary procedures remains at the level required to provide 95% confidence of <0.5 infested units in every lot.

HortNZ also notes that in Part 3 of the IHSs (e.g., the IHS for oranges) the sample size required to provide this level of confidence refers to Appendix 2 of ISPM 31. Appendix 2 is intended for small lots, for which the sample will be greater than 5% of the lot. The sample sizes for larger lots are provided in Appendix 3. HortNZ recommends that the wording in

the draft standards is changed to emphasise both the importance of homogeneity and the selection of an adequate sample size and appropriate sampling method.

For example, section 3.1(a) could be modified to:

“...sample each homogeneous lot of fresh orange. Homogeneity of lots must be determined in accordance with *ISPM 31. Methodologies for sampling of consignments*. The minimum sample size for inspection must be based on a 95% confidence level that no more than 0.5% of the units in the lot are infested as set out in *ISPM 31*.”

References

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