

SUBMISSION ON

Proposed changes to the import health standard for importing grain and seeds for consumption, feed, or processing

July 2023

To: Horticulture Imports Team, Ministry for Primary Industries

Name of Submitter: Horticulture New Zealand.

Contact for Service:

Anna Rathé

Horticulture New Zealand

PO Box 10-232 WELLINGTON

Email: anna.rathe@hortnz.co.nz

OVERVIEW

Our submission

Horticulture New Zealand thanks MPI for the opportunity to submit on the proposed changes to the import health standard for importing grain and seeds for consumption, feed, or processing and welcomes any opportunity to continue to work with MPI and to discuss our submission.



Submission

1. Consultation process

Horticulture New Zealand welcomes the opportunity to submit on the proposed changes to the import health standard for importing grain and seeds for consumption, feed, or processing.

2. Proposed risk management and amendments to Import Health Standards

2.1. Removal of *Liposcelis entomophila* (*Liposcelis entomophilus*) from the pest list for *Zea mays*

Horticulture New Zealand supports MPI's proposal to remove *Liposcelis entomophila* from the pest list for *Zea mays*.

Liposcelis entomophila is present in New Zealand. The grain psocid is a plant pest, listed by the CABI Compendium as a pest of *Zea mays* (and other cereals) as well as being a pest of dried stored products. However due to its presence in New Zealand, and not being under official control, it cannot be regulated as a quarantine pest.

MPI's action is consistent with this status, and previous actions to make *Liposcelis entomophila* non-regulated.

2.2. Removal of *Dinoderus minutus* from the pest list for *Zea mays*

Horticulture New Zealand supports MPI's proposal to remove *Dinoderus minutus* from the pest list for *Zea mays*.

Dinoderus minutus is present in New Zealand. The bamboo borer is a plant pest but, as it is present in New Zealand and official control actions were ceased in 2022, it does not meet the requirements to be regulated as a quarantine pest.

We note that the Official New Zealand Pest Register (ONZPR) states that the regulatory status of *Dinoderus minutus* has not been assessed and suggest this is updated.

2.3. Removal of Tomato black ring virus (TBRV) from the pest list for *Phaseolus*

Tomato black ring virus (TBRV) is not present in New Zealand and is a quarantine pest. It is widespread in Europe, the Americas, and India and has a very wide host range. Many of these host plants are important horticulture crops in New Zealand. Horticulture New Zealand wishes to ensure that any changes to the IHS for Grain and Seeds for Consumption, Feed or Processing do not increase the biosecurity risks to horticulture.

TBRV was removed from the import requirements for *Phaseolus* seed for sowing in 2013 (MPI, 2023). MPI's intention to remove TBRV from the *Phaseolus* pest list is consistent

with this earlier change. MPI's reasoning for removing TBRV from the pest list is that *Phaseolus* is not a natural host and that there is extremely weak evidence of seed transmission in *Phaseolus*. This is consistent with the earlier decision regarding the seeds for sowing IHS. We could find no evidence contradicting MPI's host status and transmission conclusions.

2.4. Consistency

It is pleasing to note that MPI is seeking to ensure consistency in regulation of pests across import pathways, however this appears to be a slow process. The removal of TBRV from the IHS for *Phaseolus* seeds for consumption, feed or processing IHS lagged 10 years behind similar action in the Seeds for sowing IHS.

We request that when MPI modifies IHSs to ensure consistency and technical justification for regulating pests, a wider review of risks be undertaken to ensure that there is no inconsistency leading to unmanaged pest risk in other pathways. For example, in conducting the review of TBRV to support this submission, we note that TBRV does not appear in the pest lists or additional declarations for seeds for sowing of major host plants for TBRV. Could MPI please advise what assessment was undertaken of TBRV in relation to other hosts in other import pathways.

We request that in such circumstances the scope of the analysis be expanded to review the way in which the pest is, or is not, regulated in other pathways.

2.5. Other amendments to the IHS

We note that during the consultation period (16 June 2023 to 31 July 2023) an amendment was made to the IHS (28 June 2023). This amendment was made to "Remove duplicate information about GIS requirement in Part 1.4 and clarify sampling certificate requirement in Part 1.5." These changes do not appear to have been consulted on. Can MPI please provide further information on the need to clarify sampling certificate requirements, and whether this was notified for consultation.

Please also note that the link to the SPS notification for the current consultation brings up an earlier (April) notification in relation to this standard.