

SUBMISSION ON AMENDMENTS TO THE
SEEDS FOR SOWING IMPORT HEALTH
STANDARD

22 August 2022

To: The Ministry for Primary Industries

Name of Submitter: Horticulture New Zealand

Contact for Service:

Gabi Hidvegi
Risk Policy Advisor
Horticulture New Zealand
PO Box 10-232 WELLINGTON
Email: Gabi.Hidvegi@hortnz.co.nz

Overview

Submission structure

Overview.....	3
HortNZ’s Role.....	4
Submission.....	5
References.....	7

Our submission

Horticulture New Zealand (HortNZ) thanks the Ministry for Primary Industries (MPI) for the opportunity to submit on the proposed changes to the requirements for *Pisum* and *Phaseolus* schedules in the Seeds for Sowing Import Health Standard (IHS). Our submission provides an end-user perspective.

HortNZ is a pan-sector organisation and has a comprehensive understanding of how the commercial fruit and vegetable growing sector in New Zealand operates. However, information relating to a particular crop can also be sought from individual product groups.

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 organisations:

- Katikati Fruitgrowers Association
- New Zealand Apples and Pears Incorporated
- Summerfruit New Zealand
- New Zealand Asparagus Council
- Tomatoes New Zealand
- Process Vegetables New Zealand

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 appreciates the challenges the Ministry for Primary Industries (MPI) faces when reviewing import health standards (IHS) and balancing the need to facilitate importation of commodities while managing the associated biosecurity threats.
2. HortNZ believes that taking steps to keep risks offshore and prevent any arrival of unwanted pathogens is the preferable approach.
3. HortNZ supports the removal of unnecessary requirements for the importation of all horticultural germplasm where the requirements are deemed scientifically unjustifiable and the removal does not increase the overall biosecurity risk to New Zealand.
4. HortNZ is encouraged by MPI's proactive monitoring of emerging biosecurity risks to determine whether the existing import requirements across all produce are scientifically justified and in line with international standards, such as the International Standard for Phytosanitary Measures 38 (ISPM 38) which provides guidance to assist National Plant Protection Organizations (NPPOs) in identifying, assessing and managing the pest risk associated with the international movement of seeds (as a commodity) (FAO, 2021).
5. HortNZ believes that seed pathways need to be carefully managed to prevent infected seed being inadvertently imported, distributed and grown at sites around the country. It is critical that imported seed is free from unwanted pathogens that would jeopardise New Zealand grown crops if they were to arrive and establish. For this reason, the *Seeds for Sowing* IHS is of interest to the horticulture sector.

Comments on the proposed amendments

6. HortNZ supports MPI's ongoing efforts to improve the *Seeds for Sowing* Import Health Standard, including recently reviewing the literature regarding viruses listed in the *Pisum* and *Phaseolus* schedules.
7. HortNZ would like to emphasise the importance and value of New Zealand's pea and bean crops - they are grown domestically for both fresh consumption and for processing.

8. While HortNZ is largely in support of the proposed changes to the *Seeds for Sowing* IHS, we are concerned that a lack of direct scientific experimental evidence is being interpreted as “negligible risk”, when in fact it remains a lack of evidence either way. In countries where these pathogens are prevalent, whether the viruses can spread via seeds may not be important enough to warrant studies as there may be other more common routes of transmission. However, in a country that is free of these viruses a less common transmission pathway can still present a risk of introduction.
9. HortNZ understands that any imposed measures need to be evidence-based and justifiable. We also understand that there is often a scarcity of literature on seed transmission, and that decisions need to be made based on the evidence available. We request that all literature is given appropriate consideration – to provide confidence that biosecurity risks are not overlooked due to limited evidence, where some evidence does exist.
10. HortNZ would like clarification on what constitutes sufficient evidence for requiring measures to manage a virus on seed import pathways. For example, is it evidence of seed transmission in the host genus? Evidence that the virus is seed-borne? Records of seed transmission in historical publications vs modern publications? Examples of the same genus of virus being seed transmissible? Whilst we acknowledge that every situation is different, approaches to the available evidence need to be consistently applied.
11. On page 4 of 7 of Appendix 1 – Scientific Technical Advice, it is stated for example that the entry risk of *Peanut stunt virus* (PSV) “*at this time is negligible, but with moderate-high uncertainty due to a lack of information, and PSV’s ability to be seed-borne in other members of Fabaceae.*” The definition of high uncertainty in the MPI technical advice report is “when there is conflicting information or highly limited sources” (MPI, 2022). As PSV has the ability to be seed-borne in other members of *Fabaceae*, HortNZ would like clarity on whether this is sufficient evidence of risk to warrant maintaining the existing requirements?
12. While HortNZ does not encourage the addition of unnecessary import requirements, we suggest that in the future MPI considers a precautionary approach where there is a moderate to high level of uncertainty as the potential entry and establishment of any unwanted biosecurity risk to New Zealand could adversely impact the horticultural sector and wider economy.

Recommendation – Review *Glycine max* measures

13. Evidence in scientific literature indicates that the peanut stunt virus (PSV) is seed-borne and can infect seeds of a large number of species including soybeans in the *Fabaceae* family (Iizuka & Yunoki, 1974, Nam et al. 2012).
14. The current Seeds for Sowing IHS permits the importation of soybean seeds from all countries with no requirement for a permit unless the seeds are grown in post-entry quarantine. HortNZ considers that the phytosanitary requirements are currently inadequate for managing PSV on this pathway as the requirements only refer to soybean seeds being produced in pest-free areas and pest-free places of production for *Peronospora manshurica* (plant pathogen) and visual freedom *Trogoderma* spp. (beetle).
15. HortNZ recommends MPI reviews the existing measures for *Glycine max* to ensure the risk of PSV is also mitigated on this pathway.

CONCLUSION

16. HortNZ welcomes MPI's efforts to ensure access to *Pisum* and *Phaseolus* seeds whilst effectively managing the risks posed on these pathway
17. We are happy to discuss any of the points raised in the submission.

References

Food and Agriculture Organization of the United Nations (FAO), 2021. ISPM 38. International movement of seeds.

[ISPM 38. International movement of seeds \(fao.org\)](https://www.fao.org/ispms/38)

Accessed: 8 Aug 2022.

Iizuka, N and Yunoki, T. 1974. Peanut stunt virus from soybeans *Glycine max* Merr. Bulletin of the Tohoku National Agricultural Experiment Station. No 47. 1-12.

<https://www.cabi.org/isc/abstract/19751317043>

Accessed: 16 August 2022.

Nam, M. et al. 2012. First report of Peanut Stunt Virus on *Glycine max* in Korea. The Plant Pathology Journal. 28(3).

https://www.researchgate.net/publication/264059707_First_Report_of_Peanut_stunt_virus_on_Glycine_max_in_Korea

Accessed: 16 August 2022.

The Ministry for Primary Industries (MPI), 2022. Risk Management Proposal: Amendments to the Import Health Standard Seeds for Sowing (155.02.05): Appendix 1: Technical Advice: 1-7.

<https://www.mpi.govt.nz/dmsdocument/52495-Risk-Management-Proposal-Amendments-to-the-Seeds-for-Sowing-Import-Health-Standard>

Accessed on 8 Aug 2022.