

# SUBMISSION ON

## Proposed changes to the seeds for sowing IHS

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**To:** Ministry for Primary Industries (MPI)

**Name of Submitter:** Horticulture New Zealand

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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 proposed changes to the seed for sowing import health standard (IHS). We welcome the opportunity to discuss our submission and continue to work with MPI on the development of import requirements.

The details of HortNZ's submission are below.

This submission is supported by:

- Onions New Zealand
- Potatoes New Zealand
- Strawberry Growers New Zealand
- Summerfruit New Zealand
- Tomatoes New Zealand
- Vegetable New Zealand Inc.

# HortNZ's Role

## Background to HortNZ

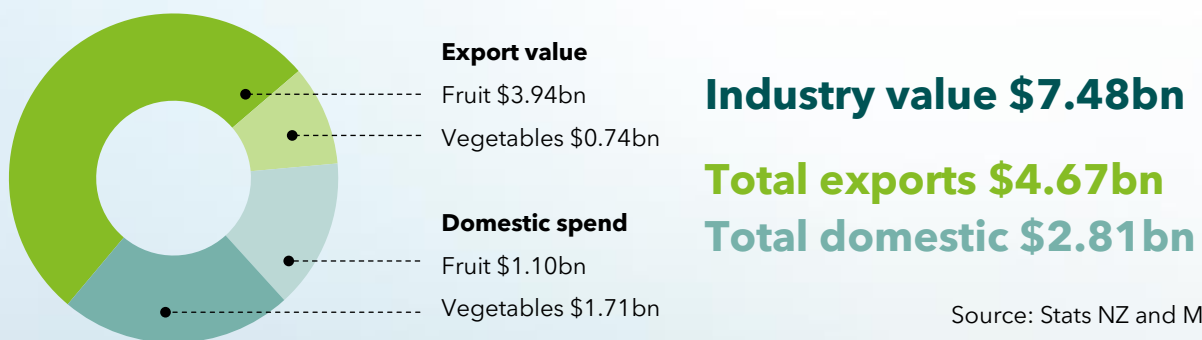
HortNZ represents the interests of approximately 4,200 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs and is valued at ~\$7.48 billion (2023/24).

There are 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.



## HortNZ's Biosecurity Act 1993 Involvement

On behalf of its grower members, HortNZ takes a significant interest in biosecurity regulations, planning, and operations. As well as advocating on behalf of growers in discussions with MPI and other regulators, HortNZ and other industry groups also work to raise the awareness of fruit and vegetable growers about the roles they can play in helping to keep their farms, orchards and wider New Zealand protected from unwanted pests and diseases

# Submission

## HORTNZ's understanding of the proposals and the basis for them

MPI proposes to change the import requirements set out in the seeds for sowing import health standard (IHS) for 11 quarantine pests on nine schedules of imported seeds.

MPI has reviewed new information and based on different technical assessments has concluded that these pests do no longer meet the criteria of a risk on the seed import pathway or the imposed mitigation measures are no longer justified and therefore no longer appropriate.

MPI concluded that the lack of supporting scientific evidence for all phytosanitary measures imposed by MPI on importing pathways in this proposal are no longer justified and appropriate and therefore do no longer meet New Zealand's international obligations under the World Trade Organization (WTO) Sanitary and Phytosanitary Agreement (SPS).

MPI proposes to remove some pests and specific measures for these pests for the respective schedule in the seeds for sowing IHS.

- Strawberry latent ringspot virus (strains not in New Zealand) from the *Fragaria* schedule.
- Plum pox virus from the *Prunus* schedule.
- High plains virus from the *Zea* schedule
- Tobacco ringspot virus from the *Solanum tuberosum* schedule
- *Septoria helianthi* from the *Helianthus* schedule.
- *Coniothyrium lavandulae* and *Phoma lavandulae* from the *Lavandula* schedule.
- *Penicillium brevicompactum* from the *Pinus* schedule
- *Pseudomonas syringae* pv. *cannabina* and *Xanthomonas campestris* pv. *cannabis* from the *Cannabis sativa* schedule.
- *Tarsonemus granarius* from the *Triticum* schedule.

## Plum pox virus as quarantine pest on imported *Prunus* seeds

HortNZ understands that at this stage, no scientific evidence of seed transmission support that Plum pox virus (PPV) poses a risk for New Zealand from the *Prunus* seed import pathway and PPV risk management measures may no longer be justified.

HortNZ, with support from Summerfruit NZ, opposes the proposed removal of import requirements and quarantine status for PPV on imported *Prunus* seeds. Despite no clear evidence of seed transmission yet, the potential risk and impact of PVV to the stonefruit industry (Summerfruit NZ) are substantial, if this virus would establish in New Zealand. With a viable pathway of introduction, the presence of this virus in New Zealand poses a significant risk of unacceptable unintended economic impact to the Horticulture industry. The removal of measures is unlikely to have impacts on importers, as imported *Prunus* seeds must still meet import requirements for other pests and disease, include post-entry quarantine and mandatory testing.

While we acknowledge MPI's reasoning, we ask that the current testing for PPV on imported *Prunus* seeds are continued and the current level of biosecurity rigor on this pathway is maintained.

## Strawberry latent ringspot virus on *Fragaria* schedule

HortNZ supports MPI's proposal to remove *Strawberry latent ringspot virus* (strains not in New Zealand) as quarantine pests from the seed for sowing IHS schedules for *Fragaria*.

## High plains virus (HPV) on *Zea* schedule

HortNZ supports the removal of High plains virus (HPV) as quarantine pest and any associated import requirements from the *Zea* (corn) seed for sowing import schedule. This includes any additional phytosanitary declaration requirements for pest absence, country freedom, pest free area, pest free place of production and seed testing.

## Tobacco ringspot virus on *Solanum tuberosum* schedule

HortNZ accepts the removal of *Tobacco ringspot virus* from the quarantine pest list of *Solanum tuberosum* seed for sowing schedule on the basis that this virus is present and widely spread in New Zealand. The ubiquitous presence of the virus in New Zealand makes the imposed import requirements on imported seeds inappropriate. Further, MPI has not clearly identified evidence that *Solanum tuberosum* is a main host species for ToRV.

While we acknowledge that the *Solanum tuberosum* seed pathway is currently inactive, it is important for the New Zealand Potato industry that this import pathways and any associated import requirements are regularly reviewed und updated to enable a viable alternative import pathway for potato germplasm in the future. Currently, the industry solely relies on importing tissue culture under plants for planting standard (IHS 155.02.06: Importation of Nursery Stock) to access new cultivars and genetics to supply potatoes to New Zealand.

## **HortNZ disagrees with the deregulation for pests without full assessment of all relevant government agencies**

HortNZ agrees with MPI's conclusion that *Tarsonemus granarius* (glossy grain mite) is predominantly found on stored grains and is unlikely to cause harm and unwanted impacts to host plants if it establishes in New Zealand.

We also understand that currently available scientific evidence do not indicate possible unacceptable impact on host plants, including host species of corn (sweetcorn and maize), wheat, barley and oat, or impact host plants differently than mites already present in New Zealand.

We understand that under these circumstances, a status of 'regulated organism' may not be warranted. However, given that *T. granarius* is not considered present in New Zealand, it will likely meet the criteria of a 'New to New Zealand' organism under the Hazardous Substance and New Organisms (HSNO) Act, 1996.

We request MPI to coordinate the de-regulation of any organism not known to be present in New Zealand with the Environmental Protection Authority (EPA), to prevent the intentional or unintentional introduction of any organisms into New Zealand.