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08 February 2022

Submission on proposed amendments to the post entry quarantine (PEQ) facility standard

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INTRODUCTION

1. Horticulture New Zealand (HortNZ) advocates for and represents the interests of New Zealand's 6,000 commercial fruit and vegetable growers. The horticulture industry is valued at \$6.73b with \$4.55b in exports annually.
2. The industry employs over 60,000 people, occupies some 80,000 ha of land and provides critical regional development opportunities in Northland, Auckland, Bay of Plenty, Waikato, Hawke's Bay, Gisborne, Manawatu, Marlborough, Nelson, Canterbury and Central Otago.
3. New Zealand growers supply fresh and processed fruit and vegetables to domestic consumers, as well as exporting crops to discerning consumers overseas. Biosecurity is essential to support production, secure market access, and provide confidence for investment – all critical to ensure the horticulture industry continues to prosper.
4. Enabling importation of new germplasm while effectively managing biosecurity risk is critical for the future success of the horticulture sector. Post Entry Quarantine (PEQ) is an important step in the germplasm import process. Time and testing in secure PEQ

facilities ensures that only safe plant material is released into New Zealand for propagation and dissemination.

COMMENTS ON THE PROPOSED AMMENDMENTS

5. HortNZ is broadly supportive of the proposed amendments to clarify the requirements in the post entry quarantine (PEQ) facility standard (MPI 2021c). Clear guidance is likely to increase user understanding and ensure the correct processes are followed, which results in better biosecurity outcomes.
6. HortNZ notes that the section in the draft standard covering ventilation for Level 3B facilities now specifies “*a directional airflow throughout the facility, from clean (lowest risk) areas towards the potentially contaminated (highest risk) areas*” (4.4.1.2 (1), MPI 2021a). However, it is not particularly clear or explicit in either the standard or the guidance document what is meant by clean areas (lowest risk) and potentially contaminated areas (highest risk). The guidance document mentions directing air flow towards each greenhouse room/unit, but this does not reflect the wording used in the standard regarding higher or lower level of risk (MPI 2021b). We suggest that additional information about what is meant by clean (lowest risk) areas and potentially contaminated (highest risk) areas is included in the guidance document. Are the same parts of the facility always going to be highest or lowest risk? Or would this change when certain activities are undertaken?
7. HortNZ supports clarification that anterooms are part of the facility (MPI 2021c). The anteroom is an essential part of the risk management system in a quarantine facility and as such needs to meet the broader facility requirements.
8. HortNZ agrees with the rationale for requiring growing media used in PEQ facilities to be pasteurised or inert (MPI 2021c). If New Zealand organisms were inadvertently introduced to the facility via growing media, it may result in unnecessary confusion and incur additional costs and time for identification. It is best to avoid introducing any domestic organisms to PEQ facilities, and it is important to manage growing media achieve this.
9. The standard states that *Growing media may be pasteurised before it enters the facility, or in the facility prior to use* (4.2.2.3 (2), 4.3.2.4 (2) and 4.4.2.4 (3), MPI 2021a). If pasteurisation is undertaken in the facility prior to use, HortNZ believes it should not take place in a room/unit containing viable plant material. We suggest that this detail is included in the guidance document.
10. Schedule 2: Abbreviations and Definitions provides the following definition of pasteurisation “*A process whereby organic materials are treated to significantly reduce numbers of plant and animal pathogens and plant propagules*” (MPI 2021a). Many online definitions of pasteurisation include reference to heat treatment and to sterilization or partial sterilization. Should these terms be added to the definition to strengthen it and avoid ambiguity about what is required?
11. HortNZ believes that the guidance document (MPI 2021b) contains important and practical details that should not be overlooked. We therefore feel that the standard should include more directive wording, such as *Operators and applicants for approval must read and be familiar with the guidance document and able to competently apply the guidance as applicable to their specific operation* (in the other Information section, MPI 2021a).

CONCLUSION

12. HortNZ welcomes the opportunity to discuss the points raised in this submission.

13. This submission is supported by:

- Citrus New Zealand
- Katikati Fruitgrowers Association
- Kiwifruit Vine Health Inc
- New Zealand Apples & Pears Inc
- Summerfruit NZ
- TomatoesNZ
- Vegetables New Zealand Inc

REFERENCES

MPI (2021a) Facility Standard: Post Entry Quarantine for Plants. 13 December 2021

MPI (2021b) Guidance Document: Post Entry Quarantine for Plants. 13 December 2021

MPI (2021c) Risk Management Proposal: Amendments to the Facility Standard: Post Entry Quarantine for Plants. December 2021.