SUBMISSION ON AMENDMENTS TO THE IMPORT HEALTH STANDARD FOR IMPORTING *PERSEA AMERICANA* PLANTS FOR PLANTING

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To: The Ministry for Primary Industries
Name of Submitter: Horticulture New Zealand

Contact for Service:

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Horticulture™ New Zealand
Ahumāra Kai Aotearoa

Overview

Submission structure

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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 amendment to the import requirements for avocados (*Persea americana*) plants for planting. 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. Information relating specifically to avocados can be sought from New Zealand Avocado.

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:

- New Zealand Apples & Pears Incorporated
- Katikati Fruitgrowers Association
- Kiwifruit Vine Health
- Persimmon Industry Council
- New Zealand Feijoa Growers Association

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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 prosper. This is done through enabling, promoting and advocating for growers in New Zealand.

Submission

1. It is recognised that access to new germplasm is essential for New Zealand horticulture to remain innovative and competitive in the global market.

2. Enabling importation of new germplasm while effectively managing any potential biosecurity threats is critical for the future success of the horticulture sector.

3. A number of high impact pathogens have been identified as potentially being associated with *Persea* for planting (MPI Risk Management Proposal (RMP) and Import Risk Analysis (IRA) 2022). Some are restricted to *Persea americana* hosts and therefore the risk is restricted to the avocado industry whilst others, such as as *Xylella fastidiosa* and potato spindle tuber viroid disease (PSTVd), have the potential to cause significant losses to other crop hosts if they were to arrive. For this reason, the *Persea* import health standard (IHS) is of interest to the broader horticulture sector.

4. HortNZ emphasises the importance of fit-for-purpose import health standards in order to protect and sustain New Zealand's horticultural sector. As noted in *ISPM 32 Categorization of commodities according to their pest risk*, plants for planting is one of the highest risk pathways (FAO 2009) and it is important that biosecurity risks are managed accordingly.

Comments on the proposed amendments

5. HortNZ understands that, since 2006, the avocado (*Persea americana*) plants for planting import pathway has been inactive. Over time new biosecurity risks for avocados have been discovered meaning the risks associated with the avocado germplasm pathway are potentially no longer managed by the existing import requirements.

6. Therefore, HortNZ is supportive of MPI's intention to create a new, fit-for-purpose independent IHS for avocados to ensure the associated biosecurity risks are appropriately managed and to provide greater assurance of biosecurity system effectiveness to New Zealand growers.

7. HortNZ is supportive of MPI's consideration for equivalent measures for regulated pests, including measures of pest free areas (PFAs) and/or pest free places of production (PFPPs).

8. HortNZ is supportive of Level 3B post entry quarantine (PEQ) to manage the risks specified in the risk management proposal (MPI RMP 2022) e.g. containment of

wind-dispersed fungal spores, insect borne pests, water and soil-borne pests and risks from pests which are dispersed via rain splash. Furthermore, the infrastructure of Level 3B containment facilities have the ability to apply temperature regimes to increase pest titre.

9. HortNZ supports the strategy of growing imported plants in environmental conditions conducive to disease expression to identify potential biosecurity risks on imported avocado plants. For those biosecurity risks that are known to be asymptomatic, HortNZ recommends that each imported consignment of avocados have appropriate PCR assays conducted in PEQ prior to the conclusion of the PEQ period to confirm that that no infected plants exist.

10. Given that *P. mengei* is potentially asymptomatic, it might not be detected by growing season inspection. HortNZ would like to understand why *P. mengei* is not stated in the draft RMP given that spores of this species are produced abundantly and can survive in adverse environmental conditions for several years (MPI IRA, 2022).

11. HortNZ would like clarity from MPI about how many avocado plants in an imported consignment will be inspected and tested for biosecurity risks in order to provide confidence that the germplasm is free of regulated pests.

12. There are over 200 recognised *Colletotrichum* species (Talhinas and Baroncelli, 2021) with 71 species, variants and subspecies listed on the ONZPR (ONZPR, 2022) with different regulatory statuses e.g. non-regulated, regulated, not assessed and under assessment. *Colletotrichum* species have a wide host range.

13. HortNZ would like clarification on why *C. aenigma, C. chrysophlum, C. endophyticum, C. jiangxiense, C. nymphaeae, C. queenslandicum, C. simmondsii* and *C. tropicale* were the selected species having "potential to form complexes with the species already present in New Zealand" (pg 18 of MPI Risk Management Proposal) but, the other *Colletotrichum* species were not selected/considered.

14. As *Colletotrichum* have a wide global distribution and an extensive host range, please can MPI confirm that the existing import health standards for *Actinidia, Capsicum, Fragaria, Malus, Prunus, Vaccinium* and *Vitis* appropriately manage the biosecurity risk of this genus.

CONCLUSION

15. HortNZ welcomes MPI's efforts to ensure access to *Persea americana* germplasm whilst effectively managing the risks posed by this pathway

16. We are happy to discuss any of the points raised in the submission.

References

FAO (2009) ISPM 32 Categorization of commodities according to their pest risk.

Ministry for Primary Industries (MPI). 2022. Official New Zealand Pest Register (ONZPR) – Pest Register for New Zealand importers. Search: *Colletotrichum*. https://pierpestregister.mpi.govt.nz/PestsRegister/ImportCommodity/

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Talhinas, P. and Baroncelli, R. 2021. *Colletotrichum* species and complexes: geographic distribution, host range and conservation status. Fungal Diversity. 110, 109-198. https://link.springer.com/article/10.1007/s13225-021-00491-9

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