

SUBMISSION ON

Proposed imports of mangosteen and rambutan plants for planting

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To: The Ministry for Primary Industries (MPI)

Name of Submitter: Horticulture New Zealand

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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 changes to the import requirements for mangosteen and rambutan plants for planting in the Import Health Standard: Importation of Nursery stock. We welcome any opportunity to work with MPI to discuss our submission.

The details of HortNZ's submission to the proposed risk management measures are set out below.

This submission is supported by:

- Citrus New Zealand
- New Zealand Avocado
- Onions New Zealand
- Summerfruit New Zealand
- Tomatoes New Zealand
- Vegetable New Zealand

HortNZ's Role

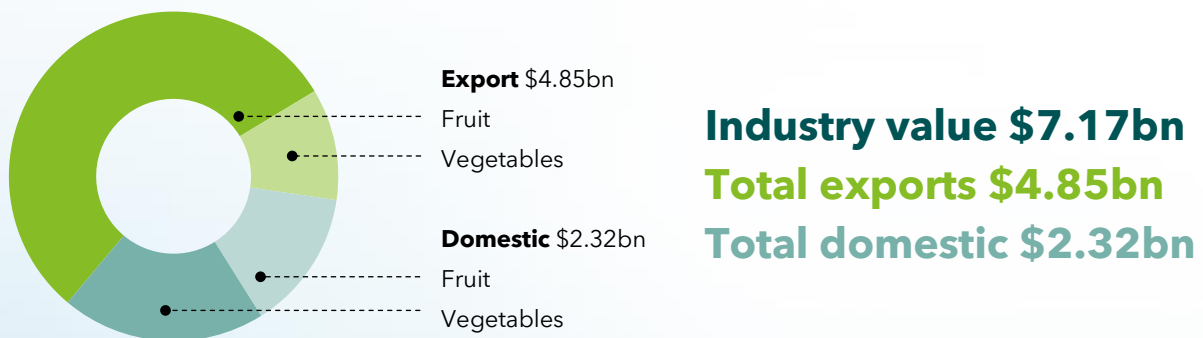
Background to HortNZ

Horticulture New Zealand represents the interests of 6000 commercial fruit and vegetable growers in New Zealand, who grow around 100 different crop types and employ over 60,000 workers.

There is approximately 80,000 ha of horticultural land in New Zealand on which fruit, berries and vegetables are grown.

It is not just the economic benefits associated with horticultural production that are important. The rural economy supports local communities and food production defines much of the rural landscape. Food production values provide a platform for long term sustainability of communities, through the provision of food security.

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 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 themselves can play in helping to keep their farms, orchards and wider New Zealand protected from unwanted pests and diseases.

Submission

1. Introduction

Horticulture New Zealand (HortNZ) welcomes the opportunity to provide feedback to MPI on the proposed changes to the import requirements for mangosteen and rambutan plants for planting (Import Health Standard (IHS): Importation of Nursery Stock).

The proposed changes are to enable importation of two species of mangosteen (*Garcinia mangostana* and *G. xanthochymus*) from Malaysia and one species of rambutan (*Nephelium lappaceum*) from Malaysia and Thailand.

HortNZ thanks MPI for having suspended imports of Mangosteen and Rambutan plant material when it was determined that measures in the Nursery Stock IHS were no longer adequate to mitigate the risk on this pathway.

HortNZ understands that MPI have recently re-assessed the risks on the pathway following years without import and subsequent suspension of this pathway. HortNZ understands people may wish to import these commodities but we want to ensure that the risks associated with these plant imports do not pose a risk to the horticulture industry.

2. Comments on the consultation process

HortNZ understands that the consultation is focused on the risk assessment and proposed risk mitigation measures (Risk Management Proposal (RMP)) for mangosteen and rambutan and that the draft IHS will be consulted on separately.

HortNZ notes that the consultation process being used to develop this new IHS is different to previous approaches, and we welcome the opportunity to provide feedback to assist with developing a process that works effectively for government and stakeholders.

2.1. Improved clarity about process

The consultation process is clearly laid out on MPI's website, and it is structured in a logical way. This makes the consultation information easy to access and navigate. The proposed changes and rationale for the particular measures are clearly highlighted at a high level for the benefit of a quick overview and in more detail using the drop-down menu if needed or wanted. The summary of this consultation is well structured and highlights all relevant information.

2.2. Consultation timeframes

1. HortNZ requests that MPI makes every effort to reduce the number of consultations that are running over the general summer-Christmas and main harvesting period.

HortNZ understands that MPI wants to publish documents such as draft RMP or draft IHS before the end of the calendar year, and therefore start the consultation period before the summer-Christmas break. However, we want to note that this is generally a very busy time for growers and sector organisations. Ideally, a consultation period should be chosen outside of the main harvesting period for the sector to reduce time pressure and allow horticulture stakeholders to provide quality feedback. Industry parties need to share information among our stakeholders and partners, including growers, for review and discussion. The consultation timing puts an unnecessary and avoidable burden on our growers and sector partners. HortNZ requests MPI to take the requirements of its stakeholders into account when designing a consultation process.

We request that MPI extends the length of time for stakeholders to provide feedback on the draft documents after their release, especially if consultation over the main harvesting period and general Summer-Christmas break (mid-December to end of January) is unavoidable.

2.3. Sufficient information provided

In contrast to more recent consultations by MPI's Plant Imports teams, a considerable effort has been made to make information accessible and understandable both in an overview and in detail. The information and details made available directly on the website is sufficient for industry stakeholders to review, assess and comment on the consultation efficiently.

We appreciate the helpful inclusion of both the complete list of Hazard Risks and the rationale behind the decisions to include or not include an organism for further assessment by the risk assessment and risk management team.

Although the draft IHS will be consulted upon separately, the information in this consultation has provided good indication on the measures intended to manage the risk associated with the pathway.

We are pleased to see that feedback provided in previous consultations seems to have been implemented.

3. Comments on the proposed amendments

HortNZ understands that the consultation is focused on the Risk Management Proposal (RMP) and proposed risk mitigation measures but not the draft IHS, which will be consulted on separately. However, submissions during this consultation will be considered and will influence the development of the draft IHS.

More details about our concerns or need for more clarity are provided below.

3.1. Undefined country commodity scope on this pathway

2. HortNZ requests that MPI clearly defines and restricts importation of mangosteen and rambutan plants for planting to the two exporting countries that have been assessed for pest absence or presence, namely Malaysia and Thailand, in the final IHS.

The commodity description, risk assessment and proposed risk mitigation measures indicate that importation of mangosteen and rambutan only occurs from Malaysia or Malaysia and Thailand, respectively.

- Importation of two mangosteen species (*Garcinia mangostana* and *G. xanthochymus*) from Malaysia.
- Importation of one rambutan species (*Naphelium lappaceum*) from Malaysia and Thailand.

However, the consultation documents do not state clearly that import of mangosteen and rambutan plants for planting will be restricted to Malaysia and Thailand.

We note that the risk assessment and the resulting proposed risk mitigation measures are based on certain pests being absent in Malaysia and/or Thailand.

If the new IHS only applies to mangosteen from Malaysia and rambutan from Malaysia and Thailand, then these countries are specified. We request that if any additional countries were to apply to export those commodities to New Zealand, a separate risk assessment and risk management proposal and subsequently a consultation would be conducted.

3.2. Proposed risk mitigation measures are appropriate.

3. HortNZ agrees with MPI's rationale for the proposed biosecurity measures to mitigate the risks associated with this pathway.

3.2.1. PEST LIST

HortNZ agrees with MPI's proposed list of pests associated with mangosteen and rambutan plants for planting. We also agree with the list of identified key pests that require risk mitigation measures in addition to the general measures.

HortNZ does not have any additional information about risks to horticulture from pests that are associated with the commodity and have not been assessed. Nor do we have information that would lead to a different conclusion than MPI's risk assessment.

3.2.2. GENERAL MEASURES

HortNZ agrees with MPI that the general import requirements (general measures that all nursery stock plant material must meet) will mitigate or reduce the risk of most pests associated with the commodities while others are managed by targeted measures.

The requirement of inspection and certification (phytosanitary certificate) of the production facility by the exporting country's national plant protection organisation (NPPO) provides a high level of assurance that the pre-export requirements for the commodities are met.

3.2.3. LEVEL 2 POST-ENTRY QUARANTINE IS APPROPRIATE

HortNZ agrees with MPI that Level 2 post-entry quarantine in combination with specific requirements for some pests will adequately manage the biosecurity risks on this pathway.

HortNZ supports MPI's proposed extension of the period that imported bare-rooted whole plants and leafless semi-hardwood cuttings of mangosteen and rambutan must be grown in post-entry quarantine (PEQ) from three to six months and must demonstrate continuous active growth, namely at least three shoot flushes. This extension will maximise the chance of visual disease symptom development during the PEQ period and detection during growing season inspection.

We also support that MPI specifies that mangosteen and rambutan tissue cultures (plants in vitro) must derive from new aerial parts of the plants and biosecurity risk for this commodity can be managed within three months and a minimum of 3 shoot flushes in Level 2 PEQ.

3.2.4. SPECIFIC REQUIREMENTS ARE ADEQUATE TO MANAGE RISKS

HortNZ supports MPI's assessment of pests that require further testing and other specific requirements to adequately manage the risk on this pathway.

We support the additional requirement for control of irrigation water and the capture and treatment of drainage water while plants are in PEQ to contain and mitigate the biosecurity risks from *Phytophthora* species.

Additional testing requirements

Additional testing of mangosteen bare-rooted whole plants and leafless semi-hardwood cuttings for the presence of *Phytophthora palmivora* using polymerase chain reaction (PCR) will provide the necessary level of certainty that this pest is not present.

We also support testing for *Lasiodiplodia pseudotheobromae* on bare-rooted whole plants and cuttings using PCR due to this being a pest of concern for multiple sectors, in particular Avocado, Citrus and Grapevine.

HortNZ agrees with MPI's assessment and rationale to include or exclude additional testing for certain pests and consider the proposed measures are adequate to manage the biosecurity risks on this pathway.

4. Conclusion

The rationale applied for the proposed measures are logical and are not considered unnecessarily restrictive for the importation of mangosteen and rambutan plants for planting while simultaneously providing a high level of assurance that pests are unlikely to enter the country through this pathway.