

**NZ Plant Producers Inc. submission on Proposed measures
to manage *Xylella fastidiosa* on plants for planting -
Importation of Nursery Stock (155.02.06)**

To: plantimports@mpi.govt.nz

Live Plants

Ministry for Primary Industries

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Date: 3 February 2025

Introduction

New Zealand Plant Producers Incorporated (NZPPI) represents businesses engaged in plant propagation and cultivation for various sectors and our members underpin the success of the country's primary industries.

The plant production sector, also known as nursery production, has witnessed rapid growth due to demand in horticulture, wine, forestry, and native plants, which has been further bolstered by government policies encouraging sustainable production systems.

The plant production industry, estimated to be worth around \$500 million annually, is a regional success story, offering skilled jobs and career opportunities where they are needed most.

Submission

NZ Plant Producers appreciates the opportunity to review the proposed updated measures for the management of *Xylella fastidiosa* in imported plants for planting.

We support the proposed changes to the Pest Free Area and Pest Free Place of Production declarations, and the development of options for use of offshore High Health Schemes (HHS) and Offshore Parent Plant testing.

PFA or PFPP with bilateral agreement

MPI are proposing changes to the option for Pest Free Area and Pest Free Place of Production phytosanitary declarations. At present, these can only be used by countries/geographic areas which MPI recognises as being free from *Xylella*.

This creates a limitation for some countries within the European Union (EU), for example, who conduct annual surveys to verify pest freedom, which is not currently recognised by MPI.

NZ Plant Producers welcomes the proposal to allow for bilateral agreements between the exporting National Plant Protection Organizations (NPPOs) and MPI.

Xylella fastidiosa is present in officially demarcated areas in Italy, France, Spain and Portugal. The EU requires all member states to conduct annual surveys for Xf and any positive findings must be reported to the Commission and other member states within 8 working days.

If MPI accepts the annual survey results as the basis for a bilateral agreement, individual countries within the EU territory could provide a PFA or PFPP declaration for freedom from Xf. The EU annual survey could refresh the evidence used as the basis for the bilateral agreement.

Recognition of a High Health Scheme

MPI are proposing an option for management of the risk of *Xylella* by offshore high-health schemes (HHS). Plants imported under an HHS would be free from *Xylella* verified by laboratory testing, and exclusion of insect vectors post-testing. The exporting NPPO has oversight of the HHS and issues the phytosanitary certificate with the appropriate declarations.

NZ Plant Producers supports the greater utilisation of high-health offshore schemes as a systems approach to manage risk offshore.

The proposal suggests the importer should apply to MPI for recognition of the HHS and provide official documentation to show how it meets the criteria for recognition by MPI.

However, we think that the HHS option would work more smoothly with a bilateral relationship

between MPI and the HHS operator, established at the scheme recognition stage (see Figure 1).

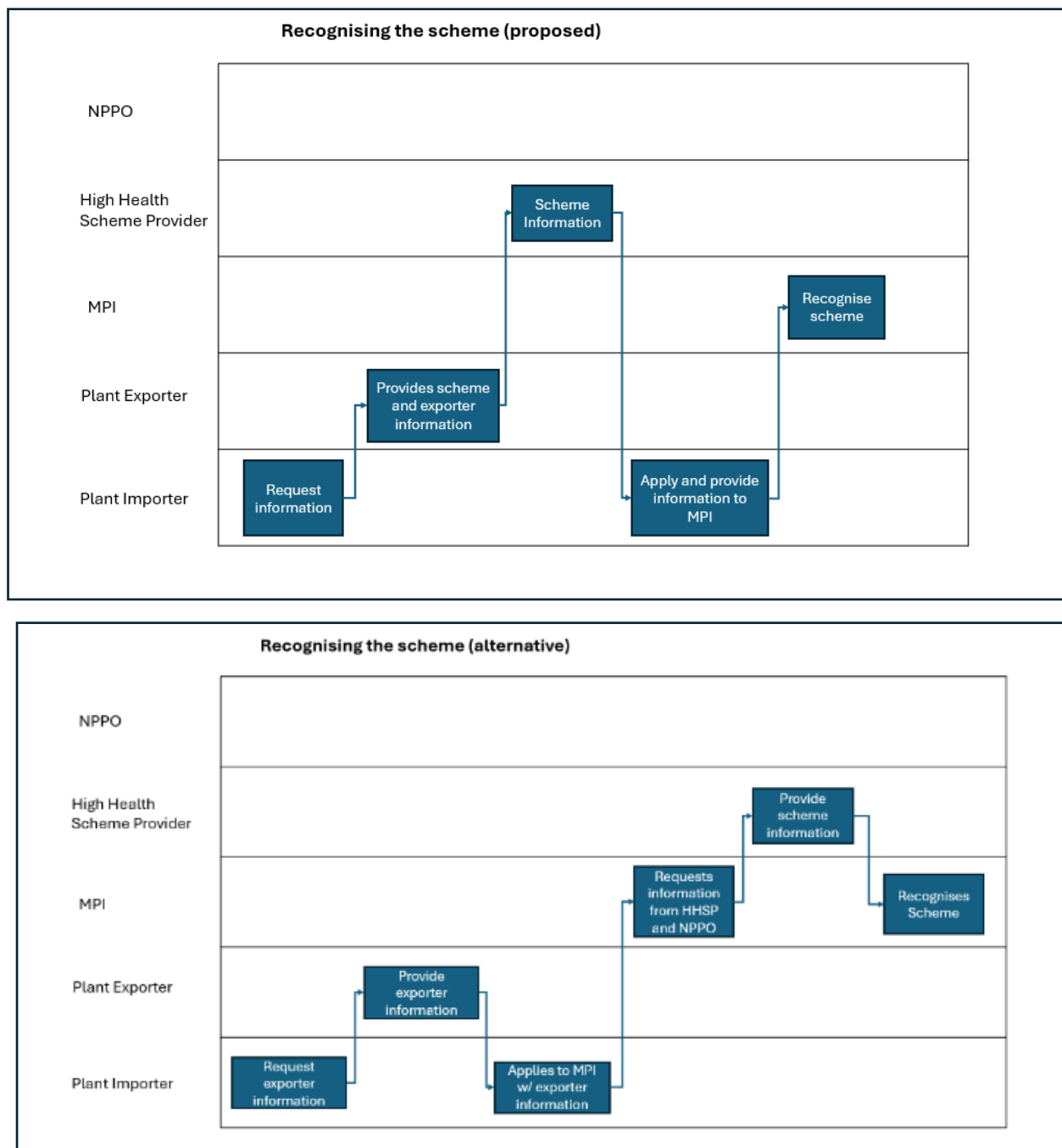


Figure 1: Workflow diagrams illustrating the proposed and alternative scheme recognition process. In the proposed process, there is no communication between MPI and the Scheme provider, whereas in the alternative, MPI communicates with both the Scheme provider and export NPPO.

This will ensure that MPI's requirements for testing and phytosanitary certification under this option are well communicated and understood rather than obtaining this information via third parties (see Figure 2).

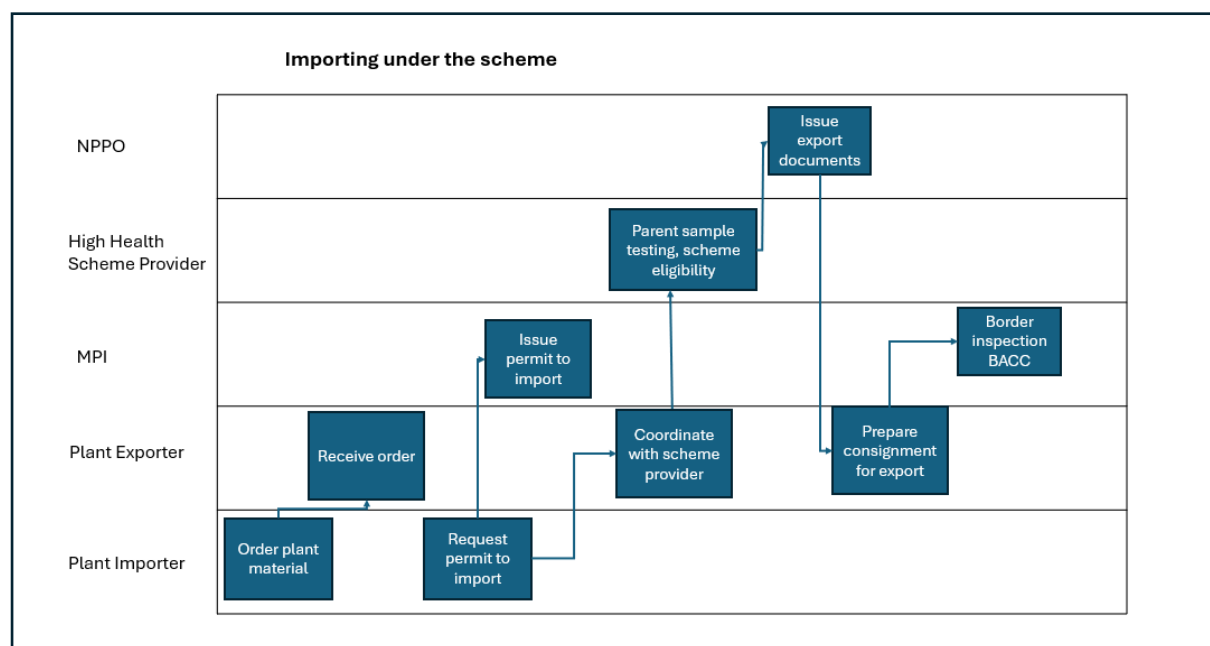


Figure 2: Workflow diagram illustrating the import/export process. Prior communication between MPI and the Scheme provider and NPPO during the Scheme recognition process will help ensure that MPI's import health standard option is well understood.

The following criteria required by MPI during the Scheme recognition step could be provided by the HHS provider:

- Plants/plants in vitro for export to New Zealand are propagated, grown, tested, and certified according to procedures and processes specified by the HHS operating under the oversight of an NPPO.
- Testing for *X. fastidiosa* is carried out by an NPPO-approved laboratory.
- Tissue sampling from each parent plant follows ISPM 27 Annex 25. 7. All parent plants are found free from *X. fastidiosa*.
- The HHS overseeing NPPO (or delegated authority) regularly audits plant producers certified by the HHS, to ensure the requirements of the scheme are met.
- The following additional declarations would need to be endorsed on the phytosanitary certificate by the exporting NPPO:

"This [insert species name] whole plants/cuttings/bulbs/tubers/plants in vitro [choose those that apply] consignment was produced and prepared for export under the MPI-recognised high health scheme [insert scheme name].

AND

“The [insert species name] whole plants/cuttings/bulbs/tubers/plants in vitro [choose those that apply] in this consignment derive from parent plants tested by PCR and found free from *Xylella fastidiosa*”.

The following criteria required by MPI during the Scheme recognition step may be provided by the Plant Export facility. This information could potentially be supplied by the importer:

- Traceability [system] of the propagation material, with all parent plants (i.e., the immediate plant source of the plants/plants in vitro for export to New Zealand) clearly identified.
- Use of insect-proof facilities that exclude vectors of *X. fastidiosa* (sharpshooters, leafhoppers, spittlebugs, froghoppers, and cicadas).
- Plants in vitro for export to New Zealand are held and packed in a manner that prevents infection with *X. fastidiosa*.

Offshore Parent Plant testing for plants *in vitro*

MPI are proposing an option for management of the risk of *Xylella* by testing of parent plants used in the production of tissue cultures (plants in vitro).

NZ Plant Producers supports this option as it will provide assurance that imported tissue culture material is free from Xf, while significantly reducing the costs and time in PEQ.

Some aspects of the wording of phytosanitary declarations required for this option in the IHS need further consideration.

- Some plant breeding companies send tissue culture (in vitro) plant stock to production laboratories for multiplication for export markets.
- Tissue culture laboratories may not have greenhouse facilities for de-flasking and growing plants out for *Xylella* testing.
 - In this scenario, exporting plants in vitro will need to rely on test certification performed on parent plant material at the breeding facility, which may be in a different country.
 - Some NPPOs will only endorse testing conducted within their own country and might not provide a specific declaration for *Xylella* testing done by another country on the phytosanitary certificates (PC).
 - While the testing certificate could accompany the PC, the wording of the required declaration for *Xylella* testing needs carefully wording for this scenario.

Additional option

Another potential approach could allow New Zealand importers to bring in small quantities of tissue cultures from a production batch or lot and have testing for Xf done in New Zealand while plants are in quarantine (status quo).

A negative test result certificate from this process could then facilitate further imports from the same batch or production lot without requiring additional PEQ or testing. The plant importer could supply the testing certificate with the plant batch number when they apply for subsequent permits to import.

- This option would need to be drafted in the IHS, as the testing endorsement would not appear on the phytosanitary certificate.
- An ‘equivalence’ clause would need to be noted on the import permit.

Members have reported that production laboratories may continue multiplying a single batch or lot for up to two years before starting from fresh mother stock. At that point, the batch number would be updated, and testing would need to be repeated as outlined above.

Parent plants

MPI have asked whether ‘Parent plants’ is a clear term which can be used in the IHS. We think that ‘Parent plants’ is a clear term, and it is used by many trading partners.

Other comments

MPI regulates *Xylella* at the genus-level rather than the species level.

The Department of Agriculture, Fisheries and Forestry (DAFF) in Australia have recently revised their *Xylella* regulations and have moved from family-level regulation to genus-level regulation. DAFF recognised that family-level regulation encompasses many genera that are not known to host *Xylella*, making it costly to resource for both the department and industry.

While acknowledging the change to genus-level regulation reduces the ‘buffer’ as new host plants are identified, DAFF note that it supports “better adherence to least trade restrictive practices, technical justification, and transparency for Australia in meeting obligations under the SPS Agreement” (DAFF, *Draft Report for the Pest Risk Analysis for Bacterial Pathogens in the Genus Xylella*, 2022).

A similar rationale could also be applied to genus-level regulation. While this approach is a way to stay ahead of an expanding host list, there is no scientific evidence that all species within a regulated genus are capable of hosting *Xylella*.

Many species incapable of hosting the pathogen are also regulated, which is a precautionary approach rather than scientifically justified.

The genus *Ficus*

The genus *Ficus* is a good example of the above. Within the genus *Ficus*, the edible species *Ficus carica* (common fig) is the only known host species of *Xylella*.

It was identified as a host in Texas, USA in 2007 and following the establishment of the bacterium in Europe, *Ficus carica* has also proven to be a host of *Xylella* in France, Spain, and Italy since 2019.

Despite the decades-long presence of *Xylella* in the USA, Central America, and South America—regions where various other *Ficus* species are native and/or cultivated—there have been no reports of other *Ficus* species acting as hosts.

Globally, other countries regulate only *Ficus carica* except for Australia, which is currently the only country aside from New Zealand to regulate *Ficus* at the genus level.

In New Zealand, other *Ficus* species such as *Ficus benjamina*, *F. lyrata*, *F. elastica*, and *F. macrocarpa* are key plants for the display plant industry. Prior to the introduction of emergency measures, these species could be imported without *Xylella* testing or post-entry quarantine (PEQ). Following the emergency measures in 2017, a special Chief Technical Officer (CTO)

decision later allowed limited imports of non-host *Ficus* species from Costa Rica, with statistical sampling conducted in line with ISPM 31 standards followed by *Xylella* testing. No infections were ever detected.

NZ Plant Producers would like to work with MPI to explore a viable option for importation of rooted cuttings and whole-plants of non-host *Ficus* species.

Thank you for consideration of our submission. We would be happy to discuss any matters raised here further.