NZ Plant Producers Inc. submission on the amendment to the Import Health Standard for Cut Flowers and Foliage from Malaysia 155.02.04

To: plantimports@mpi.govt.nz
Plant Germplasm Imports
Plants and Pathways Directorate
Ministry for Primary Industries
PO Box 2526
WELLINGTON 6140

Submitted by: New Zealand Plant Producers Incorporated (NZPPI)
PO Box 3443, Level 5, 23 Waring Taylor Street,
Wellington 6011
T: 04 918 3511
E: office@nzppi.co.nz
www.nzppi.co.nz

Date: 19 March 2021

Dear Plant Imports,

Thank you for the opportunity to consider the proposed changes to the import health standard for Cut Flowers & Foliage from Malaysia.

NZ Plant Producers appreciates the chance to provide feedback on the changes.

General

1. NZ Plant Producers recognise the potential threat posed by insect pests and diseases on imported cut flowers and foliage to New Zealand's horticultural and plant production industries.
2. The insect pest *Thrips palmi* is a High Impact Economic Pest (HIEP) and can cause damage to a wide range of glasshouse ornamental and vegetable crops. It is also a primary vector of plant viruses.
3. The distribution of *T. palmi* has expanded since the 1990s with increased trade in plant produce around the world (CABI, data sheet 53745). It has caused significant economic losses in countries where it has become established.
4. NZ Plant Producers notes that mandatory on-arrival fumigation was introduced in 2009 following several interceptions of *T. palmi* on orchids from Malaysia at the New Zealand border.
5. The proposed MPCA Scheme would replace mandatory methyl bromide at the border. It relies on a series of integrated measures intended to reduce the overall risk of *T. palmi* and other insect pests on the cut flower pathway from Malaysia.

Comments on the efficacy of measures

6. NZ Plant Producers agrees that an integrated approach, with risk management measures used in combination, will be more effective than relying on a single measure. However, the overall effectiveness of the Scheme depends on people at each step following the specified controls, with very little oversight from the exporting NPPO.
7. There are many scientific papers noting that growers of large-scale orchid farms lack the resources to monitor thrips, and tend to use spraying programmes as their main form of control (Maketon et al., 2014). Most orchid farms in Thailand and Southeast Asia are open, with nylon shading used for sunlight reduction, and growers consider thrips to be a constant threat.
8. There are studies that show reliance on chemical insecticides to control thrips is problematic because of the development of resistance or because a large proportion of the thrips population are inaccessible due to its cryptic life cycle and feeding habits.
9. Only a few insecticides currently provide acceptable thrips control, mostly insecticides in the neonicotinoid group (Elbert et al. 1990). Some organophosphate and carbamate insecticides that have effectively controlled thrips in the past have been banned because they are highly toxic to humans and nontarget organisms.
10. NZ Plant Producers agrees that rotational programmes of chemical use can help reduce the likelihood of pesticide resistance, however it is not possible to comment on the efficacy of the rotational spraying programme (2.b.), or the packhouse chemical rinse (1.b), as the applicable chemicals are not specified in the MPCA Scheme table.
11. *T. palmi* is not easily detectable because of its small size. Although direct inspection of blooms requires no special equipment, it is very time consuming because thrips typically hide deep within the blossoms and the lip of each blossom must be pulled down gently to detect the thrips within.
12. With time constraints and the huge volumes of plant material, we question the high degree of efficacy of visual inspection and removal of *T. palmi* infested material at harvest, on-arrival and during phytosanitary inspection.

Concluding remarks

13. It is not clear what impact the failure of any of the measures will have on the overall level of protection. NZ Plant Producers would like to see MPI complete a “stress-test” analysis of the system to understand the scenarios that would lead to a break-down in assurance provided by the MPCA system.
14. NZ Plant Producers believes there is insufficient experience of the MPCA Scheme to warrant immediate replacement of the on-arrival fumigation. We consider it prudent to continue to fumigate for a period of time while MPI collects data to demonstrate the MPCA measures are achieving the Acceptable Level of Protection for this HIEP.
15. NZ Plant Producers would like to see MPI take a strict approach if live pests are intercepted during the verification inspection at the New Zealand border. We would like clarification on what actions MPI will take on repeat non-compliances / pest interceptions, and at what threshold MPI would suspend the MPCA option, determining is not being effectively applied.

16. NZ Plant Producers observes that differences between the regulations applied to the import of nursery stock and those applied to cut flowers and foliage are unbalanced. Nursery stock requires a significant period in quarantine, while cut flowers of similar plant material enter New Zealand with a minimum of treatment and with significant trust in overseas parties to manage the risk. Many cut flowers each year are disposed of into the household compost heap. Any pests introduced by this route would be well established before they come to the attention of authorities.

Thank you for consideration of the points noted in our submission.

References:

Elbert A, Overbeck H, Iwaya K, Tsuboi S (1990) Imidacloprid, a novel systemic nitromethylene analogue insecticide for crop protection. British Crop Protection Conference-Pests and Diseases-1990 1: 21–28

Maketon, M., Amnuaykanjanasin, A., Hotaka, D. et al. Population ecology of Thrips palmi (Thysanoptera:Thripidae) in orchid farms in Thailand. Appl Entomol Zool 49, 273–282 (2014).