

NZ Plant Producers Inc. submission on Suspension of unused or out-of-date nursery stock import pathways and reformat of nursery stock import health standard

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Plant Germplasm Imports

Ministry for Primary Industries

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Introduction

New Zealand Plant Producers Incorporated (NZPPI) is the peak industry body for the businesses that propagate and grow plant for forests, ecology, food, wines and Greenlife plantings. Our members produce the plants that the grow food that Kiwis eat and export, that regenerate New Zealand's forests, enhance our urban and rural landscapes and are planted by millions of Kiwis in their backyard.

Our industry underpins the success of New Zealand's thriving primary industries, including forestry, horticulture, viticulture and farming.

Our sector is worth an estimated \$500 million per annum, employing approximately 4000 people, providing high skill jobs and career opportunities.

The Proposal

MPI is proposing to suspend 1,467 plant genera that have not been imported in the past 11 years or more. MPI note that some of these pathways have Emerging Risks associated with them, and many need a significant review before import could occur again.

By maintaining fewer import health standards, MPI believe they will be able to focus on active import pathways that are important to the sector, which will have positive impacts and benefits to New Zealand.

MPI are also consulting on reformatting the nursery stock IHS into a templated word document to clarify the requirements.

Submission

NZPPI does not support MPI's proposal to suspend 1,467 genera based on lack of importation in the past 11 years.

If implemented, the suspension of 75% of genera would have long-term negative impacts on innovation, plant health and the success of New Zealand's horticulture industries, the environment and communities. We believe the proposal will compound two decades of ever-tightening restrictions on the import of plant material and will cement into place a self-reinforcing cycle where only frequently imported plants can be imported, while important but infrequently imported plants are permanently excluded from New Zealand.

We support the goal to improve the plant imports system and the need to reduce costs, however we recommend a more targeted, systems-based approach.

There is a growing need for plants and new genetics to combat climate change

Auckland is growing and changing rapidly. To accommodate this, Auckland Council has committed to a strategy of urban intensification to increase housing density, deliver the benefits associated with a compact urban form and limit the negative impacts linked with continued outward growth. Successful development requires careful planning; intensification and growth need to complement the protection and planting of trees and vegetation to create liveable neighbourhoods.

Trees and vegetation also provide a range of services required for Auckland to function and thrive. These include enhanced stormwater management, air pollution removal, improved water quality, cooling to reduce the urban heat island effect, and ecological corridors to connect habitats and improve biodiversity.

[Auckland's Ngahere \(Forest\) Strategy 2019](#)

Pathway inactivity

Using 'lack of trade' as the basis for suspending standards is indiscriminate. Many pathways that are affected by the proposal may not have been used due to practical or economic reasons. The proposal captures significant groups of plants that should be traded regularly, but are caught up in inefficiencies, delays, emergency measures, and the precautionary approach that is inherent in New Zealand's plant imports system. As a country we are already impacted by our inability to access clean plant material and high-quality genetic material from overseas.

The '11 year' trade cut-off does not attempt to distinguish between pathways which are unviable versus genera which are unlikely to be imported again.

Plant breeding in horticulture is a dynamic and constantly evolving field, and new challenges and opportunities arise regularly. The development and trade of new genetics is accelerating, with advances in technology and the need to adapt to climate and agronomic factors. A pathway that has not been used in the last decade may suddenly become relevant due to emerging new genetic improvements, or as plants are required to meet new strategic priorities.

New Zealand's plant imports system needs to be dynamic and responsive enabling access to strategically important plant material within a timeframe of weeks, or months, not decades.

A targeted approach to suspension of import health standards

Streamlining and reducing the number of standards needing maintenance can help focus limited resources on enhancing the system. However, the current proposal goes too far in limiting the diversity of imports essential for industry adaptation and innovation.

We recommend a targeted approach that preserves greater opportunities for our Greenlife, food & fibre industries.

Emerging Risk Alerts

MPI have noted there are several genera with known and unmanaged Emerging Risks. We accept that it is appropriate to suspend these genera until MPI can amend the standard to manage these.

1. Invasive plant species

We accept the suspension of genera which are known to be invasive in New Zealand and have listed these in Appendix 1.1. It should be noted that overseas breeding programmes are using a range of breeding methods to induce sterility in Greenlife plants, reducing their ability to reproduce and become naturalised outside cultivation. These less invasive varieties could change the future picture.

2. Genera with active seed pathways

Many species are more regularly imported as seeds for sowing rather than nursery stock. For example, palms, cycads, cacti and many tree species are typically imported as seed for sowing. This may be due to issues with the current requirements or higher import costs for nursery stock material.

Temporarily suspending the nursery stock standard does not completely preclude importation for these genera while a review is pending to reinstate nursery stock pathways. See Appendix 1.2 for a list of these genera.

Palms: BNZ determined the nursery stock standard was fit for purpose for 13 palm genera in [October 2023](#) (Topic 5). However we are aware that the declaration for Coconut cadang cadang viroid needs review, as it has a limited host range but is currently applied to all genera within the *Acrocomia* schedule. There is interest in resuming importation of *Chamaedorea* (parlour palm), *Phoenix roebelinii* and *Rhapis* palm nursery stock within the medium term.

Cacti: All 60 genera have L2 (Basic) requirements for nursery stock and we are not aware of any specific phytosanitary issues of concern. However, the availability of seed and lack of nursery stock imports in the past 11 years suggests the seed for sowing pathway serves the needs of most. There is interest in resuming importation of *Notocactus* nursery stock in the medium term.

3. Genera with IHS rules that prevent current import

Many of the tree genera important for landscape amenity, forestry and nut crops, require a period in L3B PEQ. This is cost-prohibitive for these types of import and the whole plant nursery stock pathways under the current rules and PEQ pricing policies mean these pathways are unlikely to ever be used (see Appendix 1.3).

Some genera have viable seed for sowing import pathways, however there is still a need for a feasible import option for specific clonal (cuttings / TC) material to enable industry to access genetic improvements being developed offshore.

Two tree genera require L3B PEQ for both seeds and nursery stock, which effectively prohibits importation altogether (*Quercus* and *Castanea*). We recommend that the seed for sowing pathways are reviewed in the short-term to find a feasible import option. There is a current IHS request for *Quercus* seeds for sowing from Australia, which is also free of pests and diseases of concern in the Northern Hemisphere. If this work is progressed, it would create a safe pathway for new genetic material for this important timber species.

We are aware of an historic IHS request for new *Castanea* genetics from the NZ Chestnut Council. They are better placed to comment on future requirements for nursery stock.

Miscanthus NZ are developing an industry around the perennial grass *Miscanthus x giganteus*. Currently this can only be imported as tissue culture from two countries. We are aware of an historic request for rhizomes from another country. Miscanthus NZ are better placed to comment on future requirements for nursery stock.

4. Genera currently under review: *Xylella* hosts

At least 40 genera proposed for suspension haven't been imported since emergency measures to manage *Xylella fastidiosa* (Xf) came into force. MPI are reviewing these measures and proposals have been presented to industry, such as recognising Plant Pass certification as a risk management measure, that would substantially improve access to these plants.

We request that the affected genera are kept 'active' until the review is completed, to give industry a fair chance of importing these again. See Appendix 1.4 for a list of genera, and the comments below about Naktuinbouw testing for Xf.

5. Genera with a Naktuinbouw Elite programme

A feasible import pathway is required to access improved genetics, while managing biosecurity risk.

About 70 genera which are proposed for suspension are managed under the Naktuinbouw Elite Scheme, which is administered by the Netherlands Food and Consumer Product Safety Authority (NVWA). The Elite Scheme maintains up-to-date testing requirements, frequently adding new tests to manage emerging diseases of concern. In many cases, the Scheme has a higher risk management specification than that prescribed by the IHS.

For example, *Anthemis* has a L2 (Basic) specification under the nursery stock IHS. Under the Naktuinbouw Elite Scheme, *Anthemis* is tested for Alfalfa mosaic virus, Cucumber mosaic virus, Potato virus Y, Potato virus A, Lettuce mosaic virus, Tomato mosaic virus strain D-03,

Tomato mosaic virus strain WU1, Tomato spotted wilt virus, Impatiens necrotic spot virus, Arabis mosaic virus, Tobacco rattle virus, Chrysanthemum virus B, Tomato aspermy virus, Tobacco ringspot virus, *Erwinia chrysanthemi*, *Erwinia caratovororum*, Bean western yellow virus, *Chrysanthemum stunt viroid*, Tomato bushy stunt virus / beet ringspot virus, *Agrobacterium tumefaciens*, and *Rhodococcus fascians*. Some of these are regulated diseases in New Zealand.

The Scheme also provides an alternative to phytosanitary certificate declarations. For example, the genus *Crotalaria* requires phytosanitary declarations for Phytoplasma 16Srl - aster yellows, Phytoplasma 16SrlI - peanut witches' broom and Phytoplasma 16SrV - elm yellows. Under Naktuinbouw, *Crotalaria* are monitored during production of mother plants and plants showing phytoplasma symptoms are not eligible for Elite certification. Only plants free from phytoplasmas can be exported globally.

Another example is *Convallaria*. The IHS requires an area freedom declaration for the nematode *Pratylenchus convallariae*, however this has proven difficult to obtain as the exporting country would need to have a specific programme in place to meet this. *Convallaria* is an Elite crop and the Naktuinbouw programme manages nematodes including *Pratylenchus*. Crops exhibiting visual signs of infection with nematodes are not eligible for certification.

Naktuinbouw Elite includes a *Xylella fastidiosa* (Xf) test for *Lavandula*, *Rosmarinus*, *Salvia*, *Pelargonium* and *Vinca*. Genera which are not hosts of Xf in Europe, such as *Hydrangea*, do not have a mandatory test, but Xf testing can be included to meet an importing countries' phytosanitary requirements.

NZPPI recommends not suspending genera where an option could be developed for importation as Elite plant material under Naktuinbouw and similar plant health schemes. See Appendix 1.5 for a list of genera.

6. Additional Genera of interest to industry

In addition to the genera under review (*Xylella* requirements) and those with the potential for a Naktuinbouw option, there are approximately another 110 genera of interest to industry. See Appendix 1.6. These are important for NZ's Greenlife, food & fibre industries. Note that some of these were in proposed for suspension in the first list provided by MPI and may have been removed from this list subsequently.

Some genera have not been imported for many years but there is renewed interest for new purposes and markets. For example, there is a hybrid *Taxodium* widely used for riverside work in China and interest in trialling this in New Zealand for erosion control and timber production.

There is a current focus on new crops for emerging beverage markets, e.g. *Juniperus* (juniper berries), and sugarcane for a craft-rum industry.

Piper betle (betle leaf) is a culturally important crop for many New Zealand Indian and Fijian Indian families. This species is being assessed by the EPA under s26 (present in NZ) and a decision is expected in 2024.

We recommend nursery stock pathways for these genera are reviewed within the medium term.

7. Genera with active NZ Breeding Programmes

NZ plant breeders have active programmes both onshore and offshore and it is recommended that nursery stock pathways for these genera remain open to allow for import of genetic material, including material required for PVR application.

Some genera that we are immediately aware of include *Delphinium*, *Macropiper* and *Magnolia* (Appendix 1.7)

8. Genera with recent requests for import permits

We do not have a full list of genera with recent import permit requests but are aware that some have import requirements currently under review. We recommend that these are resolved as soon as practicable to enable the imports to progress. See Appendix 1.8.

9. Genera with recent IHS requests

Recent IHS requests that we are aware of are listed in Appendix 1.9. A review of nursery stock requirements for these genera within the medium term is requested.

10. Genera & species of interest to industry which require assessment

The following plants can be imported as seed, but nursery stock 'requires assessment'. There is interest in new clonal selections which aren't available as seed for sowing. We recommend the nursery stock requirements for these genera are developed in the short to medium term. See Appendix 1.10.

- *Lobularia maritima* – new clonal varieties available from international breeders which are significantly better than seed grown varieties. Currently *Lobularia* can only be imported as seed.
- *Buddleja davidii* hybrids – new 'low-seeding / sterile' varieties are available overseas which would be more environmentally sound than currently available in the market. We can provide more information, including sterility trial data. *Buddleja* is also available under the Naktuinbouw Elite programme.

- There is a *Cunninghamia* in China with red heartwood similar to *Sequoia*, which could only be imported as clonal nursery stock. The red heartwood variety or clone is of interest.
- *Hackonechloa macra* is a versatile grass species, popular in New Zealand. Improved new varieties offshore are only available as clonal nursery stock. *Hackonechloa* is available under the Naktuinbouw Elite programme.
- *Saccharum officinarum* - Sugarcane is a potential new high-value crop species for New Zealand, producing many by-products in addition to sugar, which are used by various industries. There is an emerging craft rum-distillation industry, with export potential for rum with 100% NZ ingredients.

Review and reinstatement of Import Health Standards

Introducing a clear and timely reinstatement pathway for suspended genera will reduce concerns and enhance the proposal's acceptance within the industry.

Timely reinstatement would result in a more adaptive and dynamic system and would also enable MPI to maintain a set of standards that are actively traded and of high priority while efficiently managing resources by suspending low-priority pathways.

This approach aligns with the principles of efficient resource use and effective risk management. In the current system, reviewing an IHS requires comprehensive reviews, risk assessments, stakeholder consultations, and possibly the development of new testing and quarantine procedures. This process is time-consuming, resource-intensive, and requires a high level of coordination and expertise.

MPI have not articulated how they plan to reinstate suspended genera in a timely way, as opportunities arise. This proposal could see hundreds of genera simply moved to a waiting list, joining the queue alongside dozens of plants which 'require assessment' or have been requested by industry over the years. Many will never reach the front of the queue to be reinstated.

Re-format of the Nursery Stock IHS

The current paper-based system for managing health standards is inadequate for the complexity and the level of protection that is expected in New Zealand's plant imports system. New Zealand's standards for imported plant material are among the highest in the world, requiring more sophisticated systems than the current document-based approach.

Reformatting the standard into a new Word template is an opportunity to improve clarity but we feel this offers limited benefits for the effort required. A paper-based standard is constrained in

how it can present relevant information. It is more time consuming to update and maintain consistency as requirements change over time.

We think that a database format would be the optimal platform for nursery stock requirements, much like the Australian BICON database. This may not be budgeted for in the foreseeable future.

If the standard must be converted into the new format, we would support splitting it into different 'descriptions or classes' of goods to make it easier to format and maintain. For example, an IHS for nursery stock bulbs.

Appendix 1: Targeted approach to genera suspension

1. Genera which are invasive in New Zealand (suspend)

Acanthus
Broussonetia
Cenchrus
Cestrum
Hedera
Leucaena
Luma
Lythrum
Oenanthe
Tradescantia
Vinca

2. Genera with active seed pathways (suspend)

Palms (*Acrocomia* and *Phoenix* schedules – 176 genera)
 Cycads (*Cycas* and *Bowenia* schedules – 6 genera)
 Cacti (60 genera)
 Tree species – e.g. *Arbutus*, *Acacia*, *Agathis*, etc

3. Genera with IHS rules that prevent current import (suspend)

L3B PEQ requirements

Abies
Carpinus
Carya
Castanea
Castanopsis
Cedrus
Chamaecyparis
Corylus
Cupressus
Diospyros
Eucalyptus
Fagus sylvatica
Fitzroya
Juglans
Juniperus
Larix
Libocedrus
Liriodendron
Olea
Picea
Pilgerodendron
Planera (schedule)
Populus
Pseudolarix
Pseudotsuga

Quercus
Salix
Thuja
Ulmus
Zelkova

Restricted country / commodity type

Miscanthus x giganteus

4. Genera which are under review (maintain)

Xylella hosts

Ampelopsis
Arctostaphylos
Artemesia
Baccharis
Berberis
Callicarpa
Celastrus
Cichorium
Cinnamomum
Claytonia
Clematis
Clianthus
Crepis
Cytisus
Epilobium
Erodium
Escallonia
Eupatoriium
Genista
Helianthus
Hibiscus cannabinus
Hibiscus rosa-sinensis
Leptospermum
Magnolia
Malva
Malvastrum
Mentha
Merremia
Mimulus
Montia
Myrciaria
Nerium
Oenothera
Osmanthus
Passiflora
Pelargonium hirsutum
Philadelphus
Phyllanthus

Pieris
Rosmarinus (Salvia)
Solidago
Streptocarpus
Symphoricarpos

5. Import option for Naktuinbouw scheme genera (suspend current standard & develop option for Naktuinbouw)

Acalypha
Aconitum
Actaea
Aeschynanthus
Anagallis
Anchusa
Anthemis
Aquilegia
Artemesia
Asclepias
Aster
Asteriscus
Bidens pilosa
Bouvardia
Buddleja
Calamintha
Cassia
Catharanthus
Ceratostigma
Chiastophyllum
Clematis
Clerodendrum
Convallaria
Crossandra
Crotalaria
Dipladenia
Epimedium
Erodium
Erythrina
Eupatorium
Euryops
Globularia
Gomphrena
Goodenia
Helianthemum
Helianthus
Hibiscus
Ipomoea
Iresine
Knautia
Lamium
Lantana
Lavatera

Leonotis
Mentha
Mesembryanthemum
Micromeria
Mimulus
Nierembergia
Oenothera
Oxalis
Pachysandra
Paeonia
Passiflora
Pelargonium hirsutum
Pentas
Perovskia
Phlox stolonifera
Phygelius
Plumbago
Pulsatilla
Rosmarinus
Santolina
Satureja
Scutellaria
Silene
Sisyrinchium
Teucrium
Thunbergia
Trollius
Tropaeolum

6. Genera of interest to industry (review requirements)

Acer
Adiantum
Aeschynanthus
Alchemilla
Allamanda
Alnus
Alyssum
Anthemis
Artemesia
Aruncus
Aster
Aucuba
Banksia
Begonia
Berberis
Bidens
Bignonia
Bulbinella
Buxus
Calibrachoa
Catharanthus

Chaenomeles
Chamaedorea
Choisya
Cissus
Clanthus
Clivia
Clematis
Columnnea
Convallaria
Cornus
Crosandra
Crotalaria
Cunonia
Cyathea (spore)
Cyclamen
Deutzia
Dicksonia (spore)
Didymochlaena (spore)
Dizygotheca
Echinocactus grusonii
Episcia
Escallonia
Euryops
Forsythia
Fraxinus
Garrya
Geranium
Gleditsia
Globularia
Gloxinia
Gomphrena
Hibiscus cannabinus
Hibiscus rosa-sinensis
Hypocyrtia
Hypoxis
Ilex
Impatiens
Juniperus
Knautia
Lilium
Liquidambar
Liriodendron
Liriope
Lobelia
Luculia
Macropiper
Magnolia
Medinilla
Michelia
Mikania
Miscanthus

Nematanthus
Nertera
Nopalxochia
Notocactus
Olea
Olearia
Osteospermum
Pachystachys
Passiflora
Paulownia
Pentas
Philadelphus
Phoenix roebelinii
Phygellus
Phyllittus
Pieris
Piper
Planera
Platanus
Protea
Podalyria
Polypodium (spore)
Populus
Pseudopanax
Pyrus
Quercus
Rhapis
Ribes
Rosmarinus
Salix
Santolina
Sinningia
Solidago
Streptocarpus
Taxodium
Telopea
Thuja
Thunbergia
Trillium
Trollius
Ulmus
Vaccinium macrocarpon
Veronica
Wisteria
Wollemia
Zinnia

7. Genera with active NZ Breeding Programmes (maintain)

Delphinium
Macropiper
Magnolia

8. Genera with recent requests for import permits (maintain / resolve)

Dahlia

Hydrangea

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9. Genera with IHS requests (maintain / resolve)

Castanea

Coleus (syn. *Solenostemon scutellarioides*, *Plectranthus scutellarioides*)

Convallaria

Cosmos atosanguineus

Lobularia maritima

Olea

Saccharum officinarum

Vaccinium macrocarpon

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10. Genera & species of interest to industry which require assessment (assess)

Lobularia maritima

Buddleja davidii – sterile hybrids

Cunninghamia

Hakonechloa macra

Saccharum officinarum

Please don't hesitate to get in touch for any further information.

ENDS