



**Risk Management Proposal: Proposed amendments to the IHS 155.02.05 Seeds for Sowing (February 2020)**

**To:** Plant Germplasm (Imports) Team  
Plants and Pathways Directorate  
Ministry for Primary Industries  
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**Submitted by:** New Zealand Plant Producers Incorporated (NZPPI)

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This submission is supported by:

- Zealandia Horticulture Ltd
- Egmont Seeds
- Lyndale Nurseries Auckland Ltd
- Green Harvest Pacific Ltd
- Evandale Gardens
- Nichol's Garden Group Ltd

## **About NZPPI**

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 amenity plantings. Plant production is also referred to as 'nursery' production.

Our members produce the plants that the grow food that Kiwis eat and export, that regenerate New Zealand's forests, beautify our urban 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.

Employing approximately 4000 people, New Zealand's plant production sector is worth an estimated \$500 million per annum.

NZ Plant Producers welcomes the opportunity to provide feedback on the proposed measures for pelleted ornamental flower & herb seeds and greenhouse crops. Pelleted seeds are an important technology that enables automation in plant production, supplying millions of seedlings to food and retail supply chains every week.

## **Summary**

The emergency measures for pelleted seeds were targeted at higher risk seed imports, including fodder beet and field vegetable species. Border testing was introduced for lower risk ornamental flower, herb and glasshouse species in 2017. Test results over two years have shown that ornamental & glasshouse species are low risk and unlikely to result in agricultural weeds in the New Zealand environment.

We support the removal of the requirement for onshore seed testing of pelleted ornamental flower, herb and tomato seeds. We do not support the requirement for mandatory Seed Analysis Certificates for every pelleted seed lot imported into New Zealand. The requirement for SACs will disrupt existing, trusted supply chains and will increase the barriers to sourcing pelleted seed from offshore suppliers. This will lead to a shrinking range of ornamental and vegetable seed varieties for domestic consumption.

NZ Plant Producers Inc. recognises MPI's need to maintain ongoing confidence in the integrity of supply chains and recommends that alternative, non-regulatory options are considered that provide assurance to MPI about purity of ornamental and greenhouse pelleted seeds.

## **Background**

Pelleted seeds increase the efficiency and productivity of plant production. Automation keeps production costs down and enables millions of seedlings to be supplied into the domestic food and flower production, and retail markets each week.

The emergency measures covering pelleted seed testing were put in place in May 2016, following detection of the agricultural pest plant velvetleaf imported in pelleted fodder beet seeds and sown in the New Zealand environment. Glasshouse ornamental and vegetable seeds (Group 2 & 3) were initially assessed as lower risk. Border seed testing was introduced in September 2017 at a frequency of 1 in 10 seed lots to test this assumption.

While the emergency measures for pelleted seeds were initially targeted towards fodder beet and field sown crops, growers of glasshouse ornamental and vegetable seeds have worn the greatest burden of compliance from this programme. Factors such as the wider range of species, higher frequency of imports, wide range of pack types, and the small quantity of seed in each batch has meant this part of the sector has been disproportionately impacted. Data from over two years of testing show that the number of tests of ornamental & glasshouse seed is four times that of other, higher risk species, costing an estimated \$270,000 and destroying more than one million seeds worth an estimated \$40,000.

NZPPI has advocated for a practical alternative to seed testing of ornamental flower, herb and vegetable seeds that is commensurate with the lower risk.

## **Seed Analysis Certificates**

NZPPI supports the removal of the requirement for onshore testing of pelleted ornamental flower, herb and tomato seeds. We do not support the requirement for mandatory Seed Analysis Certificates (SAC) for all pelleted seed lots entering New Zealand.

For pelleted fodder beet and vegetable species, the SAC is duplicated by additional testing measures required by the IHS.

For pelleted ornamental flower, herb and tomato species, SACs significantly increase the costs and barriers to sourcing pelleted seeds from offshore suppliers. New Zealand is a small customer in the global seed supply. It is doubtful that suppliers will be willing to undergo additional logistics and costs for the small size of the New Zealand market.

Feedback from international seed suppliers is that ISTA certificates are mainly used for trade in vegetable seeds. One company said they had never heard of them being used for flower seeds. The National Agriculture & Food Research Organization for Seed Analysis Certificates in Japan noted that Prairie gentian, *Lisianthus grandiflorum* (a significant species for the New Zealand cut-flower market) is not included in the list of ISTA testing articles and they would not be able to issue a certificate on ISTA's form.

MPI requires SACs to be completed using official seed samplers and tested according to ISTA (or

AOSCA) protocols. Orange ISTA certificates are issued for purity and germination tests, which is normally done on raw seed prior to pelleting.

The larger seed companies have their own in-house laboratories and routinely check purity and germination of their seed throughout production. They are unlikely to complete ISTA testing of their entire inventory prior to pelleting, for both economic and logistical reasons, when:

- a) they have already completed their own analyses for quality assurance purposes; and
- b) New Zealand is the only customer requiring SACs.

Even if seed analysis was done after pelleting, one company stated that it would be difficult to cover costs unless the order was reasonably big. The requirement for SACs therefore adds a further impediment to smaller New Zealand businesses who purchase small volumes throughout the year and may not be able to purchase in larger volumes and warehouse seed stock.

### **Conclusion**

NZPPI recognises MPI's need to maintain ongoing confidence in the integrity of these supply chains and recommends that alternative, non-regulatory options are considered that provide assurance to MPI about the ongoing purity in ornamental and greenhouse pelleted seeds. NZPPI is committed to helping MPI develop alternative options to achieve this outcome.