



NZ Plant Producers Inc. submission on the MPI Risk Management proposal: Amendments to germplasm import health standards.

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Plant Germplasm Imports
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Submitted by:
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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 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, the plant production sector has experienced rapid growth over the past 5 years, driven by growth in the plant-based sectors: horticulture, wine and forestry and the demand for greenlife (landscape, amenity) and native plants.

This growth is set to continue as markets and government policies drive a shift in our primary industries, to higher value and highly sustainable production systems, which include more horticulture and forests.

The plant production sector is critical in producing forestry and native seedlings to meet the Government's target to plant one billion trees by 2028.

Supplying seedlings for riparian plantings, erosion control and carbon sinks will enable the government and the primary sector to achieve its targets for freshwater quality, climate change and biodiversity.

Our sector is a success story in regional New Zealand and is growing rapidly, providing high skill jobs and career opportunities in the areas that need it the most.

Our sector is worth an estimated \$500 million per annum.

Submission:

NZ Plant Producers appreciates the chance to provide feedback on the proposal to amend the following import health standards:

- *Actinidia* Plants for Planting,
- *Citrus* Plants for Planting
- Importation of Nursery Stock
- *Prunus* Plants for Planting
- Seeds for Sowing.

1. Removal of biological indexing

NZ Plant Producers supports the removal of biological indexing (woody indexing and herbaceous indexing) as a diagnostic tool from all the plant germplasm standards, replacing this testing with ELISA and PCR.

We acknowledge that a third of Level 3B space in New Zealand is currently used for growing indicator plants for indexing, so this change will free up more Level 3B post-entry quarantine space.

We consider that ELISA and PCR provide an equivalent level of protection on these import pathways.

2. Removal of pests from various nursery stock schedules

As a principle, we consider that the application of risk management measures should only be applied to pests where there is evidence of natural host infection. Host plants which are experimentally infected in artificial experiments may indicate they could be susceptible to particular pests, but without natural infection, they do not pose a risk of introduction to New Zealand and should not require measures to manage them.

We support the removal of pests from import health standards where they have been determined to be present in New Zealand. We also support the removal of pests that do not pose a significant biosecurity risk to New Zealand, and the use of basic measures, such as growing season inspection, to manage low impact organisms commensurate with the risk.

On this basis, we support the proposed changes to the import health standards:

a) *Solanum tuberosum*

- removal of the 13 experimental pests on the pest list for *Solanum tuberosum*, which require indexing.

b) *Fragaria*

- removal of 2 pests that do not pose a significant biosecurity risk and management by basic measures for *Strawberry lethal decline disease*.

c) *Olea*

- removal of *Olive vein yellow virus* from the pest list as it has only been reported from one tree in 1995 and not detected again since.

d) *Prunus*

- removal of two viruses from the pest list as they do not pose a significant biosecurity risk.

e) *Rubus*

- removal of *Black raspberry necrosis virus* from the pest list, as it is present in New Zealand.
- removal of 5 additional pests from the list as they do not pose a significant biosecurity risk for New Zealand.

f) *Vitis*

- removal of LN33 stem grooving from the pest list as it is insufficiently defined and is not considered to pose a significant biosecurity risk.

ENDS.

