



NZ Plant Producers Inc. submission on the proposed import health standard for *Citrus* Plants for Planting MPI.IHS.CITRUS.PFP

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Dear Plant Imports,

Thank you for the opportunity to consider the proposed import health standard for *Citrus* Plants for Planting. NZ Plant Producers appreciates the chance to provide feedback on the changes.

General

1. Plants for planting is considered one of the highest risk pathways (MPI 2019). It is also one of the most highly managed pathways, with effective import health standards in place requiring mandatory post-entry quarantine, diagnostic testing and inspection through the growing period.

Fungal pathogens

2. *Elsinoë australis*

Section (87) b) of the RMP states that disease symptoms are expected to be observed within the first growing season in post-entry quarantine. However, in a previous RMP (2016), MPI considered the fungus affected the fruit only and that the PEQ period is too short for plants to produce fruit for symptom observation.

The 2016 RMP also stated that the fungus cannot be reliably distinguished by morphological or cultural characteristics from *E. fawcettii* which is present in New Zealand and is nonregulated (Chung, 2011; Hyun et al., 2009).

NZPPI recommends that growing season inspection should be replaced with plating on semi-selective media or plating, with a PCR test to differentiate this fungus from *E. fawcettii* if needed.

3. *Plenodomus traceiphilus*

The RMP states that disease symptoms are expected to be observed within the first growing season in post-entry quarantine and no additional measures are proposed. However MPI consulted with industry in 2016 on a proposal to include a PCR test for this fungus because it has been detected from asymptomatic citrus plants, and the growing season was not considered long enough to reliably detect it.

NZPPI recommends that a PCR test is used to detect this fungus within the first growing season.

Viruses

4. *Apple stem grooving virus* [Citrus strain].

A PCR test is proposed to replace biological indexing for the detection of *Apple stem grooving virus*. However, MPI's previous consultation with industry in 2016 proposed to remove this virus from the pest list because it was considered present in NZ and non-regulated. The RMP considered there was no evidence of a citrus strain of this virus, though ASGV is a synonym for *Citrus tatter leaf virus*.

NZPPI supports the removal of *Apple stem grooving virus* from the pest list.

5. *Citrus psorosis virus*

Section (99) of the RMP proposes to continue to manage this virus by growing season inspection and PCR or biological indexing.

MPI's consultation with industry in 2016 proposed to remove this virus from the pest list. It is synonymous with *Citrus ringspot virus*. The RMP states it was reported in New Zealand 2011, is non-regulated and there appears to be no evidence of strains.

NZPPI supports the removal of *Citrus psorosis virus* from the pest list.

Additions to the pest list

6. NZPPI supports the additional viruses and viroids which are proposed additions to the pest list. The following four viruses and two viroids were previously proposed in the 2016 consultation with industry:

4.4.1 *Citrus sudden death-associated virus*

4.4.2 *Indian Citrus ringspot virus*

4.4.3 *Olive latent virus I*

4.4.4 *Citrus leprosis virus*

4.5.1 *Citrus viroid V* and *Citrus viroid VI*

7. The 2016 RMP also proposed adding *Citrus viroid VII* to the pest list. This doesn't appear to be included in the current consultation?

Importation from approved offshore facilities

8. MPI will no longer allow citrus material to be sourced from plants in an open field (section 117). NZPPI supports the rationale for requiring citrus material to be sourced from plants in screenhouses, as per Section (120) a) i. to contribute to risk reduction of *Ceratocystis* sp., *Phyllosticta citricarpa*, and *Phytophthora* spp, which are present in Australia.
9. NZPPI does not support the rationale for citrus material to be sourced from greenhouse facilities due to an interpretation of Part 3.1 in the Offshore Facility Standard which states that:

"The offshore facility holding plants for planting must be designed, constructed, and maintained to ensure effective prevention of infestation, infection or contamination of pests and their vectors on plants for planting destined for export to New Zealand."

The RMP argues that, while not explicitly stated, the wording "designed, constructed and maintained" implies an intention for the facility to be a physical structure, rather than an open field.

10. NZPPI does not agree with this interpretation of the Offshore Facility Standard. An almost identical statement is used in the Post-Entry Quarantine for Plants Facility Standard PEQ.STD: Part 2.1:

"The facility must be designed, constructed and maintained to ensure that plant material held within the facility and any biosecurity risks associated with them are effectively managed to ensure containment at all times."

Clearly the PEQ standard considers Open fields to be a type of facility (Level 1 post-entry quarantine).

The requirements for all facilities are covered in Part 2 (Physical and Structural requirements), Part 3 (Operating Requirements), while Part 4 sets out the specific additional requirements for each level and type of facility. Level 1 Open field facilities, have a number of specific requirements to manage isolation and security for plant quarantine purposes.

11. Interpreting the Offshore Facility Standard requirements as outlined in section (117) sets a precedent which could be applied to other horticultural species in future, e.g. grapevines and pipfruit, for which there may be few alternatives to open field vineyard and orchard plant collections.

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