



NZ Plant Producers Inc. submission on the Partial review of *Malus* import requirements in the Importation of Nursery Stock Import Health Standard (155.02.06)

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)

Contact details:

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: 18 December 2020

Dear Plant Imports,

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

New Zealand is currently heralded as the most competitive pipfruit producer in the world (Belrose World Apple Review 2018). The availability of superior varieties and rootstocks, sourced from both NZ and offshore breeding programs, is a factor in this success. Ongoing access to new varieties and rootstocks from offshore breeding programmes is critical to the ongoing success of the NZ apple industry.

The world apple industry is very competitive and New Zealand produces less than one percent of world apple production. The world's biggest apple producing countries are South Africa, Chile, Argentina, the US and the European Union. To remain competitive in the

world market, New Zealand needs to continually innovate by bringing new varieties into production.

It is estimated that 25% of new apple varieties brought into NZ will go on to achieve some level of economic success, with 1 in 100 new varieties achieving significant economic success.

NZ orchards are continuously developing new production systems, which requires new rootstocks from overseas breeding programmes. For modern, intensive planting systems, growers currently have a choice of M9 or CG202 rootstocks. Although widely used, these rootstocks have limitations as they are susceptible to pests and diseases (M9), or are vigorous in NZ soils (CG202).

New rootstock selections from offshore breeding programs offers the combined benefits of dwarfing and resistance to key pests and diseases making them important for future orchard development utilising technology and robotics.

Speed to market is also extremely important. New Zealand currently lags behind Australian competitors because of the requirement for woody indexing and long post-entry quarantine periods. Currently *Malus* budwood must spend up to 36 months in offshore or onshore quarantine facilities before it can be released in New Zealand, compared to 12 months for Australia¹.

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.

Removal of woody indexing

2. NZ Plant Producers supports the removal of the requirement for woody indexing for viruses, viroids and phytoplasma. For the reasons outlined in the RMP, woody indexing

¹ Australian requirements for pome species as nursery stock

<https://bicon.agriculture.gov.au/BiconWeb4.0/ImportConditions/Questions/EvaluateCase?elementID=0000068184&elementVersionID=268> Accessed 18 December 2020

is not consistently reliable and the IHS proposes these diseases are better managed by more accurate diagnostic tests, particularly PCR.

3. There are no alternative diagnostic tests to replace woody indexing for diseases of unknown aetiology (DouA) (MPI, 2020). We support Option 1, retaining regulatory status for DouA and requiring inspection during the growing season in quarantine.

Definition of growing season

4. NZ Plant Producers recommends that a definition of a 'growing season' (referred to in paragraph 31 a) and 31 b), MPI 2020) is provided as guidance in the IHS.
5. We note that (in the absence of fruit production and harvest) some cultivars can retain leaves for an extended period following the onset of leaf senescence (eg. up to 3-4 months), so we propose the following definition:

Growing season: the period of plant growth, starting with bud-break in the spring through to the commencement of leaf fall in the autumn.

Importation from approved offshore facilities

Option 1: Malus plants to be held for a minimum period of two growing seasons at an offshore facility, followed by a minimum of six months active continuous growth in Level 2 PEQ in New Zealand.

6. NZ Plant Producers supports the change to the proposed wording of the offshore period, defining it in terms of growing seasons rather than stating it in months.
7. There is little value in continuing to hold material through the winter months prior to export just to achieve an arbitrary 24 month period, as:
 - a) no inspection or diagnostic measures are prescribed for the winter dormant period offshore on onshore (MPI *Prunus* RMP 2019, section 4.1.1; *Malus* IHS)
8. Defining the period in growing seasons means that scion material can be prepared for export as part of normal seasonal pruning operations, and exported at the start of the northern hemisphere winter.
9. This will ensure budding can occur in post-entry quarantine facilities in early summer, getting growth underway for an abbreviated first growing season. New growth has a few months to mature and then senesce (leaves), and plants go into winter dormancy in April/May. The trees commence active growth again in Spring from October onwards.
10. The RMP states that six months continuous active growth is required to detect pests that induce symptoms late in the growing season (RMP, 35a). The requirement for

active continuous growth means that the short growth period prior to dormancy is not counted, and growth starts with active growth in Spring from October onwards. Plants end up spending 12 months in PEQ (or longer if material is slow growing) before receiving biosecurity clearance.

11. NZ Plant Producers would like to see further research done on whether diseases normally expressing symptoms in summer/autumn could be detected during the first growth period in PEQ, as young leaves and plant tissues go through all the physiological processes of development, maturation and then leaf senescence in the abbreviated first growth period.

Option 2: *Malus* plants at each offshore facility to be held for a minimum period of one growing season for screening and testing, followed by a minimum period of 12 months growth in Level 3A PEQ in New Zealand. This 12 month period must include at least one period of continuous active growth for a minimum of six months.

12. NZ Plant Producers supports the option for import of *Malus* into Level 3A, following one growing season prior to export. However we would like to see the wording of the minimum period in quarantine aligned with wording in option 1: import into Level 2 facility for consistency:
 - a) stating both the offshore and onshore requirements in the same way, in terms of seasonal growth activity rather than by number of months (see points 6,7 and 10),
 - b) stating both the onshore requirements for L2 PEQ and L3A PEQ in the same way, as a six month continuous active growth period effectively means *Malus* will spend a minimum of 12 months in quarantine (see point 10).

13. We recommend the following change to Option 2:

Malus plants at each offshore facility must be held for a minimum period of one growing season for screening and testing, followed by a minimum of six months active continuous growth in Level 3A PEQ in New Zealand.

Level 3B for 24 months

14. NZ Plant Producers would like to explore the need for material to remain at the highest level of quarantine for two full growing seasons, and whether there is an opportunity for a tiered quarantine system where *Malus* material steps down into a lower level after the first growing season, once all virus, viroid, oomycete, and phytoplasma testing and visual inspection has been completed.

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