

Submission

September 2018

New Zealand Plant Producers Incorporated (NZPPI) is the peak industry body for plant producers and our industry partners. These are the nursery businesses that propagate and grow plant for forests, ecology, food, wine and amenity plantings. Our members contribute to the wellbeing of New Zealanders and the environment.

National Kauri Dieback Management Plan

Plant producers play a vital role in the management of pests and diseases, including Kauri Dieback.

Competent and professionally run nurseries have the knowledge and skills to manage critical diseases such as Kauri Dieback.

Professional plant producers are acutely aware that biosecurity hazards are readily spread and that the nursery stock distribution pathway has the potential for pests, such as Kauri Dieback to be rapidly spread throughout New Zealand into the environment.

Our industry is continuing to build on its existing capability in biosecurity management through a range of initiatives including the Plant Production Biosecurity Scheme (PPBS).

By recognizing the industry biosecurity management system in a National Kauri Dieback Management Plan, MPI can achieve effective management of Kauri Dieback within nurseries.

Our position

- i. **NZPPI supports the development of a National Kauri Dieback Management Plan and the objectives of the plan, to reduce the harmful effects of kauri dieback on environmental, social, cultural and economic wellbeing, by preventing its spread and minimising its impacts on New Zealand's kauri, kauri forests, our culture, our communities and on the New Zealand economy.**
- ii. **We recommend that MPI works in partnership with NZPPI and professional nurseries through the Plant Production Biosecurity Scheme (PPBS) to develop and implement the National Kauri Dieback Management Plan and to develop and promote good practice standards for the management of Kauri Dieback.**

- iii. **We recommend that the National Kauri Dieback Management Plan includes recognition of a management plan for Kauri Dieback in nurseries as a module that is implemented through the PPBS.**
- iv. **This approach follows the successful management of Myrtle Rust in nurseries that is underpinned by the NZPPI Myrtle Rust Protocols.**
- v. **We support an approach within the management plan that requires nurseries that grow Kauri seedlings to provide evidence that they have implemented the required management practices for Kauri Dieback, e.g through certification to the PPBS (including a Kauri Dieback module).**
- vi. **We support the inclusion of specific controls for nurseries and plant producers that grow Kauri but are unable to demonstrate their management practices for Kauri Dieback.**

1) The Plant Production Biosecurity Scheme (PPBS)

The Plant Production Biosecurity Scheme (PPBS) is a science-based framework to help producers identify, control, manage and avoid biosecurity risk. The scheme and standards are based on work undertaken early in 2018 in following experience early in the myrtle rust response that underscored the crucial role that plant producers play in early detection of pests, their containment and slowing their spread following a pest incursion. The PPBS utilizes a science and systems approach to biosecurity risk management in plant production.

It's a comprehensive science-based framework to help producers identify, control, manage or avoid biosecurity hazards in their nursery production systems.

The PPBS is being developed by MPI and the nursery industry in association with DoC, Councils and the horticulture industry.

Plant Producers who achieve Certification to the Core Standard and any specific pest or disease management modules demonstrate their production is undertaken under conditions of strong biosecurity risk and hazard management. In doing so, they provide assurance that their plants have been raised in conditions that minimise the introduction and spread of pests.

The purpose of the scheme is to support a professional approach to biosecurity across the plant production industry, which minimises biosecurity risk, builds industry and producer resilience, trust and social licence, and harnesses the critical skills and observations that exist in the industry to protect and grow New Zealand, including:

- Building trust with stakeholders and customers, and social licence with the public.
- Lift biosecurity professionalism and standards
- Increase likelihood of early detection of pest organisms
- Reduce the likelihood of the spread of pest organisms
- Preparedness for response in the event of a crisis

- Enable rapid recovery following a biosecurity event.

Participants in the Scheme will implement programmes that:

- Engage and share knowledge
- Facilitate best management practices to manage pest risk in the production and distribution of nursery stock.
- Facilitate traceability through nursery production and distribution networks.
- Reduce risk and uncertainty by providing a robust framework on which decisions can be based.
- Enhance the ability to produce and move plants around New Zealand within the regulatory framework and industry standards.

The PPBS promotes the following principles:

1. All plant producers have a role to play in biosecurity.
2. Plant producers are well-positioned to detect a new pest early, manage pest in their nursery, and prevent them being spread to the environment.
3. Recognition of the PPBS by regulators, plant buyers and the public builds trust and social licence, benefits producers and mitigates regulatory impact in an incursion.
4. Broad participation and a collaborative approach among regulators, plant producers, the community, industry and biosecurity stakeholders strengthens biosecurity outcomes.
5. The PPBS is industry-led drawing upon the critical skills, observations, experiences and shared learnings among producers, their customers and industry stakeholders.
6. Decision making is transparent, communications open and producer participation welcome.

The Scheme's design acknowledges this diversity and can be used by all plant producers, from the smallest to largest nursery, by commercial and community nurseries irrespective of what they grow or who they supply. The Core Standard focuses on core biosecurity best practice encompassing management and staff responsibly, nursery hygiene, crop monitoring and traceability. It includes examples of biosecurity hazards and management measures for nursery inputs, through the production cycle and in nursery dispatch and transportation.

Specific Modules manage concerns about a specific pest (e.g. Kauri Dieback), plant species, industry or distribution pathway that are additional to those in the Core Standard. These may be incorporated as a module within the Scheme, by reference to other biosecurity schemes or through mutual recognition. Examples may include myrtle rust, kiwifruit nursery stock and

plants supplied for restoration of offshore islands.

The development of a specific module for the management of Kauri Dieback will provide an effective and robust management approach for Kauri dieback in nurseries.

Participation and engagement from the nursery sector in the management of Kauri Dieback is best achieved through recognition of the PPBS in the National Kauri Dieback Management Plan.

2) Achieving engagement and participation within the nursery sector

The PPBS provides a level of engagement and participation from across the sector, stakeholder and the community that would be otherwise difficult to achieve.

The Scheme's scope applies to all plant producers undertaking nursery production of plants within New Zealand. The Scheme defines a "plant producer" as "any person, business or entity engaged in producing plants, or, parts of plants for sale, their own use, or, for movement outside of the property".

This includes formal for-profit nurseries, part time, lifestyle and hobbyist growers, community nurseries and those staffed by volunteers, landscapers, retailers and others who grow some of their own plants and entities that hold plants for an extended period (for example, councils, Iwi, community groups, garden retailers, landscapers and plant brokers).

The PPBS can develop guidance on Kauri Dieback that will contribute to national efforts to grow biosecurity – for example through Biosecurity 2025.

The PPBS is able to engage the range of stakeholders that are involved in the production, distribution, planting and management of Kauri.

The Scheme takes a systems-based approach to biosecurity risk management protocols including nursery inputs, plant production, and nursery outputs and their distribution and transportation.

The Scheme provides assurance that certified producers have high biosecurity risk management practices in place and that the plants they produce have been raised in conditions that ensure they are practically free of pests at the time of distribution by the producer. This assurance is vital in the management of Kauri Dieback.

3) Risk management approach

The Scheme is aligned with **HACCP methodology** (Hazard Analysis and Critical Control Points) to provide a framework to identify and manage risk within the nursery production process

HACCP is systematic and preventative approach to managing risk that is widely used in many industries, it scales with enterprise complexity and has been adopted as the standard risk management tool for food safety.

The key principles of the HACCP approach are to identify all potential hazards in a

production system and identify intervention points where these hazards can be controlled, prevented or reduced. This preventative approach to hazard management is proven to be successful in many production industries and has been adapted to provide a framework for the Scheme.

Scheme elements scale readily to accommodate enterprise and nursery diversity and complexity - the measures that a small nursery need adopt will be fewer (or less complex) to manage the hazards they face or present.

4) **Standards and Guidance**

The Scheme focuses on outcomes and provides tools that will assist producers to meet those outcomes including:

- A **Core Standard** that is applicable to a wide range of producers, nurseries, species and pests. It is organised to prompt a producer to identify **biosecurity hazards** that apply to each production step and identify and record others where applicable. It includes:
 - Nursery essentials - basic requirements including location and contact details, staff and management responsibilities, training, signage and visitor management.
 - Biosecurity management fundamentals – key requirements to ensure production areas remain free of pests and pathogens; hygiene, crop monitoring and traceability.
 - Hazard management through the production process – hazards and mitigation guidance through transplant, growing and product dispatch processes
 - Audit and record requirements.
- The **Core Standard** is organised to prompt a producer to identify **biosecurity hazards** that apply to key tasks and production steps in their nursery. They may select from several potential identified hazards for each production step and identify and record others where applicable.
- A **Core Standard Hazard Management Checklist** is provided to assist producers in identifying key risk management methods and records and to assist self-assessments and preparation for external audits.
- To assist producers working with the Scheme a **Nursery Manual** template is provided. It helps producers record how they meet requirements of the Core Standard and any applicable Specific Modules.
- The Core Standard is supplemented, where necessary and desired, by **Specific Modules** for issues of concern to or about a specific pest, plant species, industry or distribution pathway. These may be incorporated as a module within the Scheme, by reference to other biosecurity schemes or through mutual recognition. The myrtle rust module (below) is one of these, and in time others may include, for example, kiwifruit nursery stock and plants supplied for restoration of offshore islands.

While **certification to a Specific Module** is intended to be only available to producers

who are certified to the Core Standard (as Specific Modules outline measures that are additional to the Core Standard), a **transition period** is facilitated for two years post Scheme implementation where producers can have their compliance to a Specific Module recognised in advance of, and while they work towards, certification to the Core Standard.

We recommend that the National Kauri Dieback Management Plan includes recognition of a management plan for Kauri Dieback in nurseries as a module that is implemented through the PPBS.

Industry and producer support mechanisms – in addition to the Standard and associated materials the Scheme framework will build and/or facilitate considerable resource in people, guidance materials, tools, diagnostics and training engagement. Work is envisaged to include:

- Identify gaps and opportunities and develop guidance materials and tools to assist producers.
- Collate biosecurity related reference/research materials and provide online access to same.
- Improve access to diagnostics – collate, establish access, identify opportunities/needs.
- Identify training needs and establish connection for provision of same.

5) Nursery registration

Participating plant producers first register with the Scheme to enable communication of biosecurity management guidance and contact in case of specific pest action, response or incursion.

Registration information includes:

- Producer and nursery(s) identity
- Nursery location(s), physical and mailing address(es)
- Key points of contact, names, phone numbers, email addresses

Registration provides a channel for biosecurity communications (pest information, guidance and alerts) resulting in a significant increase in biosecurity awareness and management, and early detection of an exotic pest incursion

Additionally, producers are asked to supply and maintain a list of plant genera under production so that biosecurity pest response or incursion actions can rapidly identify and target producers who may be at risk, save time and increase the likelihood of preventing pest spread through the nursery stock pathway. **This ensures that nurseries that produce Kauri plants can be easily identified.**

The register enables biosecurity communication channels through to producers, facilitation of traceability, rapid and targeted comms in a crisis.

6) Certification

Following registration, producers work to achieve Certification to the Core Standard and or a Specific Module. Once certified, producers maintain the integrity of the Scheme by ensuring its Nursery Manual is up-to-date and all inspections, testing and biosecurity measures have been conducted in accordance with the Core Standard and/or Specific Module.

Certification to a Specific Module is only available to producers who are certified to the Core Standard. The Specific Module outlines measures required in addition to the Core Standard.

The Scheme should be notified of any changes that might affect risk management, such as the addition of or substantial modification to production sites or changes in key staff.

Group certification and accreditation/equivalence with other schemes is also facilitated to assist engagement with small nurseries and community nurseries.

Summary

NZPPI supports the development of the National Kauri Dieback Management Plan.

Plant producers play a vital role in the management of Kauri Dieback. NZPPI is working with a wide range of stakeholders across to develop a management programme for biosecurity in nurseries.

We recommend that the National Kauri Dieback Management Plan recognizes this programme to manage Kauri Dieback in nurseries and includes recognition of the nurseries that participate in the scheme.

Contact:

Matthew Dolan- Chief Executive
matthew@nzppi.nz

Phone 04 918 3511
Fax 04 499 9589
Email office@nzppi.co.nz
Web www.nzppi.co.nz

Postal PO Box 3443
 Wellington 6140
Office Level 5
 23 Waring Taylor St
 Wellington 6011

