



Review of Submissions:

DRAFT IMPORT HEALTH STANDARD FOR FRESH ONION FOR
CONSUMPTION

November 2016

Ministry for Primary Industries

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Plants, Food & Environment Directorate
Regulation & Assurance Branch

REVIEW OF SUBMISSIONS ON:

DRAFT IMPORT HEALTH STANDARD FOR FRESH ONION FOR CONSUMPTION

November 2016

Approved for general release

Peter Thomson

Director Plants, Food & Environment
Ministry for Primary Industries

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Acronyms used in the document

| | |
|--------------|--|
| AQSIQ | General Administration for Quality Supervision and Inspection and Quarantine |
| CIQ | Quarantine Bureau of China |
| CTO | Chief Technical Officer |
| DoC | Department of Conservation |
| ERMA | Environmental Risk Management Authority |
| FreshPAC OWG | FreshPAC onion working group |
| GAP | Good Agricultural Practices |
| HortNZ | Horticulture New Zealand |
| IHS | Import health standard |
| ISPM | International standards for phytosanitary measures |
| MoU | Memorandum of understanding |
| MPI | Ministry for Primary Industries, New Zealand |
| NPPO | National Plant Protection Organisation |
| ONZ | Onions New Zealand |
| PFA | Pest free area |
| PFPP | Pest free place of production |
| PRC | People's Republic of China |
| RMP | Risk management proposal |
| SPS | Sanitary Phytosanitary |

Introduction

1. The Ministry for Primary Industries (MPI) consulted with interested parties from 02 September 2016 to 14 October 2016 on the draft import health standard (IHS) for “Fresh Onion for Consumption” in accordance with Section 23 of the Biosecurity Act 1993 (Biosecurity Act) and MPI’s consultation policy.
2. The draft IHS was presented in MPI’s new format, and the proposed measures were supported by information presented in a Risk Management Proposal (RMP) and Guidance Document: *Importing Fresh Produce for Consumption*.
3. MPI received three submissions on the draft IHS from the following domestic stakeholders:

| Submitter | Submitted by | Date received |
|--------------------------|------------------------|-------------------|
| Onions New Zealand Inc. | Michael Ahern | 23 September 2016 |
| Horticulture New Zealand | Richard Palmer | 13 October 2016 |
| Rhys Farm Ltd | Nick and Michelle Ward | 14 October 2016 |

4. Copies of these submissions are available in Appendix 1.

Section 1: Responses to Technical Submissions

5. In this section, the context of each of the submissions received is presented alongside MPI's response.
6. The submissions covered both technical issues, MPI policy and food safety concerns. This review of submissions focusses on the technical biosecurity issues raised in submissions in relation to the draft IHS. Questions on policy and food safety are generally outside this consultation process, however they are addressed where possible.
7. Submissions have been presented in blue, and MPI's responses in black.

Submission from Onions New Zealand Inc.

8. MPI thanks Onions New Zealand Inc. (ONZ) for their submission on the draft IHS for Fresh Onion for Consumption. MPI appreciates and shares ONZ concerns regarding biosecurity and the need to manage the likelihood of unwanted organisms establishing in New Zealand.

ONZ Submission:

9. The IHS states that the consignment must be free from regulated weed seeds. However, the guidance document (10.5.6(1)) provides for an allowance of 8 regulated weed seeds per 600 unit sample. Onions NZ was not aware of this policy and would like to be assured that the IHS requirement will over-ride the operational guidance.

MPI Response:

10. The IHS requires that a sample of a consignment is inspected and found free from regulated weed seeds prior to export (refer 1.4.1 c) of the IHS) and for the issuance of a phytosanitary certificate. A phytosanitary certificate should not be issued if any regulated weed seeds are found during pre-export official inspection of a lot.
11. MPI has not intercepted weed seeds on imported onion from any country (MPI QuanCargo data, retrieved 3 October 2016, records for onion imports from 1999-2016). The post-harvest processing activities undertaken for fresh onion, including removal of loose skins, trimming pseudo stem to within 15mm and minimising root material, are likely to remove contaminating seeds. As post-harvest processing for existing import pathways is similar to that undertaken in China, it is unlikely that seeds will be associated with fresh onion on this import pathway.
12. MPI has developed an operational tolerance in the unlikely event of regulated weed seeds arriving in New Zealand on fresh produce consignments. The tolerance level is based on weed seed establishment potential and was consulted previously in IHS 152-02: *Importation and Clearance of Fresh Fruit and Vegetables in New Zealand*. Consultation included government agencies such as Department of Conservation (DoC) and Environmental Risk Management Authority (ERMA) (now known as the Environmental Protection Authority, EPA).

ONZ Submission:

13. The Targeted Measures for *Pantoea ananatis* require clarification. Stated options in the RMP (93-95) are Pest Exclusion (Country freedom, PFA, PFPP) or Pest Removal or Elimination. If an exporting country opts for the latter (Pest removal or elimination) then the options are “Basic measures for vector (*T. tabaci*) management” and “Export eligibility”. It is not clear that both of these are required or whether they are options.
 - a. Assuming that both are required it is also unclear from the heading “Pest Removal or Elimination” that monitoring for *Pantoea ananatis* is a mandatory action. The heading should read “Pest monitoring plus vector removal or elimination”.
 - b. If MPI intends that these are options Onions NZ would be very concerned – as this would allow Targeted Measures for *Pantoea ananatis* to be achieved through Basic Measures for *T. tabaci*.

MPI Response:

14. MPI would like to clarify that measures are required for both pests, as described in (a). MPI appreciates your feedback and will rename the section in the RMP as “Pest & Vector Removal or Elimination” and include “AND” between a) Basic Measures for vector (*T. tabaci*) management and b) Export Eligibility to avoid confusion in future RMPs.
15. MPI will negotiate an Export Plan that will include Targeted Measure pests and vectors, with detail describing pest management activities. For *P. ananatis* and its vector this will include:
 - a. monitoring for the presence of *P. ananatis* at production sites to determine onion export eligibility:
 - i. If *P. ananatis* is present then the production site is ineligible to export onions to New Zealand for the remainder of the season;
 - ii. If *P. ananatis* is not detected during monitoring then onions are eligible for export, but only if *T. tabaci* is absent during phytosanitary inspection or following a remedial treatment such as fumigation with methyl bromide;
 - b. Basic Measures only are required for *T. tabaci*. However, its vector status justifies a description in the Export Plan of remedial treatment to be taken if it is detected during phytosanitary inspection of a consignment;
 - c. Basic Measures for *T. tabaci* are required even if *P. ananatis* are not detected during production.

ONZ Submission:

16. Onions NZ has been concerned that onion repacking activities have the potential to concentrate wastes (and associated pests) in onion growing areas. This has been the focus of previous Onions NZ submissions. We understand that China has offered to help to manage this risk by exporting “retail ready” packs. Onions NZ would like to be assured that the size of these bags is indeed targeted to pre-packaged sale and not for repacking or loose sale.

MPI Response:

17. MPI considers retail ready to be of a size that does not require a change in the state of the packaging for sale (e.g. 5kg or less). Bags that are sold for wholesale (e.g. 20kg or 50kg), that need repackaging, or used for bulk loose onions would not meet a 'retail ready' definition.
18. New Zealand importers will be consulted on the optimal bag size for retail sale and the criteria of 'retail ready' will be agreed between PRC and MPI when an Export Plan is developed. Though the Export Plan will not be shared directly with ONZ, MPI will discuss the definition of retail ready with the FreshPAC onion working group (OWG).

ONZ Submission:

19. And while it is not a biosecurity concern, Onions NZ is concerned to ensure that onions imported from new supply countries under this Import Health Standard meet New Zealand's food safety requirements, including those for pesticide residues, microbiological contamination, and heavy metals. Any perceived, or real, food safety issues involving onions has the potential to impact on consumer demand for onions in New Zealand and in our export markets. We would appreciate MPI's advice on the food safety monitoring and controls that are in place.

MPI Response:

20. Non-biosecurity submissions are out of scope of the IHS consultation process, however MPI has passed your concern onto the food safety group.

Food Safety information can be found at: <http://www.foodsafety.govt.nz/>

Submission from Horticulture New Zealand

21. MPI thanks Horticulture New Zealand (HortNZ) for their submission on the draft IHS for Fresh Onion for Consumption. MPI appreciates and shares HortNZ concerns regarding biosecurity on behalf of all of New Zealand's commercial fruit and vegetable growers.
22. MPI acknowledges HortNZ's intention to submit a separate representation for the MPI Guidance Document: *Importing Fresh Produce for Consumption*.

The Guidance Document is separate to the IHS consultation process (and therefore comments on this document are not included in this review of submissions). However MPI appreciates and welcomes feedback on the document.

HortNZ Submission:

23. HortNZ accepts the intended application of basic measures to manage onion pests. Basic measures are concluded as being a combination of the definition of "for consumption" in Ref A, and commercial production practices as set out in Ref B. HortNZ welcomes a discussion with MPI about how confidence, that these measures have been applied, is gained and maintained.

MPI Response:

24. MPI is happy to host a discussion with interested parties on Basic Measures. Confidence in an exporting country's ability to apply and maintain Basic Measures is gained through recognition of an exporting country's Export System.
25. The Export System is the system used by the exporting country NPPO to conduct the necessary oversight in order to provide an assurance to New Zealand that risks posed by pests present in that country are managed. The Export System describes the activities, systems and procedures of the NPPO. The Export System should be consistent with ISPM 7: *Export certification system*. The operational responsibilities of the exporting NPPO and records kept as described in ISPM 7 are subject to a systems audit by New Zealand where required.
26. An Export System does not include pest control activities unless the NPPO directs these activities. Pest control activities are described in the Export Plan. Improved knowledge of the export systems (through systems audits) especially for new trading partners will provide MPI with an improved level of assurance in cases where pre-export measures (other than official inspection and certification) for certain pests are required.
27. Information on Export Systems is included in Section 7.5 of the Guidance Document.

HortNZ Submission:

28. HortNZ proposes that the IHS include a specific definition of "minimal root material", and "clean and free of soil" to align expectations, both offshore and onshore, of the cleanliness that supports basic measures. HortNZ notes the practical tolerance for soil in Ref C (draft) of 25g of soil per 600 units.

MPI Response:

29. MPI does not believe that a specific definition of 'minimal root material' is required in the IHS. The IHS aligns with the *UNECE STANDARD FFV-25* for onion. This standard states:
The bulbs must be:
 - firm and compact;
 - free from externally visible shoots;
 - free from swelling caused by abnormal vegetative development; and
 - practically free of root tufts; however, for onions harvested before complete maturity, root tufts are allowed.
30. New Zealand onions for export to other countries do not have a specific definition of minimal root material, and are only required to comply with the internationally accepted grading standard *UNECE STANDARD FFV-25* for onions: "Class I requirements of the UNECE grade standard for onions including the tolerances allowed". For details of the onion grade standard, please follow the link (UNECE Standard FFV-25, 2010) here: <http://www.unece.org/trade/agr/standard/fresh/ffv-standardse.html>
31. MPI expects trading partners to follow international grade standards as New Zealand does for our own onion exports.

32. Onions certified for export from New Zealand (phytosanitary inspection and certification) must be free from soil (as per 1.4.1 a) of the IHS). If soil is detected during pre-export phytosanitary inspection of a sample then the consignment should be:
 - a. rejected for export; or
 - b. reconditioned. Reconditioned consignments require re-inspection to verify soil freedom prior to a phytosanitary certificate being issued.
33. The post-harvest processing activities undertaken for fresh onion, including removal of loose skins, trimming pseudo stems to within 15mm and minimising root material, are likely to remove contaminating soil.
34. The 25g tolerance is a practical operational on-arrival tolerance only.

HortNZ Submission:

35. The targeted measures “pest removal or elimination”, proposed for the management of *Pantoea ananatis* (Ref B, para 95) require the specific eligibility inspections for each production site, whilst the vector *Thrips tabaci* is to be managed by basic, commercial measures.
36. Hort NZ seeks confirmation from MPI that:
 - a. the export eligibility is intended to be supported by both production site registration, and competent inspection during growing.
 - b. that the targeted measures for *P. ananatis* require the application of both the basic measures for *T. tabaci*, and the export eligibility assessment for *P. ananatis*.

MPI Response:

37. The PRC’s General Administration for Quality Supervision and Inspection and Quarantine (AQSIQ) export decrees require the Quarantine Bureau of China (CIQ) to register all production sites and associated establishments to produce onions for export.

Monitoring is conducted by AQSIQ/CIQ accredited personnel. During the 2013 pathway assurance visit for onions, MPI highlighted the necessity for AQSIQ/CIQ to ensure accredited personnel had training in the detection and recognition of this pest.

The Export Plan will include MPI’s requirement for production site registration and accreditation of the personnel undertaking inspection during production.

38. MPI would like to clarify that measures are required for both pests. In summary:
 - a. *P. ananatis* requires Targeted Measures (such as monitoring);
 - b. in addition to Targeted Measures for *P. ananatis*, Basic Measures are also required for *T. tabaci*;
 - c. onions from production sites that are found to have *P. ananatis* are not eligible for export to New Zealand;
 - d. Basic Measures for *T. palmi* are required even if *P. ananatis* are not detected during production.

HortNZ Submission:

39. HortNZ has a number of queries in relation to targeted measures which we seek further discussion with MPI on, including:
- Will any targeted measures not included in Ref B, and proposed by the exporting country, be accepted, or are the listed measures the only ones accepted?
 - How will the export plan be assessed?
 - What performance measures will MPI apply to the export plan?
 - What remedial actions are proposed in the event of systemic non-conformance?

MPI Response:

40. Query (a): the measures outlined in paragraph 46 of the RMP provide an example of the different types of Targeted measures MPI accepts.

Targeted measures identified for *P. ananatis* and *D. antiqua* in the RMP are examples of measures proposed by PRC and also currently approved for other exporting countries. As required by the SPS Agreement, if a country proposes an alternative equivalent measure to manage a particular pest, MPI must consider and evaluate the request and accept the proposed measure if it provides the same or better level of protection. Therefore, it is possible that MPI will accept other Targeted Measures.

41. The inclusion of a requirement for “Targeted Measures” to be documented in an Export Plan is a considerable strengthening of New Zealand’s phytosanitary measures and import system. Requests for equivalent Targeted Measures will undergo a greater level of assessment and scrutiny than with the previous approach to IHS measures for RG2 pests.
42. Query (b): MPI will negotiate the Export Plan with the exporting country. An Export Plan needs to contain sufficient detail to satisfy MPI that the IHS requirements will be met. MPI will audit the pathway against the Export Plan, on the commencement of trade.
43. Query (c): Performance measures will include:
- Following the negotiation of an Export Plan, MPI will survey (i.e. identify all intercepted pests to species level where possible) the pathway during the first year of trade and monitor pest interceptions on the pathway thereafter, to ensure that the right level of measure has been applied to the pathway. A high level of compliant consignments arriving in New Zealand indicates that:
 - an appropriate level of measure has been applied;
 - the exporting country is applying and verifying that measures have been met;
 - A low compliance rate indicates that:
 - measures are insufficient to manage risk; or
 - measures are not being applied or verified prior to export correctly

Actions MPI may take include:

- i. report non-compliance(s) to the exporting country;
- ii. request the exporting country to take corrective actions;
- iii. monitor the pathway;
- iv. audit the pathway;
- v. review the measures;
- vi. suspend the pathway (i.e. if critical non-compliance identified).

44. Query (d): Upon interception of pests that require Targeted Measures, the consignment will be directed for appropriate remedial action (treatment, reshipment or destruction). MPI will follow current policy and procedures and notify the exporting country requesting a trace-back investigation.

In the event of a systematic non-conformance MPI may suspend a pathway. MPI will conduct an audit on the Export System, or an audit against the Export Plan. Pending the outcomes of the audit, MPI will lift the suspension and monitor trade.

HortNZ Submission:

45. Ref B notes that until assessment of risk from commercial waste is complete, China has proposed that onions will be exported in retail ready bags, to avoid repackaging in NZ. This requirement is not specified in the IHS. HortNZ seeks advice on how, in the new IHS format, this requirement is to be set out; as a specified measure or otherwise?

MPI Response:

46. Retail ready bagging is not a MPI-Specified Measure, but a Targeted Measure. Targeted Measures are not outlined in the IHS, but negotiated and agreed with an exporting country and outlined in the Export Plan. This is because exporting countries may negotiate and apply different Targeted Measures based on their individual circumstances and pest status.

D. antiqua and *P. ananatis* only require Targeted Measures.

Submission from Rhys Farm Ltd

47. MPI thanks Rhys Farm Ltd. for their submission on the draft IHS for Fresh Onion for Consumption. MPI appreciates feedback from New Zealand industry and shares industry's concern on the importance of biosecurity for our primary producers.

Rhys Farm Ltd. Submission:

48. There is no need to import onions into NZ as the market is already supplied with enough local onions.

MPI Response:

49. Importation of fresh produce is driven by market demand and consumer preference. From discussion with onion industry representatives and a survey completed by ONZ in collaboration with MPI, it is understood that very low volumes of onions are imported to New Zealand because:
- onions are generally only imported to fill a shortage in local supply;
 - supermarkets prefer to sell locally grown produce.
50. For further information on New Zealand trade policy, i.e. why we import from other countries and how we set the rules, please refer to:
- Ministry for Foreign Affairs and Trade - <https://www.mfat.govt.nz/en/trade/nz-trade-policy/#what>
 - Ministry for Primary Industries information on balance in trade and the SPS Agreement - <https://www.mpi.govt.nz/document-vault/12576>

Rhys Farm Ltd. Submission:

51. NZ growers are subject to strict Quality Assurance programmes, such as NZ GAP, which are not replicated in some other countries, such as China. The food safety risks to the NZ consumer from the importation of onions from some countries is huge.

MPI Response:

52. GAP is not a requirement of the IHS. However international GAP (or equivalent) is often adopted by exporting countries to meet phytosanitary requirements (Basic Measures), or is demanded by consumers. The IHS is aimed at minimising biosecurity risks from importing risk goods. Food safety is regulated under the Food Act 2014. Please refer to the MPI website for information on:
- Importer responsibilities - <http://www.mpi.govt.nz/importing/food/fresh-fruit-and-vegetables/steps-to-importing/>
 - Maximum residue levels - <http://www.mpi.govt.nz/food-safety/whats-in-our-food/chemicals-and-food/maximum-residue-levels/>
53. Food safety is out of scope of this IHS consultation.

Rhys Farm Ltd. Submission:

54. Biosecurity – NZ has had several recent biosecurity incursions. We are concerned that the importation of onions from some other countries will cause additional biosecurity risks.

MPI Response:

55. MPI seeks to continually improve management of biosecurity risk through a number of initiatives including an ‘emerging risk’ programme, improving risk assessment processes, IHS format and measures, and pathway assurance. No biosecurity system is capable of reducing risk to zero. Therefore it is the objective of New Zealand’s biosecurity system for trade (in particular our “phytosanitary system” for plant trade) to reduce the likelihood of introduction (entry and establishment) of new and unwanted pests to a very low level or, to provide effective management should they establish.

56. The activities MPI undertakes to minimise the likelihood that pests will establish as the result of importing fresh produce are:
- setting the pre-export measures in an IHS at the correct level to manage risk, by conducting a thorough risk assessment and management process for each importing pathway;
 - verifying that pre-export measures have been implemented correctly e.g. by audit and on-arrival inspection and verification;
 - applying a remedial treatment to a consignment, prior to issuing biosecurity clearance, if regulated pests are detected during inspection;
 - monitoring compliance on pathways and reviewing measures as necessary;
 - post-border surveillance, response and pest management as necessary;
 - system reviews and improvements.

Rhys Farm Ltd. Submission:

57. *The garlic industry in NZ has suffered dramatically from the importation of garlic into NZ. We do not want the importation of onions to jeopardise the NZ onion industry.*

MPI Response:

58. New Zealand's international trade depends on our ability to export to other countries. Equally, we also need to enable imports from other countries, provided certain biosecurity conditions are met, such as the requirements set out in Import Health Standards. New Zealand exports onions worth more than \$81.5 million a year. This is enabled through fair and consistent rules for international trade. MPI expects our exports to be allowed to compete fairly in foreign markets, while meeting the level of protection required by the importing country. Other countries expect the same. Therefore MPI has a strong interest in the setting of international standards that maximise the flow of trade.
59. Under the Sanitary and Phytosanitary (SPS) Agreement (World Trade Organisation), which New Zealand is a signatory to, MPI needs to be technically justified in imposing measures (e.g. Basic Measures, Targeted Measures or MPI-Specified Measures) on an import pathway. MPI is confident that the appropriate level of protection (achieved through application of measures) has been identified for the new IHS: *Fresh Onion for Consumption*. Measures must not discriminate unfairly between countries, or between imported and domestically produced goods.
60. Additional information on balance in trade and the SPS Agreement can be found here: <https://www.mpi.govt.nz/document-vault/12576>

Proposed changes to standard

61. No changes will be made to the measures to manage pests in the proposed IHS as result of public consultation.
62. Changes have been made to some of the sections (outlined below) to provide further clarification of requirements, improvement of the IHS template, and in response to comments from trading partners following WTO notification of the consultation.

63. A change will be made to the “Purpose” of the IHS to reference the applicable part of the IHS.

Currently the draft IHS reads:

The IHS specifies the requirements for the importation of fresh produce for consumption into New Zealand from all countries.

This will be amended to:

This IHS specifies the requirements for the importation of fresh produce for consumption identified in section 1.1 into New Zealand from all countries.

64. A change will be made to the “Who should read this?” to reference the applicable part of the IHS.

Currently the draft IHS reads:

This IHS applies to importers of fresh produce imported for consumption into New Zealand and the exporting country National Plant Protection Organisation (NPPO).

This will be amended to:

This IHS applies to importers of fresh produce imported for consumption identified in section 1.1 into New Zealand and the exporting country National Plant Protection Organisation (NPPO).

65. The statement ‘Importers are liable for all associated expenses’ has been removed from “Why is this important?”.
66. The name of Part 1 will be changed from “Requirements” to “General Requirements”.
67. A change will be made to the “Application” (1.1.1) to reference the applicable part of the IHS.

Currently the draft IHS reads:

- (1) This import health standard (IHS) applies to the importation of fresh onions (*Allium cepa*) for consumption into New Zealand from all countries.

This will be amended to:

- (1) This import health standard (IHS) applies the goods described in section 2.1: *Commodity description*.

68. A change will be made to the “General” requirements (1.4.1 b) and 1.4.1c)) to merge the two statements.

Currently the draft IHS reads:

- b) be free from viable regulated pests based on official inspection;
- c) be free from regulated weed seeds;

This will be amended to:

- b) be free from viable regulated pests including weed seeds;

69. A change will be made to the “General” requirements (1.4.1 d)) to allow for the use of recycled/reusable packaging.

Currently the draft IHS reads:

All consignments of fresh produce imported for consumption into New Zealand must:

- d) be packaged in clean and new material;

This will be amended to:

All consignments of fresh produce imported for consumption into New Zealand must:

- d) be packaged in clean and either new or refurbished material;

70. A change will be made to the “Commodity description” (2.1.2) that the pseudostem will be trimmed to within 6 cm.

Currently the draft IHS reads:

- (2) Fresh onion for consumption is defined as commercially produced, harvested, cured *Allium cepa* bulbs with skin, minimal root material attached and pseudostem trimmed within 15 mm of the bulb, clean and free from soil.

This will be amended to:

- (2) Fresh onion for consumption is defined as commercially produced, harvested, cured *Allium cepa* bulbs with skin, minimal root material attached and pseudostem trimmed within 6 cm of the bulb, clean and free from soil.

71. The guidance box will be updated to support the change made in (70). The guidance box under 2.1.2 will include the statement:

The commodity description aligns with the Class I requirements of the UNECE STANDARD FFV-25 for onion including the tolerances allowed. The UNECE STANDARD FFV-25 is available at <http://www.unece.org/trade/agr/standard/fresh/ffv-standardse.html>

72. A change will be made to the additional declaration 3.2.4 a) to include the name of the Pest Free Area to align with ISPM 12.

Currently the draft IHS reads:

- a) *“The plant products herein have been sourced from a pest free area for specified pests as recognised by New Zealand.”*

This will be amended to:

- a) *“The plant products described herein have been sourced from {Name of Pest Free Area} recognised as a pest free area for specified pests by New Zealand.”*

73. The guidance box will be updated to support the change made in (72). The guidance box under 3.2.4 a) will include the statement:

Recognised pest free areas are listed on the MPI website [link will be inserted on issuance of the final IHS].

74. A change will be made to the description of Appendix 1.

Currently the draft IHS reads:

Definitions have the same meaning as defined by the Act and ISPM 5: *Glossary of Phytosanitary Terms*, unless set out below:

This will be amended to:

Definitions have the same meaning as defined by the Act unless set out below:

75. Additional definitions will be added to Appendix 1, these being:

Inspection

Official visual examination of plants, plant products or other regulated articles to determine if pests are present and/or to determine compliance with phytosanitary regulations (ISPM 5).

Pest

Any species, strain or biotype of plant, animal or pathogenic agent injurious to plants or plant products (ISPM 5).

76. All references will be updated prior to the IHS being issued (final).
77. All websites and hyperlinks will be updated prior to the IHS being issued (final).

Proposed changes to the RMP

78. MPI will, for clarity, rename the “Pest Removal or Elimination” section in the RMP as “Pest & Vector Removal or Elimination” and include “AND” between a) Basic Measures for vector (*T. tabaci*) management and b) Export Eligibility to improve the clarity and intent of the document.

References

MPI. Balance in Trade. <https://www.mpi.govt.nz/document-vault/12576>

Appendix 1: Copy of submissions

Submission 1: Onions New Zealand

Onions New Zealand Inc. submission on the draft Import Health Standard: Fresh Onion for Consumption.

Onions New Zealand Inc. (Onions NZ) represents the interests of over 100 growers of domestic and export onions, and onion exporters. The onion export industry is valued at \$112 million per annum (Statistics NZ, 2016), making onions New Zealand's 3rd largest fresh horticulture export crop. Approx 85% of the total crop is exported. Onions are also an essential rotational crop for vegetable growers. Onions NZ is a partner with MPI in the Government Industry Agreement for Biosecurity Readiness and Response (GIA). One of the rights and obligations of Onions NZ as a GIA Deed signatory is to actively engage with MPI to manage biosecurity risks – including engaging with MPI in the development of import health standards.

The onions industry relies on the excellent keeping qualities of NZ onions to supply the domestic market all year round and to sea freight onions long distances to export markets. Consequently, Onions NZ takes seriously biosecurity threats which may result in the establishment of new pests that may affect the production, storage quality, and export of onions. Two of the pests (onion fly and centre rot) for which Targeted Measures are required in the draft Import Health Standard are identified by Onions NZ as high impact pests. Onions NZ has therefore worked studiously over a long period to provide MPI with technical information to ensure that the phytosanitary measures proposed by MPI are sufficient to manage the risks posed by these (and other) pests.

As a result of this process Onions NZ believes the Import Health Standard provides a more appropriate level of risk management than earlier drafts, and Onions NZ supports the issuance of the Import Health Standard subject to the resolution of the following comments.

Onions NZ has a small number of points which, for improved clarity, the organisation would like MPI to incorporate into the final draft of the Import Health Standard, Risk Management proposal, and guidance document:

- The IHS states that the consignment must be free from regulated weed seeds. However, the guidance document (10.5.6(1)) provides for an allowance of 8 regulated weed seeds per 600 unit sample. Onions NZ was not aware of this policy and would like to be assured that the IHS requirement will over-ride the operational guidance.
- The Targeted Measures for *Pantoea ananatis* require clarification. Stated options in the RMP (93-95) are Pest Exclusion

(Country freedom, PFA, PFPP) or Pest Removal or Elimination. If an exporting country opts for the latter (Pest removal or elimination) then the options are “Basic measures for vector (*T. tabaci*) management” and “Export eligibility”. It is not clear that both of these are required or whether they are options.

- Assuming that both are required it is also unclear from the heading “Pest Removal or Elimination” that monitoring for *Pantoea ananatis* is a mandatory action. The heading should read “Pest monitoring plus vector removal or elimination”.
- If MPI intends that these are options Onions NZ would be very concerned – as this would allow Targetted Measures for *Pantoea ananatis* to be achieved through Basic Measures for *T. tabaci*.
- Onions NZ has been concerned that onion repacking activities have the potential to concentrate wastes (and associated pests) in onion growing areas. This has been the focus of previous Onions NZ submissions. We understand that China has offered to help to manage this risk by exporting “retail ready” packs. Onions NZ would like to be assured that the size of these bags is indeed targeted to pre-packaged sale and not for repacking or loose sale.

And while it is not a biosecurity concern, Onions NZ is concerned to ensure that onions imported from new supply countries under this Import Health Standard meet New Zealand’s food safety requirements, including those for pesticide residues, microbiological contamination, and heavy metals. Any perceived, or real, food safety issues involving onions has the potential to impact on consumer demand for onions in New Zealand and in our export markets. We would appreciate MPI’s advice on the food safety monitoring and controls that are in place.

Submission 2: Horticulture New Zealand



7 October 2016

SUBMISSION ON THE DRAFT IMPORT HEALTH STANDARD FOR FRESH ONION FOR CONSUMPTION

Submitter: Horticulture New Zealand Incorporated
Submitted by: Richard Palmer, Biosecurity and Trade Policy Manager
Contact Details:

References:

- A. Draft Import Health Standard Fresh Onion for Consumption, MPI.IHS.FP.ONION
- B. Risk Management Proposal; Fresh Onion for Consumption, September 2016
- C. MPI Draft Guidance Importing Fresh Produce for Consumption MPI.GD.FP dated 2 Sept 2016
- D. Onion Pest list for People's Republic of China

EXECUTIVE SUMMARY

1. Horticulture New Zealand (HortNZ) represents the interests of New Zealand's 5,500 commercial fruit and vegetable growers. The horticulture industry is valued at \$5.5 billion including over \$3 billion in exports.
2. The industry employs over 60,000 people, occupies some 130,000 ha of land and provides critical regional development opportunities in Northland, Auckland, Bay of Plenty, Hawke's Bay, Marlborough, Nelson, Canterbury, and Central Otago.
3. The industry relies heavily on New Zealand's excellent biosecurity status to protect productive capacity, and provide for significant market access opportunities internationally.

Horticulture New Zealand's submission on the draft Onions for Consumption IHS

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This status is also key to the industry's drive towards Integrated Fruit Production and Integrated Pest Management that reduce agrichemical inputs, while maintaining product quality and meeting the exacting standards of our international consumers.

4. Biosecurity supports production, secures market access, and provides confidence for investment – all key to the horticulture industry continuing to make a strong contribution to the Government's 'Export Double' goal.

5. Ref B summarises the risks to New Zealand from onions imported from China. Of the seven risk pests and pathogens, five are intended to be managed by basic measures, and two through targeted measures.

6. Horticulture New Zealand:

- Supports the risk conclusions drawn in Ref B
- Supports the draft IHS, in principle
- Seeks further discussion with MPI on the queries raised in this submission, and on the process for determining suitability of the Export Plan
- Will make separate representation to MPI on Ref C.

BASIC MEASURES

7. HortNZ accepts the intended application of basic measures to manage onion pests. Basic measures are concluded as being a combination of the definition of "for consumption" in Ref A, and commercial production practices as set out in Ref B. HortNZ welcomes a discussion with MPI about how confidence, that these measures have been applied, is gained and maintained.

DEFINITIONS

8. HortNZ proposes that the IHS include a specific definition of "minimal root material", and "clean and free of soil" to align expectations, both offshore and onshore, of the cleanliness that supports basic measures. HortNZ notes the practical tolerance for soil in Ref C (draft) of 25g of soil per 600 units.

9. As noted HortNZ will make separate representation on Ref C, in particular the proposed threshold for weed seed contamination.

TARGETED MEASURES

10. HortNZ accepts the intended application of targeted measures to manage higher risk onion pests.

11. The targeted measures "pest removal or elimination", proposed for the management of *Pantoea ananatis* (Ref B, para 95) require specific eligibility inspections for each production site, whilst the vector *Thrips tabaci* is to be managed by basic, commercial measures.

12. HortNZ seeks confirmation from MPI that:

- a. the export eligibility is intended to be supported by both production site registration, and competent inspection during growing.
- b. that the targeted measures for *P. ananatis* require the application of both the basic measures for *T. tabaci*, and the export eligibility assessment for *P. ananatis*.

13. HortNZ has a number of queries in relation to targeted measures which we seek further discussion with MPI on, including:

- a. Will any targeted measures not included in Ref B, and proposed by the exporting country, be accepted, or are the listed measures the only ones acceptable?
- b. How will the export plan be assessed?
- c. What performance measures will MPI apply to the export plan?
- d. What remedial actions are proposed in the event of systemic non-conformance?

MANAGING WASTE STREAMS

14. Ref B notes that until assessment of risk from commercial waste is complete, China has proposed that onions will be exported in retail ready bags, to avoid repacking in NZ. This requirement is not specified in the IHS. HortNZ seeks advice on how, in the new IHS format, this requirement is to be set out; as a specified measure or otherwise?

15. HortNZ supports the intent of this requirement to minimise risk from large volumes of imported produce waste, which may contain sufficient quantum of pests and pathogens so as to increase the risk of establishment and spread of unwanted organisms.

CONCLUSION

16. HortNZ supports, in principle, the proposed IHS.

17. HortNZ supports the Onions New Zealand submission.

18. HortNZ welcomes the opportunity to discuss the matters raised prior to release of the IHS.

ENDS

Submission 3: Rhys Farm Ltd

As onion growers we wish to make a submission opposing the Draft IHS for importing Fresh Onion for Consumption.

1. There is no need to import onions into NZ as the market is already supplied with enough local onions.
 2. NZ growers are subject to strict Quality Assurance programmes, such as NZ GAP, which are not replicated in some other countries, such as China. The food safety risks to the NZ consumer from the importation of onions from some countries is huge.
 3. Biosecurity – NZ has had several recent biosecurity incursions. We are concerned that the importation of onions from some other countries will cause additional biosecurity risks.
 4. The garlic industry in NZ has suffered dramatically from the importation of garlic into NZ. We do not want the importation of onions to jeopardise the NZ onion industry.
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