



Review of Submissions

RISK MANAGEMENT PROPOSAL ON ROSE (*ROSA* SPP.)

NURSERY STOCK FROM: Australia, Austria, Belgium, Denmark, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Japan, Luxembourg, The Netherlands, Norway, Portugal, Spain, Sweden, Switzerland, United Kingdom

9 December 2016

Ministry for Primary Industries

Te Manatū Ahu Atua
Pastoral House
25 The Terrace
P O Box 2526
Wellington
New Zealand

Telephone: +64 4 894 0100

Internet: <http://www.mpi.govt.nz>

Plants, Food & Environment Directorate
Regulation & Assurance Branch

REVIEW OF SUBMISSIONS ON:

**RISK MANAGEMENT PROPOSAL ON ROSE (*ROSA SPP.*) NURSERY
STOCK FROM:**

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Hungary, Ireland, Italy, Japan, Luxembourg, The Netherlands, Norway,
Portugal, Spain, Sweden, Switzerland, United Kingdom

9 December 2016

Approved for general release

Peter Thomson

Director Plants, Food & Environment
Ministry for Primary Industries

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1 Introduction

The Ministry for Primary Industries (MPI) consulted with interested parties on the proposed changes to specific requirements for the importation of *Rosa* nursery stock (Import Health Standard 155.02.06: Importation of Nursery Stock). Public consultation ran from 16 May to 27 June 2016, in accordance with Section 23(3) of the Biosecurity Act (1993).

Rosa nursery stock is affected by a wide range of viruses, viroids, bacteria and fungi. In 2010, three phytoplasmas ('*Candidatus* Phytoplasma mali', '*Candidatus* Phytoplasma asteris', and '*Candidatus* Phytoplasma aurantifolia') were identified as emerging risks, which may be associated with *Rosa* nursery stock imported into New Zealand. In 2010, dormant *Rosa* cuttings could be imported into a level 1 Post Entry Quarantine (PEQ) facility for a minimum period of six months for growing season inspection for disease symptom expression. Level 1 PEQ (open field sites) is not suitable to exclude vectors of phytoplasmas.

The Chief Technical Officer (CTO) decided that imported *Rosa* dormant cuttings must be held in a higher level of quarantine (level 2 PEQ), and that all *Rosa* plants in PEQ (imported as either dormant cuttings or whole plants) must be tested for phytoplasmas during the quarantine period. The import health standard (IHS) was not amended to include these requirements at the time, while the risk analysis was in progress, but the new conditions have been specified on all import permits issued since 2010.

The risk analysis identified two additional phytoplasmas and three viruses considered to pose a biosecurity risk on the *Rosa* pathway. A summary of the pest risk analysis was presented in the Risk Management Proposal (RMP) that accompanied the draft IHS during consultation. MPI notified trading partners of the proposed changes via the WTO-SPS information management system.

The Ministry for Primary Industries (MPI) received submissions from the following:

Richard Palmer	Horticulture New Zealand Incorporated (HortNZ)	27/6/2016
Barry O'Neill	Kiwifruit Vine Health (KVH)	27/6/2016
John Liddle / Ian Gear	Nursery Garden Industry New Zealand (now known as New Zealand Plant Producers Incorporated – and will be referred to as NZPPI throughout this document)	30/6/2016

This document summarises the issues raised in the submissions, and presents the MPI response to each.

1.1 Acronyms Used in the Document

MPI	Ministry for Primary Industries	IHS	Import health standard
CTO	Chief Technical Officer	ERS	Emerging Risk system
PEQ	Post entry quarantine	NPPO	National Plant Protection Organisation
RMP	Risk management proposal	PCR	Polymerase chain reaction
WTO-SPS	World Trade Organisation – Sanitary and Phytosanitary Measures	ISPM	International standards for phytosanitary measures

2 Summary of Amendments

As a result of comments made, the following is a summary of amendments to be made to the draft Import health standard (IHS): 155.02.06: *Importation of Nursery Stock*, Schedule of Special Conditions for *Rosa*.

2.1 Inclusion of the requirements for *Phellinus noxius* in the *Rosa* schedule

- 2.1.1 New requirements to manage the risk of brown root rot (*Phellinus noxius*) have been consulted and introduced into the IHS since the proposed changes to requirements for *Rosa* nursery stock were consulted. *Phellinus noxius* has subsequently been added to the pest list for *Rosa* nursery stock and conditions apply to whole plants and rooted cuttings.

2.2 Formatting changes to the presentation of Additional declarations.

- 2.2.1 The formatting of Additional declarations required on the Phytosanitary certificate have been reworded to make it clearer what declarations apply to manage which specific quarantine pest(s).
- 2.2.2 Specification of three options for management of Pucciniales (fungi) on whole plants and non-dormant cuttings, concerning the availability of propiconazole in the exporting country. Importers may arrange, pre-export, for plants to be dipped in New Zealand. Remedial treatment on plant material in New Zealand which does not comply with section 2.3.2 is not permitted.

Copies of all external stakeholder submissions in their entirety are presented in Appendix 1.

3 Review of Submissions

3.1 General Feedback

- 3.1.1 KVH commends MPI's action in updating the specific IHS to reflect emerging risks and new information - the earlier introduction of measures for *Ceratocystis fimbriata* within 'basic conditions' of Standard 155.02.06 being another good example of this.
- 3.1.2 HortNZ generally supports the proposed changes to the IHS with the exception of allowing for on-arrival fungicide treatment.
- 3.1.3 New Zealand Plant Producers Incorporated (NZPPI) supports the proposed changes to better manage risk to ensure the risks posed by the identified pathogens to the New Zealand horticulture industry are mitigated.
- 3.1.4 Comments on the risks from the cut flowers pathway, submitted by Horticulture New Zealand (Hort NZ) and the New Zealand Plant Producers Incorporated (NZPPI), were considered out-of-scope for this review. These comments have been forwarded to the appropriate team within MPI who will address these concerns.

3.2 Specific Feedback

3.2.1 Bare rooted plants

Hort NZ queries whether the measure of producing nursery stock "from seed or cuttings out of contact with the soil" is sufficient to mitigate against root-borne risk organisms.

MPI Response

Root-borne risk organisms, such as nematodes, are transmitted primarily through root-to-root contact and contact with soil or decaying plant matter. MPI considers the generic conditions listed under section 2.2.1.4 'Cleanliness' and; section 2.2.1.6a 'Pesticide treatment for Whole plants and Cuttings' (which requires rooted plants to have been raised in soil less media in pots out of contact with the soil, or chemical treatment with the nematicide 'Fenamiphos'); and section 2.2.1.3 'Measures for *Phellinus noxius*', will manage the risk of root-borne organisms.

3.2.2 Presence of Rose rosette virus (RRV) in New Zealand

NZPPI commented that Rose nursery producers have for many years observed and on occasion discussed the presence of witches' broom signs in Rosa multiflora stool beds and rootstock cuttings early in the growing season. MPI should determine if RRV is present in New Zealand before introducing the proposed measures for RRV.

MPI Response

Rose rosette virus (RRV) is not known to occur in New Zealand and MPI have not received any reports indicating its presence. Symptoms of RRV can often be confused with symptoms caused by glyphosphate damage, other viral complexes, or phytoplasmas. Mite damage is also known to result in symptoms of witches broom in other genera. RRV is only known to be present in USA and Canada, and *Rosa* nursery stock has not been imported from these countries.

MPI recommends calling 0800 80 9966 if exotic pests or diseases are observed. Samples can be submitted to the MPI Plant Health and Environment Laboratory for identification.

Additional MPI comment on virus presence in New Zealand:

Since MPI released the draft IHS for consultation in May 2016, the Raspberry strain of *Raspberry ringspot virus* (RpRSV) has been found present in New Zealand on lavender. If RpRSV [Raspberry strain] is detected on imported nursery stock in the future, no action will be taken.

However all other known strains of RpRSV - Cherry strain, Grapevine strain and English strain, will continue to be regulated. The conditions for RpRSV in the 'Inspection, Testing and Treatment Requirements for *Rosa*' nursery stock will be updated to list RpRSV (strains not present in New Zealand).

3.2.3 Fungicide treatment onshore

KVH commented that in principle, the IHS should require effective treatment offshore in order to "keep risk offshore", or at least be clear that treatment on arrival is a last resort whether effective treatment offshore is not an option.

Hort NZ commented that they do not support the proposal to allow on-arrival fungicide treatment, given the principle to manage risk offshore wherever possible, such as would be possible with pre-export treatments.

Hort NZ commented that they do not support remedial fungicide treatment on arrival should concerns exist about the offshore treatment, or post-treatment contamination/infection.

NZPPI commented that they support the proposal to allow on-arrival fungicide

MPI Response

Rosa whole plants and non-dormant cuttings must be treated with propiconazole prior to export as a prophylactic treatment against rust fungi belonging to the Pucciniales order. Due to the limited availability of propiconazole in countries from which the majority of *Rosa* nursery is sourced, the proposed change allows for exporting countries to identify and treat the non-dormant plants with an alternative systemic fungicide available in the exporting country.

It is preferable that treatment occurs offshore prior to export, however if the correct pre-export fungicide treatment has not been completed prior to export, section 2.3.2 'Treatment and testing of the consignment' of 155.02.06 'Importation of Nursery stock' standard allows treatment to occur on arrival by an MPI approved treatment supplier.

2.3.2 'Upon arrival and following inspection at the border, if any required treatment(s) or testing of the consignment has not been completed within the prescribed period, these measures may be completed in New Zealand where such services are available, and by prior arrangement with MPI. All testing and treatment in New Zealand must be completed in MPI-accredited facilities, accredited to standards 155.04.03: A standard for diagnostic facilities which undertake the identification of new organisms, excluding animal pathogens; and BMG-STD-TREAT: Approval of Suppliers Providing Treatment of Imported Risk Goods and Forestry/Plant Related Material for Export, respectively.'

Material may only be removed from a biosecurity control area to go to an approved treatment facility. Material will not be released from a biosecurity control area until all treatment requirements have been met, and risk mitigated.

3.2.4 Hazard organisms

Hort NZ seeks further discussion with MPI about the decision not to include the hazard organisms from Ref B, chapter 4 as risk organisms, notwithstanding the precautionary approach has been applied to one of these already (Xylella fastidiosa) due to the potential economic impact on wine grapes.

MPI response:

Very little is known about the other pathogens listed in Chapter 4 'Hazard organisms of unknown risk status' in the 'Pest Risk Analysis (PRA) for Rosa nursery stock' (2013) making it difficult to justify the inclusion of these as quarantine pests or applying measures. However these pathogens will be actively monitored through the MPI Emerging Risk system (ERS), so should further information become available, the pathogen will be reviewed again and measures prescribed if necessary.

MPI has taken a precautionary approach to include *Xylella fastidiosa* as a quarantine pest in the Rosa schedule because it has been assessed to be a very high impact pathogen for New Zealand.

3.2.5 Xylella fastidiosa

KVH commented on the lack of change in the measures for Xylella fastidiosa, and in particular why there are no specific measures for tissue cultures.

MPI response:

The conditions for *Xylella fastidiosa* in the Rosa nursery stock IHS are pre-existing and no changes or additional measures were proposed during this review. MPI are currently reviewing import requirements for all hosts of *X. fastidiosa* and measures are being considered for tissue cultures. Stakeholders will be informed of the outcome of this review in due course.

3.2.6 Tomato varamin virus

Hort NZ comments that Tomato Varamin virus (ToVV) (synonym: Tomato fruit yellow ring virus) is an example of hazard organisms not identified as a risk in Ref B, which does pose potential risk to commercial horticulture, in particular tomatoes.

MPI response:

Tomato varamin virus is present in Iran on tomato and Rosa, and in Kenya on tomato - neither of these countries are currently approved for the export of Rosa nursery stock to New Zealand. This is a relatively new virus and there was insufficient information to propose specific measures at this stage. We will continue to monitor this pathogen through MPI's ERS (EmergingRisks@mpi.govt.nz) for further developments, and will reassess any change in information or situation.

3.2.7 PEQ requirements (flowering in PEQ)

Hort NZ comments on the suitability for level 2 PEQ given the risk of virus transmission of Blackberry chlorotic ringspot virus and Raspberry ringspot virus may be capable of transmission by pollen.

MPI response:

The prescribed measures for each of these viruses requires for material to be sourced from a country free of the virus (certified by the NPPO of the exporting country on the phytosanitary certificate), or for testing while in PEQ. However, imported Rosa nursery stock will not be allowed to flower while in PEQ and it should be noted that it is a

requirement of the MPI facility standard 'Post entry Quarantine for Plants' section 4.3.2.10 'Plant Growing conditions' that:

'Plants must not be allowed to flower unless it is known that there are no pollen transmitted pests or diseases in the species being quarantined, or unless flowering is required to check for flower-specific symptoms.'

3.2.8 Length of time in PEQ

Hort NZ queries whether six months in PEQ is sufficient time to adequately allow expression of Phytoplasma symptoms or the titre (concentration of Phytoplasma in the plant tissues) to build up to a level where they can be detected by PCR.

MPI response:

Six months of active growth while in PEQ period is considered to be sufficient time for phytoplasmas to build to a level that can be detected by PCR. Six months active growth is the equivalent to a full spring and summer season, and plants will be tested for the presence of phytoplasmas towards the end of the summer (or summer-like conditions), the optimal conditions for phytoplasma testing by PCR.

3.2.9 Offshore testing

NZPPI requests that provision be made in the standard for those situations where tissue cultured plants (or other nursery stock germplasm) have been tested by breeders for the phytoplasmas of concern and are known to be free of those phytoplasmas.

MPI response:

MPI allows approved offshore facilities to complete certain tests under agreement. Should importers be interested in having an offshore facility approved for *Rosa* nursery stock, covering pre-export phytoplasma testing or other testing, they are welcome to discuss this further with MPI. This activity is cost-recovered.

4 Provisional import health standard schedule for Rosa nursery stock

Rosa

Note: The entry conditions in this schedule only apply to species in the Plants Biosecurity Index listed under Import Specifications for Nursery Stock as “see 155.02.06 under *Rosa*”, and are additional to those specified in sections 1, 2 and 3 of the import health standard.

1. Type of *Rosa* nursery stock approved for entry into New Zealand

Whole plants, cuttings (non-dormant and dormant cuttings), plants in tissue culture

2. Quarantine pests

Fungi	<i>Phellinus noxius</i> ; Pucciniales
Bacteria	<i>Xylella fastidiosa</i>
Viruses	<i>Blackberry chlorotic ringspot virus</i> ; <i>Raspberry ringspot virus</i> (strains not in New Zealand); <i>Rose rosette virus</i>
Phytoplasmas	‘ <i>Candidatus</i> Phytoplasma asteris’; ‘ <i>Candidatus</i> Phytoplasma aurantifolia’; ‘ <i>Candidatus</i> Phytoplasma mali’; ‘ <i>Candidatus</i> Phytoplasma prunorum’; ‘ <i>Candidatus</i> Phytoplasma rubi’

3. Approved Countries

Australia, Austria, Belgium, Denmark, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Japan, Luxembourg, The Netherlands, Norway, Portugal, Spain, Sweden, Switzerland, United Kingdom.

Entry Conditions: **Basic**; with variations and additional conditions as specified below:

A. For Whole Plants:

PEQ: Level 2

Minimum Period: 6 months

a. Conditions for *Xylella fastidiosa* (section 2.2.1.12)

b. Conditions for *Phellinus noxius* (section 2.2.1.13)

c. Conditions for viruses:

OPTION 1: Additional declaration:

“[Virus name] is absent/not known to occur in __ [name of country]__”

OR

OPTION 2: Pre-determined testing in PEQ; refer to “Inspection, Testing and Treatment Requirements for *Rosa*”

d. Conditions for phytoplasmas:

Pre-determined testing in PEQ; refer to “Inspection, Testing and Treatment Requirements for *Rosa*”

e. Conditions for Pucciniales:

OPTION 1: Additional declaration:

“The plants have been dipped in propiconazole at the rate of 5g a.i. per 10 litres of water”

OR

OPTION 2: For countries where propiconazole is not approved; additional declaration:

“The plants have been [dipped/sprayed until dripping] in [fungicide active ingredient]; a broad range systemic fungicide suitable for treating rust fungi from the Pucciniales order at the rate of [specify rate] at least 48 hours prior to shipment”

OR

OPTION 3: With prior arrangement with MPI, the plants may be dipped on arrival in New Zealand in propiconazole (5g a.i. per 10 litres of water); refer to section 2.3.2 “Treatment and Testing of the Consignment”.

B. For Non-dormant Cuttings:

PEQ: Level 2

Minimum Period: 6 months

a. Conditions for *Xylella fastidiosa* (section 2.2.1.12)

b. Conditions for viruses:

OPTION 1: Additional declaration:

“[Virus name] is absent/not known to occur in __ [name of country]__”

OR

OPTION 2: Pre-determined testing in PEQ; refer to “Inspection, Testing and Treatment Requirements for *Rosa*”

c. Conditions for phytoplasmas:

Pre-determined testing in PEQ; refer to “Inspection, Testing and Treatment Requirements for *Rosa*”

d. Conditions for Pucciniales:

OPTION 1: Additional declaration:

“The plants have been dipped in propiconazole at the rate of 5g a.i. per 10 litres of water”

OR

OPTION 2: For countries where propiconazole is not approved; additional declaration:

“The plants have been [dipped/sprayed until dripping] in [fungicide active ingredient]; a broad range systemic fungicide suitable for treating rust fungi from the Pucciniales order at the rate of [specify rate] at least 48 hours prior to shipment”

OR

OPTION 3: With prior arrangement with MPI, the plants may be dipped on arrival in New Zealand in propiconazole (5g a.i. per 10 litres of water); refer to section 2.3.2 “Treatment and Testing of the Consignment”.

C. For Dormant Cuttings:

PEQ: Level 2

Minimum Period: 6 months

a. Conditions for *Xylella fastidiosa* (section 2.2.1.12)

b. Conditions for viruses:

OPTION 1: Additional declaration:

“[Virus name] is absent/not known to occur in __ [name of country]__”

OR

OPTION 2: Pre-determined testing in PEQ; refer to “Inspection, Testing and Treatment Requirements for *Rosa*”

c. Conditions for phytoplasmas:

Pre-determined testing in PEQ; refer to “Inspection, Testing and Treatment Requirements for *Rosa*”

D. For Plants in Tissue Culture:

PEQ: Level 2

Minimum Period: 6 months

- a. Conditions for viruses:

OPTION 1: Additional declaration:

“[Virus name] is absent/not known to occur in __ [name of country]__”

OR

OPTION 2: Pre-determined testing in PEQ; refer to “Inspection, Testing and Treatment Requirements for *Rosa*”

- b. Conditions for phytoplasmas:

Pre-determined testing in PEQ; refer to “Inspection, Testing and Treatment Requirements for *Rosa*”

Inspection, Testing and Treatment Requirements for *Rosa*

ORGANISM	MPI ACCEPTABLE METHODS	Comments
Insects	Visual inspection AND approved insecticide treatments as described in section 2.2.1.6 of the Basic conditions	Applies to whole plants and cuttings only
Mites	Visual inspection AND approved miticide treatments as described in the section 2.2.1.6 of the Basic conditions	Applies to whole plants and cuttings only
Fungus		
<i>Phellinus noxius</i>	Refer to section 2.2.1.13 “Measures for <i>Phellinus noxius</i> ”	Applies to whole plants only
Pucciniales	Treatment; refer to part A and B of the <i>Rosa</i> schedule	Applies to whole plants and non-dormant cuttings only
Bacterium		
<i>Xylella fastidiosa</i>	Refer to section 2.2.1.12 “Measures for <i>Xylella fastidiosa</i> ”	Applies to whole plants and cuttings only. Testing requirements for <i>Xylella fastidiosa</i> are identified in section 2.2.1.12.
Virus		
<i>Blackberry chlorotic ringspot virus</i>	PCR	Applies to whole plants, cuttings, and tissue culture
<i>Raspberry ringspot virus</i> (strains not in New Zealand)	PCR	Applies to whole plants, cuttings, and tissue culture
<i>Rose rosette virus</i>	PCR	Applies to whole plants, cuttings, and tissue culture
Phytoplasmas	Nested or real-time PCR using universal phytoplasma primers	Applies to whole plants, cuttings, and tissue culture

Notes:

1. The **unit for testing** is defined in section 2.3.2.1.
2. **Sample collection:** Plants shall be sampled from at least two positions on every stem including a young, fully expanded leaf at the top of each stem and an older leaf from a midway position.
3. **Time of testing:** Virus testing must be carried out using the new season’s growth in the spring, or spring-like conditions. Bacteria and phytoplasmas testing must be carried out during late summer to early autumn, or during late summer-like conditions.

6 Appendix 1: Copies of Submissions

6.1 Richard Palmer, Horticulture New Zealand Incorporated (HortNZ)

PO Box 10232, The Terrace, Wellington, 6143
Level 4, Co-operative Bank House
20 Ballance Street, Wellington, 6011
Phone: +64 4 472 3795
Fax: +64 4 471 2861
Web: www.hortnz.co.nz
Email: info@hortnz.co.nz

27 June 2016

SUBMISSION ON THE RISK MANAGEMENT PROPOSAL FOR ROSE (*Rosa* spp.) NURSERY STOCK

Submitter: Horticulture New Zealand Incorporated
Submitted by: Richard Palmer, Biosecurity Manager
Contact Details: P O Box 10232, The Terrace, Wellington 6143, New Zealand
Ph +64 4 472 3795
Email Richard.palmer@hortnz.co.nz

References:

- A. MPI Risk Management Proposal; Rose (*Rosa* spp.) nursery stock from: Australia, Austria, Belgium, Denmark, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Japan, Luxembourg, The Netherlands, Norway, Portugal, Spain, Sweden, Switzerland, United Kingdom. MPI Discussion Paper 2016/06
- B. MPI Import Risk Assessment on Rosa Nursery Stock dated 2013
- C. MPI Standard 155.02.06, Importation of Nursery Stock dated May 2016

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 nearly \$3 billion in exports.
2. The industry employs over 50,000 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. 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. Effective biosecurity is a key part of industry risk management. 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 A, the RMP, identifies significant threat to a broad range of species in New Zealand from pathogens in *Rosa* spp. nursery stock, many of which are key commercial horticultural crops, including: grapes, onions, apple, potato, tomato, brassica, corn, carrots, citrus, stonefruit, berryfruit. HortNZ commends MPI for undertaking this review and identifying the risks posed by the pathogens noted in Ref A. HortNZ appreciates that there is limited information on many of the *Rosa* spp. nursery stock hazard organisms identified in Ref B, some of which are new to science.
6. Horticulture New Zealand:

- ☐ supports the proposal to amend the IHS to ensure the risk posed by the identified pathogens is managed
- ☐ does not support the proposal to allow on-arrival fungicide treatment, given the principle to manage risk offshore wherever possible, such as would be possible with pre-export treatments in this case.
- ☐ seeks further discussion with MPI about the decision not to include the hazard organisms from Ref B, chapter 4 as risk organisms, notwithstanding the precautionary principle has been applied to one of these already (*Xylella fastidiosa*) due to the potential economic impact on wine grapes.
- ☐ seeks a discussion with MPI on the potential risk posed by these pathogens on other pathways, in particular the cut flower pathway, and whether offshore testing for the risk pathogens is required before certification by the NPPO.

HAZARD AND RISK ORGANISMS OF ROSA NURSERY STOCK

7. Ref B, section 4.1, identified 51 organisms that present a hazard ("hazard organisms") on the *Rosa* spp. nursery stock pathway. Of these 29 were excluded, mostly due to presence in New Zealand, or lack of *Rosa* association. A further 17 were not considered due to insufficient information. Therefore only five hazard organisms are identified as actual "risk organisms". Of note two of the hazard organisms not considered a risk in Ref B have subsequently been carried forward into Ref A (*Ca. Phytoplasma prunorum* and *Xylella fastidiosa*).

8. Tomato Tospovirus (ToTV) (synonym: Tomato fruit yellow ring virus) is an example of one of the hazard organisms not identified as a risk in Ref B, which does pose potential risk to commercial horticulture, in particular tomatoes.

9. The hazard organisms are mentioned very briefly in Ref A, with just one paragraph (9) identifying that "due to limited information of the epidemiology or limited distribution (of) these pathogens, specific measures have not been proposed..." HortNZ encourages MPI to reconsider the status of these hazard organisms as further information becomes available. As Ref B notes; "If further information becomes available about any one of the following organisms ... then it may be necessary to conduct further risk assessment, which may alter the current status of the organism i.e. a hazard organism may become a risk organism."

10. HortNZ notes that *Raspberry ringspot virus* was added to Ref A from the emerging risk system, having not been considered in Ref B. This addition, by use of other MPI processes for risk management, is commended.

PROPOSED CHANGES TO IMPORT HEALTH STANDARD

11. Ref A proposes the following changes to the importation of *Rosa* nursery stock for the management of phytoplasmas - specifically *Candidatus Phytoplasma asteris*; *Ca. P. aurantifolia*; *Ca. P. prunorum*; and *Ca. P. rubi*:

- a. Level 2 Post Entry Quarantine (PEQ) for minimum growing period of six months (including tissue cultures)
- b. PCR test for all phytoplasmas (nested or real-time PCR using universal primers which is capable of detecting all phytoplasmas)

12. Ref A proposes the following changes to the importation of *Rosa* nursery stock for the management of the viruses – specifically *Blackberry chlorotic ringspot virus*, *Raspberry ringspot virus* and *Rose rosette virus*:

- a. Sourced from a pest free area (certified declaration by NPPO) **OR**
- b. PCR testing whilst in PEQ

13. Ref A proposes the following changes to the importation of *Rosa* nursery stock for the management of fungi – specifically rust fungi of the Pucciniales order:

- c. Pre-shipment treatment with an suitable broad range fungicide approved by the NPPO and certified as such **OR**
- d. On-arrival treatment with the fungicide propiconazole at an MPI approved treatment facility.

14. HortNZ supports the proposed IHS measures with the exception of allowing for the on-arrival treatment for fungi. The policy for risk management offshore does not support the on-arrival fungicide treatment, and HortNZ asserts that treatment must be undertaken offshore and supported by NPPO certification, and MPI's assurance regime. HortNZ does support remedial fungicide treatment on-arrival should concerns exist about the offshore treatment, or post-treatment contamination/infection.

LEVEL 2 PEQ REQUIREMENTS

15. HortNZ supports the intent for Level 2 Post Entry Quarantine (L2 PEQ) facility as the appropriate facility to prevent transmission of the risk phytoplasmas, given that transmission occurs by insect vector.

16. Likewise for viruses a L2 PEQ facility mitigates the risk of virus transmission which is mechanical (seed and graft), and nematodes. It is noted however that two of the risk viruses (*Blackberry chlorotic ringspot virus* and *Raspberry ringspot virus*) may be capable of transmission by pollen, however removal of flowers in PEQ will mitigate this risk.

17. HortNZ requests further information from, and discussion with, MPI on whether the six months' time in PEQ is sufficiently adequate to allow expression of Phytoplasma symptoms or for the titre (concentration of Phytoplasma in the plant tissues) to build up to a level where they can be detected by PCR.

RISK PATHOGENS ON OTHER PATHWAYS AND OTHER RISK PATHOGENS

18. As noted, HortNZ seeks a separate discussion with MPI about the risk posed by these risk pathogens on other pathways, in particular roses on the cut flower pathway. HortNZ understands, from discussions with MPI, that the risk from viruses is managed through the devitalisation of the plant to prevent propagation in NZ, which destroys the plant reproductive capability, and also mitigates the risk of virus transmission by limiting the plant hosting viability. Fungi are managed by visual inspection both pre-export and on-arrival. HortNZ welcomes further discussion on the residual risk posed by these pathogens, in particular those potentially vectored by pollen from cut flowers.

19. HortNZ is also cognisant of other risks posed by the introduction of bare-rooted plants in this nursery stock IHS, with roots harbouring other pathogens and nematodes. HortNZ requests the opportunity to discuss with MPI whether the current IHS (Ref C) measure of production "from seed or cuttings in soil-less rooting media in containers maintained out of contact with the soil" is sufficient to mitigate against root-borne risk organisms.

CONCLUSION

20. HortNZ supports the proposed changes to the IHS with the one exception - not supporting the general acceptance for on-arrival fungicide treatment.

21. HortNZ encourages MPI to actively review the hazard organism list when new information comes available, as has commendably occurred with *Raspberry ringspot virus* being added as a risk organism through the MPI emerging risk system.

22. HortNZ seeks a further discussion with MPI on the risks posed by these risk organisms on other pathways. HortNZ seeks to better understand the offshore testing requirements for pathogens (risk group 2) required for cut flower certification.

23. This submission is supported by Vegetables New Zealand Inc, Process Vegetables New Zealand, New Zealand Wine Growers Inc, Kiwifruit Vine Health, Tomatoes New Zealand Inc, New Zealand Citrus Growers Inc, and Summerfruit New Zealand.

24. HortNZ supports the submission made by Kiwifruit Vine Health.

25. HortNZ welcomes the opportunity to discuss the matters raised, together with other horticultural industry product groups. ENDS

6.2 Barry O'Neill, Kiwifruit Vine Health (KVH)

27 June 2016

plantimports@mpi.govt.nz
Ministry for Primary Industries
PO Box 2526
Wellington 6140

To whom it may concern

Re: Kiwifruit industry comments on MPI's Risk Management Proposal (RMP) for Rose (*Rosa* spp.) nursery stock from listed countries.

Thank you for the opportunity to make a submission on the above risk management proposal.

KVH supports the overall submission made by Horticulture New Zealand on behalf of the Horticulture Sector.

KVH submits in support of this RMP, drawing attention to the following:

1. We support the proposed changes to IHS requirements, including updated list of quarantine pests and in particular the strengthening of measures for phytoplasmas (increasing level and duration of PEQ to Level 2 for a minimum period of six months).
2. In relation to *Xylella fastidiosa* we note "these measures remain unchanged", including no specific measures for tissue culture imports. We seek to fully understand the extent to which tissue culture reduces or eliminates risk associated with *X. fastidiosa*, and would appreciate supporting technical information from MPI that covers this.
3. In relation to 'Proposed measures for fungi' we note the proposal to allow plant material that has not been "treated offshore" to be "treated on arrival". We note "diminishing approval of propiconazole in exporting countries" is the reason MPI gives for this. In principle, the IHS should require effective treatment offshore in order to "keep risk offshore", or at least be clear that treatment on arrival is a last resort where effective treatment offshore is not an option.

KVH commends MPI's action to updating this specific IHS and previously the wider *Standard 155.02.06 for Importation of Nursery Stock* to reflect emerging risks and new information - Earlier inclusion of measures for *Ceratocystis fimbriata* within 'basic conditions' of Standard 155.02.06. being another good example of this.

KVH welcomes opportunity to discuss any aspect of our submission with MPI, and we look forward to your careful consideration of these matters.

Yours sincerely,



Barry O'Neill
CE, Kiwifruit Vine Health

6.3 John Liddle/Ian Gear – Nursey Garden Industry New Zealand (NGINZ)

NGINZ submission on the: MINISTRY FOR PRIMARY INDUSTRIES RISK MANAGEMENT PROPOSAL FOR ROSE (*Rosa* spp.) NURSERY STOCK

June 2016

Introduction

1. The Risk Management Proposal for Rose Nursery Stock (RMP) identifies significant threats, from unwanted organisms in imported nursery stock (*Rosa* spp), many of which are key commercial horticultural crops contributing significantly to our internal food security and export earnings.

2. Nursery and Garden Industry New Zealand (NGINZ) has long recognised the potential threat posed by diseases on the imported nursery stock and imported produce pathways to New Zealand's horticulture industry.

3. This view is similarly shared by Horticulture New Zealand in its submission on the RMP to the Ministry for Primary Industries (MPI).

4. NGINZ substantially supports Horticulture New Zealand's submission.

NGINZ comment:

5. NGINZ wishes to compliment MPI on its efforts to improve clarity and consistency through the introduction of the Risk management proposal for rose nursery stock.

6. NGINZ supports the proposal to better manage risk to ensure the risks posed by the identified pathogens to the New Zealand horticulture industry are mitigated.

7. NGINZ supports the proposal to allow on-arrival fungicide treatment for the following reasons:

- a. Consignments of *Rosa* cultivars forwarded to New Zealand agents for trial are typically 10 – 50 buds per cultivar.
- b. The number of cultivars sent annually by breeders to their agents is typically within the range of 10-20 (often less) annually.
- c. Breeders may not have access to a broad spectrum fungicide such as propiconazole (or choose not to use) the treatment at the time of despatch.
- d. On occasion several breeders may club together to send consignments to New Zealand.
- e. In order to maintain our border protection NGINZ advocates the treatment of whole plant, dormant and non-dormant plants with a broad spectrum fungicide such as propiconazole on arrival.
- f. NGINZ will support a regime where-by all consignments of **all** rose plants and parts of rose plants (dormant and non-dormant) are treated on arrival even in the event where those consignments were treated by the consigning regulator.

8. Like Horticulture New Zealand NGINZ seeks a discussion with MPI on the potential risk posed by these pathogens on other pathways, in particular the cut flower, rosaceous and other fresh produce risk pathways.

9. NGINZ has previously commented on the draft import health standard (IHS) for 'Fresh Cut Flowers & Foliage' (November 2014).

10. NGINZ seeks to be assured that regulations provide appropriate protection for New Zealand from potential pests and the imported product pathways associated with the family *Rosaceae* and other risk products.

11. NGINZ observes that differences between the regulations applied to the import of nursery stock and those applied to cut flowers and foliage need to be aligned and where appropriate the gaps closed. Nursery stock in most cases requires a significant period in quarantine. Cut flowers which

are often similar plant material enter New Zealand with a minimum of treatment. Many cut flowers each year are disposed of into the household compost heap. Any pathogens, and potentially pests, introduced by this route are well placed to spread to susceptible garden plants in the surrounding gardens and would be well established before they come to the attention of authorities.

12. NGINZ has previously reported cut flowers are also known internationally by plantsmen and enthusiastic gardeners as a legal way to import new and interesting varieties. NGINZ considers that some of the flowers imported into New Zealand which claim to be devitalised are in fact able to be propagated. In 2008 the New Zealand flower growers procured and supplied a number of imported roses to Lyndale Nursery and Plant and Food Research. Using standard propagation, 80% of the product produced viable plants indicating that the plants were either not treated or treated insufficiently. NGINZ requests that MPI monitors closely devitalisation treatments and the risk assessment associated with key species such as roses.

Specific comment on the Summary of Risks

Phytoplasmas

13. NGINZ notes the need to introduce specific measures to manage the risk associated with *Candidatus* Phytoplasma asteris and Phytoplasma mali.

14. NGINZ also notes that the *Candidatus* Phytoplasma asteris is not reported from the United Kingdom and Phytoplasma mali has been eradicated from the UK.

15. A number of garden rose selections originate from breeders in the UK.

16. NGINZ notes the need to retain the measures to manage the risk associated with *Candidatus* Phytoplasma aurantifolia.

17. NGINZ notes the need to introduce specific measures to manage the risk associated with *Candidatus* Phytoplasma prunorum and Phytoplasma rubi.

Viruses

18. NGINZ notes the need to introduce specific measures to manage the risk associated with Blackberry chlorotic ringspot virus and Raspberry ringspot virus.

19. NGINZ notes the commentary regarding Rose rosette virus (RRV) and makes the following observations.

- a. Rose nursery producers have for many years observed and on occasion discussed the presence of witches' broom signs in *Rosa multiflora* stool beds and rootstock cuttings early in the growing season.
- b. Budded plants sometimes demonstrate similar symptoms when the scion bud begins moving in the spring.
- c. Similar symptoms occur with glyphosate damage.
- d. The issue is not considered to be a major concern.
- e. Plants afflicted in this way either die or are discarded.
- f. To the best of our knowledge no definitive testing has been done in New Zealand since the advent of PCR testing to determine if the RRV sequence is present.

Specific comment on the Summary of Risks

Proposed phytoplasma measures

20. NGINZ notes that MPI intends to increase the level of post entry quarantine and specific testing for phytoplasmas as, the introduction of the phytoplasmas: 'Ca. P. asteris', 'Ca. P. aurantifolia', 'Ca. P. mali', 'Ca. P. prunorum' and 'Ca. P. rubi' would have impacts greater than to just the rose industry.

21. NGINZ notes that MPI proposes that all of these phytoplasmas are included as regulated pests on the Rosa schedule, and that the following measures must be met prior to biosecurity clearance being given:

- a. Level two PEQ for a minimum growing period of 6 months

b. Nested or real-time PCR using universal primers.

22. NGINZ requests that provision be made in the standard for those situations where tissue cultured plants (or other nursery stock germ plasm) have been tested by breeders for the phytoplasmas of concern and are known to be free of those phytoplasmas.

Proposed virus measures

23. NGINZ requests that MPI determines if RRV is present in New Zealand before introducing the proposed measures for RRV.

Proposed fungi measures

24. NGINZ advocates that all whole rose plants and parts of rose plants (dormant and non-dormant) are treated on arrival.

A note of concern

25. NGINZ notes that as molecular technologies and methods are developed the ability to measure the presence of gene sequences is greatly improved. In this context NGINZ is concerned that the knowledge gained as such sequences are 'deep mined' does not automatically result in further unwarranted regulations being put in place. Appropriate levels of protection are required not 'absolute levels of protection'.

26. References:

MPI Risk Management Proposal; Rose (Rosa spp.) nursery stock from: Australia, Austria, Belgium, Denmark, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Japan, Luxembourg, The Netherlands, Norway, Portugal, Spain, Sweden, Switzerland, United Kingdom. MPI Discussion Paper 2016/06
MPI Import Risk Assessment on Rosa Nursery Stock (2013)
Horticulture New Zealand Submission: *The Risk Management Proposal for Rose (Rosa spp.) Nursery Stock.* (June 2016)
