

# Submission

## **DRAFT IMPORT HEALTH STANDARDS: PRUNUS PLANTS FOR PLANTING**

Submission to:  
Ministry for Primary Industries [plantimports@mpi.govt.nz](mailto:plantimports@mpi.govt.nz)  
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## Contact Details

David Rhodes  
Chief Executive  
Forest Owners Association  
Level 9, 93 The Terrace, Wellington  
[david.rhodes@nzfoa.org.nz](mailto:david.rhodes@nzfoa.org.nz)  
[www.nzfoa.org.nz](http://www.nzfoa.org.nz)

## Introduction - Forest Owners Association

The New Zealand Forest Owners Association Incorporated (FOA) is the representative membership body for the commercial plantation forest growing industry. FOA members are responsible for the management of approximately 1.2 million hectares of New Zealand's plantation forests and over 80% of the annual harvest.

In 2018, the forest growing sector was worth \$6.38 billion in export value and is a 12% share of rural land use.

The Forest Biosecurity Committee is a subcommittee of the FOA Executive Council and is Chaired by Dave Cormack. Members consist of key biosecurity personnel in large commercial forestry companies, the small-scale forest owners (representative from New Zealand Farm Forestry Association) and the Crown Research Institute, Scion.

The forestry sector recognises the potential for serious biosecurity risk associated with the import of biological material into New Zealand. A review of Import Health Standards completed by Scion for the industry in December 2016 identified the IHS for Nursery Stock as one that required further examination.

*“Out of a total of 342 import health standards 203 were retained for further assessment. Of these, 54 were judged as either needing, or possibly needing, further examination. Seven standards were considered to definitely warrant further consideration. They were 1. Nursery stock, 2. Seeds for sowing, 3. Poles, piles, rounds and sleepers, 4. Sawdust, wood chips and shavings, 5. Sawn wood, 6. Wood packaging and 7. Zoo red pandas.”*

The specific comment on the Nursery Stock IHS in the Scion report was:

*“The international movement of living plants represents a high biosecurity risk pathway (Brasier 2008), and it is not surprising that this standard is complex, comprehensive and undergoing regular revision for different plant genera and species. For instance, MPI lists amendments to nine schedules under this standard in their current work programme ([www.mpi.govt.nz/document-vault/2029](http://www.mpi.govt.nz/document-vault/2029)). The standard is flagged for this reason and for its potential importance to forest and other tree species. For instance, special import conditions apply to the schedules for several known plant hosts addressing the risks posed by *Phytophthora ramorum* (sudden oak death) and *Puccinia psidii* (myrtle rust). In the present overview this standard is highlighted as one which requires further detailed work to determine how well it addresses these and other forestry pests e.g. is treatment for plants that have been raised in soil sufficient to eliminate potential fungal or oomycete pathogens such as soil-borne *Phytophthora* species?”*

*A full review of this standard may entail a studied consideration of significant known pests from lists such as those of IUFRO (1963) and Hepting (1971), and their more modern equivalents, in order to relate known hosts to the plant species catalogued in this standard.*

*The lists in the appendices of Flux et al. (1993) will also be helpful. Such knowledge will assist in assessing if the biosecurity risk is adequately covered. This approach has its limitations, because new pest incursions are often not represented on international disease lists, or may not even be known to science (cf. *Phytophthora pluvialis*, the cause of red needle cast in *Pinus radiata*, and *Phaeocryptopus gaeumannii*, agent of Swiss needle cast in Douglas fir, both unknown when first found causing disease); and pests in one region may behave differently in another. It may also be time consuming and often inadequate or even misleading, if information about the listed pests is limited or unavailable. However, while it is understood that emphasis on particular pests may have less value than managing important pathways (Ridley et al. 2000; Ridley 2003; Brockerhoff and Bulman 2014; Liebhold et al. 2016; Ramsfield et al. 2016), certain key pests of significant international economic impact cannot be ignored, and in fact their risk analysis forms part of pathway management. Specific import conditions determined for particular plant species in different schedules vary depending on the risk assessed for particular anticipated pests. As with many things, it is necessary to achieve the right balance.”*

Further detailed work was undertaken by Scion with a subsequent report produced in December 2018. Both reports were sent to MPI for comment and to our knowledge this has still not been received.

The new Actinidia IHS and, when finalised, this draft Prunus IHS will replace what was covered in the Nursery stock IHS and is therefore highly relevant to forestry and other sectors.

We also note from the covering letter inviting comment on the draft Prunus IHS that the IHS has wider implications and could affect forestry in the future, i.e.,

*“The consultation relates to imports of Prunus plants for planting but has wider implications in terms of managing biosecurity risk from various bacterial, fungal and oomycete pests that could have negative impacts on many commercially grown crop species and/or native or introduced plants of environmental and cultural significance. This includes high risk pests such as *Ceratocystis* spp., *Phytophthora* spp. and *Xylella fastidiosa*.”*

The forestry sector does not currently import germplasm but likely will want to in the future. We recognise the Prunus IHS will likely have implications for the import of germplasm for other genera and therefore it is important that the IHS is as correct as possible and achieves a reasonable balance between trade (imports) and protection.

The Prunus IHS is a key tool to manage the risk of high profile pests such as *Xylella fastidiosa*, *Phytophthora ramorum*, and other serious pathogens that are spreading internationally. Because of this growing risk and the uncertainty associated with plant germplasm imports, forestry supports a conservative approach to the development of the Prunus IHS but would welcome changes as new knowledge comes to hand.

## Summary

We welcome any improvements in Import Health Standards that will provide greater protection and greater assurances to New Zealand's biosecurity and realise that these areas are very complicated and need considerable science investment. Forestry is supportive of setting phytosanitary measures for bacteria, fungi and oomycetes appropriate to their level of risk. New Zealand's appropriate level of protection (ALOP) must be consistently applied for organisms that have a similar level of risk, regardless of the class of the regulated pest.

## Comment on specific aspects of the Import Health Standard

From the covering letter, and covered in the draft Prunus IHS:

*"As part of the consultation MPI has proposed some new ways to help manage biosecurity risk from pests such as those listed above. This includes a proposal to grow plants under specific environmental conditions that will encourage the expression of disease symptoms when plants are being held in post entry quarantine on arrival in New Zealand (in the past this has not generally been required to manage risk from these types of pest)."*

Regarding the three options listed in the Risk Management Proposal:

### Option 1. Maintaining the status quo

The risk analysis paper suggests that the current system works, at least for Prunus, but we know from experience that potentially very serious pathogens, such as *Fusarium circinatum* have slipped through in the past and it was only through using a method that did not rely on visual inspection that they were detected before being released to the natural environment. In the *Fusarium circinatum* case the problem was with asymptomatic Douglas-fir material.

<https://www.nzffa.org.nz/farm-forestry-model/the-essentials/forest-health-pests-and-diseases/forestry-diseases/Pine-pitch-canker/Pitch-cankerFHnews137/>

It could be that visual inspections are completely ineffective because symptoms do not develop in containment. It would be important to compare this with the number of new pests detected on Prunus since 2004.

Therefore, Option 1 is not supported, and we seek improvements.

### Option 2: Applying specific environmental conditions in post entry quarantine

We consider that this option would be an improvement, but difficult to do for a range of pests and pathogens unless you put the plants under a range of conditions. For some pathogens it is difficult to get them to produce symptoms in artificial conditions.

### Option 3: maintaining the status quo with more comprehensive testing requirements and no requirement for plating on agar.

This would be an improvement. PCR testing could be targeted at different taxonomic levels e.g. Is there a *Phytophthora* present? Or Is there a specific species of *Phytophthora* present?

## Conclusion

This is an important standard to get as correct as possible, realising that amendments will be made as technology develops and new risks are uncovered. We suggest that a workshop of experts is convened to explore the options in more detail.

A handwritten signature in black ink, appearing to read 'DC', is positioned above the typed name.

Dave Cormack,  
Chair, FOA/FFA Forest Biosecurity Committee