FOREST OWNERS ASSOCIATION

27 November 2015

Submission on the "Draft Facility Standard for Post Entry Quarantine for Plants"

Background

1. The New Zealand Forest Owners Association (FOA) is the representative membership body for the commercial plantation forest growing industry.

2. 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.

3. FOA is submitting on behalf of its membership nationally.

Submission

A: Draft Facility Standard for PEQ

4. Nursery stock, live plants, etc. are one of the main pathways of concern to the biosecurity interests of the forest growing industry. FOA's primary is concern around the import of new pathogens, but we also want to stop the spread of existing pathogens from nurseries to plantation forests. There is considerable evidence that this has happened in the past.

5. FOA is very concerned that the focus of the standard is on "pests and diseases". While it is understood that this is common language in MPI, there are two issues with the focus on "disease":

    a) It implies that it is satisfactory to simply look for disease symptoms, rather than for disease organisms

    b) It ignores the fact that many organisms may be pathogenic to some species of plants and not to others, and specifically in this case, that imported nursery plants may be carrying pathogens of radiata pine and other plantation forestry species.

Level 9, 93 The Terrace, PO Box 10986
Wellington 6143, New Zealand
Tel: +64 4 4734769 Fax: +64 4 499 8893

6. The draft standard does not take into account that technology has changed considerably since the previous standard was written and that diagnostic tests are now available to enable rapid screening of imported plants for unwanted organisms. While molecular tests are now rapid and relatively inexpensive, plant tissue can also be plated out on media, including *Phytophthora*-selective media, to determine if potential pathogens are present. While this is a slower process than molecular testing, *Phytophthora* test kits are also available in which pine needles, for example, can be put into a pouch and a colour change indicates the presence of *Phytophthora*. The test kits can then be analysed (PCR) to determine the species of *Phytophthora* present.

7. FOA strongly supports the proposed Operational Requirements and is both surprised and concerned that some of these requirements are not already in place. This highlights the issue with the large number of IHS's and a lack of capability to review all existing standards that may be relevant to the forestry sector.

8. In particular, FOA strongly endorses the requirement to have Operating Manuals at all facilities and that the facilities are inspected by MPI at least once every 6 months.

9. FOA has concerns with regard to section **3.6 Inspecting Plants**. Inspecting plants for disease symptoms is not enough to ensure pathogens such as new species, or even strains, of *Phytophthora*, are not introduced into New Zealand. FOA is also concerned about cryptic insect pests such as aphids or psyllids. The plants found to be infected with *Fusarium circinatum* (cause of pitch canker) that were imported in 2003 did not have any disease symptoms. As outlined in paragraph 6 – new developments in technology enables inexpensive testing. FOA recommends all plant shipments are initially batch tested, reducing this over time to testing imports from those areas with known risk pathogens, such as *Phytophthora*.

10. Referring to the reporting of organisms, Section 3.7.1, FOA considers that MPI must recognise and take regard for the lack of incentive, and in fact considerable disincentive, for facility operators to report suspected unwanted organisms to MPI. FOA recommends the introduction of a facility standard that ensures independent third party audits are completed by an MPI-verified organisation, or by an MPI inspector. It is suggested this inspection could include molecular testing of plant material for potential disease-causing organisms.

11. Section 3.7.2 highlights the problems with the language used in the standard discussed in point 9 above, i.e., "If a pest or disease is found, or if pest or disease symptoms are detected". FOA considers that it is the "disease-causing organisms" that need to be found. In many cases pathogenic organisms may be present but not causing identifiable disease symptoms. The standard needs

to reflect this risk and put steps in place to detect unwanted organisms in asymptomatic plants.

12. Section 4.1.2.6, and other sections, discuss treatments for fungi and insects. Facility operators should be made aware that there are many other types of organisms including *Phytophthora*, bacteria, viruses, etc. that can cause diseases. Perhaps somewhere in the standard these could be explained and that the term "fungus" is used in a generic sense. "Pathogen" would be a better term.

13. Section 4.2 – Level 2 – FOA commends the requirement for stronger material to avoid rips and potential pathogen and insect escapes. FOA strongly supports this proposal, however would like to register its concern that facility biosecurity has been compromised in the past due to tears in the polythene cover.

B: Draft guidance document – relevant to the PEQ Facility Standard

14. Section 3.6 covers plant inspection. As discussed above, FOA does not consider that only inspecting for disease symptoms is adequate in order to identify biosecurity risks.

15. It is recommended that Section 3.7.2, as well as others, are rewritten with the understanding that it is disease-causing organisms that should be looked for, not only the diseases, for example references to "diseases of NZ origin" should be "pathogens" or "disease-causing organisms of NZ origin".

16. Section 4.4 Level 3B – FOA considers that this does call for HEPA filtration, however notes that it appears to be only for plant imports where the risks are known. It should be noted that there is considerable concern regarding the possible importation of plant material into Level 2 or Level 3A facilities where the plants may be harbouring a foliar *Phytophthora*, such as *P. ramorum*, but HEPA filtration is not required. While it is realised that it is difficult for MPI to manage for unknown risk, FOA considers that it is important for MPI to understand the potential risks of foliar *Phytophthora* species, sporulating and spores escaping through unfiltered PEQ facilities.

Concluding remarks

17. In summary FOA agrees with the proposal to tighten the standard for PEQ facilities.

18. FOA also acknowledges that, to a large extent, MPI will be relying on the specific IHS for the plant species being imported and not just on the PEQ facility standard to reduce risk. However, in the case of asymptomatic pathogens (e.g., *Phytophthora*, fungi, as well as viruses and bacteria etc.), there is a considerable risk that the IHS updates will not keep up with pathogen evolution and ability to move (or at least be detected) on new hosts.

Yours sincerely

David Rhodes
Chief Executive