

SUBMISSION

SUBMISSION ON

Amendments to the Import Health Standard for Sea Containers from All Countries [SEACO]

10 June 2022

To: The Ministry for Primary Industries

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OVERVIEW

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Our submission

Horticulture New Zealand (HortNZ) thanks the Ministry for Primary Industries (MPI) for the opportunity to submit on the draft amendments to the Import Health Standard for Sea Containers from All Countries (SEACO) and welcomes any opportunity to continue to work with MPI and to discuss our submission.

This submission is being made by Horticulture New Zealand and is supported by the following organisations:

- Citrus New Zealand
- Katikati Fruitgrowers Association
- New Zealand Apples and Pears Incorporated
- New Zealand Asparagus Council
- New Zealand Avocado
- Summerfruit New Zealand
- Strawberry Growers New Zealand
- Tomatoes New Zealand Incorporated
- Vegetables New Zealand Incorporated

HortNZ's Role

Background to HortNZ

HortNZ represents the interests of 6000 commercial fruit and vegetable growers located across the whole of New Zealand. Our members farm 80,000ha of land, grow around 100 different types of fruit and vegetables, and provide employment for over 60,000 workers.

Having a thriving horticulture sector brings many important benefits to this country. Besides the sizeable and increasing economic benefits, a successful rural economy supports local communities to prosper and strengthens rural wellbeing. Horticulture also helps to shape the country with many of New Zealand's landscapes defined by food production. Further to this, supporting our horticultural industries to prosper also protects food security for all New Zealanders, which is becoming increasingly important at this time of global challenges and change.

HortNZ's purpose is to create an enduring environment where growers can thrive. This is done through enabling, promoting and advocating for growers in New Zealand.



HortNZ's Biosecurity Involvement

On behalf of its grower members, HortNZ takes a significant interest in biosecurity regulations, planning and operations. As well as advocating on behalf of growers in discussions with MPI and other regulators, HortNZ and other industry groups also work to raise the awareness of our fruit and vegetable grower members about the roles they themselves can play in helping to keep their farms, orchards, and wider New Zealand protected from unwanted pests and diseases.



Body of Submission

1. Inclusion of “clean on arrival”

HortNZ supports the inclusion of “on-arrival” to the general biosecurity requirements listed in section 1.4. as this helps to clarify that soiling of containers on route to New Zealand presents an unacceptable biosecurity risk.

2. Transshipping through New Zealand

HortNZ supports the inclusion of a general requirement for all containers that are being transshipped through New Zealand to arrive clean and free from contaminants and regulated pests.

However, HortNZ suggests that the wording in section 1.4(2) of the draft IHS “before being exported to another country without requiring biosecurity clearance” is shortened to “before being exported to another country”. Irrespective of the presence or absence of biosecurity requirements at the final destination, containers being transshipped through New Zealand should arrive here clean and free from contaminants and pests.

3. Update of the quarantine declaration

No details appear to have been provided about the changes that have been made to the quarantine declaration. Comparing the two versions suggests that the changes are simply alterations in wording rather than substantive changes. If HortNZ has not understood this correctly, then please clarify the changes that have been made.

4. Requirements for Italy between 1 September and 30 April of every year

As the risk of BMSB entering New Zealand from Italy remains high, HortNZ supports the transformation of the 2018 emergency treatment measures for Italy into a permanent requirement. However, we have a number of questions and comments related to this aspect of the draft SEACO IHS.

4.1. Is Italy truly a standalone case and will it always remain so?

Is there sufficient evidence that Italy is truly the only country from which containers should be routinely treated before arriving in New Zealand, either now or in the future? In contrast, the IHS for Vehicles, Machinery & Parts lists 37 risk countries in a Schedule. Could a similar approach be taken here, where the body of the IHS talks

about the requirements from countries that are listed in a Schedule, rather than specifically talking about requirements for containers from Italy alone? This would allow for the inclusion of other countries more easily, should that ever be necessary.

4.2. Are robust, non-subjective, and unbiased processes in place to monitor the levels of relative risk of BMSB arriving in containers from Italy and other countries?

A number of statements made about the Italian situation in the risk management proposal document appear to be valid and supportive of these treatment measures remaining in place for Italy. HortNZ would like to test some of the comparative assumptions that are being indirectly made about other countries with populations of BMSB.

Bullet point 23 in the proposal document states that BMSB are detected on a wider range of goods imported from Italy compared to other countries. Has this assertion been tested statistically?

The figures provided in MPI's May 2022 BMSB Pest Report suggest that there's been 131% increase in the live BMSB finds during this recent BMSB season compared to the previous season. The same report also shows that more live BMSB interceptions have been made on goods from China and the USA, than Italy. Furthermore, few live interceptions have been linked to vehicles this season and considerably more have been linked to "non-risk goods". While these figures may provide indirect evidence that the treatment regimens being applied to containers from Italy and to imported vehicles are working, could these figures also indicate that the risk profile for live BMSB entering New Zealand may be changing too? HortNZ is keen to understand whether MPI investigates such matters using mathematically sound, year-by-year trend analyses of the data it holds.

4.3. The level of documentation about BMSB in a country may not be equal to the actual level of risk

Bullet point 20 in the SEACO proposal suggests that higher levels of documentation of BMSB in Italy demonstrates that the population there is still growing. The counterfactual of this is the assumption that a lack of reporting from other countries indicates that BMSB populations are not growing there. In reality there is likely to be some degree of reporting bias here, Italy may be more actively looking for and reporting BMSB than some other countries that feature in Schedule 3 of the VMP IHS. Is ongoing work being conducted within MPI to actively and systematically monitor BMSB populations in other, more recently infested, countries without waiting for official reports to be released or peer-reviewed research to be published? Conducting systematic and ongoing monitoring of MPI data and other information MPI is privy to could detect subtle signals of changing risk profiles for BMSB and other priority pests and diseases.

4.4. Should quarantine declarations accompany commodities from Italy as well as containers?

The current proposal to apply management measures at the level of the container rather than the cargo appears to leave one aspect of the risk posed by commodities from Italy unmanaged.

What would be the consequences of containers from Italy being devanned and repacked into different containers at an international transshipment hub? The current proposal is for containers leaving Italy and coming to New Zealand to be treated and for the goods they hold to be treated too. Is there a loophole in this proposal whereby goods from Italy that were repacked into different containers at a transshipment hub may arrive in New Zealand without being treated before leaving Italy and without being identified at our border as untreated goods from Italy?

Does MPI know what proportion of containers arriving in New Zealand have been repacked at transshipment hubs? Are the Border teams able to detect this sort of activity and adjust the level of inspection accordingly?

HortNZ understands the reasoning provided in the proposal to keep the Italian requirements within the general SEACO IHS. It is important that the users of IHSs are able to quickly and easily find, understand and comply with New Zealand's biosecurity requirements. However, with MPI's own BMSB reports highlighting that a relatively large proportion of border interceptions of BMSB occur on "non-risk goods" and that the origins of many of these goods are unknown, should more serious consideration be given to the development of a separate IHS for commodities from Italy rather than the containers alone?

5. Inclusion of sensitive goods as a schedule

HortNZ supports the inclusion of the list of approved sensitive goods within the IHS itself rather than directing readers to a list on a website. Making sure the IHS is a one-stop shop for importers should support them to comply with the regulations.

6. General comments

HortNZ supports the recent changes that have been made to the formatting of IHSs. In general, these new formats are much cleaner to look at and easier to digest, navigate and understand.

Concluding Summary

In summary, HortNZ supports the permanent inclusion of the treatment of containers coming to New Zealand from Italy in the SEACO IHS.

However, HortNZ requests that MPI:

- Makes some minor adjustments to the wording in the IHS so that it is completely clear that all shipping containers being transshipped through New Zealand have to arrive here clean and uncontaminated regardless of the biosecurity requirements of their final destination;
- Ensures that the risks of BMSB arriving on Italian goods that have been repacked at international transshipment hubs are adequately managed, which may require a commodity-based IHS to be developed for Italian goods;
- Considers not highlighting Italy as an individual case in the body of the IHS, but instead includes a list of risk countries in a Schedule so that compulsory treatments of containers from other countries can be added easily, if required;
- Ensures that it constantly checks its assumptions about risks in a systematic, unbiased, robust, evidence-based way that would stand up to scientific scrutiny;
- Takes a continuous improvement approach to enhancing its foresight technologies, processes and capabilities in order to keep ahead of changing risk profiles.

HortNZ would also like to thank MPI for their constant efforts to keep BMSB and other priority pests and diseases out of New Zealand. It is not easy work, actual levels of risk are difficult to assess, and there is a balance to be found between over and under regulating importation pathways. It is likely, BMSB would already be in the country if it was not for MPI's hard work. HortNZ would like to acknowledge this mahi and encourage MPI to keep modernising the biosecurity system so that New Zealand has the ability to continue to stay safe in a rapidly changing world.