

SUBMISSION ON ACTARA® REASSESSMENT

20 January 2023

To: Environmental Protection Authority

Name of Submitter: Horticulture New Zealand

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Our submission

Horticulture New Zealand (HortNZ) thanks the Environmental Protection Authority (EPA) for the opportunity to submit on the proposed reassessment of Actara®. Our submission provides an end-user perspective.

The horticulture sector welcomes any opportunity to continue to engage with the EPA and to discuss this submission. HortNZ would like to be heard in support of our submission if there is a hearing.

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

- New Zealand Apples & Pears Incorporated
- Summerfruit New Zealand
- Tomatoes New Zealand

HortNZ's Role

Background to HortNZ

Horticulture New Zealand (HortNZ) advocates for and represents the interests of approximately 5,500 commercial fruit and vegetable growers in New Zealand. These growers supply fresh and processed fruit and vegetables to domestic consumers, as well as exporting crops to discerning consumers overseas. The horticulture industry is valued at \$7b with \$4.6b in exports annually.

The national and regional economic benefits associated with horticultural production are important. The industry employs more than 40,000 people and provides critical regional development opportunities in Northland, Auckland, Bay of Plenty, Waikato, Hawke's Bay, Gisborne, Manawatu, Marlborough, Nelson, Canterbury and Central Otago. The rural economy supports local communities and primary production defines much of the rural landscape.

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

Submission

The threat

1. The brown-marmorated stink bug (*Halyomorpha halys*) (BMSB) is a highly invasive polyphagous insect with a host range of over 300 plant species, including many of horticultural significance including pip fruit, grapes, stone fruit, berries, and a range of vegetables (Haye et al. 2015; Kriticos et al. 2017; Macavei et al. 2015). Adult and nymph BMSB damage host fruits by inserting their proboscis into the plant's tissues, causing necrotic lesions, and deforming the fruit (Macavei et al. 2015).
2. BMSB is also considered to be a significant social nuisance pest. Large numbers of BMSB individuals can be found overseas aggregating in homes, equipment, and belongings during their overwintering life stage (Haye et al. 2015; Maistrello et al. 2016; Maistrello et al. 2018).
3. A strong biosecurity system must include the ability to use post-border tools in the event of an incursion. This is critical to ensuring New Zealand's horticultural and wider economy is protected from unwanted exotic pests such as BMSB.

Readiness efforts

4. The severity of the risk that BMSB poses led to the creation and signing of the BMSB Operational Agreement (BMSB OA) in 2017. The Operational Agreement is a formal partnership between industry and government to undertake BMSB readiness and response activities. The BMSB OA established the BMSB Council to oversee achievement of the outcomes sought, which are as follows:
 - Maintaining and enhancing on-going public, importer, and tourist awareness campaigns
 - Successfully and rapidly detecting BMSB post border, eradicating any population(s) before BMSB can establish, and reducing the spread and establishment potential of any populations detected
 - Continuing to develop and improve readiness and response plans, including targeted research and development activities that will measurably improve the ability to respond to a BMSB incursion
 - Planning to reduce the impact of a BMSB incursion on production, processing, and sales
 - Developing transition plans and funding arrangements for long-term management of BMSB
 - Enhancing the integrity and effectiveness of New Zealand's wider biosecurity system, and enhancing the social license for BMSB activities

5. The existence of the Government Industry Agreement for BMSB and the readiness efforts undertaken by this group to date highlight the level of concern about the threat BMSB poses to our environment, productive systems, and way of life.

Tools

6. The timeframe for mounting an effective response to a biosecurity incursion, including BMSB is short. Time is of the essence, as the more time that passes, the more opportunity for reproduction and spread to occur. New Zealand is faced with a lack of effective tools for BMSB that would be available for immediate deployment in the event of an incursion.
7. Evidence from scientific literature demonstrates that Actara's active ingredient, thiamethoxam, is efficacious against BMSB (Alford et al. 2020; Aigner et al. 2015; Leskey et al. 2013). Given the severity of risk posed by BMSB, Actara® has been identified as an essential biosecurity tool in New Zealand's preparedness toolbox for responding to an incursion of BMSB.

Comments on the consultation

8. It is essential that New Zealand has access to Actara® and that the controls do not hinder biosecurity efforts to respond to BMSB which poses a significant national risk.
9. HortNZ strongly supports the reassessment application of Actara® and the proposed changes to controls which:
 - increase the maximum number of applications from four to 19 within any one target area per year
 - an exemption from a control prohibiting the application of Actara® where bees are foraging or on plants that are in flower or likely to flower.
10. HortNZ believes that it is critical that MPI can apply this tool in a targeted area in a way that maximises the chance of rapidly controlling BMSB. This may require multiple applications, and application on plants that are flowering. Timely, localised use of this tool may prevent BMSB from establishing, meaning we could avoid long-term use of the insecticides necessary to keep population numbers in check, as experienced overseas.
11. The application is for use by MPI only and for a very specific situation. If BMSB does not arrive in New Zealand, then any risk associated with the use of Actara® is negligible as it will not be used.
12. HortNZ believes the benefits of amending the two controls of Actara® outweigh the perceived risks. The proposed changes will provide greater capacity for biosecurity officials to carry out pest management in the event of a biosecurity response to protect our environment, productive systems, and way of life from the significant impacts of BMSB.

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