

SUBMISSION ON

Draft International Plant Protection Convention Standards

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To: The Ministry for Primary Industries (MPI)

Name of Submitter: Horticulture New Zealand

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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 country consultation for the International Plant Protection Convention and welcomes any opportunity to continue to work with MPI and to discuss our submission.

The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

HortNZ's Role

Background to HortNZ

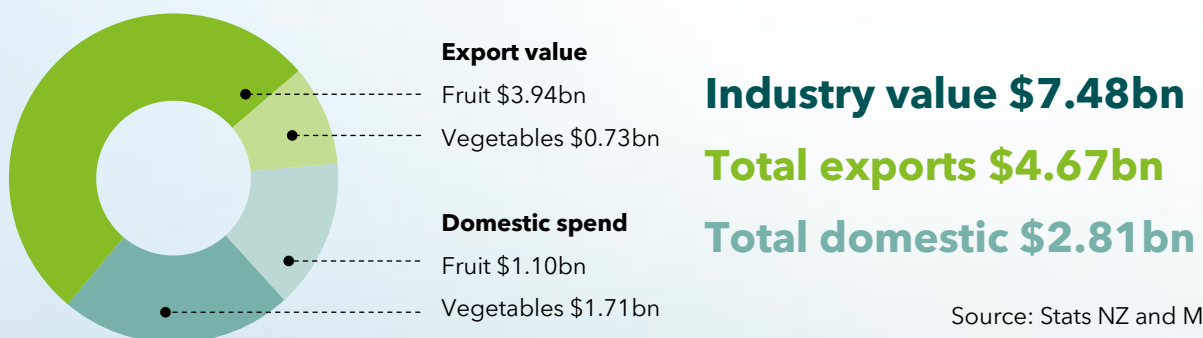
HortNZ represents the interests of approximately 4,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

There are approximately 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain, and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

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



Submission

1. International Plant Protection Standards

1.1. Overall comment

HortNZ welcomes the opportunity from MPI to comment on the draft International Standards for Phytosanitary Measures being consulted on by the International Plant Protection Convention. Generally, HortNZ supports harmonisation of international standards based on an evidence-based framework.

We do not have extensive comments but would ask to be kept updated as this work progresses.

We have draft International Standards relevant to the horticulture industry, not all draft standards. Our comments are outlined below, and where we have specific comments on a document these are tracked as changes to the document itself, as requested.

1.1.1. DRAFT SPECIFICATION: ANNEX REMOTE AUDITS TO IPSM 47

HortNZ supports the draft standard being prepared.

However as noted in the document, the work should review current best practices, examples and approaches to ensure the advantages as well as limitations of using remote audits are identified. This includes consideration of risk being appropriately managed, as remote audit is not suitable for some high risker products and activities.

Hort NZ overall supports harmonisation of international standards, but our policy position is that industry standards should be recognised as meeting regulatory requirements where they meet all the required food safety outcomes (and in most cases - exceed requirements). Therefore, the guidance should not specifically exclude the possibility of industry programmes being used or recognised as part of the regulatory and certification system.

NZGAP is the horticulture industry's assurance scheme. NZGAP certification covers food safety, environmental practice and social practice. It also ensures growers meet all requirements for horticulture growers under the Food Act 2014. For NZGAP, the three types of audit currently are:

- on-site
- blended audit (record checks remotely)
- fully remote.

NZGAP allows fully remote audits only for crisis response - i.e. they are temporarily allowed in emergency situations only (such as a pandemic, natural disasters) where a physical onsite audit is unable to take place due to restrictions for a country or region, to complete certification. This is in alignment with international GAP requirements. Remote

audits can utilise a combination of techniques such as video streaming and document sharing.

Having remote audit guidance will be valuable, particularly around the identification of activities that could be undertaken remotely. For example, it would be useful under GAP to have this option for closing out corrective actions, or supplementary 'quick check' assessments; as well as guidance on timeframes allowed for between on-site and off-site audits.

1.1.2. DRAFT SPECIFICATION REVISION OF IPSPM 12: PHYTOSANITARY CERTIFICATES

HortNZ notes that this is a NZ developed revision.

HortNZ has no comment on this draft annex but will be interested in this work as it progresses as our horticulture exporters may ultimately be subject to any requirements, if adopted.

1.1.3. DRAFT SPECIFICATION REVISION OF IPSPM 23: GUIDELINES FOR INSPECTION

HortNZ support the revision of IPSPM 23: Guidelines for inspection, given it has not been reviewed since its adoption in 2005.

1.1.4. DRAFT SPECIFICATION REVISION OF IPSPM 23: GUIDELINES FOR INSPECTION: FIELD INSPECTION

HortNZ supports the Draft annex to IPSPM 23: Guidelines for inspections on field inspection.

However, we consider field inspections as a critical component of other phytosanitary measures such as a systems approach, or in combination with another phytosanitary measure to detect or manage pests and diseases such as IPSPM 6: Guidelines for surveillance, not at as stand-alone phytosanitary measure.

1.1.5. DRAFT SPECIFICATION REVISION OF IPSPM 26: ESTABLISHMENT AND MAINTENANCE OF PEST FREE AREAS FOR TEPHRITID FRUIT FLIES

HortNZ notes that this is a New Zealand-led draft standard under review for second consultation.

HortNZ supports the draft standard. Overall, we agree with the requirements and guidance provided in this standard when establishing and maintaining a pest free area for economically important fruit fly species (*Tephritidae*).

However, we would like to see more specificity where possible, as indicated in the table below.

Additions are indicated by bolded underline, and deletions by strikethrough text.

Provision	Reason	Decision sought
[58] GENERAL REQUIREMENTS - 3. Review activities	Seeking more specificity in how regularly an FF-PFA maintenance program should be reviewed	[68] Once the FF-PFA is established, including the administrative activities, the performance of the FF-PFA maintenance programme should be regularly reviewed by the NPPO, <u>no less than annually</u> , to verify correct implementation of the maintenance programme.
[73] SPECIFIC REQUIREMENTS - 5.1 Surveillance for the establishment of the fruit fly pest free area	Seeking more specificity on the minimum duration of a surveillance period.	[87] When specific surveillance is used during the establishment of the FF-PFA, it should be undertaken for a <u>minimum period of 8 generations of the target fruit fly and</u> determined by:
[156] 7.2 Reinstatement	Seeking a more defined interpretation of a sufficient period of absence of a target fruit prior to reinstate the FF-PFA status	[160] To provide confidence that the target fruit fly is not present in the area, the reinstatement of the FF-PFA designation should occur only after a sufficient period <u>of no less than four generations of the target fruit fly under the area-specific climate conditions</u> has elapsed without evidence of a breeding population.
[263] ANNEX 3: Control measures when a breeding population is detected within a fruit fly pest free area - 1. Initiation of an eradication area	Seeking more clarity on the reasoning and duration on when to revoke a suspension of a FF-PFA.	[266] The eradication area should be based on a technical evaluation. The designation of the affected area should be suspended <u>until a successful eradication has been demonstrated</u> . If control measures cannot be applied to initiate an eradication area, then the designation for the FF-PFA should be withdrawn in accordance with this standard.