

**REVIEW OF SUBMISSIONS ON PROPOSED
AMENDMENT TO THE IMPORT HEALTH
STANDARD FOR COCO PEAT AND COIR FIBRE
PRODUCTS**

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INTRODUCTION

A revised import health standard (IHS) and discussion of the proposed changes for Coco peat and Coir fibre products was notified for public consultation on the MAF Biosecurity New Zealand website www.biosecurity.govt.nz on the 27 January 2009.

A total of 6 submissions from the consultation period were received.

Submitters	Date Received
Greg Goff (Agrocoir)	29/1/2009
Garry Clark (Pacific Wide (NZ) Ltd)	2/2/2009
Ken Robertson (Horticulture New Zealand)	12/2/2009
Gnanavel Arumugam	16/2/2009
Phillip Bell (Department of Conservation)	16/2/2009
Alan McLean (Grower Technology Ltd)	17/2/2009

This document provides a summary of the submissions and correspondence that were received for the proposed amendment of the import health standard, and how these have been addressed by the Ministry of Agriculture and Forestry Biosecurity New Zealand (MAFBNZ). Comments from submitters are reproduced in normal text and the MAFBNZ responses are recorded in *italics*.

If you wish to see any of the full submissions, please contact Shane Olsen, Border Standards, MAF Biosecurity New Zealand; email: shane.olsen@maf.govt.nz or phone (04) 894 0460.

SUBMISSIONS

1. Greg Goff (Agrocoir)

1.1 We feel the proposed amendment is fair and complete and stand ready in compliance.

MAFBNZ acknowledges your understanding of the amendments and willingness to comply.

2. Garry Clark (Pacific Wide)

2.1 Pacific Wide (NZ) Ltd. wish to acknowledge we have viewed the above proposal and discussion document and wish to advise we fully support the proposed changes. The past year has been a difficult one for all but we would like to commend MAFBNZ for their proactive approach to getting the standard to a point where for most it gives them some certainty for the future.

MAFBNZ appreciates your reply and support of efforts to gain information and gradually improve import requirements.

3. Ken Robertson (Horticulture New Zealand)

3.1 The Fresh Tomato and Fresh Vegetable Product Groups of Horticulture NZ, which represent the interests of our 425 commercial greenhouse vegetable growers, support the proposed changes to the Import Health Standard for Coco Peat and Coir Fibre Products. In particular the change applying to the use of these products in hydroponic (soil-less media) greenhouses will be beneficial to our members. I look forward to receiving further results of the seed germination trials and possible further changes to the IHS in the future as the results of this research becomes clearer.

As information builds, MAFBNZ considers these changes will be reviewed further over time with a move to a simpler IHS.

4. Gnanavel Arumugam

4.1 Treatment with ethylene oxide is not done in India. For consignments to Australia and some other countries they use methyl bromide at 80gms for 48 hrs at 26 to 28 degrees Celsius. I hope usage of methyl bromide is an acceptable treatment for NZ also. Currently we do autoclaving at the rates accepted by MAFBNZ. We follow this processing for the products supplied to NZ. It will not be possible for the Plant Quarantine Department of India to certify the heat treatment given to the material as the place of production of the goods is very far away from the Port & the Plant Quarantine Office.

Methyl Bromide is not accepted by MAFBNZ as a treatment for rendering seeds non viable. Some exporters may choose to use it in case of storage pests associated with transport, but this is not a requirement. The option for ethylene oxide treatment is provided in case there is a situation where it can be used.

MAFBNZ is conscious of your situation and the fact that it will not be possible to have your steam sterilization process stated by the Indian NPPO as a phytosanitary certificate additional declaration. We have decided to amend the proposed standard to allow manufacturer's certificates to accompany consignments from suppliers who use steam at appropriate rates combined with good handling practices in a process approved by MAFBNZ. These consignments will be subject to a random periodic grow out test monitor by MAFBNZ on an annual basis. No consignment will be held pending result of this audit test.

5. Phillip Bell (Department of Conservation)

5.1 Option E allows for the 'grow out' test to take place in New Zealand, from a sample taken by a MAFBNZ inspector. Where will these grow out tests be carried out? And by whom? The accompanying discussion document does not explain this part of the process. The Department would expect that all grow out tests in NZ will be conducted under strict containment.

The grow out tests to take place in New Zealand will be carried out by AsureQuality at Lincoln.

5.2 Section 5 (Page 10) states "If there are multiple interceptions or post-border reports of seedlings from a particular importer or supplier...", we question what the interceptions are of? Is that only seedlings or does it cover interceptions of any risk matter (insects, seeds, animal matter, etc)? In addition to the above point, we question the meaning of multiple? The Department considers it would be beneficial to importers and suppliers if a figure, such as "3 in a 12 month period", was included in brackets following the word 'multiple'.

The interceptions referred to here are of seeds. The clause will be amended to read "if there are more than 2 seedling interceptions or post border reports of exotic weeds from a particular importer or supplier in a 12 month period..."

6. Alan McLean (Grower Technology Ltd)

6.1 Heat treatment has proven problematic. Not only is it expensive but in some instances the combination of heat and humidity have somehow combined to wreck the physical structure of the coir.

MAFBNZ has received mixed reports about the effects of heat treatment but accepts that it can be damaging.

6.2 Sri Lankan authorities have taken time to get the pre-germination in place. Initially there was a lot of concern as to what they were supposed to do. They seem to be getting this under control but the whole process still takes a long time. Initially 3 weeks was indicated. For our last container the report was accessible in 4 weeks and 3 days.

Importers should expect the testing could take 4 to 5 weeks including sampling.

6.3 The logistics of co-ordinating the whole process of pre-germination, the phytosanitary certificate, and meeting the delivery requirements of our customers has proven difficult. There is tension between working through the requirements under the existing IHS and trying to operate commercially in the market place.

MAFBNZ is aware of these difficulties with this level of monitoring.

6.4 Implementing the new IHS has proved expensive - not only through lost orders due to time of importation but also through secondary things like heat treatment, additional fumigation charges and late return of containers.

MAFBNZ is hopeful that some of these expenses will be minimised over time.

6.5 Some clarification and an allowance for small amounts of contamination should be allowed.

Tolerance for soil. NPPOs operate to an international standard for issuance of a phytosanitary certificate. Should any contaminants be found prior to issuance they must uphold their agreement to these regulations and not issue the certificate. MAFBNZ does allow a tolerance of greater than 0.1% by weight of soil particles for soil in seed for sowing. However, comparison with requirements for coco peat for a few other countries, shows that at least some others appear to successfully operate to a zero tolerance. MAFBNZ sees no need to specify a tolerance.

6.6 Grower Technology submits that there is scope to use the import permit to improve feedback and communication with MAFBNZ and further develop accountability and further quality control within NZ.

MAFBNZ encourages feedback and communication on the import requirements so that they are aware of the problems being encountered by users of the systems put in place. The permit to import process provides an opportunity to review quality control measures on an annual basis.

6.7 The differentiation between 'hydroponic' and 'nursery' as the two major pathways needs feathering out. 'Hydroponic' seems to be defined as vegetable growers in large glasshouses growing in growbags. Nursery seems to indicate material in nursery's that is destined for retail sale as growing media for a plant in a Garden Centre or similar. The demarcation line should be 'Nursery material' and everything else. Nursery Coco peat needs a definition which could be defined as something like: 'Coco peat that is intended for use in the retail sector'. In reality there are significant numbers of growers who are growing hydroponically in Coco peat for a range of other crops that are not directly destined for retail sale with the growing media attached. The underlying principal should be that if Coco peat is not used as 'Nursery' it should be treated as 'Hydroponic' and treated in the same way as growbags in vegetable glasshouses. The material in 'blocks'

is the exact same material as the material in the growbags. We submit that the key point is a 'property registration' rather than just a 'glasshouse registration'. It is a clearly defined area that needs to be subject to the conditions of the MAFBNZ registered facilities, rather than just a glasshouse. It would be patently unfair and a breach of natural justice if, say, an orchid grower growing in a greenhouse did not have the same opportunities as a vegetable grower growing in growbags in a glasshouse, as long as the crop was planted for the 9 month minimum. It is not only big hydroponic glasshouse growers that need the assurance of supply for their planting time.

When the glasshouse hydroponic option was introduced it was understood by MAFBNZ that there were outdoor hydroponic crops, either in bags or pots filled with loose material for which MAFBNZ was not attempting to provide the same option. A line needed to be drawn somewhere to avoid the option becoming unmanageable. The glasshouse option was selected because a glasshouse provides a structural containment for any exotic weed surviving to seeding. MAFBNZ believes that at this stage the requirements of all the other growers can be met by timely ordering and a certain level of stock holding by suppliers. We expect that importers and growers will gradually adapt to any time limitations associated with the import process.

6.8 One of the progressive steps in the future of easing up the requirements of the current IHS could allow importers to identify specific stipulated and identified pallets within the container that are destined to MAFBNZ registered properties. These pallets should be subject to the same conditions as full containers in option A. This would require some lateral thinking in setting up a system whereby importers can be audited to check the pallets are going to the nominated registered properties.

MAFBNZ would prefer to dispense with the glasshouse hydroponic option at some time in the future rather than expand it, which is likely to result in a more complicated import system that is labour and time intensive. If a different system of property registration were introduced it would need to be simple. At the moment any other system of property registration is seen as unlikely.

6.9 All importers should have the option of selecting the option of having grow out tests conducted in NZ regardless of the country of origin. It is arbitrary and unfair to make one set of rules for one country and other for another country. All importers may choose to have pre-germination tests in Sri Lanka for 'Nursery product' but it is also a breach of natural justice and fairness not to have this option for NZ pre-germination tests.

MAFBNZ encourages all grow out testing to be conducted offshore so that risks are managed by the exporting country. Unfortunately, MAFBNZ encountered a problem where at least one country has decided that they are unable to conduct grow out tests after the import health standard was developed and issued. Therefore, to ensure fairness for all countries that may not have the capacity to conduct grow out tests, an option will be available for grow-out tests on arrival. Any products requiring testing on arrival will have to be held for the duration of the tests. This type of monitoring is being implemented for the first time and if continued long term, grow out test facilities may expand.

6.10 In the 'worst case scenario' event of a shipment from Sri Lanka proceeding to NZ and some weeds germinating in the Sri Lankan grow out test the NZ importer should

have some more specific options other than heat treatment or destruction of the whole container.

In Australia, if a consignment is rejected following seeds being detected by the monitoring system (inspection in their case) the options are treatment, reshipment or destruction. We have been told this is now extremely rare because only suppliers of clean product persist with importation into Australia. Their importers do not appear to have that problem. However, we are open to the suggestion of other feasible alternatives that mitigate potential biosecurity risks associated with these types of consignments.

6.11 The Sri Lankan grow out tests should be required to stipulate in which grade of material the germination occurred. If the shipment has other grades on different pallets that tested negative then the importer should have the option of grow out test in NZ for these pallets other than heat treatment. In the event of a negative test in other grades these grades should be cleared and only the stipulated 'positively tested' grades should require heat treatment. Over time on the basis of further evidence of the status of individual importer's material a progressive series of evaluation and revisions of the IHS should occur. Grower Technology suggests for now this occurs every 6 months.

As random samples are taken from different points in the whole consignment it is not possible to keep extra records when different grades of product from the same supplier are involved. If the situation occurs, it may be possible to introduce a further option for an intensive inspection in addition to offshore results. MAFBNZ would prefer to see how the situation develops over a few months before being descriptive in this area. Suppliers who have confidence in their products have also voiced this concern.

6.12 In the longer term we believe the IHS should be similar to the Israeli system. That is no pre-germination off shore. A sample from each container is taken and the goods are released. The risk analysis is based on random pre-germination testing of the samples and inspections of downstream plantings. Importers that are having breaches have a stepped series of warnings prior to their import permit being revoked. Israel is also concerned about exotic weeds. They import a much higher volume of Coco peat than us (at least 5-6 times more than NZ) and their system appears to work well.

In the future it is possible that, if increased facilities can be found, MAFBNZ may move towards all grow out tests being conducted in NZ. If further information and evidence is built up over time showing that current production processes are ensuring the arrival of clean product, MAFBNZ may consider that consignments will not have to held awaiting grow out test results. Official inspections of downstream plantings is very unlikely though as this type of system is not undertaken on other commodities, such as to check the purity of seed for sowing.

6.13 It is much better that we move to a post planting inspection where very high volumes and percentages of material can be surveyed rather than a sampling of very small samples that really mucks up the exporting logistics of the exporting company. This is probably cheaper than pre-germination tests. Its certainly easier and not very expensive.

Any system of post planting inspection is not likely. Whether any collaboration within the industry, between all stakeholders could arrive at a self driven scheme is unknown. There are a number of small independent stakeholders.

It is envisaged that there could be at least one more review of the standard as more information is gathered. MAFBNZ accepts that the current proposed amendments will not present a perfect arrangement and that there may be some delays, inconveniences and extra costs for importers from time to time. We believe most importers will be able to manage the forward timing of importations for their major client commitments under the proposed provisions as has been indicated from submissions received. It is conceivable that future information and records may lead to the introduction of a more minimal monitoring system with no hydroponic glasshouse registration. To move in this direction too quickly may open the path for suppliers who take insufficient care with preparation of their products, thus risking the introduction of new species and commercial viability of NZ trade for the careful suppliers.