

## **Analysis of submissions on draft import health schedules for nursery stock of *Prunus* (Released for consultation on 26 August 2004)**

Two submissions were received regarding the draft import health schedules. These were submitted by:

1. The Horticulture and Food Research Institute of New Zealand Limited
2. Summerfruit New Zealand

This documents records the issues raised in the submissions and how these have been addressed by the Ministry of Agriculture and Forestry Biosecurity New Zealand (Biosecurity New Zealand). Comments from submitters are reproduced in **bold text** and the responses are recorded in normal text.

## **The Horticulture and Food Research Institute of New Zealand Limited**

Regarding the following passages in the draft import health standard: “Phytoplasmas - Woody indicators AND PCR using the universal phytoplasma fU5/rU3 primers (Lorenz et al. 1995) AND R16F2n/R16R2 primers (Gundersen et al. 1996).....

**6. Polymerase chain reaction (PCR) tests for phytoplasmas. Tests are to be carried out on two occasions, firstly using the imported dormant cuttings during winter and secondly using the new season’s growth from grafted cuttings during the following summer.”**

### **Concerns**

- 1. They don’t mention nested PCR. For phytoplasma detection I would recommend that nested PCR be carried out.**
- 2. Nested PCR could be carried out with the primers recommended, in which case the first stage would be with R16F2n/R16R2 and the second stage with fU5/rU3.**
- 3. They don’t state a preferred method (or methods) of DNA extraction.**
- 4. They might want to consider giving guidance to best tissues to sample – in particular the need to focus on phloem tissue.**

Biosecurity New Zealand thanks the Horticulture and Food Research Institute of New Zealand for their comments made during consultation on the proposed revisions to the *Prunus* import requirements. We have considered your comments on the measures required for phytoplasmas and agree that the two PCRs should be run as a nested PCR as you have suggested. We are grateful for your comments on the extraction method and sample selection and have decided that these should be considered when the post-entry quarantine manual (required for all Level 3 facilities) is prepared based on these import requirements.

## Summerfruit New Zealand

- 1. We realise that the new standards and harmonisation is particularly important for importations from Australia. However, we'd just like to reconfirm that it's important that the IHS will be workable for imports from other countries as well. Prosser is still the main source of new material for NZ and we need to be able to keep that avenue open (ie workable). While you assured us that Prosser is going down the same track as NZ regarding import standards, it's important to remember that they are not there yet and we are unaware of how long it will take them to complete the process. We also can't assume that Australia will immediately fill the role that Prosser currently fills for the NZ industry.**
- 2. We must make sure that the first stage on the harmonisation of standards with Australia is signed off as soon as possible. October/November was the timeframe discussed. However, it's possible that the restructuring in MAF could slow things down. We are concerned that any slippage this year could mean that the accreditation of a facility in Australia could be delayed significantly.**
- 3. Chris Hale had looked at the testing regimes in the draft and is comfortable they should work. As a result of the harmonisation with Australian standards, the number of extra tests that need to be done should not be an onerous task. This is better than we had expected.**
- 4. We agree with your recommendation that the wording of the IHS should be adjusted to accommodate the importation of tissue culture. It would be more straight forward to make this adjustment now. If any changes are made can you forward us a copy of the wording please.**

Biosecurity New Zealand thanks Summerfruit New Zealand for their comments made during consultation on the proposed revisions to the *Prunus* import requirements. We are pleased to hear that you are in general supportive of the proposed revisions and the progress made to date. We anticipate finalising these requirements during December 2004 and anticipate evaluating a facility in Australia as a source of high-health material early in the new year.

As you know there were two aims of this review of the requirements, firstly to review the current requirements and consolidate these (if appropriate) into one schedule, and secondly to compare New Zealand's draft requirements with those of Australia. In the latter part of the project we have also considered the phytosanitary measures being employed by the three existing facilities accredited overseas (in Canada, France and the USA) as sources of high health *Prunus* nursery stock. Biosecurity New Zealand has also consulted with these facilities on the new requirements and is confident that they should be able to meet the proposed new requirements. For example, the proposed measures are very similar to those employed by Prosser (see: <http://nrsp5.prosser.wsu.edu/nrspid2.html#stone>).

As discussed the risk presented by *Prunus* plants in tissue culture has not been formally assessed separately from dormant cuttings. However, Biosecurity New Zealand considers that it would be desirable to specifically review the import requirements for tissue culture but in the meantime considers that such material should be imported according to the same requirements as dormant cuttings. The wording of the new import health standard will be adjusted to clarify this point when it is finalised.