



DRAFT Risk Management Proposal for Truffles for Consumption and Propagation

**Amendment to the Import Health Standard
BNZ-IMP-TUBER: Importation into New
Zealand of specified fresh and frozen *Tuber*
species (truffles)**

FOR PUBLIC CONSULTATION

2 September 2016

**Plant Imports
Plants, Food & Environment
Ministry for Primary Industries
Pastoral House
25 The Terrace
PO Box 2526
Wellington 6140
New Zealand
Tel: +64 4 894 0100
Fax: +64 4 894 0662
Email: plantimports@mpi.govt.nz**

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Submissions

The Ministry for Primary Industries (MPI) invites comment from interested parties on proposed measures in two import health standards: *Fresh and Frozen Truffles for Consumption*: MPI.IHS.FP.TRUFFLES and *Truffles for Propagation*: MPI.IHS.TUBER, as outlined by this risk management proposal.

Import health standards (IHS) specify the requirements to be met for the effective management of risks associated with importing risk goods, including risks arising because importing the goods involves or might involve an incidentally imported new organism (section 22(1), Biosecurity Act 1993 [the Act]).

MPI has developed this proposal based on best available scientific evidence and assessment of this evidence. If you disagree with the measures proposed to manage the risks, please provide either data or published references to support your comments. This will enable MPI to consider additional evidence which may change how risks are proposed to be managed.

The following points may be of assistance in preparing comments:

- wherever possible, comments should be specific to a particular change in IHS requirements (referencing section numbers or commodity names as applicable);
- where possible, reasons, data and supporting published references to support comments are requested;
- the use of examples to illustrate particular points is encouraged.

MPI encourages respondents to forward comments electronically. Please include the following in your submission:

- the title of the consultation document in the subject line of your email;
- your name and title (if applicable);
- your organisation's name (if applicable); and
- your address.

Send submissions to: plantimports@mpi.govt.nz.

However, should you wish to forward submissions in writing, please send them to the following address to arrive by close of business on **14 October 2016**.

Plant Imports
Plants, Food & Environment
Ministry for Primary Industries
PO Box 2526
Wellington 6140
New Zealand

Submissions received by the closure date will be considered during the development of the final IHS. Submissions received after the closure date may be held on file for consideration when the issued IHS is next revised/reviewed.

Official Information Act 1982

Please note that your submission is public information and it is MPI policy to publish submissions and the review of submissions on the MPI website. Submissions may also be the subject of requests for information under the Official Information Act 1982 (OIA).

The OIA specifies that information is to be made available to requesters unless there are sufficient grounds for withholding it, as set out in the OIA. Submitters may wish to indicate grounds for withholding specific information contained in their submission, such as the information is commercially sensitive or they wish personal information to be withheld.

Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

Introduction

Purpose

1. MPI has reviewed the import requirements for truffles for consumption and propagation. The purpose of this document is to provide the rationale for the proposed changes to import requirements.

Background

2. The IHS [BNZ-IMP-TUBER: Importation into New Zealand of specified fresh and frozen Tuber species \(truffles\)](#) was issued in 2003 to manage the biosecurity risks associated with the importation of fresh and frozen truffles.
3. Under the current IHS, truffles imported for consumption and propagation have the same import requirements. All truffles must be identified by morphological examination and molecular analysis, using polymerase chain reaction (PCR), to ensure they are one of the four eligible species.
4. The time and cost of molecular testing effectively prevents the import of fresh truffles for consumption. Molecular testing can take up to 10 days and the cost can be greater than the actual market price of the truffle. The average shelf life of a fresh truffle for consumption is less than 7 days, so the quality of the truffle declines while the importer waits for the test result.

Eligible Species

5. Of the many truffles species world-wide, only a few are sought out for culinary purposes.
 6. Truffles species eligible for importation into New Zealand are: *Tuber aestivum* (Burgundy truffles), *Tuber borchii* (Bianchetto), *Tuber magnatum* (Italian white) and *Tuber melanosporum* (Périgord black truffles).
 7. Many truffle species are similar in morphology so that distinguishing species based on visual characteristics is not 100% accurate. *Tuber indicum* (Chinese truffles) closely resembles *Tuber melanosporum* (Périgord - black truffles). These two truffles cannot be accurately distinguished by visual (morphological) examination and molecular testing is required for 100% certainty about the species.
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Phytosanitary Requirements

8. Truffles must be free from soil and other contamination, to prevent the entry of regulated pests into New Zealand. Prior to export, truffles must be washed and inspected for soil and pest infestation (including pest eggs and larvae).
9. Evidence of soil and bacterial rot will be visible to the naked eye. A 10 x magnification lens may be used for more detailed surface inspection to detect signs of infestation by burrowing pests.

Phytosanitary Certification

10. Every consignment of truffles must be accompanied by a phytosanitary certificate issued by the exporting country National Plant Protection Organisation (NPPO).
11. The certificate must state that the truffles have been inspected for the presence of regulated pests and soil and are considered to be free from these contaminants.

International Context

12. Where possible, phytosanitary import requirements are aligned with international standards, guidelines, and recommendations as per New Zealand's obligations under Article 3.1 of the World Trade Organisation (WTO) Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement), and section 23(4)(c) of the Biosecurity Act 1993 (the Act).
13. The Agreements set in place rules that protect each country's sovereign right to take the measures necessary to protect the life or health of its people, animals, and plants while at the same time facilitating trade. It embodies and promotes the use of science-based risk assessments to manage the risks associated with the international movement of goods.
14. "The SPS Agreement will continue to guide how New Zealand sets standards and makes decisions related to biosecurity. In particular, it will be important to maintain the standards of transparency and scientific rigour required by the SPS Agreement, and to make decisions as quickly as possible. This will encourage other countries to comply with the rules of the SPS Agreement, and also demonstrate that New Zealand's strict controls are justified to countries that challenge them." Balance in Trade [online reference ISBN 978-0-478-33881-2]
15. In keeping with New Zealand's obligations under the SPS Agreement, and the International Plant Protection Convention (IPPC), phytosanitary measures must be justified for regulated pests; commensurate with the risk; and not discriminate unfairly between countries or between imported and domestically produced goods.

Note: International standards, guidelines or recommendations referred to in the SPS agreement are those of Codex, OIE and the IPPC (including regional standards developed by Asia Pacific Plant Protection Commission).

Domestic Context

16. The New Zealand biosecurity system is regulated through the Act. Section 22 of the Act describes an IHS and requires all risk goods (including plants and plant products) entering New Zealand to be covered by an IHS.
17. MPI is the government authority responsible for maintaining biosecurity standards for the effective management of risks associated with the importation of risk goods into New Zealand (Part 3 of the Act).
18. MPI is committed to the principles of transparency and evidence-based technical justification for all phytosanitary measures, new and amended, imposed on importing pathways.

Proposed Changes

19. MPI proposes to revoke the existing IHS and replace it with separate IHSs for the importation of truffles for consumption and for propagation.
20. The proposed separate IHS are: *Fresh and Frozen Truffles for Consumption*: MPI.IHS.FP.TRUFFLES and *Truffles for Propagation*: MPI.IHS.TUBER

Inclusion of Additional Pests

21. Plant Imports regularly receive permit applications for the import of fresh truffles for consumption from Australia.
22. The pest list for *Tuber* included Northern hemisphere beetle and fly pests. Additional earth-borer beetles, which are present in Australia and are known to be associated with truffles, have been added to the pest list: these include species in the *Bolborhachium* and *Blackbolbus* genera.
23. These beetles feed on truffles and are known to deposit their eggs in the soil. They lay relatively large eggs (Houston 2011) which are visible to the naked eye. These pests are managed by the existing measures; namely washing and inspection for freedom from soil and pest infestation.

Pre export Morphological Examination

24. Pre export morphological examination of every truffle is required to ensure only eligible species are sent to New Zealand. Examination must be completed by experienced truffle personnel.
25. A report of morphological examination must accompany each consignment and be presented on arrival in New Zealand. The report needs to state the species present in the consignment as well as provide the MPI import permit number to enable the MPI Inspector to cross-reference the various documents.
26. Any consignments without correct documentation will be directed to the facility stated on the import permit, until correct documentation is presented.

Molecular Testing Requirements

27. Molecular testing to species level is important for truffle imported for propagation, to ensure only eligible species are imported and cultivated in New Zealand. The requirement for molecular testing of truffles for propagation are unchanged in the proposed IHS: *Truffles for Propagation*: MPI.IHS.TUBER.
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28. For truffle imported for consumption, the accuracy of species level identification is less critical. Buyers and consumers want to know that they are getting the truffles they have paid for, but this is a market and quality/price issue and outside the purposes of the Biosecurity Act 1993.
29. MPI considers that morphological examination of truffles is sufficient for a consumable product and proposes removing the requirement for molecular testing of truffle imported for consumption in the proposed IHS: *Fresh and Frozen Truffles for Consumption: MPI.IHS.FP.TRUFFLE*.
30. It is illegal to use plant products imported under an IHS for a purpose not stated in that IHS. Penalties may be applied under the Act to persons found to be propagating inoculated-trees from truffles imported for consumption.

Onshore Audit Testing

31. MPI reserves the right to conduct audit testing of truffles for consumption to confirm that the species matches that which is stated on the phytosanitary certificate.
32. Consignments selected for species identification will be directed to a diagnostic laboratory in New Zealand for molecular testing. The importer will be responsible for all costs incurred.
33. Once the consignment arrives at the diagnostic laboratory, one or more truffles will be randomly selected from each species in the consignment and a small slice taken.
34. Provided all other requirements of the IHS have been met, the remainder of the consignment (including the selected truffles) may be given biosecurity clearance on the same day and released to the importer.
35. Testing results will be provided to the importer and MPI Plant Imports to confirm species identity. If non-eligible truffles species are detected, further permit applications from the offshore supplier may be declined.
36. Proposed changes to requirements are detailed in the IHS: *Fresh and Frozen Truffles for Consumption: MPI.IHS.FP.TRUFFLE* Part 3.3: *Species validation*.

Import Permit

37. Import permits are required for all consignments of truffles imported under both proposed IHS. Applications for permits must include details of the offshore supplier and the name of the plantation where the truffles were sourced.
38. MPI reserves the right to request further information regarding source of the truffles.

References

Balance in Trade [online reference ISBN 978-0-478-33881-2]

Houston, T. F. 2011. Egg gigantism in some Australian earth-borer beetles (Coleoptera: Geotrupidae: Bolboceratinae) and its apparent association with reduction or elimination of larval feeding. *Australian Journal of Entomology* 50: 164–173.
