

11 December 2020

Stu Hutchings
Kiwifruit Vine Health
25 Miro Street
Mount Maunganui 3116

Via email to: info@kvh.org.nz

Dear Stu

Re: Kiwifruit Vine Health (KVH) Pathway Plan

Please find attached a submission on the Pathway Plan

Please do not hesitate to contact us if you require any further information on this submission.

Yours sincerely



Sarah Cameron
Senior Policy Analyst

TO: KVH

SUBMISSION ON: Pathway Plan Review

NAME: NZ Kiwifruit Growers Inc (NZKGI)

ADDRESS: PO Box 4246, Mount Maunganui South, 3149

1. The kiwifruit industry in New Zealand

The kiwifruit industry is a major contributor to regional New Zealand returning \$2 billion directly to rural communities in 2019/20. There are ~3000 growers, 14,000ha of orchards, 10,000 permanent employees and up to 25,000 jobs during the peak season. Approximately 80% of New Zealand's kiwifruit crop is grown in the Bay of Plenty and the industry is expected to grow its global sales to \$4.5 billion by 2025 which is an increase from \$3.1 billion in 2018/19. The projected growth of the industry will contribute significantly to the Bay of Plenty GDP increasing to \$2.04 billion by 2029/2030.

2. General comments

Thank you for the opportunity to comment on the Pathway Plan. NZKGI commends KVH on the consultation process undertaken and the flexibility KVH has shown to amend standards within the plan where there has been feedback from growers.

NZKGI supports the concept of the Pathway Plan but notes that it must be cost effective and simple as to not to impede the process of growing fruit. NZKGI has canvassed the views of Forum members and via Forum, our wider grower membership, and makes the following comments for consideration.

3. Biosecurity

NZKGI supports KVH to manage the wider biosecurity readiness and response on behalf of the kiwifruit industry. Shifting the focus from a single pest, like Psa, to a full range of biosecurity threats on orchard is supported however the requirements need to be both simple and practical.

4. Compliance

Growers are facing increasing compliance demands from local and central government and while there are some essential environmental and food safety requirements that are needed to ensure sustainability and the production of quality fruit, if compliance does not make it time-efficient for growers to satisfy the increasing number of rules, and if rules are not straight forward and enabling, then widespread compliance will be hard to achieve. Growers have been very clear that the rules must be simplistic and align to existing structures like Zespri GAP and the CAV scheme.

NZKGI makes the following recommendations which may help with reducing the compliance burden on growers meeting the Pathway Plan requirements:

- Develop templates that cover the requirements for each standard:
 - Obligation to report contamination (or suspected contamination) template

- Provision of information template
- Biosecurity plan template
- Safe movement template
- Traceability App

5. Biosecurity Plan

NZKGI supports the intent of a Biosecurity Plan and makes the following comments:

- The Biosecurity Plan fact sheet states that KVH has already introduced the On-Orchard Guideline Document which will serve as the template. Clarification on whether this is the intended Biosecurity Plan template for the Pathway Plan is required.
- It is strongly suggested that any template mirrors the same framework as Zespri GAP eg - low/high risk is noted as major/minor (this aligns with language used in the GAP standards)
- Holding workshops for growers to provide guidance on completion of the plan will provide certainty and is supported
- NZKGI has noted that the Orchard Biosecurity Plan Fact sheet does not provide the amount of information that the Contractor fact sheet does which has good, detailed information for growers

Wording in the Contractor Fact Sheet which states *What might a biosecurity plan look like? It is not proposed that biosecurity plans must be a defined length, follow a particular format, or look a certain way.* NZKGI strongly suggests that a template for contractors is available - consistency is key.

6. Review period

The Pathway Plan has built in non-statutory reviews three and seven years after implementation or at any other time as triggered by the KVH Board. While this provides a level of comfort to growers, only minor amendments can be made. Major amendments would require a law change. NZKGI suggests that KVH define what a major amendment is and provide more transparency to growers on this.

It is unclear how a review is triggered and what the process is. This needs to be explained in the Pathway Plan proposal document and communicated to growers.

7. Property definition

NZKGI submits that it would be helpful to provide a definition of property especially where an orchard is connected over two titles - is a plan required for each title and for enterprises as a whole?

The Bay of Plenty Regional Council has defined property as:

The land described in a particular certificate of title, or a group of contiguous certificates of title owned or leased by the same owner or lease holder, or land which is designated as a road or reserve or is Maori land.

It is suggested that KVH canvas other industries and use a definition that is consistent across the board.

8. Budwood

The requirements for growers sourcing budwood and budwood suppliers have changed:

Growers sourcing budwood: need to ensure they are sourcing from a KPCS certified supplier and maintain traceability records of where material was sourced from and planted/grafted. To assist with this process KVH will maintain a list of certified budwood suppliers online.

Budwood suppliers: growers supplying budwood to other orchards (separate parcels of land), must achieve KPCS certification. While the certification requirements are not onerous and are similar to existing protocols, they do require planning in advance to ensure monitoring can occur while vines have leaves and are in active growth. There is no fee for audit as growers will already be contributing through their pathway levy.

The Kiwifruit Plant Certification Scheme (KPCS) applies to the nursery production of all Actinidia species grown for commercial sale or use within New Zealand or for export. A 'nursery' is defined for the purpose of this scheme as 'any entity that grows Actinidia plant species to any age for sale or movement outside of the property'.

NZKGI does not support that all growers supplying budwood should have to become certified and recommends the following:

- A grower supplying more than 250 buds will need to be certified (an exemption applies for the supply of under 250 buds)
- To ensure traceability for exempt suppliers, a traceability template is created that details the following (not an exhaustive list):
 - Lot, row and kpin budwood supplied from
 - Psa check completed
 - Lot, row, kpin of budwood receiver

The template is a much easier and simple process for smaller scale suppliers.

There do not seem to be any rules that capture backyard growers (those that grow for personal use and not commercial). Does KVH have any plans to include these growers in the requirements?

9. Contractors

NZKGI supports the requirement for contractors to operate in accordance with a Biosecurity Plan to identify and manage risks before entering an orchard. NZKGI also supports the intent which is to address the high risk associated with kiwifruit orchard contractors, who routinely move machinery, equipment and tools, personal effects, kiwifruit plant material and/or compost into, within and between orchards. Contractors should be managing biosecurity risks, by demonstrating biosecurity hygiene and biosecurity awareness with staff.

NZKGI has found that the rule document and the fact sheet contradict each other and are confusing. While the rule document states that:

- *Every kiwifruit orchard contractor must register with KVH*
- *Every person referred to above must have and operate in accordance with a Kiwifruit Orchard Contractor Biosecurity Plan*

- *Every person referred to above must ensure that the Kiwifruit Contractor Biosecurity Plan includes, as a minimum, the following matters:*
 - *A description of the pathway risks to be managed*
 - *The hygiene practices in place that ensure all vehicles, machinery, tools, equipment and personal effects are clean and disinfected using management agency approved disinfectants, including before entering the kiwifruit orchard; and*
 - *The steps that will be taken to ensure that all kiwifruit orchard contractor personnel are aware of kiwifruit industry biosecurity risks and of reporting and hygiene requirements before entering a kiwifruit orchard*
 - *Failure to comply with this rule is an offence.*

The contractor fact sheet states:

Contractors who are part of the Zespri Gap/CAV would need to complete an online biosecurity training module and a KVH Biosecurity Risk Management Plan. This would be audited as part of their existing CAV audit. Those contractors who are not currently required to hold a Zespri CAV will need to complete an online biosecurity training module and a KVH Biosecurity Risk Management Plan. This would automatically be forwarded to KVH who will then issue a registration. A list of registered contractors will appear on the KVH website.

The fact sheet goes on to say that:

KVH will provide guidance on appropriate cleaning and disinfection recognising practical considerations and that certain tools or equipment have a higher level of risk than others.

If you are a shelter trimmer, our Biosecurity Plan would need to describe how you would manage traceability at a minimum. This could be as simple as using your invoicing system to maintain a record of orchards visited during the year. The plan should also include when cleaning of equipment occurred so that records show which orchards were visited between cleaning episodes.

If there is a requirement for contractors to clean tools and machinery before entry to each orchard, NZKGI submits that this is unreasonable and impractical. To do so would require the contractor to return to their depot after each orchard visit which would be a costly and an inefficient use of time. Contractors generally wash down their vehicles and equipment at the end of each day. In the event of a biosecurity risk, traceability is able to be confirmed for the previous 24 hours.

NZKGI suggests that the cleaning requirements form part of a risk-based risk assessment and that contractors/growers should determine the risk instead of a requirement to clean and disinfect after each orchard visit which is impracticable. NZKGI submits that KVH should provide a risk assessment for contractors to determine the level of risk if the machinery and tools are not cleaned after each orchard visit.

NZKGI understands that it is KVH intent to make the contractor Biosecurity Plan a requirement under the CAV scheme with an online training module.

For contractors that are not part of the CAV scheme - how do growers know they have done the Biosecurity Training Module and a KVH Biosecurity Risk Management Plan - would they be required to check the KVH website for a list of registered contractors. If a contractor is not part of the CAV scheme and not registered with KVH, are they not permitted to enter an orchard?

10. Plants and Shelter Belts

NZKGI supports the inclusion of shelter belt species into KPCS however notes the following comments around cleaning requirements:

NZKGI submits that it is not practicable to clean shelter belt machinery between orchards. Like contractor cleaning requirements, this would mean the operator would need to return to their depot after each orchard visit which would be a costly and an inefficient use of time. It is suggested that a daily cleaning requirement is more appropriate. This way, in the event of a biosecurity risk, traceability is able to be confirmed for the previous 24 hours. However, in the event that the work is to continue for a number of days on the same orchard then there should not have to be a daily cleaning requirement.

NZKGI highly recommends that the risk assessment (noted under the contractor section) should apply here as well.

11. Collaboration with other industries

NZKGI would be interested to know what collaboration takes place with other industries and whether KVH has presented the Pathway Plan or consulted with other industries. While there is a level of comfort understanding biosecurity and how it is applied on orchards, it is recommended that KVH provide a presentation to Forum in 2021 on the framework of biosecurity in New Zealand.

12. Conclusion

NZKGI thanks KVH for the opportunity to provide feedback and looks forward to further consultation on the Pathway Plan