

Important

This application form is to seek approval to import for release or release from containment new organisms (including genetically modified organisms).

The application form is also to be used when applying to import for release or release from containment new organisms that are or are contained within a human or veterinary medicine.

Applications may undergo rapid assessment at the Authority's discretion if they fulfil specific criteria.

This application will be publicly notified unless the Authority undertakes a rapid assessment of the application.

This application form will be made publicly available so any confidential information must be collated in a separate labelled appendix.

The fee for this application can be found on our website at www.epa.govt.nz.

If you need help to complete this form, please look at our website (www.epa.govt.nz) or email us at noinfo@epa.govt.nz.

This form was approved on 21 September 2011.

1. Brief application description

Provide a short description (approximately 30 words) of what you are applying to do.

Importation of ornamental *Camellia* species

2. Summary of application

Provide a plain English, non-technical description of what you are applying to do and why you want to do it.

In 1990, a vigorous fungal disease, *Ciborinia camelliae*, arrived in New Zealand, and has been destroying *Camellia* flowers (Stewart and Neilson 1993; Frampton 1994). This blight spreads easily and when a flower is infected it quickly turns the petals dark brown or black (Stewart 1994). No satisfactory method has been developed for controlling *Camellia* flower blight and there is no indication that one will be developed in the foreseeable future.

This application aims to import new *Camellia* species into New Zealand that would help a programme to breed resistance to *Camellia* flower blight into new *Camellia* crosses. Currently the species displaying resistance have tiny flowers, and it is the aim of the Trust-supported research to breed large flowered show-quality resistant varieties.

3. Describe the background and aims of the application

This section is intended to put the new organism(s) in perspective of how they will be used. You may use more technical language but please make sure that any technical words used are included in a glossary.

The natural range of genus *Camellia* is in East Asia, from Korea and Japan in the north, to Vietnam in the south, and Tibet in the west. The genus may contain up to about three hundred species, although authorities differ in their estimates and recognition of specific distinctions. Many of the species are very localised and rare in their natural habitats, and are seldom brought into cultivation. Very few of them are known outside of their native country, and there are probably many species that remain to be discovered and botanically described. The centre of diversity of *Camellia* appears to be in northern Indochina - so, they are primarily tropical species, despite their most familiar members being from the temperate regions.

Camellias are usually forest understory trees, and as such, are threatened wherever the forests in which they live are threatened. However, there are mature *Camellia* forests in China where camellias form the forest canopy up to 20 m high. As well as being eradicated by deforestation for agriculture, recreation (golf courses), or settlement, wild camellias are collaterally destroyed in timber-cutting operations, and opening access into forests leads to *Camellia* trees being cut down for fire-wood for domestic cooking and charcoal manufacture.

Camellia flowers occur in a wide variety of forms and their relative ease of survival in the garden environment has made them a popular ornamental since the earliest of European settlers arrived in New Zealand. Camellias are not

known as aggressive colonisers and are widely enjoyed. For example the New Zealand Camellia Society has 700 members.

There are potential export earnings for New Zealand if the long-term results of this research are successful. The industry was worth NZ\$2-3 million in the 1990s (Taylor & Long 1998). It had shrunk to approximately NZ\$1 million in 2010. Currently, approximately 100,000 plants/annum are being sold principally by Lyndale Nurseries (66,000 plants), Cambrian Nurseries and Midland Nurseries (15,000 plants each). Nursery production has not only declined but exports have almost ceased due to *C. camelliae* flower infections. Not only would a successful outcome of the proposed introductions lead to increased export income, but it would also reverse the declining industry in New Zealand.

Species to be imported

The species to be imported are very similar in their requirements and biological characteristics to species already present in New Zealand and are expected to behave in the same way. The new species to be imported are not expected to cause any adverse effects to the New Zealand environment or its people. They are not expected to displace any native species, as exemplified by the original two camellias planted in the Waitangi Treaty Grounds by James Busby's wife in about 1833 and now assimilated by native forest.

4. Information about the new organism(s)

- Provide a taxonomic description of the new organism(s) (if the organism is a genetically modified organism, provide a taxonomic description of the host organism(s) and details of the genetic modification).
- Describe the biology and main features of the organism including if it has inseparable organisms.
- Describe if the organism has affinities (e.g. close taxonomic relationships) with other organisms in New Zealand.
- Could the organism form an undesirable self-sustaining population? If not, why not?
- What is the ease with which the organism could be eradicated if it established an undesirable self-sustaining population?

Biology

The *Camellia* comprises a genus of evergreen shrubs or trees which originate from the warm-temperate climates of Southeast Asia (Huxley 1999). A general review of the global cultivation of camellias is provided by Longhurst and Savage (1982). The history of the introduction of the *Camellia* into New Zealand is detailed in Durrant (1982). Existing varieties in New Zealand are usually replicated by cuttings and scions (see section 3). A general guide to camellia cultivation in New Zealand is provided by Rolfe (1992). In many countries camellias are grown in greenhouses to protect them from frosty conditions. Here in New Zealand this is unnecessary in most places.

Seeds develop in capsules that range from grape to apple-size. These seeds are only viable for a short period of time because the seed is high in oils and lipid content (Dr. B. Christie, pers.com. 2008). Normally lipid- or oil-containing seeds have limited viability for only short periods of time *i.e.* they would not normally be expected to survive more than one growing season. Seeds may be germinated by cracking them first, but their flowers often show variations to the parents, and are considered unreliable.

Taxonomy

The taxonomy of the genus has proven complex and the following is the most commonly accepted practice, known as Sealy's classification. All have the common name "camellia".

- Class: Angiospermae
- Sub class: Dicotyledoneae
- Family: Theaceae
- Tribe: Gordoneae
- Sub-tribe: Camelliinae
- Genus: *Camellia* Linnaeus 1735

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- The specific new species which are sought for approval for importation are as follows:

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Section: Archecamellia

- *amplexicaulis*

Section: Camellia

- *albo-sericea*
- *bailinshanica*
- *brevigynea*
- *changii* (syn. *azalea*)
- *compressa*
- *cryptoneura*
- *jinshajiangica*
- *jiuxiensis*
- *lapidea*
- *longicaudata*
- *longituba*
- *magniflora*
- *oligophlebia*
- *omeiensis*
- *phelloderma*
- *tunganica*
- *villosa*
- *xifongensis*

Section: Eriandria

- *melliana*

Section: Furfuracea

- *gaudichaudii*
- *pubifurfuracea*
- *suaveolens*

Section: Longipedicellata

- *longipedicellata*

Section: Luteoflora

- *luteoflora*

Section: Oleifera

- *gauchowensis*

Section: Paracamellia

- *kissi*
- *shensiensis*
- *weiningensis*

Section: Protocamellia

- *albogigas*

Section: Pseudocamellia

- *chungkingensis*

Section: Theopsis

- *elongata*
- *euryoidea*
- *jiuyishanica*
- *parvi-ovata*

Section: Tuberculata

- *acuticalyx*
- *anlungensis*
- *hupehensis*
- *leyeensis*
- *pyxidiacea*
- *rhytidocarpa*
- *rubituberculata*
- *tuberculata*

Affinities with the New Zealand Flora

There are no indigenous members of the Theaceae in New Zealand. The closest living relative in the New Zealand flora is *Myrsine*. For a detailed treatment of the botanical affinities please see Appendix 3. No *Camellia* species currently present in New Zealand hybridise with indigenous native species.

Potential for Self-sustaining populations

There is no evidence that *Camellia* has established an undesirable self-sustaining population in New Zealand. The genus does not appear in the naturalised Flora of New Zealand (Webb *et al.* 1988). Neither is it mentioned in the Department of Conservation Consolidated List of Environmental Weeds in New Zealand (Howell 2008). The Allan Herbarium at Landcare Research, Lincoln, has 6 samples of what are called “wild” camellias. Five are seedlings from under parent plants in home gardens or botanical gardens. Two specimens are said to be wild from the east bank of the Waikato River at Huntly (database entries can be supplied upon request); this record being a duplicate of one (AK235330) held in the Auckland Museum Herbarium. The designation of “wild” in this instance designates casual occurrences of seedlings found growing in the immediate surroundings of a planted (cultivated) adult plant. We have not found any reference to Regional Councils referring to camellias as a species under control. Nearly all isolated *Camellia* specimens are not naturalising but rather are remnants from former long gone homesteads or churches.

5. Detail of Māori engagement (if any)

Discuss any engagement or consultation with Māori undertaken and summarise the outcomes.

A summary of this proposal was circulated to 184 runanga and iwi for comment; 117 by email and 67 as letters. In response we received 9 submissions; one opposed as they could not see any direct benefits to Maori from this proposal, two were supportive, four had no objections and two acknowledged receipt but made no comment. Some of the responses expected the necessary phytosanitary conditions to apply which we believe to be absolutely essential and will be discussed with MAF during the application for an import permit. These submissions are summarised in Appendix 4.

6. Identification and assessment of beneficial (positive) and adverse effects of the new organism(s)

Adverse effects include risks and costs. Beneficial or positive effects are benefits.

- Identification involves describing the potential effects that you are aware of (what might happen and how it might happen).
- Assessment involves considering the magnitude of the effect and the likelihood or probability of the effect being realised.

Consider the adverse or positive effects in the context of this application on the environment (e.g. could the organism cause any significant displacement of any native species within its natural habitat, cause any significant deterioration of natural habitats or cause significant adverse effect to New Zealand’s inherent genetic diversity, or is the organism likely to cause disease, be

parasitic, or become a vector for animal or plant disease?), human health and safety, the relationship of Māori to the environment, the principles of the Treaty of Waitangi, society and the community, the market economy and New Zealand's international obligations.

Self sustaining populations

Isolated pockets of camellias are known to survive long-term, for example in the gardens of old settlements. These pockets are restricted in size and do not spread, and there are readily available methods of eradicating camellias. We consider it **highly improbable** that they could form a self-sustaining spreading population taking into account the ease of eradication.

Camellias grow well outdoors between latitudes 35 and 45°. We consider that they are capable of forming non-spreading (isolated) populations where originally planted. However, they are not known to spread beyond the drip line of the tree other than by human planting. Temperature is the main determinant on limiting their distribution, especially frosts of more than 6°C. Given this tolerance it is likely they would be able to survive and grow in most non-mountainous places in New Zealand. The earliest camellias planted in New Zealand are often found in churchyards or old farm homesteads. In most cases they still appear as single isolated specimens. These include two specimens planted in the grounds of the Treaty House at Waitangi in 1833 (by James Busby's wife); a single "Triumphans" planted at the Mangapouri mission station in 1834; "Lowii" planted in Gordonton in the 1870s; and "Pilida" planted in late 1860 in a churchyard at Cambridge (Durrant 1982). From these examples it is clear these early planted specimens have not spread beyond their planted localities.

Ability to spread

Camellias are not known to spread in New Zealand, even around the garden environment. They will only form very restricted populations in areas where they are planted. This is partly because camellias are considered infertile. They produce very low levels of seeds and this seed is viable for only a short period of time. Camellias are also not well dispersed in New Zealand. In their natural range they are dispersed by rodents, but there are no records of this method of dispersal into leading to self-sustaining populations in New Zealand. In most cases seeds that do germinate are outcompeted by faster growing native species.

Ease of eradication

It is quite simple to remove and eradicate small pockets of camellias. Given their inability to spread, eradication can be readily and cost effectively achieved by either physical removing plants or by applying well known pesticides such as Tordon, Grazon, Roundup, or Diesel Oil around the bark edge immediately after cutting the trunk.

Camellia species have been introduced around the world, yet there are no records of them ever becoming invasive (Appendix 1). The genus is not known for any rapid spreading or colonisation to the detriment of native species. In New Zealand, camellias do not compete with any New Zealand plant species and there are no records of indigenous flora being displaced.

We consider that it is **highly improbable** that the 43 *Camellia* species in this application could displace or reduce any valued indigenous species after release. They do not appear on any weed lists in New Zealand.

Camellias are slow-growing ornamental species which are grown in close proximity to homes or botanical gardens. They are not known to have deteriorated any natural habitats worldwide (see Appendix 1). At Pukeiti Rhododendron Gardens in Taranaki, some camellias have been planted, but have not spread into the adjoining Egmont National Park forest. In the Waitangi Treaty Grounds the two original planted camellias have been completely surrounded and assimilated into the native forest over the last 179 years, with no new seedlings having grown under the heavy shade.

Based on the 170 years+ experience of growing camellias in New Zealand, they are not found to be disease-causing or parasitic, or to be a vector or reservoir for human, plant, or animal disease, with one exception (Bieleski 1991b). The exception to this rule is that some stock may contain viruses (Bieleski 1991a; Thomas 1995) which are mainly spread between *Camellia* species (and other plant species) through sap contact only when grafting. The main viruses so far detected are: camellia leaf yellow mottle virus (CLYMV), camellia yellow mottle virus (CYMV), camellia infectious variegation virus (CIVV), and camellia mosaic virus (Ofsoski 1990).

Of the 43 *Camellia* species named in this application there is no evidence that any of them will have any adverse effects on human health and safety or the environment worldwide. In fact the genus has been mainly used for beneficial purposes e.g. *Camellia* oil, soap and of course tea, although this application does not involve species which are known for these uses.

Conceivably the only harm they could cause is by triggering people's allergies. There is no evidence of *Camellia* pollen being a common pollen type nor are there any reported adverse allergies to its pollen either in New Zealand or overseas. Even if there were, because it is usually an insect transmitted pollen (rather than a wind-type pollen) there would be little effect compared to the large amounts of introduced pollen already monitored in our atmosphere.

No *Camellia* species hybridise with indigenous native species. The nearest living plant in the New Zealand flora to the genus *Camellia* (Family Theaceae) is *Myrsine* in the Family Myrsinaceae but please see Appendix 3 for a detailed comparison.

7. Could your organism(s) undergo rapid assessment?

7.1. If your application involves a new organism that is or is contained within a veterinary or human medicine, could your organism undergo rapid assessment (s38I of the HSNO Act)?

Describe the controls you propose to mitigate potential risks (if any). Discuss what controls may be imposed under the ACVM Act (for veterinary medicines) or the Medicines Act (for human medicines).

Discuss if it is highly improbable (after taking into account controls if any):

- the doses and routes of administration of the medicine would have significant adverse effects on the health of the public or any valued species; and
- the organism could form an undesirable self-sustaining population and have significant adverse effects on the health and safety of the public, any valued species, natural habitats or the environment.

N/A

7.2. If your application involves a new organism (excluding genetically modified organisms), could your organism undergo rapid assessment (s35 of the HSNO Act)?

Discuss if your organism is an unwanted organism as defined in the Biosecurity Act 1993.

Discuss if it is highly improbable that the organism after release:

- could form self-sustaining populations anywhere in New Zealand (taking into account the ease of eradication)
- could displace or reduce a valued species
- could cause deterioration of natural habitats,
- will be disease-causing or be a parasite, or be a vector or reservoir for human, animal, or plant disease
- will have adverse effects on human health and safety or the environment.

Yes. See section 6.

8. Other information

Add here any further information you wish to include in this application including if there are any ethical considerations that you are aware of in relation to your application.

Camellia species are not known to be invasive plants anywhere in the world (see letters in Appendix). They have been introduced from their native countries of China, Japan and Vietnam to throughout much of southern Europe, North America, Chile, South Africa, Australia and New Zealand, and in none of these locations have they been known to cause any problems.

Camellias pose no significant threat to the New Zealand environment or society. Their past introductions were to benefit society by having colour in the garden environment over the winter months. Subsequently New Zealand breeders established a \$2-3 million export industry but the *Camellia* flower blight has reduced this to almost nothing. There is a large potential for export growth if New Zealand could become the first country to breed and

export flower blight-resistant stock. Currently a Camellia Memorial Trust-sponsored project (totalling \$NZ 171,600) at Massey University is delving into the molecular biology of the disease resistant mechanism (in selected camellias) to try and understand the fundamental biology which might then be applied to plant breeding.

9. Appendices(s) and referenced material (if any) and glossary (if required)

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Bieleski, R. L. 1991a. Do viruses really matter? *New Zealand Camellia Bulletin* XVII (2): 2-6.

Bieleski, R. L. 1991b. Camellia diseases. Pp. 45-52. In Bieleski, V. (ed.) *Growing better Camellias in the 1990's*. New Zealand Camellia Society (Inc.) 96 pp.

Durrant, T. 1982. *The Camellia Story*. Heinemann, Auckland.

Frampton, R. 1994. New disease on Camellias in Wellington. *New Zealand Camellia Bulletin* XVIII (4): 4-5.

Howell, C. 2008. Consolidated list of environmental weeds in New Zealand. Department of Conservation, Wellington.

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Kolbe, K. and J. Jutta. 1980. Serology and Systematics of the Ebenales and the Theales. *Biochemical Systematics and Ecology*, Vol. 8, 249-256.

Longhurst, P. and Savige, T. 1982. *The Camellia*. Bay Books, Sydney & London.

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Rolfe, J. 1992. *Gardening with Camellias*. Whitcoulls Ltd., Auckland.

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Schonenberger, J., Anderberg, A.A. and K.J. Sytsma. 2005. Molecular phylogenetics and patterns of floral evolution in the Ericales. *Int. J. Plant Sci.* 166(2):265–288.

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Stewart, T. M. and Neilson, H. 1993. Flower blight – A new disease of Camellias in New Zealand. *New Zealand Camellia Bulletin* XVIII (3): 29-33.

Taylor, C. and Long, P. 1998. Camellia flower blight in New Zealand. *Proceedings of 51st New Zealand Plant Protection Conference 1998*: 134-137.

Thomas, M. B. 1995. Camellia viruses. *New Zealand Camellia Bulletin* XIX (2): 34-36.

Webb, C. J., Sykes, W. R., Garnock-Jones, P. J. 1988. *Flora of New Zealand Volume IV*. Botany Division, D.S.I.R., Christchurch.

10. Signature of applicant or person authorised to sign on behalf of applicant

- I request the Authority to waive any legislative information requirements (i.e. concerning the information that shall be supplied in my application) that my application does not meet (tick if applicable).

I have completed this application to the best of my ability and, as far as I am aware, the information I have provided in this application form is correct.

Signature

Date

APPENDIX 1



INSTITUTE OF NATURAL RESOURCES
Te Kura Mātauranga o ngā
Taonga ā Papatuanuku

Agricultural & Horticultural
Systems & Management - PN433
Private Bag 11 222
Palmerston North
New Zealand
T 64 6 356 9099
F 64 6 350 5680
www.massey.ac.nz
<http://ahsm.massey.ac.nz/>

5 February 2009

Professor Vince Neall
New Zealand Camellia Society
PALMERSTON NORTH

Dear Professor Neall

I write in relation to your application to import *Camellia* species into New Zealand. For about 10 years I undertook research on exotic plants at Eastwoodhill Arboretum, near Gisborne, and that collection contained an extensive collection of *Camellia* species and cultivars.

From my observation, the horticultural cultivars and hybrids of *Camellia japonica* and *Camellia sasanqua* will produce seedlings, but only in the immediate vicinity of the parent plant and in limited quantity. Seedlings of the other common species, *Camellia reticulata*, are found less often. I believe that the species are no more likely to produce seedlings than the hybrids and cultivars.

The Eastwoodhill collection also contains about 16-18 other *Camellia* species, less seen in common cultivation. Over the period that I worked on that site, seedlings of these species were infrequent, if not nil, so I believe these pose no issue of seeding.

Overall, I believe that *Camellia* species will not be any problem in terms of excess seeding, and so I support the application of the Camellia Society to import additional species into New Zealand.

Yours sincerely

A handwritten signature in blue ink that reads "Marion MacKay".

Dr Marion MacKay
Senior Lecturer in Landscape Management

APPENDIX 2



THE INTERNATIONAL CAMELLIA SOCIETY

INTERNATIONAL CAMELLIA REGISTRAR

Neville Haydon
4/6 Ingram St, Papakura,
New Zealand. 2110.
email; nevhaydon@xtra.co.nz
phone/fax; 64 9 296 1893

11 May 2009

ERMA New Zealand,
Wellington.

Dear Sirs,

At the request of the Chairman of the Camellia Memorial Trust, and relative to their application to bring new camellia species to New Zealand, I offer my opinion, based on working for over 50 years with the genus, that there would not be a problem with any camellia species becoming an invasive or spreading weed. Camellia seeding is limited to once yearly, and the seeds are not windborne, or ingested by birds or animals, so are confined to the area underneath the parent plant. The 70 or more camellia species already in New Zealand, some for over a century, have never caused any problem.

Yours faithfully,

A handwritten signature in blue ink, appearing to read "Neville Haydon". To the right of the signature, the initials "AHRH" are written in blue ink.

APPENDIX 3

Camellia's closest relatives in New Zealand

Camellia is a genus in the family Theaceae, which over time has variably been placed in the Orders Guttiferales, the Theales and now in the Ericales (Prince 2007). In the New Zealand flora there are no species of *Camellia*, or any members of the Theaceae. Theaceae is now placed in the Order Ericales. Also in that Order are the families that contain the genera *Myrsine*, *Gaultheria* and several other Ericaceous shrubs, *Planochella*, and the herbs *Ourisia* and *Samolus*; but the relevant families appear in different clades to that of Theaceae and *Camellia*.

From 1999 onwards Theaceae has been considered part of the Ericales (and several of the families previously in Theaceae were transferred to Ericales) (Luna and Ochoterena, 2004). Of this new definition we have native flora in the following families:

- Ericaceae from which we have *Arcerhia*, *Cyathodes*, *Dracophyllum*, *Epacris*, *Gaultheria*, *Leucopogon*, *Pentachondra* and *Pernettya*. Some place *Epacris* and *Dracophyllum* in Epacridaceae.
- Myrsinaceae in which we have *Myrsine*.
- Primulaceae in which we have *Ourisia* and *Samolus*.
- Sapotaceae in which we have *Planochella*.

By the same definition of Ericales, we have many species of cultivated flora from the same order. I am aware of cultivated flora in the following families:

- Actinidiaceae: *Actinidia*.
- Balsamaceae: *Impatiens*, annuals.
- Clethraceae: *Clethra*, shrubs.
- Ebenaceae: *Diospyros*, woody trees.
- Ericaceae: *Rhododendron*, *Erica*, *Enkianthus*, and others, woody.
- Halesiaceae: *Halesia*, trees.
- Polmoniaceae: *Polemonium*, perennial.
- Primulaceae: *Primula* and others, perennial.
- Sarraceniaceae: *Sarracenia*, perennial.
- Styracaceae: *Styrax*, trees.
- Symplocaceae: *Symplocus*, shrub.
- Ternstroemiaceae: *Ternstroemia*, shrubs.
- Theaceae: *Camellia* and others, shrubs.

Ericales and *Camellia*

Schonberger *et al.* (2005) investigated Ericales and placed Ericaceae and Theaceae in the same clade within the overall order, suggesting that the nearest relatives in the New Zealand flora would be our Ericaceous shrubs. Myrsinaceae, Primulaceae and Sapotaceae fall in another clade suggesting that these are less related. Conversely, an earlier study of Ericales found that Theaceae, Primulaceae, Myrsinaceae and Sapotaceae were all in different clades (Anderberg *et al.* 2002).

An earlier study by Kolbe and Jutta (1980), supported the formation of a superorder and proposed “to include the Actinidiaceae and Theaceae in this superorder, assigning them a central position along with the Sapotaceae and Styracaceae on one side and the Primulales [and Myrsinaceae] and Ericales on the other.”

While the above studies all refer to Myrsinaceae, Primulaceae, Ericaceae and Sapotaceae, the data are not conclusive about which of our native species might be most closely related to *Camellia*, and the only native genus represented in the data is *Myrsine*. So we must conclude that the candidates are the Ericaceous shrubs, *Myrsine*, *Planochella*, *Ourisia* and *Samolus*. None of these is in the same genus or the same family as *Camellia* so it appears that there is adequate separation between our native flora and any additional *Camellia* species that might be brought into New Zealand to avoid undue effects or hybridisation.

APPENDIX 4

SUMMARY OF RESPONSES RECEIVED FROM TANGATA WHENUA

Submitter	Affiliation	Comment summary
Beverley Hughes	Te Runanga o Ngati Awa	No comment to make.
Mate Heita	Pukeko Communications	“I do not support your application as I do not see any benefits for Aotearoa or te iwi Maori from this proposed venture”.
Teri Puketapu	Te Runanganui o Taranaki Whanui kit e Upoko o te Ika a Maui	“no objections”.
Rick Barber	Te wahi Pounamu – Te Tai o Poutini	“I do not oppose your application provided the attributes and traits of the Camellia you propose to liberate here are confirmed by a credible peer review as not presenting any risk to our natural biodiversity.”
Catherine Pioletti	Ngati Maniapoto	No objection “provided hygiene and biosanitary best practice is followed”.
Harry Burkhardt	Ngati Kuri Trust Board	With appropriate conditions “the Board is supportive of the initiative”. *See details in appended letter attached.
Grant Kettle	Raukawa Charitable Trust	Unable to engage at present on this issue.
Paul Horton	Tanenuiarangi o Manawatu Inc.	“We are happy for the Camellia Memorial Trust to progress with their application and invigorate the New Zealand camellia industry” #See detailed letter appended.
Jim Doherty	Tuhoe Tuawhenua Trust	“I do not have any issues with your application”.

2nd December 2011

The Camellia Memorial Trust

39 Kohekohe Road

Waikanae 5036

By e mail als@paradise.net.nz

Attention Vincent Neall

Tena koe Vincent,

I have been made aware of your request to Wayne Petera regarding the Camellia Trust's approach to EPA for approval to import new camellias into New Zealand to help breed resistance to the camellia flower blight *cibornia camelliae*.

The Ngāti Trust Board is mandated to represent nga uri o Ngāti Kuri. Its contemporary rohe begins at Hukatere on Te Oneroa A Tohe across to Maungatohora (Mt Camel) north. It includes Rangitahua (Kermadec Is) and Manawatawhi (Three Kings). Ngati Kuri are the tangatawhenua and kaitiaki for this area.

We appreciate you seeking support from Iwi over your application. We have been led by Wayne's input and also general themes that underpin Ngāti Kuri's role and responsibilities as kaitiaki. As this is a common strategy for dealing with imported diseases/pest our responses are as follows

- First preference is to use global expertise and experience to trial outside New Zealand
- If importation of solutions are the final results these need to be carried out in controlled environment
- Durable solutions will require stepped through introduction at a small scale to ensure complete understanding of any collateral damage
- Open sharing of successes and failures.

On this basis the Board is supportive of the initiative.

Heoi ano ra

Harry Burkhardt

Chairman Ngāti Kuri Trust Board

10 January 2012

Camellia Memorial Trust
39 Kohekohe Road
Waikanae 5036
New Zealand
Phone (04) 904 2922

Environmental Protection Agency (EPA) applications to bring new flora into Aotearoa New Zealand from the Camellia Memorial Trust

Tena koe

Nga mihi nui ki a koe i roto i nga tini ahuatanga o te wa nei.

Tanenuiarangi Manawatu Incorporated (TMI), the mandated iwi authority for Rangitaane o Manawatu (ROM) wishes to thank you for providing the correspondence regarding the proposal of the Camellia Memorial Trust for the importation of new floral organisms (namely *Camellia* spp., of the family *Theaceae*) into the country.

1. We have read your request and we agree there is little or no threat to Native plants or forests from camellia propagation NZ setting. We were unable to determine if the fungal attack being experienced by existing plants is a camellia specific one, or if this was a general fungal pathogen however there doesn't appear to be too much of a risk given 170 years of cultivation and spread of the camellia within New Zealand.
2. Positives of having camellia in the New Zealand garden setting is that they attract tui (*Prosthemadera novaeseelandiae*) and to a lesser extent other native birds at certain times of the year. Being what botanists call a medium day length flowerer (ie they will flower twice a year) the camellia provides a spring and autumn food source to localised tui populations and or individuals, and it is not uncommon to visit your local botanic garden and see a good display of breeding males in early spring.
3. We are happy for the Camellia Memorial Trust to progress with their application and invigorate the New Zealand camellia industry, and wish them well in this endeavour.

We look forward to hearing from you regarding our comments, if you require any further information, or to discuss any of the above please don't hesitate to contact the undersigned.

Heoi ano,



Paul Horton
Tanenuiarangi o Manawatu Inc.