

# Stakeholder comments

## Draft report of Part 1 of the pest risk analysis for cut flower and foliage imports

### Comments submitted by: AUSVEG

AUSVEG is the national peak industry body representing the interests of Australian vegetable and potato growers and is committed to securing the industry's future.

We advocate for growers to all levels of government and ensure that the industry has a strong, active voice in the public sphere. We also communicate industry issues and perspectives to government, media and the public.

AUSVEG is also a service provider for a number of levy-funded research projects that are funded by Horticulture Innovation Australia using levy and government funds.

Ensuring the results from these research projects are made available to Australian vegetable and potato growers is vital for the vegetable and potato industries to remain on the forefront of global horticulture production and for local growers to be able to operate an efficient, productive and profitable growing operation.

AUSVEG welcomes the opportunity to provide comment on the *Pest Risk Analysis for Cut Flower and Foliage Imports – Part 1* (PRA). The biosecurity risks associated with importing cut flowers have been a concern for AUSVEG for many years and this PRA provides an important means for evaluating and mitigating future arrivals of organisms of biosecurity concern. AUSVEG further supports the concerns raised by Flowers Australia, Growcom, Victorian Farmers Federation and NGIA in their respective submissions to this PRA.

For us, as the peak body for the vegetable industry, we are very concerned about the ongoing threat that pests arriving from imported cut flowers have the potential to have a devastating impact on the AUD 3.9 billion vegetable industry. In 2016-17, there were around 2,300 Australian farm businesses growing vegetables with an estimated value of operations of over \$40,000. This represents a little over six per cent of the total value of Australian agricultural production. Our concern is for the producers that we represent which grow vegetables in every state and territory of Australia and how pests and diseases introduced on imported cut flowers previously have, and will potentially continue to, impact on their business through quarantine, crop losses, additional management costs and loss of market access.

While AUSVEG does not represent the flower industry, we are committed to support Australia's local flower industry against the threat of the pest risks that imported cut flowers pose. More critically, the pests detections from the imported cut flowers industry are pests of concern for much of Australia's plant based agriculture. Past incursions, such as Western flower thrips, and many of the high risk species identified in various plant Industry Biosecurity Plans, are highly polyphagous. New Emergency Plant Pest detections arriving on imported cut flowers have the potential to put at risk many of our agricultural industries.

In response to the PRA, AUSVEG would like to highlight some general concerns to the content of the document and follow this by also raising some more specific points with some of the content and assumptions made in the analysis.

## **General Concerns:**

### **1) Consultation:**

Section 4.3 and Appendix B of the PRA details the international and domestic industry stakeholder consultation that has been conducted in preparing and publicizing the analysis. AUSVEG welcomes the increased general level of engagement that DAWR has had with industry recently and we commend the efforts that have been made to consult and flag the release of other recent PRA's. However, in the case of this PRA, we feel that much more could have been done. The release for consultation period covers the holidays and peak production period for our industries. Unlike with other draft PRA releases, we were not contacted by Department staff or invited to teleconferences to discuss the forthcoming release.

Furthermore, the membership of Imported Cut Flowers and Foliage Regulation Working Group was not detailed in the document and was difficult to obtain. Given the broad host range of many of the arthropods intercepted, more plant industries should have been represented on the group, as they will potentially be impacted by any Emergency Plant Pests that may come in through the imported cut flowers pathway. In addition to this, we believe that State Farming Groups, Peak Industry Bodies and all signatories to the EPPRD should have been, at least, notified, and, preferably, consulted in the development of this PRA. A liaison process, similar to that followed in the development of other PRA's with key industries who are at significant risk from the pests, would be greatly preferable.

### **2) Increased Interceptions**

We note that there has been a significant increase in recent years of the value (400%) and consignment (300%) of fresh cut flowers. Coinciding with this, interceptions have also increased by 400% to now make up 23% of all arthropods detected at Australia's borders.

AUSVEG is pleased to see that the risk of the arthropods from importation, establishment to spread has been rated between moderate to high. However, we are incredibly concerned at the increase in interception rates on cut flowers from 13% in 2007 to 58% in 2017. Section 5.2 also states that between January 2000 and February 2018 more than 38,000 interceptions of live arthropods occurred. Furthermore, "In many instances phytosanitary action was taken because a live pest was either exotic to Australia, or could not be identified to a taxonomic level sufficient to exclude the possibility of it being a quarantine pest." We find these numbers unacceptable and are significantly concerned about the potential risk of posed by insect pests that are not intercepted.

We also have concerns with the assessment provided on Table 6.2 which estimates the level of Low for Thrips arrivals. Table 5.4 puts the members of the Thripidae family, for the past eighteen years, at 39% of insect interceptions. This is a relatively high proportion of a class that makes up 69% of all interceptions at Australia's borders and should

consequently be the justification for raising its risk to a level above its current setting of Low.

### **3) Major Source Countries**

A related general issue that we have concerns the shift in major source countries and the rates of border inspection failures that have been registered by these exporters. For example, 82% of consignments from Kenya were found to contain live arthropods, 81% from India and China, 78% from Colombia, 54% from Vietnam and 47% from Ecuador. Additionally, it is shocking to see that interception rates from Kenya, Vietnam, China, India and the Netherlands is above 50% in 2017. AUSVEG has questions and concerns as to the required skill levels, professionalism and integrity of these countries and associated industries abilities to be able to manage the broad range of risks.

The interception data provided in the PRA states that 50% of consignments originating from major source countries have failed border inspections since the upgraded phytosanitary conditions were introduced on 1st March 2018. AUSVEG supports, in principle the increased phytosanitary measures introduced by DAWR to ensure that imported cut flowers and foliage meet Australia's ALOP, but we have a number of concerns, detailed below, on the strategies DAWR are applying to ensure compliance, detect breaches and assess overall risk associated with different source countries. From the document, it appears that data regarding the efficacy of these implemented import protocols is available. It may not paint a good picture of the current situation, but we believe that is vital to a better understanding of the systems in place and allow us to make a better comment. We request that this data be provided to AUSVEG if available.

### **4) Establishment**

Section 3.1.1 of the PRA addresses perishability and pest risk and, to its credit, recognises the rural outdoor usage and urban compost disposal of cut flowers and the risk that such practices pose. We argue that this does not go far enough in recognizing the treat. Cut flowers are distributed all across Australia. Composts provide a supportive environment for insects to survive and potentially establish in our urban environments. The majority of recent EPPs that AUSVEG has been an affected party have emanated out of our cities and where eradication has been attempted, it has been hindered by the highly diverse environment.

Tracing back the source of EPP's is usually a difficult process, but the VFF have offered a list of plant pests, which are likely to have entered through cut flower and foliage imports that have already had an impact on horticulture and other plant industries across Australia. These include Russian wheat aphid, Chrysanthemum white rust, Western flower thrips, Myrtle rust and Alstomeria gall midge. Furthermore, recent CCEPPs that AUSVEG has participated in have included a number virus species which are vectored by many of the arthropods commonly intercepted on cut flowers. This is a cause of great concern, given the cost to industry of the attempts at eradication and the ongoing addition cost to production and management, which these incursions have brought to Australia's broader plant production industries. This issue also bring us to the first of the more specific issues that AUSVEG has with the PRA.

### **Specific Concerns:**

## **1) Vector and Biotype Risks**

Table 7.1 states that consignments are released if arthropods are non-quarantine or unregulated. This is highly problematic for two significant reasons. The first is that if these insects were able to get into Australia, they could be vectoring a range of plant pathogens that could have significant impacts on our environment, community and agriculture. Many species of Thrips, Mites and Aphids are capable of vectoring a range of virus and bacteria not known to be currently present in Australia. The significant number of recent virus incursions further supports this concern. If live arthropods are detected at the border, then this should require retreatment and also be seen as a failure of the pre-border disinfestation processes.

A related point to the above concerns the potential arrival of new biotypes or strains that are different to the ones currently in the country. These can potentially be a pesticide resistant biotype that could establish here, become dominant and turn into a much larger issue for industry to control. Green peach aphid could be seen as an example of this. This is a significant issue overseas and is compounded by the limited range of legally available treatment options available to industry in Australia.

## **2) Pre-shipment disinfestation**

Section 7.1.4 covers pre-shipment disinfestation. We are very concerned with the effectiveness of the treatments that are being undertaken in the exporting countries. We would argue that DAWR needs to be more proactive in getting the source country NPPO to provide all details of the proposed pre-shipment disinfestation process before receiving approval as an acceptable phytosanitary measure. We are worried about the accuracy of the records being provided by the fumigation facilities with regards to the treatment of flowers and foliage. It seems that the fumigation is ineffective, the chemical rates being used are not appropriate or the shipments are not being consistently treated regardless of what the documentation implies.

This iterates to AUSVEGs position that the pest risk management measures developed, (Table 7.1), while somewhat acceptable to reducing the risk, may have not been explicitly implemented at the border of the exporting country. These measures need to be implemented and policed without exception with a zero tolerance policy.

## **3) Accredited Treatment**

All proof of off shore treatment and its credibility is the responsibility of the NPPO of the exporting country, as well as verifying that flowers are grown in export standard registered facilities and fumigation and certification is done by registered fumigators. Australia needs to be provided with a list of audited approved and registered growers and fumigators at the start of the year to ensure that the exported flowers are coming from the “accredited” source.

Additionally, the countries that are major exporters of cut flowers to Australia often have corrupt processes and governments. So DAWR should develop a mitigation process to ensure that the certification by the NPPO of the exporting country is in fact a true representation of the shipment.

#### **4) DAWR Oversight**

Similarly to the above point, the systems approach outlined in Section 7.2.1 rises concerns for us and we believe a more proactive approach toward NPPO's by DAWR is warranted. We are supportive of a systems approach in concept, but exporting countries must first receive approval from DAWR for the measure making up their chosen approach. Ratification from DAWR should be a requirement before implementation of the process. We believe that a regular on-the-ground assessment of the practices in-place should be implemented and reassessed under periodic review.

#### **5) Recent Data**

Given the changes implemented since 1 March 2018, data needs to be provided to highlight whether these protocols have so far been more effective in reducing the number of interceptions. This is vital to the successful application of Section 7.2.8 of the PRA which covers Remedial action(s) for non compliance. Without this data, we as industry, do not have specific details on the 'appropriate' level of remedial action taken for non-compliance. Furthermore, within the same section the PRA fails to adequately define 'repeatedly' when discussing non-compliant consignments and has no clear guide on the number of 'repeat failures' that will trigger punitive measures on the offending exported and/or source country NPPO. This section requires significant attention to allow stakeholders an opportunity to comment on managing non-conformances and future imports from the source country. Similarly, we need to know what actions, if any, have been taken by the government in response to repeated failures to comply. Without significant consequences for repeated breaches, where is the incentive for exporting countries to improve their processes?

#### **6) On-shore Fumigation**

Finally, AUSVEG would like DAWR to review its assessment of the appetite for undertaking on-shore fumigation activities on the grounds that it poses a greater risk. The system of pre-border fumigation, as it currently stands, is failing and placing all our plant based agricultural industries as great and ongoing risk. We believe that a system of on-shore treatment, combined with a revised and well-functioning off-shore systems approach or approved fumigation processes, with significantly improved oversight functions, can work in tandem with each other. This would, in some way, go to greatly improve the currently flawed approach that we have in dealing with the biosecurity risks associated with the importation of cut flowers from overseas.