

Stakeholder comments

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

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Systems Approaches without details make one nervous, how will these be verified and will the Australian industry get to see what they are? It is accepted that systems approaches are valid and also used by Australia but it would be useful to have these placed alongside a HACCP table detailing the critical control points and how the proposed system measure will operate at each of these CCPs. This is particularly the case with cut flowers as the IRA notes that off-shore system approach is a significant problem with up to 50% non-conformances. Considerably more information needs to be provided around this procedure. More detail about the effectiveness of the systems approach introduced in 2018 would have been appropriate. Whilst it is noted that the IRA mentions step-wise improvements since March 2018 and the new measures, these are not documented so presumably the improvements are not that great!

The second concern is around fumigation/disinfestation protocols with methyl bromide. The recommendations in chapter 7 specify amongst other things that vent holes in packages must be closed and that flowers may also be in plastic wrap outers. This would appear to make fumigation a rather haphazard affair, particularly as I am aware that for many importers the containers are stuffed as tightly as possible to minimise freight costs. This in fact has been a problem in the past with fumigation of cut flowers. It being almost impossible for fumigant to penetrate many areas of the container. More detail needs to be put around fumigation requirements because as they stand they are not adequate. Requirements should be assessed against package type and sealing, package density in the container as well as product temperature of treatment, which is also not spelt out only a rather generic mention of temperature vs time.

Lastly it is noted that irradiation is only mentioned once but again should this be part of any approach more details need to be provided as flowers vary considerably in their ability to tolerate gamma radiation. Compositae/Asterae being reasonably tolerant but other species much less so.