

15 March 2019



Risk Analysis, Efficiencies and Stakeholder Engagement  
Department of Agriculture and Water Resources  
GPO Box 858  
CANBERRA ACT 2601

Via email: [plantstakeholders@agriculture.gov.au](mailto:plantstakeholders@agriculture.gov.au)

To whom it may concern,

**RE: Draft Pest Risk Analysis for Cut Flower and Foliage Imports – Part 1**

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to the Department of Agriculture and Water Resources' *Draft Pest Risk Analysis for Cut Flower and Foliage Imports – Part 1* (the PRA).

The NFF is the voice of Australian farmers and was established in 1979 as the national peak body representing farmers and the agriculture sector more broadly, across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

The farming sector and indeed the broader community need absolute confidence that Australia's biosecurity system is robust, science-based, independent and transparent. A strong biosecurity system underpins the production of high-quality, affordable food and fibre for domestic and international consumers, supports our ability to be competitive and maintains our access to markets for a range of commodities all around the world. The NFF recognises the important role that the Department of Agriculture and Water Resources (DAWR) plays in delivering national biosecurity functions, and in coordinating national biosecurity policy.

While the NFF is a strong advocate for agricultural trade between countries, this trade must be managed so as not to put at risk our favourable pest and disease status, which is vital for farming, for the wider community and the environment. In this context the NFF has reviewed the draft PRA prepared by the department, and recorded significant concerns about the biosecurity risk posed by the current import arrangements for cut flowers and foliage. We are particularly concerned about the lack of information provided to demonstrate the effectiveness of new import conditions and to demonstrate how non-compliance is handled, and by the approach to industry consultation. These matters are expanded on further below.

**Data showing the effectiveness of the new import protocols has not been published**

We understand that revised import conditions for cut flowers and foliage imports were introduced in March 2018 to reduce the risk of quarantine pests arriving in Australia. These changes were made in response to a 2017 review of existing import conditions, which identified a high number of arthropod interceptions on imports of cut flowers and foliage

(58 per cent of consignments in 2017 – an alarming figure). The new conditions require importers to manage biosecurity risk before cut flowers are sent to Australia.

One of the stated aims of the PRA is to ‘confirm that the introduction of revised import conditions manages the biosecurity risks to achieve the appropriate level of protection (ALOP) for Australia.’ However, the document does not provide any interception data for consignments inspected following the introduction of the new import conditions, which makes it difficult to assess the effectiveness of those conditions. This is a serious omission, and one that could be read to imply that there has in fact been no material improvement as a result of the new measures – or the data would surely have been made public. The PRA alludes to the shortcomings of the new conditions, by mentioning only ‘incremental improvements’, and more concerningly – ‘on-going high levels of non-compliance.’ The PRA also states that pests of quarantine concern have been detected in more than 50 per cent of consignments from some major exporting countries using systems approaches.

**Recommendation 1:** The NFF recommends that DAWR publicly releases data on interceptions of live arthropods on consignments of cut flower and foliage imports since March 2018. This should be done before the PRA is finalised.

The PRA states that previous import conditions were not adequate to achieve Australia’s ALOP because of the large numbers of interception events of quarantine arthropods on imported cut flowers and foliage. It follows that unless there is data to show a significant reduction in the number of interceptions since March 2018, and clear evidence that action is taken to address non-compliance, the new conditions are also likely to be inadequate to deliver Australia’s ALOP. Should this be the case, additional measures to address this risk should be developed as a matter of urgency.

While a range of measures are available to respond to non-compliance – such as suspending the use of a particular approach or undertaking a departmental audit of a country’s phytosanitary certification system – it is not clear what action is being taken by the department, and whether these tools are being used. Non-compliance is clearly an ongoing issue. It is critical that the new import conditions are enforced and that non-compliance is taken seriously and adequately addressed. The NFF understands that the department corresponded with National Plant Protection Organisations of the leading export countries in August 2018 to provide an update on compliance with the revised import conditions, and requested that countries with high rates of non-compliance investigate and address the causes of non-compliance. The outcomes of this process should be publicly reported prior to finalising the PRA.

**Recommendation 2:** Should interception data show that the new import conditions have not achieved a significant reduction in detections of live arthropods in imported cut flower and foliage consignments, DAWR should commit to: suspend imports where repeated non-compliance has been recorded, and consider additional biosecurity measures to achieve Australia’s ALOP.

### **There were gaps in the approach to industry engagement on this PRA**

Given that pests detected on cut flower and foliage imports pose a risk to a broad range of plant industries (outside of cut flower and foliage production), the NFF questions why there was no initial engagement with the wider agricultural community about the PRA. There is

clear motivation for the broader sector's interest in this issue. The two-part PRA includes national priority plant pests, such as Russian Wheat Aphid, as well as arthropod pests capable of transmitting priority plant pests such as *Xylella fastidiosa* – Australia's number one priority plant pest, which is known to infect more than 350 plant species. The detection of Russian Wheat Aphid in Australia occurred at the end of a period that saw a quadrupling in the number of live arthropod detections in cut flower consignments (2007 to 2017<sup>1</sup>), and this pest now infests grain crops across four states.

The NFF supports the department's establishment of an Imported Cut Flower and Foliage Regulation Working Group, but believes that this group should include, or have a remit to consult directly with, representatives of broader plant industries as well as livestock industries as appropriate. While details of the specific membership of the working group are not available, we would also stress the importance of this group having strong representation from across the Australian cut flower and foliage production industry.

**Recommendation 3:** The NFF recommends that DAWR commits to direct consultation with wider plant and livestock industries affected by the biosecurity risk created by cut flower and foliage imports before finalising the PRA.

### Country of origin labelling

The NFF considers the current country of origin labelling requirements for cut flowers and foliage as inadequate, including in light of the issue of transshipment that frequently conceals the true country of origin of cut flowers<sup>2</sup>. In addition to border officials struggling to determine where consignments of cut flowers and foliage are from and whether they have been fumigated, it is very difficult for Australian end-consumers to find out where their flowers are from. To support Australian consumers to make more informed purchasing decisions, the NFF recommends the introduction of country of origin labelling requirements to cut flowers and foliage that are sold in pre-packaged bunches in supermarkets and warehouses. We raise this matter here while acknowledging that responsibility for regulation of labelling sits within another portfolio, and is outside the scope of the PRA process.

**Recommendation 4:** The NFF recommends the introduction of mandatory country of origin labelling on pre-packaged cut flower and foliage bunches in supermarkets and warehouses to help consumers understand where their flowers are grown.

Should you require any further information in relation to this submission, please do not hesitate to contact Adrienne Ryan, General Manager Rural Affairs, at [aryan@nff.org.au](mailto:aryan@nff.org.au) or 02 6269 5666.

Yours sincerely,



**TONY MAHAR**  
Chief Executive Officer

<sup>1</sup> See PRA page 27, *Figure 1 - Number of consignments and interceptions per year: 2007 to 2017*.

<sup>2</sup> See PRA page 18, *Section 3.1.2. Country of origin labelling*.