

Stakeholder comments

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

Comments submitted by: Nursery and Garden Industry Australia (NGIA)

NGIA is responding to the opportunity to comment on the *Pest Risk Analysis for Cut Flower and Foliage Imports – Part 1* (PRA) due to the potential impacts arising from the unintentional import of plant pests of quarantine concern carried by imported fresh cut flowers and/or foliage. These pests of quarantine concern have the real possibility of negatively impacting on the \$2.3 billion nursery industry through increased funding of emergency plant pest responses, crop losses and ongoing pest management costs. NGIA further supports the concerns raised by Flowers Australia and Ausveg in their respective submissions to this PRA.

NGIA bases the following concerns upon the import volume data and pest interception data provided in the PRA noting fresh cut flower/foliage import value having increased by more than 400% (00/01 – 15/16), consignments by more than 300% (07 – 17) and inspection failures as high as 50% from some countries. Consignment interceptions have increased by 400% (07 – 17) over the past decade with nearly a quarter (23%) of all arthropods detected at Australia's border arriving on fresh cut flower/foliage imports.

Adding to the above concerns NGIA has, on the volume and interception rates of fresh cut flower/foliage imports, is that of the very clear shift in source countries from first world economies (Europe/Asia) to second/third world economies (Asia, Africa & South America). NGIA believes that serious questions exist around the associated skills, professionalism and integrity of these 'new' source countries (NPPO's and/or industry) being adequate to manage the risk. NGIA believes that this is supported by the interception data provided in the PRA that states 50% of consignments originating from major source countries have failed border inspections since the upgraded phytosanitary conditions were introduced on 1st March 2018.

NGIA supports, in principle, the overall rating of the three key pest groups (Aphids, Mites and Thrips) being above Australia's *Appropriate Level of Protection* (ALOP) currently set at very low however questions the PRA risk estimate (Table 6.2) of Thrips arriving at Low. Based on the interception data (Table 5.4), and acknowledging the biology/host information, the interception of members of the Thripidae family, over the past 18 years, sits at 39% of the Class Insecta (69% of all interceptions) with Aphids (Aphididae), at 7% of the Class Insecta, rating Low/Moderate. NGIA believes that the PRA modelled data in Table 6.2 does not reflect the reality as demonstrated in Table 5.4 with 18 years of interception data. NGIA believes the Unrestricted Risk Estimate (URE) for 'Thrips' should be elevated at least to Low/Moderate or to Moderate if key interception data is a fundamental underpinning value.

NGIA supports, in principle, the increased phytosanitary measures introduced by DAWR on 1st March 2018 to ensure that imported cut flowers and foliage meet Australia's ALOP. NGIA however has a number of concerns on the strategies DAWR are applying to ensure compliance, detect breaches and assess overall risk associated with different source countries. The uniform approach of offering

phytosanitary options currently being applied to source countries appears indifferent to the interception data currently in the hands of DAWR. NGIA would like to see a 'risk rating' applied to source countries based on interceptions and provide options to source countries based on the ranking e.g. fumigation for low ranked source countries with high interceptions and Systems Approach access to high ranked source countries with minimal (less than 0.5%) interceptions.

NGIA has specific concerns around the following:

1. *"Consignments released if arthropods are non-quarantine or unregulated..."* is of significant concern due to the potential to bring/release into the Australian environment plant pests that may be a vector for a plant pathogen, known or unknown, that could have significant impacts on our environment, community and/or agriculture (e.g. Thrips are the primary vector of some of the world's most virulent viruses from the tospoviruses genus). Furthermore, introduced arthropods could be a source of resistant biotypes that could establish in Australia, become dominant and turn into a much larger issue for industry to control (e.g. green peach aphid). NGIA believes that the presence of live arthropods detected in any consignment should deem the pre-border phytosanitary treatment to have failed and require the consignment be destroyed or undergo on-shore treatment (fumigation) or be re-exported.
2. *"NPPO- approved systems approach..."*. NGIA is a firm supporter of 'Systems Approach' being used to manage biosecurity risks however believe strongly that the NPPO introducing the measure(s) must first receive approval from DAWR for the measure(s) making up the 'Systems Approach'. NGIA cannot see the justification, due to existing evidence, for DAWR to allow the source country to establish the measures making up the 'Systems Approach' without ratification from DAWR before implementation, particularly those source countries with a high incidence of interceptions. Receiving consignments with live arthropods and then DAWR seeking the details of the measures approved by the NPPO is a reactive approach and must be moved to a proactive strategy of pre-approval of measures. NGIA further considers it a mandatory condition of application for approval of a 'NPPO Systems Approach' that DAWR undertake an investigation of the measures and their application in-situ in the source country before approval.
3. *"NPPO- approved alternative pre-shipment disinfestation..."* As for item 2 above NGIA does not understand why DAWR does not require the source country NPPO to provide all details of the proposed pre-shipment disinfestation process before receiving approval as an acceptable phytosanitary measure. Again, a proactive approach is required and DAWR must identify and provide to NPPO's pre-shipment approved treatments for cut flower and foliage as well include a process for the source country NPPO to apply to DAWR for approval of alternative disinfestation methods. DAWR must implement a robust verification system for all off-shore fumigation not just cut flower and foliage as we are experiencing significant failures across many source countries as evidenced by the recent Brown marmorated stink bug (BMSB) detections across Australia in 2018.
4. NGIA does not support the assumption made by the PRA that under the secure packaging section, 7.2.3 (third dot point. pp 56) *"Overlapping folded edges of a liner are considered to be sealed"*. NGIA disagrees that overlapping edges are effectively sealed for the purposes of addressing the

risks of arthropods escaping in transit, upon arrival or being infested in the source country. NGIA believes that all vented containers must be screened with a minimum mesh size of 0.5mm otherwise all packaging must be fully sealed.

5. Section 7.2.8 Remedial action(s) for non-compliance – NGIA considers this section to be underwhelming in its content failing to provide stakeholders with 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 exporter 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 and having transparent tolerance information upon which industry can comment. Feedback from elements of industry have suggested that DAWR have advised importers of fresh cut flowers and foliage that interceptions must get below 10% or action will be taken, this infers that below 10% no action is taken. NGIA would like DAWR to provide industry with a response and if true NGIA would like to be provided with the legal instrument that allows this tolerance level to be implemented by departmental officers.
6. NGIA does not agree with the current position articulated by DAWR within the PRA that there is not an option nor an appetite to undertake on-shore fumigation activities due to the high risk of introducing quarantine plant pests and the subsequent risk of establishment and spread this poses. This seems somewhat confusing and ignores the recorded facts that current off-shore mitigation measures are failing spectacularly at levels that have most of horticulture extremely concerned about the importation of cut flowers and foliage. NGIA believes that on-shore fumigation has a part to play in a mitigation program and should be considered in part with other off-shore mitigation measures such as NPPO Systems Approaches, etc. NGIA strongly believes that it is inappropriate to completely rule out an option to mitigate risk therefore the wording around on-shore fumigation must be that DAWR considers it as an option and will consider such a mitigation measure upon application.

In conclusion NGIA recommends DAWR implement the following:

1. Adopt appropriate phytosanitary measures to mitigate the biosecurity risk the fresh cut flower and foliage pathway presents including ranking source country compliance and access to layered phytosanitary measures e.g. level 1 mandatory fumigation, Level 2, etc; and
2. Ensure the implementation of these phytosanitary measures is undertaken by source countries (industry and NPPO) through validation inspections and prior approval of Systems Approach and offshore fumigation; and
3. Validate and monitor the implementation and compliance to the phytosanitary measures by source countries (industry and NPPO) both pre and post border holding to account non-compliant industry’s and NPPO’s; and
4. Provide a high level of rigour around the key parameters within the non-compliance of consignments including clearly defined limits to ‘appropriate level’ and ‘repeatedly’ and

'repeat failures' and all other vague and open conditions that have no defined limits within the PRA; and

5. DAWR operate in a transparent manner at all times including establishing a national pest interception reporting platform (e.g. similar to EU) for open access by stakeholders showing real-time consignment interceptions for all commodities; and
6. Adopt and implement a clear policy that deem's a consignment not to have meet the pre-border phytosanitary import conditions when a live organism is intercepted at the border in any consignment. The consignment is further rejected and destroyed, treated or re-exported to source country.