

Stakeholder comments

Draft review of import conditions of brassicaceous vegetable seeds for sowing

Comments submitted by: **Mr Cameron Burgess, Alfalfa House**

Dear Sir/Madam,

We are Alfalfa House, a community food cooperative consisting of over 3,000 members, based in Enmore, in Sydney's Inner-West. The Alfalfa House Objects include:

- Providing a retail source of whole foods so that members may have some control over the sources of their food supply;
- Providing information on and promoting the use of i) low-cost, ethically produced and packaged whole foods, ii) cruelty-free foods, iii) vegetarian foods, iv) vegan foods, v) organic foods and vi) genetically-modified-free foods;
- Stimulating community development, fostering community spirit and promoting sustainable living.

While we understand the importance of safeguarding Australia's agricultural industry, Alfalfa House is deeply concerned with the proposal for the mandatory systemic fungicide treatment on all brassicaceous crop seeds for a number of reasons.

Firstly, this proposal financially threatens our cooperative and other vendors of organic produce. There are few organic seed suppliers in Australia and thus a limited supply of locally-sourced organic seed. Without the supply of imported, organic seeds, it will not be possible for organic seed suppliers to meet demand for organic seeds. This will result in a dramatic increase of organic seed prices. Subsequently, the price of organic produce will rise, making it difficult for Alfalfa House to provide locally-sourced, competitively-priced organic and non-genetically modified produce to the community.

As mentioned above, organic seed providers and small-scale, organic farmers will be severely affected by the mandatory application of fungicide on brassica seed. Many will be unable to maintain an organic seed supply, or even maintain organic certification. This will have flow-on effects, impacting organic farmers, including those small-scale farmers from whom Alfalfa House source their produce. These farmers may be at the mercy of multinational seed corporations with a monopoly on the seed market and the ability to dictate seed prices. Both non-treated and treated seed could become more expensive, and the number of commercially available seed varieties may decrease. It will become increasingly difficult for small-scale farmers to compete with large-scale industrial farms, and they may ultimately be priced out of the market.

This proposal negatively impacts Australia's organic food industry at domestic and export levels. According to the Australian Certified Organic Standard, produce cannot be classified as organic if it has been treated with fungicides or pesticides (Australian Organic 2017a). This is also the case under national export standards (DAWR 2015). Given that the Australian organic market is expected to reach AU\$2 billion in 2018 (Australian Organic 2017b), this is a concerning prospect. Even if certifiers were to provide exemptions at the domestic level and allow seed which has undergone mandatory fungicide treatment to be classified as organic, this weakens the credibility of the organic standard, and goes against consumer expectations.

Finally, this proposal threatens Australia's vegetable biodiversity and food security. Should mandatory fungicide treatment come into effect, only a handful of modified varieties will be available to farmers and growers. This arguably goes against the International Treaty on Plant Genetic Resources for Food and Agriculture, of which Australia is a signatory. According to Article 6(2)(d) of the treaty, signatories should be, where possible, "broadening the genetic base of crops and increasing the range of genetic diversity available to farmers" (FAO 2009). This proposal goes against this and would significantly reduce the number of varieties available to farmers.

We recommend:

- a) The deadline for submissions should be extended, as to allow the Australian public to be fully-aware of this proposal, and its detrimental impacts;
- b) There has been insufficient consideration of viable alternatives. We ask that there be further consideration of organic alternatives to mandatory fungicide treatment, such as non-chemical, eco-friendly fungicides, like those discussed by Meena et al. (2013) as well as comprehensive seed testing. These measures would allow organic growers and seed companies to maintain their organic accreditation, protecting Australia's organic industry.

Yours sincerely,
Alfalfa House