

Stakeholder comments

Draft review of import conditions of brassicaceous vegetable seeds for sowing

Comments submitted by: Arian McVeigh, Canberra Seed Savers

This submission does not support the recommendation of the Draft Draft Review for mandatory fungicide treatment of the named brassicaceous seeds.

Canberra Seed Savers is a volunteer run community network of backyard growers and farmers across the Canberra region. The network aims to grow, save and share herb and vegetable seeds, educate growers about seed saving, protect heirloom varieties, and build community and ecological resilience through building community connections; and increase the rate of growing plants from seed, growing plants for seed, and seed saving. Canberra Seed Savers operates on organic principles.

This brief submission has been created in a short time frame and aims to raise some of the key issues and concerns.

Canberra Seed Savers is very concerned by the recommendation for mandatory fungicide treatment of imported brassica seeds as specified in the Draft Review (*brassica oleracea*, *brassica rapa*, *eruca vesicaria*, *raphanus sativas*). Our concerns are outlined in this submission and are focussed on: lack of consideration of alternatives that would accommodate the importation of organic seeds by individuals and small groups; lack of consultation with a sufficiently broad range of stakeholders and the community; and the creation of a default importation regime that favours conventional agriculture at the expense of organic agriculture – in particular small and individual organic growers; no risk assessment of the potential economic, environmental and health consequences of introducing mandatory fungicide treatment, and no consideration in the Draft Review of the risks and damage to human and soil health.

Canberra Seed Savers is very supportive of Australia's biosecurity and the need to ensure an appropriate level of protection against biosecurity hazards. Canberra Seed Savers is in favour of strong biosecurity measures. It is our submission that alternatives that allow for organic importation of seeds should be fully investigated, assessed and made available. Given that almost all of Australia's seed is imported, if mandatory fungicide treatment is introduced for the named brassicaceous crops, Australia's organic growers, big and small will be severely economically impacted, and the health of our soils compromised.

1. The Draft Review does not include any consideration of alternative, organic, measures to mandatory fungicide treatment.

There are organic treatment measures that may suffice to achieve the ALOP (appropriate level of protection) for importation of the named brassicaceous seeds (for example, heat/steam treatment (<http://www.utas.edu.au/news/2018/4/10/574-why-australia-imports-so-many-veggie-seeds/>)). The Draft Review does not consider these, instead focussing on measures that require control over conditions of origin and certification of origin as the only possible alternatives to fungicide treatment. The Draft Review also discounts the possibility of enhanced testing measures e.g. batch testing.

2. The Draft Review has been conducted on the basis of consultation with a limited range of stakeholders, and ostensibly on a limited range of technical factors.

The Draft Review lists the stakeholders who have been involved in the consultation process, as part of the Seeds Regulation Working Group: “representatives from the Australian Seed Federation, Grain Producers Australia, Nursery and Garden Industry Australia, AUSVEG, Plant Health Australia, state and territory government agencies and the Australian Government Department of Agriculture and Water Resources” 1.2.4 of Draft Review. This list does not include any representatives from the organic agriculture and food industries, nor any representatives of interested community organisations, for example: the Australian City Farms and Community Gardens Network (<https://communitygarden.org.au>) or Seed Savers Network (seedsavers.net). The lack of engagement with these groups, or like organisations, creates a major gap in the decision making process – the needs and priorities (and solutions) from organic and community organisations may be very different to those of conventional agriculture organisations. The Draft Review is not informed by any of those perspectives.

Although submissions are open to the public, the submissions guidance and submission form call for comment on the ‘technical aspects’ and the ‘risk assessment’, with very little scope for other comments and input. This may potentially have had the effect of discouraging participation by interested community members and, again, preventing valuable and valid perspectives from being considered.

3. The recommendation for mandatory fungicide treatment creates a default importation regime that favours conventional agriculture at the expense of organic agriculture – in particular small and individual organic growers.

Small organic growers, whether backyard growers or farmers are penalised through the proposed regime. The default mandatory treatment destroys the capacity to import organic seeds without very expensive and prohibitively difficult processes, all of which are recommended to be established and managed by the importing parties. This will affect organic seed importers, and in turn small growers. This regime will effectively make it too hard for most Australians to access a range of organic brassicaceous seeds and to therefore grow organic brassicaceous vegetables.

4. The Draft Review contains no assessment of the potential economic, environmental and health consequences of introducing mandatory fungicide treatment.

The Draft Review thoroughly considers the environmental impact of brassica pest and disease spreading in Australia but not the environmental impact (risk assessment) of these brassica seeds being treated with fungicide: it doesn’t actually specify what type of fungicide will be used – only using the term ‘broad spectrum’ – or whether organic fungicides measures are being considered.

There is evidence that human health may be negatively impacted by working with seeds treated with fungicide (for example:

<https://www.nature.com/articles/7500312.pdf?origin=ppub>).

There is evidence that soil health is negatively impacted by fungicide treatment of seeds (Hongyan Jin, James J. Germida, Fran L. Walley, “Suppressive effects of seed-applied fungicides on arbuscular mycorrhizal fungi (AMF) differ with fungicide mode of action and AMF species”, *Applied Soil Ecology*, Volume 72, 2013, Pages 22-30, ISSN 0929-1393, <https://doi.org/10.1016/j.apsoil.2013.05.013>, <http://www.sciencedirect.com/science/article/pii/S0929139313001443>

In particular, mycorrhizal development (colonisation and host growth), essential to the life of soils was found to be restricted. Coating seeds with broad spectrum fungicide treatments destroys the beneficial fungi which are vital for healthy plant growth, and the health of soils.

Organisations such as Soils For Life work to demonstrate, through practical on-farm case studies and research, the value of a regenerative approach to agriculture which values the soil as the source of life: <http://www.soilsforlife.org.au/regenerative-agriculture-case-studies>.

Canberra Seed Savers is a strong supporter of culturally, economically and environmentally appropriate biosecurity measures. Thank you for considering our submission.