

# Stakeholder comments

## Draft review of import conditions of brassicaceous vegetable seeds for sowing

Comments submitted by: Virginia Solomon, Permaculture Australia

### *Comment on the technical aspects of the report*

On behalf of the membership of Permaculture Australia, we request more time and a broader distribution of this proposal, please see question below.

### *Comment on proposed risk management measures*

On behalf of the membership of Permaculture Australia, we request more time and a broader distribution of this proposal, please see question below.

### *Other comments including additional information or issues*

On behalf of the 500 members of Permaculture Australia, we would like you to consider offering more time and a wider distribution of this proposal. We are a member-based organisation of individuals and organisations who predominantly grow their own food organically. We are concerned that the proposal to treat major genera of Brassicaceae with fungicides on and off shore could adversely affect the potential for importation of rare and heirloom varieties. Many of our member organisations and some member individuals are working with other seed savers around the world to preserve rare varieties by growing them to seed crop in a range of conditions (thus strengthening the growing conditions for the new/heirloom varieties). We understand the risk of disease and are certainly not suggesting that it be taken less seriously. On the contrary, we would like to see a less 'one size fits all' and more targeted approach to the problem.

Please can you allow more time and involve more organic producers in your study, so that we can help you develop policy that does not disenfranchise people who are attempting to improve the selection of Brassicaceae (and other Families as well!) available to producers in Australia.