

Stakeholder comments

Draft review of import conditions of brassicaceous vegetable seeds for sowing

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Comment on proposed risk management measures

1. Fumigants, fungicides, antibiotics do not kill viruses. Witness the presence in Australia of Cucumber Green Mottle Mosaic Virus. The probably real cause of the present of CGMMV is no or inadequate seed testing. More staff are needed.
2. Current biosecurity measures in general seem inadequate. Proof: presence in Australia of fire ants, Asian bees, Myrtle rust (*Puccinia psidii*), Hazelnut mite (*Tetranychopsis horridus*). More front-line staff are needed.

Other comments including additional information or issues

1. What fumigants or fungicides are you proposing to use on imported seeds?
2. Your Department's website reports that the Federal government has offered the organics industry up to \$100,000 on a matching basis to support its development of an organics export strategy, and has awarded \$70,000 to support market access gains through the use of the Organic Mark.

<http://www.agriculture.gov.au/about/media-centre/media-releases/allowing-trade-to-flourish-organically>

This is an excellent and forward-looking policy. It seems totally counter-productive or at least confused for the Department to require the use of fungicides and fumigants on seeds only to cripple or destroy an industry whose growth and development the government supports.

3. The NASAA Organic Standards accepts a wide range of permitted practices and inputs but no fumigants or fungicides (Annex 1), certainly not for pest control in storage and transport (Annex 3). The standards prohibit the use of all parabens (Annex 5).

<https://www.nasaa.com.au/documents/standards/6-nasaa-organic-standard.html>

The practical upshot of compulsory fumigation of all incoming seeds is that the source of supply of organic seeds would be terminated. That said, a positive outcome might be that we are impelled to grow far more of our own seeds than our current few percent. It is clear that to achieve this will require government support over a considerable period of time.

4. Australia is a signatory to the International Treaty on Plant Genetic Resources for Food and Agriculture (then Director, Productivity & Food Security Unit, Ag. Policy Division, Dept Ag.).

<http://www.fao.org/plant-treaty/countries/membership/country-details/en/c/359228/?iso3=AUS>

We have an international obligation to give Australian businesses and public the right and ability to choose fungicide-free seed and provide access to the widest possible range of plant varieties. Any proposal to douse all incoming seeds with various chemicals sounds like a

search for a quick, easy and cheap fix to a lack of support for AQIS and others to play their necessary part in the growing and exciting organic industry.

5. I would like to see more explanation from you about the soil chemistry impacts of the likely fungicides and fumigants given our emerging knowledge of the vital role of soil fungi.
6. More public consultation needs to be undertaken before taking a probably irreversible decision. The future of an entire industry sector is at issue, and not just the brassicaceous part of it.