

Department of Agriculture, Water and the Environment
CANBERRA ACT 2601

Via email: plantstakeholders@agriculture.gov.au

RE: Draft Pest Risk Analysis for Cut Flower and Foliage Imports – Part 2

Cotton Australia welcomes the opportunity to provide a submission to the Department of Agriculture, Water and the Environment's Draft Pest Risk Analysis for Cut Flower and Foliage Imports – Part 2 (PRA).

Cotton Australia is the key representative body for Australia's cotton growing industry supporting more than 1200 cotton producers. The cotton industry is an integral part of the Australian economy, worth more than \$2 billion per annum in export earnings and helping to underpin more than 50 rural communities.

Cotton Australia holds the official role for biosecurity stewardship in the Australian cotton industry, and works with the Australian government to manage this national priority through its membership of Plant Health Australia. Cotton Australia recognises the need for the cotton industry to work with the federal, state and territory governments to help reduce the potential for incursions of emergency plant pests that could adversely impact on production, domestic and international trade and the regional economy and environment. It is critical to all of Australian agriculture that the risk of major biosecurity threats entering and establishing in Australia is managed effectively.

Cotton Australia provided a submission to the PRA Part 1 highlighting the concerns that if a pest is found to be present in a consignment, but defined as non-quarantine or unregulated, the consignment is released without treatment and not recorded as non-compliant. These pests could be vectoring a range of plant pathogens or be a new biotype or strain different to those currently present in Australia, including biotypes or strains that are resistant to our available pest control tools. This was relevant to a number of species of mites, aphids and thrips as outlined in the submission to PRA Part 1, and this concern is equally relevant to a number of species listed in PRA Part 2. These include:

- *Bemisia tabaci* (silverleaf whitefly) complex. This pest is widespread throughout Australia, however there are several exotic varieties (Asia II species complex and Mediterranean MED species) which are not present in Australia. Silverleaf whitefly are capable of vectoring plant viruses. This includes Cotton leafroll dwarf virus (*polerovirus*) which is listed in the Cotton Industry Biosecurity Plan 2020 as a High Priority Pest with an overall risk rating of High. *Bemisia tabaci* is listed in the PRA as being regulated only in TAS and WA.
- *Helicoverpa armigera*. This pest is widespread throughout Australia, however the Cotton Industry Biosecurity Plan 2020 lists strains of *H. armigera* carrying Bt resistant alleles as a High Priority Pest with an overall risk rating of High. The introduction of strains resistant to the Bt toxins currently used in the Australian cotton industry would have a devastating impact on the industry however *H. armigera* is not listed as a regulated pest in the PRA.

The Australian cotton industry has a strong stewardship approach to pest management, incorporating principles of integrated pest management (IPM) and resistance management which has seen pesticide use dramatically reduced by

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97% since 1992 (Australia Cotton Sustainability Report 2019). The result of resistant pests and/or exotic strains entering our production system would negate the substantial environmental and financial benefits the industry has derived from adapting better, more environmentally responsible, chemical use practices.

Recommendation 1: Further consideration should be given to the management of biosecurity risk associated with non-quarantine and unregulated pests that arrive in cut flower and foliage consignments, recognising the potential for these pests to vector pathogens or introduce new and potentially resistant pest biotypes to Australian production systems. This may include mandatory control of any live plant pests found on cut flower and foliage imports, or alternative options.

Cotton Australia is concerned regarding the ongoing high levels of non-compliance from a range of exporting countries that pose a significant biosecurity risk to Australia. The data show in PRA Part 2 clearly shows that the revised import conditions introduced in 2018 have not significantly reduced the amount of live pests detected on imported cut flowers and foliage that are of biosecurity concern.

Cotton Australia supports the intent of the revised import conditions to move the risk offshore and establish a systemic approach with multiple control points to manage biosecurity risk.

Further, Cotton Australia supports the recommendation put forward by the NFF regarding non-compliance:

Recommendation 2: Where consignments of cut flowers and foliage are repeatedly non-compliant, the department should commit to suspending imports and consider additional biosecurity measures to achieve Australia's ALOP, such as suspending the systems approach or alternative disinfestation treatments.

Cotton Australia expresses support for the full submission put forward by the NFF.

Cotton Australia views biosecurity as a key priority for the industry and would welcome an opportunity to provide further information on its position. For more information, contact Sally Ceeney, Research Direction and Stewardship Policy Officer, sallyc@cotton.org.au 0459 189 771

Yours sincerely,



Research Direction and Stewardship Policy Officer
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