

19 August 2020

Grain Producers Australia Submission to the Draft report of the Pest Risk Analysis for Cut Flower and Foliage Imports – Part 2

Submission due date: 20th August, 2020

Submitted to: <https://haveyoursay.awe.gov.au/cut-flower-foliage-imports-part-2>

Grain Producers Australia background

Grain Producers Australia (GPA) represents Australia's broadacre, grain, pulse and oilseed producers at the national level. Grain Producers Australia works to foster a strong, innovative, profitable, globally competitive and environmentally sustainable Australian grains industry. Representing 5200 farm businesses, it strives to represent Australian grain farmers nationally and internationally in their contribution to sustainable development and society.

Working with its members – state farm organisations and farmers across the grain production area of Australia - GPA advocates for sound outcomes that deliver a positive commercial result. GPA is a not-for-profit company limited by guarantee. GPA is governed by a board, elected by its members.

The objectives of GPA are to:

- Provide a strong, independent, national advocate for grain producers based on a rigorous and transparent policy development process.
- Engage all sectors of the Australian grains industry to ensure operation of the most efficient and profitable grain supply chain.
- Facilitate a strategic approach to research, development and extension intended to deliver sound commercial outcomes from industry research.

The GPA policy council is strategically focused on three pillars of economic development, social responsibility and environmental management.

Our policy council includes representatives from State Farm Organisations including:

- Agforce Grains
- Grain Producers SA
- NSW Farmers
- Victorian Farmers' Federation Grains Group
- Tasmanian Farmers and Graziers Association
- WAFarmers
- WA Grains Group

GPA represents the grains industry as grains signatory to the Emergency Plant Pest Response Deed (EPPRD) and manages the biosecurity program as a member of Plant Health Australia. GPA is a joint Representative Organisation (RO) responsible for overseeing the performance of the Grains Research and Development Corporation (GRDC).

GPA Submission

Key biosecurity concerns coming from the Pest Risk Analysis Report Part 2, for GPA as grains industry EPPRD signatory.

GPA is concerned that while Part 1 of the Pest Risk Analysis report provided considerable information with regards non-compliance there is limited transparent information regarding non-compliance contained with Part 2 of the Pest Risk Analysis report.

The lack of transparency is of considerable concern. The data contained in Part 2 has been de-identified so scrutiny of continued non-compliance from importing countries is difficult and will be extremely difficult into the future. While GPA understands the Department is trying to show sensitivity with regards trade negotiations, continued non-compliance from the same countries, continued high level of risk to the Australian plant industries from the import of non-essential recreation product imports is unacceptable.

GPA understands the Department is focusing on the pests themselves rather than the origin of the containers in which detections or non-compliance are recorded. However, if surveillance is to be effective, industry planning and management of biosecurity are to be effective we need transparent flow of information regarding the origins of these constant source of risks to our industry.

GPA Statement: It is unacceptable not to include complete and transparent analysis of the interception and compliance data within the report. While the report is conducted in a manner consistent with international standards if the aim of the report is to provide complete analysis of the biosecurity risk to Australia from the import of cut flowers and foliage then greater transparency regarding the source of the risks is required.

The aim of the pest risk analysis is to assess the biosecurity risks associated with the importation of cut flowers and foliage into Australia. Part 2 assesses the risks posed by arthropod pests (other than thrips, mites and aphids which were assessed in part 1). Part 1 clearly identified significant non-compliance issues which led to imposition of permit requirements on Colombia, Ecuador and Kenya.

While it must be disappointing for those countries to have been named the transparency ensures those countries and the Australian companies importing cut flowers and foliage from those countries can be held to account. It is unfair to those countries previously identified that while their non-compliance, regarding the pests investigated under Part 1 and prior to the imposition of the permit system, is a matter of public record those countries who have not been able to comply with the biosecurity requirements with relation to the pests assessed within Part 2 have been able to hide the level of interceptions and non-compliant containers within de-identified data.

Data regarding rates of non-compliance has also been amalgamated with no significant differentiation between the impact on compliance of the 1st March, 2018 permit system and the 1st September, 2019 permit imposition.

The report clearly illustrates the incidence of interceptions is still worryingly high. The report contains updated analysis of volumes of imports, countries of origin and detection data. However, due to concerns that countries of origin may take offence at perceived criticism of the inability to adequately meet Australian biosecurity requirements the Department has chosen to de-identify the country by country data regarding level of detections and non-compliance.

It is unacceptable that when undertaking media activity regarding this issue the Department have taken a conciliatory angle regarding the slight decrease in interceptions and non-compliance. The focus of the Department should be the actions required to ensure Australian based plant industries are not put at risk from the pests and diseases entering via this import pathway.

GPA recommendation: All data regarding interceptions and non-compliance should be a matter of public record and clearly identified within the Part 2 report.

GPA Statement: It is not acceptable that companies importing cut flowers and foliage from higher risk countries are able to hide behind de-identified data and not be held accountable for the risks and substantial potential costs they are imposing on the Australian plant industries.

Full disclosure of countries of origin and data regarding their compliance with biosecurity requirements would improve accountability and provide consumers of the product with choice.

Reports such as the Pest Risk Analysis Parts 1 and 2 help to inform Government policy and the Department's approach to biosecurity. A lack of transparency inhibits accountability and inhibits the ability for measures to be developed adequately address the need for increased biosecurity surveillance activities, increased fully cost recovered biosecurity management activities at import points, increased surveillance of supply chains and distribution of imported flowers and implementation of a compulsory country of origin labelling system to enable Australian's to support locally grown flowers.

GPA statement: It appears DAWE have backed themselves into a corner supporting the rights of importers of a non-essential recreational plant product ahead of the Australian based agricultural plant industries which should be their priority.

- They have allowed flower importers to be the ones setting the definitions of reasonableness with regards to import and permit conditions,
- They have made excuses for the continued unacceptably high levels of non-compliance, under the provision that “well they are doing better than they were”,
- At plant industries request they expanded the membership of their Imported Flowers and Foliage Working Group only for members to find that under the Department's rules membership of the working group essentially gagged them from continuing to raise concerns about ongoing non-compliance and permit breaches, and
- They have attempted to subvert the ability of industry bodies to raise concerns by refusing to provide access to compliance data under the grounds of trade sensitivities.

GPA recommendation: Acceptable “appropriate levels of protection” should be based on individual countries performance individually, not on the average of all countries importing products into Australia. The ALOP must be less than 5% non-compliance for a country to be allowed to continue to import the product into Australia. Importers must not be allowed to put Australian based industries at risk.

Conclusion

As the grains industry signatory to the EPPRD GPA would like to thank you for the opportunity to provide comment on the Draft Pest Risk Analysis Report Part 2. We remain deeply disappointed that the biosecurity of Australia's plant industries and therefore broader Agriculture are not been given the priority they deserve.

The Department of Agriculture, Water and the Environment must put a greater focus on working transparently with the broader Australian plant industries and agricultural sector to ensure they are undertaking the actions required to prioritise the biosecurity needs of Australian plant industries.

A funding mechanism must be introduced which ensures importers, and particularly containerised product importers are contributing to the costs of Australian biosecurity activities. As an island nation there is clear evidence that imported products, and the containers they travel in, are the most significant source of biosecurity risks. It is time these importers have a levy imposed which will contribute towards costs of the surveillance, monitoring and management of the risks they are a significant vector for.