



25 August 2020

Department of Agriculture, Water and the Environment
CANBERRA ACT 2601

Via email: plantstakeholders@agriculture.gov.au

To whom it may concern,

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

The National Farmers' Federation (NFF) 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).

The NFF was established in 1979 as the national peak body representing farmers and the agriculture sector more broadly, across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

Australia's biosecurity system is fundamental to the success of our agriculture industries, to the health of our natural environment and our society and economy at large. Ensuring Australia's biosecurity system is innovative, adequately resourced and operating efficiently is critical and should be a shared priority for governments, industry, and the broader community. In an increasingly complex global environment where international trade and travel continue to increase, the risk of major biosecurity threats entering and establishing in Australia is heightened. As a trading nation, we must ensure that we have taken all measures possible to prevent pest incursions through all import pathways, particularly known high risk pathways like cut flowers and foliage.

While the NFF is a strong advocate for agricultural trade between countries, this trade must be managed so as not to put at risk our favourable pest and disease status, which is vital for farming, for the wider community and the environment. The NFF and its member organisations are concerned that the biosecurity risk associated with imported cut flowers and foliage is not being adequately managed, and puts in jeopardy our plant production industries, which generate more than \$30 billion annually.



The NFF recognises the critical role that the Department of Agriculture, Water and the Environment (DAWE) plays in delivering national biosecurity functions, working with trading partners and coordinating national biosecurity policy. Initiatives such as the PRA for imported cut flowers and foliage are important to inform biosecurity risk management and the department is to be commended on the extensive technical work undertaken in the preparation of PRA Part 1 and draft PRA Part 2. The department is also to be commended for the work it has done since 2018 to reduce the arrival rate of live pests from the more than 19 countries that export cut flowers and foliage to Australia. These efforts provide a solid foundation from which to progress further improvements needed to achieve Australia's appropriate level of protection (ALOP).

In March 2019 the NFF responded to the draft PRA Part 1, expressing concerns about a lack of information to demonstrate the effectiveness of new import conditions and how ongoing non-compliance is handled. Some of these concerns remain relevant in the context of PRA Part 2, and further detail is provided below, along with further commentary on remedial fumigation, management of non-quarantine and non-regulated pests, effectiveness of devitalisation and the use of alternative disinfestation treatments.

The department's engagement with industry is welcomed

In our submission to the draft PRA Part 1, NFF stressed the importance of consultation with the broader agriculture sector, given that pests detected on cut flower and foliage imports pose a risk to a wide range of plant industries outside of cut flower and foliage production. The NFF has welcomed the department's inclusion of agricultural industry representatives in the Imported Cut Flower and Foliage Regulation Working Group, and looks forward to continuing to engage through this group. We have also appreciated the department's willingness to directly engage with NFF and its member organisations both in the context of PRA Part 2 and regarding broader concerns about the cut flower import pathway. This engagement and exchange of information is important, and is underscored by our shared interest in maintaining Australia's biosecurity status.

New import conditions are not effective in reducing risk to an acceptable level

The biosecurity risk posed by the current import arrangements for cut flowers and foliage has the potential to negatively impact the entire agriculture sector. Ongoing unacceptably high rates of non-compliance from a range of exporting countries significantly undermine the good work government and industry have done over an extended period to protect Australia's clean, green and safe image and pest and disease-free status.

The data included in draft PRA Part 2, particularly Figure 11 and Figure 12, clearly demonstrate that for a number of countries the revised import conditions introduced in 2018 are not having the desired effect of significantly reducing the



arrival rate of live pests of biosecurity concern. While there have been improvements to the rates of non-compliance in some instances – as a result of both changes to import conditions and the introduction of import permit requirements for Kenya, Ecuador and Columbia – a high rate of non-compliant consignments continue to arrive at the border from a range of countries. As noted in the text accompanying Figure 12, while several countries have had a decrease in the rate of non-compliant consignments, other countries have not improved. Countries 2, 3, 5 and 9 all show a proportionate *increase* in non-compliance¹.

The NFF strongly supports the intent of the revised import conditions to move risk offshore, with multiple control points established to ensure a systemic approach to managing biosecurity risk. Similarly, we welcomed the introduction of import permits in 2019 as an additional compliance tool. It is clear, however, that neither the revised import conditions nor the import permits are achieving ALOP.

Changes are needed and import conditions must be enforced

The current import conditions require the exporting country National Plant Protection Organization (NPPO) to visually inspect consignments and include the following declaration on a phytosanitary certificate: ‘*The consignment ... was inspected and found free from live quarantine pests.*’² The pre-export arthropod pest management options are intended to reduce the risk of quarantine and regulated pests prior to the visual inspection³. The NFF is concerned that despite these requirements being in place, live quarantine pests continue to arrive at the Australian border in consignments officially certified as being free of pests.

For those countries from which Australia consistently receives non-compliant consignments, the reliance on pre-export certification of pest freedom does not appear to be an effective way of managing risk. The NFF understands that the department works with these trading partners to understand and improve in country pest management approaches, and that improvements continue to be made. However, in the meantime non-compliance continues to put at risk Australia’s plant industries and environment.

The new import conditions have been in place for over two years, and the NFF recommends that the department now take a zero-tolerance approach, enforce the import conditions and suspend imports from countries and suppliers that have been repeatedly non-compliant. The NFF would also support the department using other regulatory options to improve non-compliance, such as suspending the systems approach, which for the majority of countries is clearly not an effective

¹ See draft PRA Part 2 page 32, *Figure 12: Consignment non-compliance by country: January 2019 and January 2020.*

² See draft PRA Part 2 pages 70-75, *Section 7.1: Pest risk management measures and phytosanitary procedures.*

³ *Ibid.*



and reliable way of managing pest risk to meet Australia's ALOP⁴. The department's decision in June this year to suspend the systems approach and alternative NPPO approved disinfestation treatments for chrysanthemums from Malaysia⁵ was a decisive and welcome regulatory action that should be replicated to manage risk from other exporting countries.

Recommendation 1: 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.

Recommendation 2: Consideration should be given to the reliance on NPPO pre-export certification of cut flower consignments as 'free from pests' and opportunities to work with exporting countries to improve and verify the certification process in country.

Assurance is needed that remedial fumigation is effective

The data summarised in Figure 11⁶ is particularly concerning, as it shows that for most countries the systems approach is not effective in reducing pest load. Equally concerning are non-compliance rates for countries using methyl bromide fumigation prior to export - particularly two countries reporting non-compliance above 20%. Australia relies on methyl bromide fumigation for onshore treatment of non-compliant consignments prior to release from biosecurity control. None of the four countries represented in Figure 11 successfully eliminated all biosecurity pests using methyl bromide fumigation. This is alarming given remedial methyl bromide fumigation is essentially our last line of defence against biosecurity pests arriving in Australia through this import pathway.

The NFF appreciates that the data provided in the draft PRA does not relate to fumigation undertaken in Australia, but would make the point that the data does undermine confidence in this treatment option. The NFF would welcome the inclusion of onshore post-fumigation verification data for cut flower imports in the final PRA. The 2015 Interim Inspector-General of Biosecurity report on the effectiveness of biosecurity controls for imported cut flowers⁷ recommended the department consider the need for regular or random post-fumigation checks for live pests, to establish the effectiveness of fumigation treatments. Provision of data from these checks would provide confidence to industry that using remedial

⁴ See draft PRA Part 2 page 31, *Figure 11. Consignment non-compliance by import measure: September 2019 to January 2020*

⁵ <https://www.agriculture.gov.au/import/industry-advice/2020/102-2020>

⁶ See draft PRA Part 2 page 31, *Figure 11. Consignment non-compliance by import measure: September 2019 to January 2020*

⁷ Interim Inspector-General of Biosecurity, 2015. *Effectiveness of biosecurity controls for imported fresh cut flowers*. Report No. 2014-15/01, January 2015.



fumigation – while not the preferred approach to biosecurity risk management for this pathway – is an effective measure.

The 2017 review of import conditions for cut flowers revealed that the reliance on a single critical point of control (methyl bromide fumigation onshore) presented a significant biosecurity risk to Australia. The revised import conditions are designed to move risk offshore, with multiple control points established⁸. The NFF is concerned that under current import conditions live pests continue to arrive at the border, which effectively puts us back in a position of relying on a single point of control (onshore methyl bromide fumigation). We need to be confident that onshore fumigation removes all biosecurity pests from imported cut flowers and foliage.

Recommendation 3: That the final Pest Risk Analysis Part 2 include data from onshore post-fumigation verification checks, to provide confidence to industry that remedial fumigation effectively removes pests from cut flower imports prior to release from biosecurity control.

Other comments

After consideration of the PRA and consultation with NFF member organisations and broader industry representatives, the NFF holds a number of additional concerns regarding current approach to pest risk management in imported cut flowers. The NFF refers to and supports the detailed comments made in the submission from AUSVEG regarding the following issues:

- **Vector and biotype risks.** The NFF has concerns around the provision that if pests are 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.
- **Devitalisation.** PRA Section 7.1.2. details the requirement for devitalisation of species that are propagatable. The NFF strongly supports the department's requirement for cut flowers from propagatable species to be devitalised with glyphosate treatment prior to export. To reduce the risk of transmission and spread of exotic plant pathogens, it is critical that imported cut flowers and foliage are not able to be propagated in Australia. The NFF seeks further information on how the efficacy of devitalisation treatments is assessed when consignments arrive in Australia.

⁸ <https://www.awe.gov.au/sites/default/files/2020-01/cut-flower-industry-forum-communicue.pdf>



- **Alternative pre-export disinfestation treatments.** Section 7.1.4 of the PRA advises that the department will accept any treatments approved by the NPPO of the exporting country that are applied to kill pests on cut flowers and foliage for export to Australia. Industry is concerned that pest management approaches employed by exporting countries are not effective (e.g. see Figure 12 of the draft PRA), and requests that the department be proactive in working with exporting country NPPOs to understand, approve and review the effectiveness of alternative disinfestation treatments.

The NFF is concerned about the potential for imported cut flowers and foliage to vector exotic pathogens that could cause serious damage to our domestic primary production industries and environment. This risk is heightened where imported cut flowers are propagated in Australia or used and disposed of in a manner that exposes the cut flower to potential host materials – for example in outdoor weddings, cemeteries, or in household compost systems or near waterways. Cut flowers may be infected by pathogens without displaying symptoms⁹, and therefore the presence of infection won't be picked up by biosecurity officials in the visual inspection of incoming consignments.

Devitalisation of imported cut flowers using glyphosate is an important mechanism for managing the risk of pathogen spread, and we must have confidence that these devitalisation treatments are effective. This may require auditing of export country supply chains, given the ongoing issues with pre-export certification of pest freedom (outlined above). A systematic approach to onshore verification of devitalisation treatments is also needed. Responsible disposal of cut flowers is important, and consideration should be given to consumer education about the risk of spreading pests and diseases through the inappropriate disposal of imported cut flowers.

Recommendation 4: 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 (that may be asymptomatic in cut flowers) or introduce new and potentially resistant pest biotypes to Australian production systems.

Recommendation 5: The final PRA Part 2 should include information on how the effectiveness of devitalisation treatment of imported cut flowers and foliage is assessed prior to export and when consignments arrive in Australia.

⁹ E.g. *Ralstonia solanacearum* found to infect ornamental species without showing symptoms
<https://www.greenhousemag.com/article/when-roses-are-blue-ralstonia-wilt/>



Recommendation 6: The department should consider how it can work with exporting country NPPOs to establish and review the effectiveness of alternative disinfestation treatments applied to cut flower and foliage consignments.

Country of origin labelling

To support Australian consumers to make more informed purchasing decisions, the NFF supports the introduction of mandatory country of origin labelling on pre-packaged cut flower and foliage bunches in supermarkets and warehouses. Many Australian consumers would be unaware that Australia imports cut flowers from at least 19 countries and these flowers are distributed and sold across Australia. The issue of transshipment must be taken account of in any new labelling requirement – so that labels accurately reflect where the flowers were grown, rather than an intermediate country where the flowers were transhipped and re-exported. Part 1 of the PRA advised that incorrect identification of the country of origin of imported cut flowers is an internationally recognised risk¹⁰. We raise this matter here while acknowledging that responsibility for regulation of labelling sits within another portfolio and is outside the scope of the PRA process.

Recommendation 7: The NFF recommends the introduction of mandatory country of origin labelling on pre-packaged cut flower and foliage bunches in supermarkets and warehouses to help consumers understand where their flowers are grown.

The NFF thanks the department for the opportunity to provide input to this important consultation process. The effective management of biosecurity risk associated with high risk import pathways like cut flowers and foliage is of utmost concern to the farm sector, and we would welcome the opportunity to continue to engage with the department on this matter. The NFF would also like to express support for the submissions provided by our member organisations and members of the NFF's Horticulture Council, including AUSVEG, Cotton Australia and NSW Farmers.

Should you require any further information in relation to this submission, please contact Adrienne Ryan, NFF General Manager for Rural Affairs, on 02 6269 5666 or aryan@nff.org.au.

Yours sincerely,

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Chief Executive Officer

¹⁰ Pest Risk Analysis for Imported Cut Flowers and Foliage Part 1. Section 3.1.2. *Country of origin labelling*.