



24 August 2020

Department of Agriculture, Water and the Environment  
CANBERRA ACT 2601

Via email: [plantstakeholders@agriculture.gov.au](mailto:plantstakeholders@agriculture.gov.au)

To whom it may concern,

NSW Farmers is grateful for the opportunity to comment on Part Two of the Draft Pest Risk Analysis for Cut Flower and Foliage Imports.

We remain very concerned about significant non-compliance from a number of exporting countries, who continue to fail a large number of inspections. Despite the introduction of new import conditions, the level of non-compliance remains concerning. If the Department intends to continue its acceptance of offshore assurance measures, these should be comprehensively reviewed to understand where they fail to meet Australia's biosecurity standards. It is critical that pre-treatments are verified as effective – given the large number of interceptions, it is clear that these measures do not all meet established biosecurity standards.

Our members are disappointed to see the inconsistent application of biosecurity standards across industries, pointing to the discrepancy between the strictly (and appropriately) controlled import of bulk grain and the standards required for cut flower imports. While we recognise the need for sensitivity around trading relationships, we are concerned that this is likely at the expense of our plant industries.

NSW Farmers endorses the following recommendations made by the National Farmers' Federation in their submission:

- 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 Appropriate Level of Protection, such as suspending the systems approach or alternative disinfestation treatments.
- 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 that country.
- 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.
- 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.
- The final PRA Part 2 should include information on how the effectiveness of devitalisation treatment of imported cut flowers and foliage is assessed when consignments arrive in Australia.

**NSW Farmers' Association**

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- 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.
- 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.

Should you wish to further discuss NSW Farmers' position on this issue, please contact Alexandra Buntton, Senior Policy Advisor – Cropping and Horticulture, on 0434 399 639 or at [buntona@nswfarmers.org.au](mailto:buntona@nswfarmers.org.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ian McColl'.

Ian McColl  
Chair – Biosecurity Committee