Submission to the Draft Pest Risk Analysis for Cut Flower and Foliage Imports—Part 1

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. The cotton industry is committed to ensuring effective responses to pest incursions are possible to minimise costs.

Cotton Australia welcomes the opportunity to put forward a submission on the Draft Pest Risk Analysis for Cut Flower and Foliage Imports on behalf of its members.

Cotton Australia is supportive of the Draft Pest Risk Analysis, however would like to highlight some concerns regarding the level of interception of live insects on imported cut flower and foliage products.

The high level of pest interception and non-compliance being recorded suggests that either the pre-shipment treatments being undertaken in exporting countries is largely ineffective, and/or there are high levels of non-compliance in treatment. This non-compliance is increasing the costs to the Australian industry for further treatment and inspection, and increasing the biosecurity risk by limiting the treatment to a single application.

A number of pests that are imported on cut flowers and foliage are also insect pests of cotton, including mites, thrips and aphid.

A key biosecurity risk is the potential importation of exotic strains of established pests. For example, the two-spotted spider mite (*Tetranychus urticae*) is an established pest in Australia, but there are a number of exotic spider mite strains (*Tetranychus turkestani, T. pacificus, T. cinnabarinus*) that may not respond to chemical control in the same way. Exotic strains may also display different levels of crop damage and may attack different crops.

The import of established pests carrying resistance to one or more of the current chemical control options available in Australia is also a key biosecurity risk for the cotton industry. Imported pests may also act as vectors for disease and viruses.

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 along with the use of more selective options when pest control is necessary.
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.

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,

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Cotton Australia