SUBMISSION

Draft Pest Risk Analysis for cut flower and foliage import

Submitted to: https://haveyoursay.agriculture.gov.au/cut-flower-foliage-imports-part-1/survey_tools/submit-your-feedback-online1

Date: 31st January 2019
Grain Producers Australia

Grain Producers Australia (GPA) represents Australia's broadacre, grain, pulse and oilseed producers at the national level.

GPA was created to foster a strong, innovative, profitable, globally competitive and environmentally sustainable grains industry in Australia.

The objectives of GPA are:

- To establish 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, and
- Facilitate a strategic approach to Research, Development and Extension intended to deliver sound commercial outcomes from industry research.

GPA has an industry leading policy council which is supported by State Farm Organisation (SFO) members including: VFF Grains Group, NSW Farmers Association, Agforce Grains, Grain Producers SA, TFGA, WA Farmers, WAGG along with 3 elected growers from the North, South & Western GRDC regions of Australia. As such, GPA has comprehensive national representation across the Australian grain production sectors.

Thank you for the opportunity to provide this submission on behalf of our grain producer members.

Yours sincerely,

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**Introduction**

While Grain Producers Australia (GPA) thanks you for the opportunity to provide comments on the draft Pest Risk Analysis for cut flower and foliage imports part 1, we condemn the timing of your consultation and feedback process and the general lack of sincere consultation with the broader agricultural sector. We became aware of the draft PRA in late January and so have had little time to undertake the extensive review and consultation process, with our policy council and members, we would normally take. Hence our comments on this initial stage will be brief.

GPA strongly supports the response submitted by the Victorian Farmers Federation and Flowers Australia. The concerns expressed in that submission are endorsed by GPA and reflect the same concerns GPA has regarding the situation facing Australian plant industries as outlined in the draft PRA.

While the GPA commends the detail so far included in the PRA we do not support the conclusion reached that Australian plant industries are being or able to be adequately protected from the very real risk of pest and disease outbreaks without substantial improvements to the enforcement of import protocols for cut flowers and foliage.

Australian based industries and Governments are making considerable contributions towards the management of incursions of pests such as Russian Wheat Aphid. We are concerned about what level of contribution to Plant Health Australia (PHA), the cut flower and foliage importers are making to support the biosecurity activities being undertaken in Australia.

**Lack of transparent consultation**

As the grains industry member of PHA and signatory to the Emergency Pest Plant Response Deed (EPPRD) we would request that in future we be contacted directly regarding reports and PRA processes dealing with pests of significance to our industry. We are concerned the draft PRA has been released in a way and at a time of the year which makes it difficult for GPA and other grains industry organisations to give it the consideration it deserves given the implications for our industry.

**Serious risks are being imposed upon the $20 Billion grains industry in order to allow the importation of non-essential recreational ornamentals.**

Around $64.1million worth of cut flowers and foliage is imported into Australia. There has been no information provided of the actual value to the Australian economy.

The assessment of the level of risk doesn’t provide an accurate reflection of the use of ornamentals within the Australian environment and the potential for two spotted mites, aphids and thrips to enter the agricultural environment and go on to cause significant biosecurity issues.

It is concerning the needs of an ornamental industry based on importation, with a significant record of non-compliance with biosecurity requirements, has been allowed to put at risk the domestic Australian grains industry worth between $9 - 14 billion at the farm gate.
Depending on the season, and once it passes through the supply chain; grains deliver more than $10 billion in export income to the broader Australian economy. Overall the grains industry has a gross value of production worth between $18-20 billion. 

Where is the focus on the impact these risky imports are having on the domestic, Australian based cut flower and foliage industry and the other Australian plant industries? All Horticultural industries, grains and oilseed, rice, cotton, pasture and even the success of our backyard gardens are dependent on strong biosecurity protocols. While briefly acknowledged within the PRA, the considerable biosecurity risk to Australian plant industries has not been adequately addressed.

Grains and oilseeds are Australia’s largest category of food exports, representing 24 per cent of total agricultural exports. The importance of the Australian grains industry is recognised and supported by strict import protocols, which severely restrict the importation of any grains or oilseeds into Australia. If applications for the importation of grain are received the grains industry, in particular producer representative and EPPRD signatory GPA are directly consulted both by proposed importers and the department regarding concerns and key import considerations.

The lack of consultation with the grains industry regarding the import protocols for cut flowers and foliage is therefore of grave concern given the high risk and serious impact from pests entering Australia via this pathway.

The draft PRA highlights a number of areas of considerable concern to GPA, not the least of which is the ongoing high level of non-compliance amongst flower and foliage importers. That our grains industry is being putting at such risk from the importation of cut flowers and foliage carrying arthropods such as two-spotted mite, thrips and aphids.

That in the eighteen years between January 2000 and February 2018 there were more than 38,000 intercceptions recorded between is indefensible. That the import protocols were then altered in March 2018 to address the previous failures is largely irrelevant given:

- No concrete information on compliance or enforcement actions has been provided, leading to a lack of confidence that the issues identified prior to March 2018 as outlined in the PRA are being appropriately addressed,
- No data has been provided for the period March 2018 until November 2018 to illustrate whether the changes were successful in reducing the number of intercceptions. At the very least data from March 2018 until June 2018 (including the busy Mothers Day period) should have been included, and
- There has not been appropriate (if any) consultation with the broader agricultural sectors, in particular the plant industries, regarding the import protocols, the level of ongoing non-compliance and the associated risks.

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1 Economic data compiled from figures available on the GRDC and AEGIC websites. GRDC.com.au and aegic.org.au.
Ongoing non-compliance with import protocols and fumigation requirements.
GPA notes that within Appendix B is the brief acknowledgement that in August 2018, six months after the implementation of the updated import protocols, the department had to correspond again with importers and their suppliers about ongoing high levels of non-compliance. This leads GPA to make a number of observations:

- There must therefore be data that was collected by the department during the six months to August outlining the level of ongoing non-compliance, that data must be included in the PRA, and
- For the sake of transparency, and if the PRA is to provide an accurate reflection of the current situation, an assessment of the levels of non-compliance, ongoing correspondence with the relevant importers, audits of the fumigation facilities and compliance and enforcement actions undertaken need to be transparently and prominently included in the report.

The PRA’s conclusion that Australia can reach an Acceptable Level of Protection must be challenged. There is too much evidence of non-compliance, a naïve assessment of the actual use of imported ornamentals within the Australian environment and therefore a lack of consideration for the significant level of risk being placed upon Australian plant industries.

GPA believes it is important additional Australian plant industry representatives, representing broader Australian agricultural interests, are actively involved in future working group discussion and directly consulted in the next stages of the PRA process.