30 January 2019

Plant Sciences and Risk Assessment
Department of Agriculture and Water Resources
GPO Box 858
Canberra ACT 2601
Email plantstakeholders@agriculture.gov.au

To whom it may concern

**Pest Risk Analysis for Cut Flower and Foliage Imports—Part 1**

Growcom is the peak industry body for production in horticulture in Queensland as well as being the signatory to the Plant Health Deed on behalf of the pineapple industry. Biosecurity is a key issue for our members and there is significant concern that the Australian government is not adequately managing the prevention of new pest incursions from imported plant products.

As you are aware, Growcom worked closely with your department to improve consultation mechanisms with industry in relation to the Import Risk Analysis process and we strongly support the industry liaison function within the department. Considering that Arthropod pests are a significant risk to the Queensland horticulture sector, we are disappointed that minimal effort was made to contact us in relation to the release of the Pest Risk Analysis (PRA) for Cut Flower and Foliage Imports – Part 1. Consultation with other industry organisations such as AUSVEG and VFF indicates that they were not formally engaged either.

Whilst we appreciate that it can be difficult to identify key stakeholders due to the sheer number of horticulture bodies within Australia, we would recommend that signatories to the Plant Health Deed be notified at the bare minimum and a liaison process followed with key industries who are at significant risk from the pests.

Having only just been made aware of the PRA, we are unable to provide detailed technical comment even with an extended deadline however we would like to support the submissions made by the Nursery and Garden Industry Australia, AUSVEG and the VFF. In particular we would like to support comments relating to the very high interception rates from certain importing countries which would indicate that current measures are not adequate.

Whilst we do acknowledge the department's efforts in initiating this review, the lack of consultation with broader industry, coupled with the disconcertingly high non-compliance rates from some importing countries does little to quell the concerns of growers regarding imported plant commodities.
I will be leaving Growcom to take up the position of Executive Officer of Berries Australia. I would be happy to engage with you in that capacity in relation to industry consultation and I am sure Growcom will continue to take an active role in biosecurity for the broader horticulture sector and pineapples specifically. Please contact me on 0408 796 199 or the Growcom CEO David Thomson at dthomson@growcom.com.au 07 3620 3817.

Yours sincerely,

Rachel Mackenzie
Chief Advocate