19 March 2019

Risk Analysis Efficiencies and Stakeholder Engagement
Department of Agriculture and Water Resources
GPO Box 858
Canberra ACT 2601

To whom it may concern,

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

While NSW Farmers does not have the expertise to comment on technical elements of the Pest Risk Analysis (PRA), we consider it important to respond to matters raised in the draft document. NSW Farmers is very concerned about the very high number of pest detections on imported cut flowers and foliage, and supports appropriate measures to reduce ongoing risk and appropriately respond to repeated non-compliance from exporting countries.

NSW Farmers would like to ask a number of questions regarding the draft PRA, as detailed below.

- Can the department provide an updated dataset on detections to 31 January 2019, following the introduction of the new import requirements?
- In relation to section 7.2.8 (Remedial action(s) for non-compliance) – which organisation undertakes audit of risk management systems in the exporting country – the Department of Agriculture and Water Resources or that country’s National Plant Protection Organisation (NPPO)? How many times has this occurred to date?
- How regularly is equivalence with exporting countries reviewed, as per ISPM24?
- What is the impact of fumigation on eggs? Do approved integrated pest management solutions appropriately neutralise eggs?
- Appendix B states that in August 2018 the department corresponded with the NPPOs of the leading exporting countries to provide an update on compliance with the revised import conditions, and requested that countries with high rates of non-compliance investigate and address the causes of non-compliance.
  - Have the import conditions for phytosanitary certificates been updated with the changes to the import requirements?
  - Does the request for investigation include instances of non-compliant certificates?
  - Has the department received any reports from exporting countries on their investigations?
  - How regularly are reports requested from countries with high rates of non-compliance?
  - How does the department follow up (or plan to follow up) on the information and actions from these reports?
• Is non-compliance in country of origin labeling reported back to exporting countries? What remedial action does the department undertake when observing consistent non-compliance with origin labeling?

• Which organisations were consulted in the preparation of the draft PRA? How did the department determine which organisations to consult? Why were state farming organisations and industry bodies not included on the Imported Cut Flower and Foliage Regulation Working Group?

Should you wish to further discuss NSW Farmers’ position on this issue, please contact Alexandra Bunton, Senior Policy Advisor – Cropping and Horticulture, on 02 9478 1020 or at buntona@nswfarmers.org.au.

Yours sincerely,

Ian McColl
Chair – Biosecurity Committee