Draft Pest Risk Analysis for Cut Flower and Foliage Imports – Part 1

NSW Department of Primary Industries (NSW DPI) notes Department of Agriculture and Water Resources’ extension of the consultation period for the draft Pest Risk Analysis for cut flower and foliage imports to 15 March 2019 and appreciates the opportunity to provide comment. NSW DPI considers the report informative and thorough.

Proposed risk management measures
The draft Pest Risk Assessment (PRA) proposes that the revised import conditions introduced on 1 March 2018 should reduce the unrestricted risk for all identified quarantine and regulated mites, aphids and thrips to ‘Very low’, thus achieving the ALOP for Australia. However the PRA also states (p51) that at the time of publishing (November 2018) compliance with the March 2018 import conditions was variable and had only improved incrementally.

NSW DPI comment
In the absence of compliance with the March 2018 measures it is not possible to know if the ongoing interceptions are the result of non-compliance or inadequacy of the measures (or both). It cannot currently be demonstrated that the proposed measures do in fact reduce risks sufficiently to achieve the ALOP for Australia.

NSW DPI recommends stronger enforcement of the March 2018 measures and subsequent analysis of interception and compliance data to assess the effectiveness of the proposed measures.

NPPO-approved Systems approaches
The report states (p51) that “The change to pre-shipment management (systems approach or treatment) is justified by the changing risk profile...”. However the report goes on to say (p 52) that “Since the implementation of the revised import conditions on 1 March 2018, the highest rates of non-compliance have been linked to NPPO-approved systems approaches. Australia has detected quarantine pests in more than 50 per cent of consignments from some major exporting countries using systems approaches.”

NSW DPI comment
Such a high rate of non-compliance undermines both confidence in NPPO-approved systems approaches in general and any justification to adopt/support NPPO-approved systems approaches to risk management in this instance. NSW DPI firmly supports robust systems approaches as the way of the future and considers effective rectification of non-compliance issues vital to successful implementation.
General comments
NSW DPI has made a number of general comments and suggestions on a Word version of the document, which accompanies this response.

Thank you once again for the opportunity to provide comment. NSW DPI looks forward to continuing its participation in this Pest Risk Analysis for cut flower and foliage imports as the process unfolds.

Yours sincerely

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