

Comment from AUSVEG On Draft PRA for PepMV and pospiviroids associated with tomato seed.

General

AUSVEG welcomes the opportunity to provide comment on this document.

The biosecurity risks associated with importing seed have been a concern for AUSVEG and these PRAs provide an important means for evaluating and mitigating organisms of biosecurity concern. To this end AUSVEG is also an active member of the Imported Seed Regulation Working Group.

Although AUSVEG does not represent the tomato industry, comment is provided on this document as the pathogens are also of concern to AUSVEG members who produce capsicums, potatoes and other Solanaceous crops.

AUSVEG has also noted that improvement in rigour in recent PRAs. However, this PRA raises a number of concerns in the construction of the case for Emergency Measures around tomato seed imports and as such raises concerns that this may lead to questions from trading partners as to the need for these measures. These PRAs are public documents and if we can see some potential issues then it would follow that others can also see them.

The PRA, as written lacks clarity in places (particularly section 5) and as such appears at times contradictory and defeated by its own logic. The evidence presented by the Department in this PRA provides in our view, grounds for querying Australia's biosecurity protocols around seed testing. At the very least the data undermines the risk assessment procedures and ratings.

Australia has set its ALOP at very low. As detailed in Table 2.1, and previous PRAs provided by the Commonwealth, this has an ascribed probability of p 0.001 to 0.05 or 0.1% to 5% (Table 2.1).

Referring to Section 5:

The data and the subsequent discussion on testing of imports shows that in 2013, (emergency measures were implemented in several stages up to 2013), of 502 samples of seeds tested only 19 were infected by quarantine pests. This represents an incidence of 3.78% which is within Australia's ALOP as defined in Table 2.1.

Furthermore when the data is further broken by individual viruses, the incidence falls to even lower levels for the two viruses (PepMV and TPMVd). This, coupled with nil detections since 2013 conflicts directly with the risk assessments in the following section whereby risk of importation for these species is described as moderate. Hence nil risk, does not just justify a modest risk assessment.

The data supplied in Table 5.4 also renders the assessment of import risks as meaningless as by its own data the Commonwealth has shown that for all the viruses presented the interception data suggests either negligible or very low risk. By considering each virus individually the data in Table 5.4 shows that with the existing measures the current risk is negligible to extremely low. This, therefore provides no justification for any extension of emergency measures as proposed in Section 7.

A more relevant data set would have been to provide data pre Emergency measure introduction and the impact of the emergency measures.

AUSVEG recognises that the risks do exist and is certainly not advocating removal of emergency measures. However, our recommendation is a change of approach to the whole report. Australia cannot argue for increased testing of seed (such as proposed in section 7 for PepMV) and at the same time show data that we have never detected the virus in testing. A better case needs to be made for what is proposed. Again AUSVEG is not arguing against the proposals from the Commonwealth just that the reasoning and logic does not support the proposal.

Comments by Section (where required)

Section 1 Scope

The report states that it proposes continuing emergency measures. This is not strictly accurate as the details of what is being proposed is that these be extended/amended in terms of the rigour of testing (see section 7).

It would also be beneficial to tell the reader what measures are in place to address the risk posed by these viroids from other pathways. As constructed currently, this section could give the impression that such pathways remain open.

Section 3 Commercial Seed Production and Trade

AUSVEG concurs with the assessments made therein and that the current system does not provide much certainty with respect to pathogen contamination.

Section 4 Pepino Mosaic Virus

What is the significance of “worth noting (p31 word version) why only two infected seed crops were infected? It is unclear what the author is trying to say?”

Section 5 Pospiviroids

In presenting the data in this section it is not described at what iteration of the Emergency Measures, that were introduced or amended several times, this data was collected.

Are pospiviroids an emerging problem (p36) or are we just better at detecting them?

Section 5.7.2 provides an extensive discussion about weeds but it is unclear what the reader is to conclude. This is particularly the case when this section is considered with the arguments about individual viroids whereby weeds are provided as evidence for spread and establishment. The report requires a consistent approach.

In Section 5.8.1 do we know the exact place of production for each seed lot? It is not clear if the individual mixing of seed from various production areas needs to be known. This needs to be clarified.

Section 5.8.2

This section is difficult to follow. It is also where the potential trade ramifications could arise as highlighted in our comments above. The second last and last paragraphs provide a discussion around detection and incidence levels. Based upon the probability functions shown in Section 2 none of the lots discussed would exceed an extremely low level of risk. This is below Australia's ALOP. It is suggested that this section be completely eliminated from the report or reworded to at least provide supporting evidence for what is proposed in Section 7. It should also be argued that the emergency measures are working. The data would also be strengthened if it could be contrasted with how many lots failed to comply before they were sent.

AUSVEG believes we need to make the case for continuation of emergency measures and their extension, not provide an argument that they are not necessary.

Section 6 Pest Risk Assessments for quarantine pests

Noting that pest risk assessments are provided on the basis that there are no emergency measures in place (p45) AUSVEG questions why the data in Section 5 is presented at all. This work is performed on imports after the implementation of the emergency measures were implemented! The results potentially undermine the tenet of the PRA and can mislead.

An example of the rather confused writing of the report can be gained by contrasting the following two sentences.

“The report proposes pest risk management measures to address the assessed risks and it reviews the existing emergency measures on tomato seed and wild tomato seed that target PepMV and the pospiviroids identified in previous sections.” (Section 1)

“Imports of seed of wild tomato species (*Solanum chilense*, *S. chmielewskii*, *S. parviflorum*, *S. peruvianum* and *S. pimpinellifolium*) have not been assessed in the pest risk assessments as no reports were found showing the listed pathogens are transmitted through the seed of these species.” (Section 6)

Why not state this at the beginning under scope?

In the discussion around PSTVd it is noted that the Department is intending to publish a PRA if the viroid meets the requirement of an RNQP. Is there any timeline on this and where is this procedure at? A bit more clarity around this would be helpful to all.

The PRA is also misrepresenting what others have said. For example contrast the following sentence from p48;

“Long-distance transmission of the virus with trade of infected tomato fruit is also possible (van der Vlugt 2009) as the virus can contaminate people who consume fruit and contaminate fruit waste (Werkman & Sansford 2010).”

With what they actually wrote;

“Tomato fruits are finally sold to the end-consumer. Consumers will eat the tomato fruits or dispose them in the domestic waste if they are not suitable for consumption. The only potential pathway of spread is by consumers handling infected fruit and domestic tomato crops.”

The difference in meaning between the two sentences is self-evident. Instances such as these do not help the credibility of the report. AUSVEG is keen to support measures designed to minimise biosecurity risk and wants the evidence to be rigorously presented.

With respect to the individual viroid risk assessments the comments earlier about providing evidence from unrestricted imports would be important to support the risk profiles provided.

Data is presented on transmission rates through seeds in Section 5, but incidence levels are not provided only that there have been numerous interceptions. As noted earlier we contend that the data provided from testing in Australia only confuses the argument and needs to be reworked.

Section 7 Pest Risk Management

AUSVEG concurs with the recommendations but again suggests that this section should be more clearly written. The sentence on current emergency measures (bottom of p84) is incorrect. Emergency measures are not only being maintained but are being amended/extended as noted in the next section (7.3.1).

Summary

Whilst AUSVEG agrees with the proposed measures around seed importation it would like to see the report provide a much stronger case for both the continuation and extension of the current emergency measures. This report does not do this and has in our view the potential to raise questions from trading partners.