




Department of
Agriculture and Fisheries

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Dr Marion Healy
First Assistant Secretary
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Department of Agriculture and Water Resources
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Dear Dr Healy

Thank you for your letter of 12 September 2017 regarding the Department of Agriculture and Water Resources' (DAWR) request for submissions on the '*Draft review of import conditions for apiaceous crop seeds for sowing into Australia*' (the draft document).

The Queensland Department of Agriculture and Fisheries (DAF) has reviewed the draft document and notes that the importation of apiaceous crop seeds from all countries into Australia for sowing will be permitted subject to specific quarantine measures. The department notes that DAWR currently permits the import of seeds of multiple species of apiaceous vegetables and herbs from all sources under Australia's standard seed import conditions. Further conditions apply to carrot, celery/celeriac, chervil, fennel, parsley, and parsnip. The draft document identified ten apiaceous host species for which seeds may provide a trade pathway for quarantine pests. The draft document also identified ten new quarantine pests that require additional phytosanitary measures to reduce the biosecurity risk to meet Australia's appropriate level of protection (ALOP).

DAF supports the findings of the review, including the updating of the quarantine pest list for apiaceous crop seeds for sowing in Australia, pest risk assessments for quarantine pests, and pest categorisation. DAF does not support the proposed list of host species for which seeds require additional phytosanitary measures, mandatory treatment or testing, nor proposed polymerase chain reaction (PCR) testing and hot water treatments without further scientific evidence being provided to support these measures. Further details are provided in the attachment.

Thank you for the opportunity to comment on the draft review. DAF would appreciate being included in any further review processes leading to the finalisation of this review.

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If you require any further information, please contact Dr Abu-Baker Siddique, Senior Plant Health Scientist, Plant Biosecurity, Department of Agriculture and Fisheries on telephone 07 3708 8506 or email abu-baker.siddique@daf.qld.gov.au.

Yours sincerely

A handwritten signature in cursive script that reads "Elizabeth Woods".

Dr Elizabeth Woods
Director-General
Department of Agriculture and Fisheries

Att



Draft review of import conditions for apiaceous crop seeds for sowing into Australia

The Department of Agriculture and Fisheries (DAF), Queensland has reviewed the 'Draft review of import conditions for apiaceous crop seeds for sowing into Australia', and following are our comments on the draft review.

3 Pest risk assessment for quarantine pests (the draft review, pages 16 - 39)

DAF supports the assessment ratings of the likelihood of entry, establishment, spread and consequential impacts of the quarantine pests identified in the draft review.

4.2.3 Mandatory treatment or testing (the draft review, pages 43 - 48)

DAF does not agree with the proposed fungicide seed treatment for reducing the risk of introducing *Carum carvi*, *Coriandrum sativum*, *Cuminum cyminum*, and *Pimpinella anisum* into Australia. The effectiveness of the proposed fungicide treatment is not supported by any scientific references. Treatment with a broad-spectrum systemic fungicide is unlikely to kill all infective fungi or reduce the risk of sowing the seed to a very low risk. Remaining fungi would retain the capacity to initiate infection in a new seedling. The import of seeds for sowing is a very high risk pathway of entry for many seed-borne pests, and many countries are increasingly strict in their regulation of this pathway. The proposed seed treatments require further scientific support to ensure their efficacy.

Polymerase chain reaction (PCR) testing and hot water treatment (the draft review, pages 44 - 48)

DAF would like the scientific references to justify the efficacy of the proposed PCR testing and hot water treatment for *Candidatus Liberibacter solanacearum*, and hot water treatment for *Anthriscus cerefolium*, *Apium graveolens*, and *Daucus carota* host seed. Similarly, the proposed treatments for *Foeniculum vulgare*, *Pastinaca sativa*, and *Petroselinum crispum* also require scientific references.

DAF supports the other risk management measures proposed including mandatory certification, on-arrival visual inspection, and sourcing seed from pest free areas, pest free places of production, or produced under an effective systems approach.

5 Conclusion – proposed application of additional risk management measures to seeds of some species (the draft review, page 49)

The draft review proposes that seeds for sowing from ten host species require additional risk management measures under Australia's standard import conditions. The proposed

species are *Anthriscus cerefolium*, *Apium graveolens*, *Carum carvi*, *Coriandrum sativum*, *Cuminum cyminum*, *Daucus carota*, *Foeniculum vulgare*, *Pastinaca sativa*, *Petroselinum crispum* and *Pimpinella anisum*. In the draft review, the pathway analyses for hosts were conducted only at the genus level. The DAF believes therefore that seeds of other species from these genera may also have the potential to provide a pathway for seed-borne pests (Appendix 1).

Appendix 1: Pest categorisation – pathogens associated with representatives of the Apiaceae family, their status in Australia, pathway association, potential for establishment, spread, and economic consequences (the draft review, pages 50 – 198)

DAF does not support the assessment of 'non-quarantine pest' status for some pests in the draft review. The non-quarantine pest status of these pests is not supported by scientific references. DAF has identified the following pests as seed-borne, and that apiaceous seeds provide a pathway for entry.

- *Xanthomonas campestris* pv. *coriandri* (Srinivasan et al.) Dye [Xanthomonadales: Xanthomonadaceae] – page 54 (<https://pnwhandbooks.org/plantdisease/host-disease/coriandrum-spp-coriander-cilantro-parsley-bacterial-leaf-spot>).
- *Artichoke yellow ringspot virus* (ARYSV) [Secoviridae: Nepovirus] – page 186 (<http://sdb.im.ac.cn/vide/descr044.htm>).
- *Chicory yellow mottle virus* (ChYMV) [Secoviridae: Nepovirus] (synonym: *Parsley carrot leaf virus*) – page 190 (<http://sdb.im.ac.cn/vide/descr207.htm>).
- *Grapevine chrome mosaic virus* (GCMV) [Secoviridae: Nepovirus] – page 192 (<http://sdb.im.ac.cn/vide/descr368.htm>).
- *Tomato black ring virus* (TBRV) [Secoviridae: Nepovirus] – page 198 (ref. <http://sdb.im.ac.cn/vide/descr823.htm>).

In conclusion, DAF supports the draft review policy report with consideration of the above comments.