Cut Flower and Foliage Industry Submission – July 2016 Intergovernmental Agreement on Biosecurity Review

The Cut Flower and Foliage Industry's submission asserts that there are higher risks with the importation of cut flowers and cut foliage products than there may have been 10 years ago when imports were at least 10 or 20 times fewer than today.

Given that Australia currently imports more than 120 million flower stems per annum from a number of countries including Europe, Asia, India and the Americas, appropriate biosecurity protocols for imported products and a maintained vigilance in their application are critical.

Moreover the cut flower supply chain is so efficient that from the date the product enters Australia to the date the product is purchased by the final consumer, no more than 3-7 days may have elapsed. In that time the extent of distribution of the product is likely to be dozens of locations nationally from just one or two shipments of flowers.

Please find below our answers to the questions raised within the discussion paper of which the cut flower and foliage would like to submit for your consideration.

Question 5

In order of importance, what do you see as the most significant current and future biosecurity risks and priorities for Australia and why? Are Australia's biosecurity objectives appropriately tailored to meet these risk and priorities?

There is the current concern within our industry over the handling and movement of flowers for treatment from the port of entry to a treatment facility. The 2015 report by the Interim Inspector-General for Biosecurity (IIGB) found some serious gaps within the process of releasing and transporting cut flower consignments. This included inadequately sealed vehicles/shipments moving product within Australia with insufficient traceability. The product was also being released after treatment without being re-checked by the departmental officers; ineffective fumigation at third party premises resulted in the detection of live insects after treatment and non-compliant packaging with open ventilation holes and other compromises to the integrity of the packaging was found to be occurring during transit.

The IIGB report also observed instances where sampling and standard operating procedures were not adhered to by departmental staff, namely the examination for insects of the correct proportion of a flower shipment in the correct manner was not undertaken. Our belief is that breaches in protocol such as these are a result of resourcing issues, most likely at peak times for our industry where imports are much higher (such as Valentine's and Mother's Day).

Question 15

What can be done to ensure an equitable level of investment from all stakeholders across Australia's national biosecurity system, including from risk creators and risk beneficiaries?

Implementation of a mandatory licensing and insurance system for all cut flower importers. The industry thinks that any future pest incursion as a result of imported cut flowers should not necessarily be paid for by the entire industry (and certainly not by the Australian growers), but rather by those importing flowers. This places the cost of the incursion (if it is from an imported consignment of cut flowers or foliage) with the companies that are benefiting from the importation of product. Concerns regarding an insurance scheme being unfeasible and that finding an insurer would be "impossible" are probably overstated but if true, may highlight the level of risk involved in the exercise. Licensing could consist of mandatory training for importers and their staff to ensure that the risks and costs of an incursion, as well as the practical measures that can be implemented to minimise those, are understood.

Question 19

Which specific areas of Australia's national biosecurity system could benefit from research and innovation in the next five, 10 and 20 years and why? Please provide examples.

The development of rapid and affordable disease diagnostics tools/kits would be beneficial as in many cases the current inspections for potential diseases are necessarily limited to an inspection to determine the presence of their insect vectors.

Question 21

How can innovation (including technology) help build a more cost-effective and sustainable national biosecurity system?

The report by the Interim Inspector-General for Biosecurity (IIGB) highlighted some concerns in regard to the design and integrity of packaging used to import cut flowers and foliage into Australia. It highlighted a lack of compliance that the packaging be insect-proof (sealed) and maintain its shape and structure during transit. Specifically his concern related to the lack of insect screening on box ventilation holes and the propensity for boxes which became wet with plant transpiration to collapse. Both issues would allow the escape of insects during transit to post-entry quarantine facilities.

The IIGB report identified instances where post-entry quarantine procedures for imported fresh cut flowers, including the handling and treatment of flowers once they had entered Australia and were undergoing post quarantine procedures, were not compliant. This included both the transport of the consignments in vehicles that were insufficiently sealed, compromised boxes being left in open quarantine facilities and deviation from inspection and monitoring procedures at ports of entry. New technologies such as packing methods and materials are available that could easily eliminate these risk factors from the import process.

Question 24

How can existing or new data sets be better used? How might data be collected from a wider range of sources than government?

Currently little information is readily available for the cut flower industry to monitor and assess the frequency of pest/disease interceptions in cut flower consignments entering Australia. Provision of monthly reports of pest and disease interceptions nationally would allow the data to be summarised and scrutinised to discern patterns of non-conformance. The Department of Agriculture & Water currently compiles and publishes data from inspections of imported food consignments in a monthly failing food report. Similarly the EU release a European Phytosanitary report (EUROPHYT) which describes all interceptions for consignments of plants imported into all EU member countries. The cut flower industry would like to see this sort of reporting of border interceptions and non-compliance of import shipments of cut flowers made publicly available on a monthly basis. Ideally this should provide the following information: interception date; commodity type; plant species; port of entry; country of origin; non-conformity/breach type; insect/pest type; number of interceptions/breaches per shipment.

(refer www.agriculture.gov.au/import/goods/food/inspection-compliance/failing-food-reports#2016 and http://ec.europa.eu/food/plant/plant_health_biosecurity/europhyt/interceptions/index_en.htm).

References

Interim Inspector-General of Biosecurity (IIGB), 2015. Effectiveness of biosecurity controls for imported fresh cut flowers – Audit Report