

# Horticulture Australia Council

## PUBLIC SUBMISSION TO THE QUARANTINE & BIOSECURITY REVIEW

HORTICULTURE AUSTRALIA COUNCIL  
APRIL 2008

RESPONSE TO THE ISSUES PAPER



## EXECUTIVE SUMMARY

**Horticulture Australia Council (HAC) is the peak national industry body representing the Horticultural industries.** Horticulture in Australia is intensive, generally irrigated, agriculture. Horticulture is a diverse industry, spread across the continent in a wide array of climates. Horticulture is the fastest growing industry in agriculture; with some 30,000 businesses nationally, and a farm gate value of \$7 billion.

Australia has the strategic advantage of relatively pest and disease-free status, along with our reputation as a supplier of fresh, high quality and clean produce, which need to be maintained. Australia maintains a competitive advantage with its trading partners as it is free from most serious plant and animal diseases which are endemic in most other countries. Australia's extremely high level of regulation also ensures that agricultural products are free of chemical, bacterial and viral contaminants that can affect humans.

In promoting a global free trade environment, quarantine and biosecurity authorities have been charged with devising protocols for importing agriculture products from countries not sharing Australia's disease-free status. These protocols are developed from an Import Risk Analysis (IRA) that is submitted to the affected industries for examination. Horticulture has repeatedly argued against the current IRA methodology; we believe that, in many cases, the resultant risk management protocols only delay the inevitable introduction of a pest or disease into Australia.

Concurrently, the scale and complexity of the threat of pests and diseases is increasing, which - together with increasing imports and exposure to natural spread - requires effective management of risk of incursion and spread. Australia requires an import regime which maintains high import quarantine standards to protect Australia's horticultural production base, in particular - our export trade, for instance (eg potential loss of Fruit Fly Free status); and the environment and biodiversity more generally (including potential risks to tourism and geographic risks (eg risk of incursions).

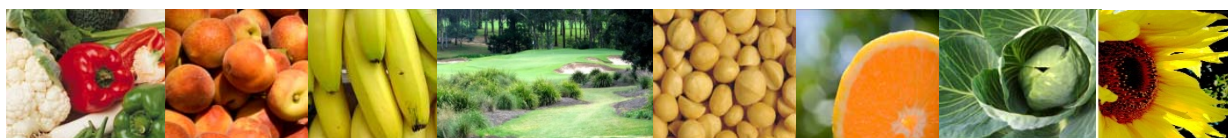
**In support of these objectives, Australia seeks to maintain a rigorous, science-based quarantine regime, the elements of which cover a combination of pre-border, border and post-border management of quarantine threats, with responsibilities shared between governments, industry and the community generally. These activities must be transparent to the international community. It must be clear that these regimes are developed and operated independently of the political persuasion of the government of the day; and based solely on sound scientific principles and analyses to defend the integrity of our environment and production areas, rather than as a barrier to trade.**

Australia's quarantine system must include an IRA process that is transparent, science-based and contestable and is capable of being carried out within a reasonable timeframe, whilst retaining the confidence of stakeholders (including the general community) in its ability to deliver an objective outcome. Horticulture believes that Australia should continue to take a conservative approach to managing quarantine risk, consistent with the scientific, and other, evidence of potential impacts of incursions.

## *Our Position*

The Horticulture industry's position is that the conduct of a quarantine regime by adequately resourced government agencies should:

- ❖ Involve consultation with the horticulture industry on all critical aspects of biosecurity management which impact on industry.
- ❖ Take all reasonable steps to identify quarantine risks (whether from imports, or domestic movement of produce between jurisdictions).
- ❖ Take a conservative approach to managing quarantine risks, based on an Australian appropriate level of protection (ALOP) which sets a low level of risk.
- ❖ Communicate this level of ALOP to the horticulture industry to secure industry's understanding of the measures in hand or recommended.
- ❖ Pursue a risk analysis process which is based on high quality science supported by scientific review and contestability as appropriate.
- ❖ Pursue a risk analysis process which is transparent to industry with opportunity for formal and informal discussion and input at multiple stages.
- ❖ Pursue a risk analysis approach which is timely through minimizing delays and alleviating international and domestic pressures on the system.
- ❖ Include an economic consequence analysis concurrent with the risk analysis to the extent appropriate, including the economic consequences which may result (to an industry and/or community) from a disease or pest incursion.
- ❖ Involve industry in the process of receiving and prioritizing import requests which is part of the government agency approach.
- ❖ Maintain a quarantine operational process which does not allow for the incursion of pests and diseases through regulated pathways – including a transparent process for incursion responses and preparedness.
- ❖ Require that government agency inspection performance is to a consistently high standard and is supported by work plans which are clear and unambiguous.
- ❖ Require that government agency quarantine inspectors are effectively trained and make decisions on the basis of experience and that such decisions are consistent between locations of same quarantine status.
- ❖ Strengthen and maintain a close integration between quarantine policy and operational functions.
- ❖ To ensure transparency and generate confidence by industry, maintain the best possible communications processes between the government agency and the horticulture industry on quarantine policy and operational matters.



## INTRODUCTION

**Horticulture Australia Council (HAC) is the peak national industry body representing the Horticultural industries.** Members of HAC are the national peak industry bodies (PIBs) for the Horticultural industries, and some State grower organisations. Horticulture Australia Council (HAC) represents over 97% of the Australian horticulture industry, and its Member organisations include:

- Apple & Pear Australia
- Agricultural Investment Managers Australia
- Avocados Australia
- Australian Banana Growers' Council
- Australian Citrus Growers
- Australian Dried Fruit Association
- Australian Mushroom Growers Association
- Australian Nut Industry Council
- Australian Passionfruit Industry Association
- Ausveg
- Cherry Growers of Australia
- Growcom
- NSW Farmers' Association
- Nursery and Garden Industry Australia
- Persimmon Industry Association
- Strawberries Australia
- Turf Producers Australia

Horticulture's peak committee for market access is the Horticulture Market Access Committee (HMAC), managed by Horticulture Australia Ltd (HAL). HMAC is responsible for the definition of market access priorities to which quarantine and market access need to be linked. HAL also has responsibility for the Biosecurity Portfolio Plan which links to PHA (eg PLANTPLAN, the EPPRD, etc), the CRCNPB, and the Working Group for Market Access R&D (WGMARD). The HAL submission to the Review will cover export-related market access issues not covered by this submission. Members of both HAC and HAL (peak industry bodies) have also been encouraged to make submissions to the Review on their individual industry-specific issues.

### ***Horticulture in Australia***

Horticulture in Australia is intensive, generally irrigated, agriculture. Horticulture is a diverse industry, spread across the continent in a wide array of climates. Horticulture is the fastest growing industry in agriculture; with some 30,000 businesses nationally, and a farm gate value of \$7 billion. Total horticultural exports in 2006/07 were \$763 million. As the most labour intensive of all agricultural industries, Horticulture employs one-quarter of those employed in agriculture. The industry is the principal driver of many local communities and economies in rural and regional Australia.

Primary horticultural imports into Australia were valued at around A\$690 million on an annual basis (2005/06) and have been growing strongly over recent years. Concurrently, the scale and complexity of the threat of pests and diseases is increasing, which - together with increasing imports and exposure to natural spread - requires effective management of risk of incursion and spread.

Australia has the strategic advantage of relatively pest and disease-free status, along with our reputation as a supplier of fresh, high quality and clean produce, which need to be maintained. Australia maintains a competitive advantage with its trading partners as it is free from most serious plant and animal diseases which are endemic in most other countries except New Zealand (although even New Zealand has some exotic diseases such as Fire Blight). Australia's extremely high level of regulation also ensures that agricultural products are free of chemical, bacterial and viral contaminants that can affect humans.

In promoting a global free trade environment, quarantine and biosecurity authorities have been charged with devising protocols for importing agriculture products from countries not sharing Australia's disease-free status. These protocols are developed from an Import Risk Analysis (IRA) that is submitted to the affected industries for examination. Horticulture has repeatedly argued against the current IRA methodology; we believe that, in many cases, the resultant risk management protocols only delay the inevitable introduction of a pest or disease into Australia.

Australia requires an import regime which maintains high import quarantine standards to protect Australia's horticultural production base, in particular - our export trade, for instance (eg potential loss of Fruit Fly Free status); and the environment and biodiversity more generally (including potential risks to tourism and geographic risks (eg risk of incursions)).

**In support of these objectives, Australia seeks to maintain a rigorous, science-based quarantine regime, the elements of which cover a combination of pre-border, border and post-border management of quarantine threats, with responsibilities shared between governments, industry and the community generally. These activities must be transparent to the international community. It must be clear that these regimes are developed and operated independently of the political persuasion of the government of the day; and based solely on sound scientific principles and analyses to defend the integrity of our environment and production areas, rather than as a barrier to trade.**

Australia's quarantine system must include an IRA process that is transparent, science-based and contestable and is capable of being carried out within a reasonable timeframe, whilst retaining the confidence of stakeholders (including the general community) in its ability to deliver an objective outcome. Horticulture believes that Australia should continue to take a conservative approach to managing quarantine risk, consistent with the scientific, and other, evidence of potential impacts of incursions.

In particular, the government agencies have identified responsibilities for the management, operation and maintenance of a quarantine regime which is effective for those threats which can be regulated and places them in the forefront of Australia's biosecurity requirements.

Horticulture industries are encouraged to engage in all relevant consultative processes to ensure their interests are represented and that they have a sound understanding of the handling of key biosecurity issues, and to utilize the feedback mechanisms included in these processes. Horticulture industries are encouraged to become members of Plant Health Australia (PHA), to develop national biosecurity committees, and to implement various strategies to minimize threats from plant pests. Horticultural industries need to be well protected by a strong quarantine system and well prepared for invasive pests via the proactive development and implementation of ongoing industry biosecurity programs.

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Horticulture welcomes the opportunity to provide a response to the Issues Paper released by the Quarantine and Biosecurity Review Panel on 14 March 2008 on “the appropriateness, effectiveness and efficiency of:

- ◆ current arrangements to achieve Australia’s appropriate level of protection;
- ◆ public communication, consultation and research and review processes;
- ◆ resourcing levels and systems and their alignment with risk in delivering requisite services; and
- ◆ governance and institutional arrangements to deliver biosecurity, quarantine and export certification services.

Horticulture also welcomes the consideration by the Panel of the Nairn Review. The 1997 Nairn Report made over 100 recommendations for improving the quarantine and biosecurity system; and industry is keen to see these recommendations re-visited in the context of current circumstances.

# RESPONSE TO ISSUES PAPER

## 1. CURRENT ARRANGEMENTS TO ACHIEVE AUSTRALIA'S APPROPRIATE LEVEL OF PROTECTION

As a result of the potential for threat to our plant-based industries (and therefore the survival and profitability of our industries, the potential impacts on our international trade and the environment) Horticultural industries have strong views about Appropriate Level of protection (ALOP) and managing risk.

### *Appropriate Level of Protection (ALOP)*

Horticulture believes that our quarantine system should be one which takes all reasonable steps to identify and manage risks. Australia currently takes, and should continue to take, a conservative approach to managing quarantine risk - industry appreciates that a zero risk approach is not practicable. The quarantine system must be effective, balanced and scientifically based; and it must also be reasonable and fair.

In relation to Appropriate Level of Protection (ALOP), Horticulture's specific concerns include:

- ❖ The ALOP is difficult to understand and express, but industry needs a better explanation of the concept expressed in practical terms to assist with communication;
- ❖ there is a view within industry that the ALOP varies according to the individual assessment and needs to be specifically defined in each case.

### *Quarantine*

To balance a low (but not zero) risk, maintain sustainable and profitable plant industries, and reduce negative impacts on trade, **it is critical that we can rely upon effective, efficient and cost-effective pre-border, border and post-border protection systems.**

Horticulture has in recent years expressed strong concerns in regard to our confidence in the current systems and processes. Recent incursions - such as Citrus Canker in Emerald, and Black Sigatoka in the Banana industry - though fortunately eradicated, have had significant and devastating impacts on several of our industries in Queensland; and placed the rest of the industry nationally under threat. The recent experience with Equine Influenza has again highlighted many of these concerns.

Specifically, in regard to AQIS and quarantine processes, industry's concerns are:

#### *Appreciation of Risks to Industry*

- ❖ There appears to be a lack of appreciation by many AQIS staff of the true risks to industry and the community of an incursion of a significant disease/pest;
- ❖ There appears to be a failure to keep track of, or learn from, overseas experiences with incursions;

- ❖ Failure to monitor the quarantine status of product before import into Australia (pre-border surveillance), or implement adequate testing of product at border – this includes apparent ‘blind faith’ in the certification process as an effective quarantine barrier;
- ❖ A lack of sensitivity or ‘customer service’ culture towards AQIS’ external clients/customers;
- ❖ Failure to listen to constructive feedback from clients and industry.

#### *Internal AQIS processes and procedures*

- ❖ There appears to be a concentration on internal processes and paperwork rather than AQIS core business – implementing quarantine;
- ❖ Lack of clarity in areas of responsibility and lines of communication within the organisation;
- ❖ Lack of resourcing, and relevant training, experience and expertise, amongst AQIS staff to fulfil their identified roles (including at senior management level);
- ❖ Failure to induct, train and supervise AQIS staff in basic quarantine and biosecurity processes/practices, their powers under the Quarantine Act 1908, and lack of provision of basic manuals/SOPs/work plans to frontline staff;
- ❖ Apparent intent to move responsibility outside of AQIS, even to unqualified personnel who are not employees of the organisation;
- ❖ In the case of the Callinan Review of the EI incursion, failure to listen to feedback from, or to provide adequate support to, frontline staff;
- ❖ Lack of appropriate audit and compliance testing of quarantine and biosecurity processes/practices.

#### *Learning from Our Experience*

Plant Health Australia (PHA) has formed a Plant Health Task Force on Equine Influenza to establish whether lessons learnt during the EI outbreak can be applied to plant health. The following main points have been identified:

- The importance of Industry Liaison Officers in dealing with the incursion;
- A plant health experience register would be of great benefit;
- Even though Victoria was a ‘non-combat’ state, a lot of resources went into the incursion;
- Unlike plant health incursions, animal health incursions are usually over a short time period; and EI was an exception;
- Scientific Advisory Panels and sub-committee structure must be written into PLANTPLAN.
- The importance of defining ‘normal commitments’;

and, we would add

- There is real potential value in exploring a HACCP-type (pro-active rather than re-active) approach to risk management for pest/disease incursions as we do for food safety
  - this might avoid potentially devastating and expensive incursions such as occurred with EI, small hive beetle or fire ants; or for Horticulture pests/diseases such as Citrus Canker, Black Sigatoka, or Papaya Fruit Fly.
- The Nursery and Garden industry have suggested that a register of all businesses involved with plant handling would be highly desirable. The industry is a key component of all horticulture, and

moves large volumes of germplasm, including inter-state. A national register would enable easy communication in the event of an incursion. As a result of the EI experience an "Owner Register" is being proposed. This should be done for plant production, transporters and sellers. This does not, of course, address the issue of transfer of plant materials by members of the community at large.

### *Private Quarantine Facilities*

While there are recognised benefits to having off-site QAP facilities in some research institutes, private QAPs do raise concern. Although a QAP Accredited Person (QAP-AP) must personally conduct or directly supervise all activities involving physical contact with items subject to quarantine, questions have been raised about the qualifications of such people. The businesses with private QAPs do not generally include as core business, a commitment to biosecurity assurance for the country's benefit. The rigour with which QAPs are independently monitored (numbers of plants maintained, plant density, plant disposal, reporting of suspect material, hygiene etc), is unclear and the potential remains for early propagation from yet-to-be released, incompletely-tested plant material.

### *Accredited or Approved Overseas Facilities*

In general terms, industry does not support the position that the sourcing of propagation material from accredited or approved overseas facilities confers upon that material a degree of exemption from testing by AQIS in PEQ. Acceptance of material from approved multiplication schemes without prescribed, additional testing within PEQ can be a dangerous practice. Release of such material (whether to a private importer or to an industry budwood scheme) and its official declaration as being "virus-tested", "virus-free" or "pathogen-tested" cannot be relied upon for the following reasons:

- ❖ An approved scheme may have several categories of product health status, eg foundation trees, registered budwood source trees or an interim programme without full pathogen testing. Similarly for almond rootstock seed suppliers who provide both non-certified, untested seed and certified, tested seed for sale (eg. one of the seed sources in USA used by Australian importers of seed for almond nurseries).
- ❖ Material collected from field trees could become infected with a vector-borne pathogen, or by pollen or mechanical transmission, in the time between indexing and budwood supply.
- ❖ Staffing and/or funding may alter the reliability of the scheme over time. Without regular independent audit, the changing status of the scheme and its pathogen-free material may go unnoticed in Australia.
- ❖ Human error may result in the supply of wrong material or the failure to detect a pathogen.
- ❖ The schedule of AQIS auditing of the inspection standards and methodologies of the certifying authorities abroad, is irregular, and therefore we cannot be certain that the imposed import and PEQ conditions are adequate in each case, to protect Australia's horticultural industries<sup>1</sup>.

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<sup>1</sup> See HAL Project AL06006. 2006, *Review of Almond Budwood and Seed Multiplication and Recommendations for Accreditation Scheme* for concerns the almond industry has re importation of rootstock seed and approved sources.

## Case study – Citrus Canker

### *Pre-Border Intelligence:*

The Citrus industry supports the initiatives of NAQS to survey domestically, in the Torres Strait, Northern Australia and adjacent islands; and overseas, including Papua New Guinea, Indonesia, and East Timor, especially as the NAQS surveys encompass citrus species in backyards and orchards as well as native Rutaceous species, with the frequency of surveys depending on the classification of risk zones, with high-risk areas being surveyed two times each year. This surveillance is essential to provide an early warning of the presence of *huanglongbing* disease of citrus and the Asian citrus psyllid which NAQS found in surveys in northern areas of Papua and PNG, as well as East Timor. **The Citrus industry is concerned, however, about reports that NAQS has not surveyed southern areas of Papua or PNG bordering Australia this year.**

The Bureau of Meteorology, NAQS, and other relevant State and Commonwealth authorities collaborate to assess the risk of wind-borne incursions of *D. citri* and develop an 'early warning' system to alert State and Commonwealth agriculture and forestry departments, national parks, regional councils, and the nursery industry of a possible incursion. Such assessments and warnings should take into account the natural and cultivated distributions of known hosts, particularly species of *Citrus* and *Murraya* and of *B. koenigii* and *Clausena lansium*. Evidence to support this view comes from the introduction of the leucaena psyllid into Australia, where evidence suggests that it entered Australia on air currents from the Western Pacific to the northeast of Queensland, and within three months the psyllid was dispersed throughout Queensland by wind currents.

Pre-border intelligence is essential to know the risks posed by citrus imports. We alluded earlier to the risk posed by seed from South American countries with CVC and the time taken for BA and AQIS to respond and change the ICON import requirements for citrus seed. Incidence of the Asian citrus psyllid in Guam and the attraction of adult psyllids to light, suggests that AQIS should consider passive transport of adult psyllids in military aircraft from Guam. We do not agree with Recommendation 67 of the Nairn Report that aircraft disinfection be discontinued<sup>2</sup>.

### *Surveillance post-border:*

The Smith Review of Citrus Canker Emergency Preparedness and the National Response states: *"If there had been a national surveillance strategy in place specifically targeting high risk areas and high-risk activities, Emerald may well have qualified as a high risk area and citrus canker may have been detected there before its detection on Infected Premises 1 (IP1) in June 2004, and possibly before the storm events of January 2004 which are believed to have been responsible for its spread to IP2 and IP3"*.

Recommendation 2 of that report goes on to say: *"National surveillance strategies need to be developed which target high risk areas and high risk activities as well as potential pests, diseases and weed invaders which are identified as being of major national concern"*.

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<sup>2</sup> UWS scientists consider that the small hive beetle found at UWS probably was a hitchhiker on a military vehicle landing at Richmond RAAF base.

The Citrus industry believes that there is a need to refine/develop and use new methodologies to improve the efficacy of specific surveillance activities.

In the canker outbreak at Emerald, the surveys (by foot) in the PQA were initially 600 trees per 10 ha. The finding of canker by the grower at IP2, after surveys had been conducted, pointed to the insensitivity of the survey methods, and the methodology was later revised to 600 trees per 5 ha. The time frame for **repeated** surveillance needs to be considered.

The construction of a simple aerial platform on the back of a tractor (as used in Brazil and now Florida for surveying citrus trees for canker and HLB) could have supplemented and improved surveillance of larger trees where disease detection in the top of the canopy (a likely site for initial infection if disease spread over distance was by wind-blown rain) was impossible.

The efficacy of the surveillance in the PQA could have been improved by allowing farm staff or pest scouts (after training and accreditation) to assist with the surveys ie self-surveys as carried out in Florida and Brazil.

QDPF surveillance provide early warning of the presence of target organisms (including HLB and *D. citri*), where there are risk pathways identified and focuses on urban, periurban, remote areas and hazard sites, as well as orchards. A variety of hosts are inspected including native Rutaceous species.

There is no routine surveillance of commercial citrus growing areas or citrus nurseries in other areas of Australia for exotic pests/pathogens. State Government Pathologists more experienced in identifying exotic pathogens of citrus occasionally visit economically important plantings and may keep an eye out for symptoms of exotic or unfamiliar looking diseases. The citrus growing and nursery industries have a limited number of industry development officers working in the field who provide extension services, and some pest scouts and IPM consultants work for citrus growers in some regions, but they do not specifically survey for exotic pests.

The Office of the Chief Plant Protection Officer (OCPPO) and Plant Health Australia (PHA) has established a plant health surveillance communication network, a key component of which is the National Plant Surveillance Reporting Tool (NPSRT), a database containing summary information on all surveillance and related activities that contribute to knowledge of Australia's plant health status. NPSRT, which is internet-based, has been designed to allow selected people from Government Agencies and from industry groups to report on plant surveillance activities. This initiative is to be commended, but the trouble is there are few people on the ground to feed in the information.

Consultation with industry is required to determine how surveillance by trained and accredited industry staff (eg IDOs, pest scouts) can be harnessed to provide surveillance - especially as OCPPO has shown that about two-thirds of plant pest incursions in Australia over the last 15 years were detected incidentally rather than as part of a surveillance program; and the majority of these incidental detections were made by the private sector (growers, agri-industry, general public). Many, possibly the majority, of incursions are likely to have been associated with imported germplasm, natural processes (eg cyclones), or as "hitchhikers".

### *Canker Contingency Plan*

Incursion response plans can never be totally adequate, and require frequent upgrading. The draft canker contingency plan was commenced by OCPPO with RIRDC funding. It had not been reviewed by state officials prior to the canker outbreak at Emerald. It did, however, provide guidelines for dealing with the incursion. Recommendation 7 of the Smith Review of Citrus Canker Emergency Preparedness and the National Response states: "PLANTPLAN and the Draft Contingency Plan should be reviewed and updated in the light of the citrus canker outbreak. In particular, they should be strengthened by incorporation of generic templates for standard operating procedures in the case of PLANTPLAN, and more specific standard operating procedures in the case of the Draft Contingency Plan, utilising the experiences gained by Queensland".

#### **But whose role is it to carry out, and especially fund, this update of the canker contingency plan?**

The Citrus industry, through HAL levy, is funding drafting of the incursion management plan for HLB and its vectors. So great does the Citrus industry consider the risk of a HLB incursion, that it has also funded participation of Australian citrus pathologists at two international HLB workshops. These are currently the only two plans the citrus industry has, to deal with the plethora of exotic pests and diseases of citrus.

### *Inadequate Surveillance*

**It would be true to say that surveillance for exotic citrus pests and diseases is woefully inadequate** (especially in major citrus growing and urban areas) and that effective, standardised and well-targeted resource material, networks, and record management should be developed to enhance general surveillance in Australia in order to maximise early detection capability.

While OCPPO and PHA have established the National Plant Surveillance Reporting Tool (NPSRT), a database containing summary information on all surveillance and related activities, some state people are questioning its value.

The National Citrus Industry Biosecurity Plan has not been revised since its publication in April 2004. Categorisation of emergency plant pests has not been achieved.

## Case study – Almonds

### *Prunus spp Seed Screening*

In the case of Almonds, seed-borne viruses of *Prunus spp.* are not being routinely tested for in PEQ, because Australia has Prune Dwarf Virus (PDV) and Prunus Necrotic Ringspot Virus (PNRSV). In-coming seed appears not to be screened at all for any pathogens, nor for the exotic, virulent European strain of PDV. We have been unable to establish if any grow-out testing has been undertaken despite the ICON requirement for it.

### *Xylella fastidiosa*

There are some discrepancies in PEQ testing for the exotic organism *Xylella fastidiosa*. At present some (but not all) hosts from USA are tested, but hosts from other countries (that have *X. fastidiosa*) have not been identified for specific testing.

### *ELISA*

There are concerns about the use of ELISA (serological) methodology for the detection of some viruses (i.e. PDV) for which there is evidence it is an unreliable method, and for which positive controls of exotic strains are not included. More biological and molecular testing is recommended.

### *Minimum Standards for Seed?*

The rapid release of poor quality *Prunus spp.* seed (less than 12 hours) has been reported. This poses significant risk to the industry as the seed not only was not of the correct (as labelled) variety – but also was approved for further off-site sorting – without provision for safe disposal for the rejected seed. The minimum standards accepted for seed by AQIS (where they are different to ICON), need to be revealed to the industry.

### *Plant Movement*

The continuum must include post-border plant movement. Post-border industry biosecurity is limited by many practices already referenced. An additional threat is that posed by large distribution chains (i.e. Bunnings, etc) that move huge volumes of plant material. These groups are generally 'removed' from industry and have low general awareness of quarantine and biosecurity measures and movement restrictions. Such groups need engagement in the biosecurity continuum.

### *Whattam report*

Quarantine for the *Prunus* industry (including almonds) has been hindered by the delayed review of the Whattam report (Prunus Post-entry Quarantine Manual, 2006) by Biosecurity Australia (BA). Documents reviewing and recommending improved quarantine measures should be of high priority within BA.

### **Case study – Nursery & Garden**

#### *Calluna Vulgaris*

Brushwood fencing (*Calluna Vulgaris*) is the largest volume of garden screening being imported, and - due to the nature of the product - it attracts many concerning foreign materials such as poultry feathers, mosses, and dead leaves, that have been partially composted in areas where water collects. This product has several hundred containers coming into the country each year, and should be heat treated (in the same manner as willow products are subjected to) for adequate protection. Of the numerous containers imported, very few are inspected. This plant material will move from importer direct to retailer, then the consumers' backyard - where if a disease outbreak/pest incursion occurs, it will take time to identify.

The NGIA made a submission to Biosecurity Australia/AQIS in mid-2007 regarding the importation of brushwood fencing material from China. This material was contaminated with leaves, seeds, feathers and even green shooting plant material. The material description was suspect in its plant classification. This contamination has been brought to the attention of AQIS (with photographic evidence). At this stage, no official response has been received.

There is little co-operation between AQIS and Biosecurity Australia. Local AQIS officers at the port of entry have a history of making determinations that are inconsistent with AQIS Canberra; this causes significant added cost to the importation to shipments.

#### *P.ramorum*

NGIA as the peak industry body has raised the issue of the relaxation of rules for importation of plant material from countries scheduled at risk of *P.ramorum*. The rules have been set and guidelines established. A small growers group lobbied with a local AQIS officer, and the rules for importation of rose wood were changed.

If *P.ramorum* is introduced it will have a devastating impact on all of horticulture. Despite requests to AQIS for information and consultation with the Peak Industry Body (NGIA), there has been no response, yet as an industry we are expected to pick up the issue once an incursion occurs. Engagement with industry is appalling.

#### *Salax Babylonica* Treatments

Willow products (*Salax Babylonica*) for which Gardman Australia has a signed letter from AQIS Canberra (letter active for 17-02-2006 to 17-05-2008) for a heat treatment and a Methyl Bromide treatment - negotiated as adequate to protect the Australian environment - is now not recognised by AQIS staff at the port of Melbourne.

### Comments from industry leaders:

“A new computer application known as BioSIRT (Bio-security, Surveillance, Incident Response and Tracing) BioSIRT will be used by each jurisdiction for managing emergency and routine incidents of disease, pests or incursions. The use of a single application will enable information to be quickly exchanged between jurisdictions to facilitate a coordinated response, especially in an emergency incident.”

“Historically each state agency would have developed its own system leading to national inconsistencies and overall higher development costs. The initial version of BioSIRT includes three main components – SQCR (Survey, Quarantine, Control and Recovery), CRIS (Client Resource Information System) and RMP (Resource Management Package) - all closely integrated. The Citrus industry has little knowledge of this initiative.”

“For exporting countries such as US, UK etc certification most likely provides strong evidence of compliance with Australian import protocols whereas certification for some developing countries could not be relied upon. Perhaps a rating system is required (similar to those for the economic health of a country - such as Moody's AAA rating etc.)?”

“All banana tissue culture plantlets imported to Australia are subjected to virus testing even though they are certified as clean by the exporting country.”

“For industry biosecurity pre-border, at-border and thereafter, there must be broad agreement throughout perennial horticulture (commercial and retail) of the definition of the label “virus-tested” – and the conditions that justify its valid use (i.e. a defined set of testing requirements and timeframes, agreed by AQIS, BA and industries). The Prunus industries would benefit from harmonised protocols for testing of exotics (in AQIS facilities) and accreditation of laboratories undertaking endemic organism testing. The proposed closure of the AQIS facilities of Eastern Creek and Knoxfield are a concern to the almond industry but this also provides some opportunity for a centralised testing facility for perennial horticulture.”

“Consideration need to be given to the issue of the potential for government to undermine the documented procedures and systems as set out in the plant and animal health deeds (such as the EPPR Deed and owner reimbursement costs). In the event of an outbreak, Government has the tendency to disperse funds outside the set procedures and systems to which they are signatories. This could clearly be seen in the response to the recent outbreak of equine influenza, where compensation payments were made to many people and enterprises well outside the scope of the animal health deed arrangements. This has many implications, including undermining the commitment of both government and industry representatives who are active participants in a number of committees who negotiate, analyse and establish the appropriate systems and procedures. Government actions and decisions made in heated political environments surrounding emergency situations can threaten the validity and meaningfulness of the deed when the associated activities and consequences fall outside the stipulated guidelines.”

## IRAs -The Science

Many in Horticulture believe that there is a credibility problem with the current assessment process (and consequently, that all IRA outcomes are treated with scepticism). Industry views about the science behind the IRA process include:

- ❖ The critical importance of expert scientific advice being drawn from specific disciplines, and not just from generalists with no detailed understanding of specific pests/diseases.
- ❖ Support for a system that encourages greater contestability of the science; for example, through the establishment of a 'court of science' to arbitrate on areas where different groups of scientists have differing views;
- ❖ We believe there should be processes for taking a conservative estimate of biosecurity risks in situations where the scientific data is not conclusive or is lacking;
- ❖ There have been serious questions raised about the appropriate balance of qualitative versus quantitative methodologies in the risk analysis process;
- ❖ Horticulture believes there is too much focus - both quantitatively and qualitatively - on the likelihood of entry, establishment and spread of pests and diseases, and not enough focus on the consequences that may result (i.e. in particular, whether there was appropriate expert consideration of the economic, health and social consequences within an IRA process);
- ❖ Horticulture strongly supports an expansion of the role of the Eminent Scientists Group (ESG), so that it can examine more than whether stakeholder views have been taken into account in the IRA process. For example:
  - Examining all relevant scientific evidence available, not simply reviewing the Government's response to industry submissions, with their report on an IRA submission made publicly available;
  - Recommending consideration of additional/alternative or new science
    - Comparison of bibliography and relevant research in the case of Apple & Pear Australia re NZ apple imports and the potential risks of Fire Blight, for instance, demonstrated that new research directly relevant to Fire Blight survival was not taken into account, i.e. data on
      - bio-films (a bacteriological self-protection mechanism), and
      - viable but non-culturable (VBNC);
- ❖ We seek a revision, in consultation with industry, of the current procedures for assessing consequences, including:
  - A review of the economic consequences analysis within the IRA and the use of appropriate expertise;
  - Broader consideration of other (eg economic, environmental or health) impacts of potential incursions<sup>3</sup>;
  - Considering a longer impact timeframe than just one year (we would suggest up to 10 years), as well as the full range of possible pests/diseases simultaneously;

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<sup>3</sup> Environmental considerations are essential and tend to be given little weight viz our unique *Rutaceous* flora. See also Davidson A, Elliston L, and King J-A, Brennan J. 2004, *Contribution of Plant Industries to Regional Economies*, ABARE project commissioned by Plant Health Australia. This work should be part of the decision making process in determining consequences.

- Processes for ensuring that the consequence assessment is undertaken with advice from appropriately qualified experts (i.e. “based as far as possible on the analysis and assessment of [all available and relevant] objective and accurate scientific data”);
  - Processes to ensure that the cumulative risk of multiple pests is acknowledged, as the cumulative risk in statistical terms may see ALOP exceeded where the assessment for each individual pest does not. This argument is further supported by the fact that BA promote the combining of risk management measures to reduce the overall risk of entry, establishment and spread of a pest.
  - A method for standardising the timeframes of varying IRAs (ie commodities) to enable comparison between each IRA and prove consistency;
  - Alternate methodology for determining likelihoods which includes using qualitative terms only;
  - State of the art techniques robustly based on mathematical theory for each step in the methodology;
  - State of the art techniques which deal with uncertainty at each step in the methodology;
  - A statement on the accuracy limitations of each step in the methodology;
  - Documenting the diversity of interpretation of the ALOP;
  - Identifying alternate expressions of a risk beyond the matrix which are well-grounded in mathematical theory (with reference to time);
  - Probability ranges which accurately reflect common understanding of the meaning of probability descriptors where quantitative data is available;
    - The probability category “low” falling within the range of 5% to 29.9% for the initial quantitative step in the methodology is inappropriate use of language. Horticulture’s view is that the range 5% to 9.9% more accurately reflects the general community’s understanding of the meaning of a “low” probability. Without a common understanding at this initial step in the methodology, there will be continued challenges that the benchmark of a very low ALOP should be reduced to negligible risk.
  - Research producing likelihoods which have a consistent meaning for stakeholders;
  - Research into a mathematical based technique for combining scenarios; and
  - A ‘lay person’s’ explanation of the methodology;
- ❖ For example, there was an outbreak (fortunately identified and eradicated) in the Melbourne Botanical Gardens in 1999 (during the NZ apple IRA process), which clearly demonstrated that *even without trade*, the risk of incursion is already acute
    - however, this was not taken into account in the process for analysing risk;
  - ❖ Another example occurred with potential environmental risks associated with Citrus Canker. It became evident to the Australian citrus industry during the recent canker outbreak at Emerald and during the drafting of an incursion management plan for *huanglongbing* (HLB) and its vectors, that we do not have the essential knowledge on the resistance or tolerance of Australia’s indigenous rutaceous species to be able to assess risk from these exotic pests and diseases.
    - there is a continuity of indigenous citrus around the Australian coastline — *Glycosmis* spp. in thickets in northern Australia and *Citrus australasica*, *C. australis*, *C. garrawayi* and *C. inodora* in rainforests along the east coast and the inland distribution of *C. glauca* from north of Emerald, through central Queensland, and New South Wales to the

Flinders Ranges and wild *Murraya paniculata* var. *ovatifoliolata* in coastal and sub-coastal monsoon vine-thickets on stabilised dunes or lateritic ledges above the beach; vine-thickets on rock outcrops in open woodland in Western Australia, Northern Territory and Queensland.

- as these Rutaceae are indigenous to Australia, knowledge of their susceptibility to exotic pests and pathogens can only be determined *in vitro* or in tests conducted in containment facilities. An alternative is for ACIAR or CRC Plant Biosecurity to establish trials in countries where the diseases/pests are endemic. This has occurred to a very limited extent for HLB and its Asian vector, but more should be done eg in ACIAR projects in Bhutan, Sikkim and Pakistan.
  - it is imperative that any contingency planning document contain as much information on host susceptibility as possible. This was a deficiency in the draft canker contingency plan.
- ❖ Many of those involved in biosecurity policy are clearly concerned that that internationally, Australia's approach to exotic pests and diseases is seen as too conservative, and as a result we are attracting increased scrutiny. Industry, however, is of the view that **a genuine and transparent science-based approach will always be defensible.**

### ***IRAs – the process***

Horticulture wants an IRA process that can withstand international scrutiny. We appreciate the need for work on IRAs to be consistent with international trading rules and the SPS Measures Agreement, and for a strong, independent scientific process. The industry has significant concerns, however, as to whether the current process effectively delivers on this objective. In particular:

- ❖ Industry wants more certainty about the timing, conduct and delivery of IRAs
  - BA takes up to two years to produce an IRA – industry has 60 days to respond
  - in the case of Fire Blight and the IRA for NZ apples, industry's response required input from a diverse range of experts (eg plant pathologist, bacteriologist, mycologist, entomologist, mathematicians); collection and collation of their responses exceeded the 60 days allowed;
- ❖ Horticulture believes that the IRA process should be more transparent and consistent;
- ❖ Horticulture believes that economic and social issues need greater attention in the IRA process (understanding that this cannot extend to issues of economic competitiveness); and to that end, we call for a more multi-disciplinary approach to IRAs (for example, interaction with the Department of Health and Ageing throughout the IRA process);
- ❖ Economic analysis also need to be current to the circumstances
  - for example, many apple growers are moving towards growing Cripps Pink (Pink Lady™) - these are a more profitable variety, but are also significantly more susceptible to Fire Blight;
- ❖ We believe that it is essential to formalise more effective and inclusive consultation processes between industry and government on bio-security issues; eg between the IRA panel, the relevant peak industry body and major stakeholders, for example:
- ❖ Information for inclusion on the Public File should include the following:
  - background to the import proposal

- scope of the IRA
- documents circulated publicly by Biosecurity Australia during the IRA process
- formal membership of any specialist IRA team
- all stakeholder submissions
- stakeholder comments and submissions where stakeholders have not maintained a claim of confidentiality
- minutes of IRA team meetings
- policy determinations.
- correspondence between BA and individual stakeholders

The Public File should be maintained in a manner consistent with proper public administration.

- ❖ BA does not have a public policy position with respect to the way it deals with errors contained within its draft IRA's, but claims that any issues requiring attention are dealt with in subsequent drafts. In circumstances where an error is identified in an IRA draft that immediately precedes a final IRA document, no provision is provided for stakeholders to comment on any revised risk management measures that BA may initiate to address the impact of the error. This is a denial of procedural fairness.
- ❖ Risk management measures that are to be applied *in situ* by the exported country need to be considered very carefully, particularly where that country has problems with lack of qualified personnel, corruption etc. There are two issues here.
  - Firstly, BA currently proposes risk management measures but leaves it to AQIS to determine how those measures will be applied *in situ*. Clearly, the effectiveness of the risk management measures is at least in part a function of the way they are administered, and BA should be a party to determining this;
  - Secondly, any risk management measures that are to be carried out *in situ* by the exporting country should also be assessed against that country's ability to undertake the proposed measures consistent with international standards for public administration. Where standards for public administration are judged to be below world standards additional or stronger risk management measures should be applied.
- ❖ Horticulture calls for a wider role for the Eminent Scientists Group in IRAs (see above – *IRAs - the Science*);
- ❖ Industry is also looking to the establishment of processes for taking a conservative estimate of biosecurity risks in situations where the scientific data is not conclusive or is lacking – for example
  - BA appears reluctant to utilise section 5B of the SPS Agreements (that is, if there is insufficient scientific data available, then import restrictions can stay in place until the research has been completed). BA seems to believe that it is essential to develop a position/response, even in the absence of sufficient data/evidence;
- ❖ Horticulture also calls for appropriate processes to be established to ensure the selection, recruitment and appointment of staff with appropriate skills and experience
  - career paths and key performance indicators within both BA and AQIS, matched to the aims of each organisation, would encourage the development and enhancement of these skills with appropriate salary and other rewards;
- ❖ Horticulture considers it critical that both BA and AQIS have not only relevant training and experience, but also independence from political influence

- this would have the effect of ensuring that they are providing the best, objective, scientific/technical advice to government (eg BA advising impartially on an application to import a product, rather than being accused of placing a greater emphasis on trade considerations).

## 2. IRAs - PUBLIC COMMUNICATION, CONSULTATION, AND RESEARCH & REVIEW PROCESSES

Horticulture believes it is critical to formalise more effective and inclusive consultation processes between industry and government on bio-security issues - eg between the IRA panel, the relevant peak industry body and major stakeholders - to improve the effectiveness, timeliness and cost-effectiveness of consultation and review. Specifically:

- ❖ Horticulture is seeking better explanation of decisions and the basis on which they are made;
- ❖ Industry want responses to their views, even when the Government doesn't agree;
- ❖ industry is seeking greater timeliness of decisions (and is aware of recent changes to the maximum timeline to 30 months);
- ❖ But we also seek realistic timeframes for industry to respond (i.e. greater than 60 days!);
- ❖ Horticulture is looking to the establishment of processes for taking a conservative estimate of biosecurity risks in situations where the scientific data is not conclusive or is lacking;
- ❖ Many in Horticulture hold the view that if the consultation process were amended to allow for consultation with Australian stakeholders (including producers, consumers, trade lawyers etc) to discuss relevant issues concurrent with the IRA process, this would reduce much of the potential for disagreement/dispute and public acrimony, and also enable industry to be better placed to produce a timely response;
- ❖ Industry acknowledge that both Government and industry have a role to play in promoting a common understanding of the quarantine system; we believe that Government and industry groups can do more to explain decisions to stakeholders;
- ❖ Horticulture believes that more regular avenues for discussion are needed, and that there should be better coordination of communication and consultation across all parts of the quarantine continuum. Ensuring biosecurity in Australia's horticultural crops is a complex responsibility shared by all levels of government and by each horticultural industry. Industry and government can best protect against exotic disease threats by proactively collecting and sharing knowledge of the existing threats, their potential for entry, establishment and spread.
  - However, it requires BA and AQIS to implement a response to the information. For example, several years ago industry brought to the attention of BA that Citrus Variegated Chlorosis (CVC) (caused by *Xylella fastidiosa*) could be seed transmitted in citrus to a high 28% of seedlings. It was 2 years before ICON was changed to prohibit citrus seed from countries with CVC, and to query import applications for citrus seed from countries with Pierce's Disease.
  - Avenues of communication are improving with more active participation by industry in the Post-Entry Plant Industry Consultative Committee (PEPICC). PEPICC acts as an effective conduit for information exchange between the plant importing industries and AQIS. This is a forum in which concerns regarding approved sources, health status of imported rootstock seed, testing for pathogens etc, can be raised and in future, issues prioritized for consideration by BA.
  - Industry has good dialogue with both BA and AQIS, as well as PHA with meetings at least twice per year where issues regarding export and import matters etc are raised and frankly discussed.
- ❖ Costs of consultation on both industry and government need to be reduced.

### ***Case study – Pineapples IRA***

There is an issue of equity within the IRA process. There are examples which demonstrate that Government may only complete a thorough IRA when it is pushed into this position through significant industry agitation and investment. This is simply unacceptable.

This issue is demonstrated in the following example. The pineapple IRA was conducted and concluded in 2002. Since then, the pineapple industry observed with interest activities around the apple and banana IRAs, which after significant industry investment by both industries, uncovered major errors in the IRA processes and content of the reports.

With this in the public domain, the pineapple industry seriously questioned the way in which the pineapple IRA was conducted and whether the outcome sufficiently provided an adequate level of protection to prevent the incursion of pests and diseases in the Australian pineapple industry.

As a result, the pineapple industry engaged a number of experts to review the pineapple IRA. The summary finding was that in comparison to the apple and banana IRAs, the pineapple IRA was far less rigorous with limited analysis applied to its development and consideration. The broader implication of the way in which the pineapple IRA was conducted is the issue of equity. Major investments by large industries, such as bananas and apples, have led to the identification of flaws in draft IRAs, with changes and amendments made following this significant industry investment. On this basis, it is not be unreasonable to conclude that the Australian Government will only complete a thorough IRA when it is pushed into this position through significant industry agitation and investment.

This is unacceptable, as the process must be driven by science and risk assessments, rather than significant industry investments in submissions that scrutinize the IRAs and government's analysis. All industries and the Australian community deserve an exceptional level of service and professionalism in biosecurity and quarantine matters involving all IRAs. If this is not provided, we will be in a situation where those industries with larger capacity for investments in these issues will have a greater chance of maintaining relatively pest and diseases free industries whilst smaller industries will be vulnerable.

### **Comments from industry leaders:**

“Environmental considerations are necessary to protect our unique fauna. Risks in the exporting country need to be assessed by competent pathologists/entomologists, with a knowledge of the pest and crop. BA personnel with no experience in either crop or pest cannot adequately assess the risk (eg with the IRA for mandarins from Korea, an experienced citrus pathologist accompanying a BA staff member picked up canker in the field).”

“No one expects a zero-risk environment (well almost no one!). However, the decision making process is a black box.”

“AQIS lacks pro-active input to industry on all levels and appears to lack a partnership approach with stakeholders. AQIS appears to have a different outlook when assessing

Australian produce for export and that being imported. The perception is that AQIS is harder on Australian produce for export and the inspections seem more intense and critical. Industry does not believe that AQIS aids export-driven businesses. There is a lack of inspection consistency by AQIS staff across the country for like products destined for the same export markets - what is OK in one state is ruled out in another, and time taken in inspections varies greatly between states. Industry generally feels guidance from AQIS officers is minimal and lacks constructive advice in meeting compliance requirements.”

“Our industry has good dialogue with both BA and AQIS, as well as PHA with meetings at least twice per year where issues regarding export and import matters etc are raised and frankly discussed. Consultative arrangements regarding IRAs between our industry and BA, have been good. This may in part be through the meetings mentioned above and also because we have employed a pathologist with 40 years experience and knowledge of exotic pathogens, with whom BA consults. On-going pre-border intelligence is essential to know the risks posed by imports. Interception records for imports should be made public.”

“The AQIS ICON site is full of contradictions and is most confusing; this site has to be relevant to the moving target of disease infiltration into Australia. One example is that AQIS is sometimes looking in the wrong places for diseases coming into Australia - witness the vast numbers of visitors to the country wearing woollen clothing that retains a higher moisture level than synthetics where viruses and diseases can be harboured.”

“There needs to be some debate around the concept of ‘acceptable to whom’. Growers are going to bear the brunt of an outbreak, so they need to be more involved in determining what is an acceptable risk. However, this issue goes further than determining the risk. Consideration needs to be given about who is responsible for bearing the costs of an outbreak. The EPPR Deed deals with the actual costs of the response; but nowhere is the broader cost to individual growers, to an industry, or to a local community dealt with. Use apples and fire blight as an example. The government has decided that the risk of introducing fireblight into Australia from NZ is ‘acceptable’. The scientific data on which that risk assessment is based shows that the risk is not uniform - Stanthorpe is most at risk because it is a warmer growing area and provides more optimal conditions for the disease. So, essentially, the government has agreed that the fact that the Stanthorpe apple industry will most likely disappear is an acceptable risk. Assume I am a grower in Stanthorpe. Do I think this is an acceptable risk? Probably not. So who should bear this cost? As a grower, when there is an outbreak and if it is decided this is eradicable, under the EPPRD deed, I will contribute to (and benefit from) the cost of the eradication. But if it is decided that the disease is not eradicable, I face being wiped out - because of a decision by faceless bureaucrats in Canberra who work on the ‘all care, no responsibility’ principle. In this instance, it was the federal government who made the decision that the risk was acceptable and so they should bear the costs faced by individual businesses and any industry adjustment activities. Furthermore, where it is applicable, the federal government should also bear the cost of structural adjustment in the local community. In the apple instance, the destruction of the apple industry in Stanthorpe will have wide ranging community impacts - take the apples out and there’s not a great deal left. Those pieces have to be picked up somehow.

This leads me to one of my hobby horses - the fact that growers cannot get insurance to cover many risks involved in producing their crops. If government is going to force their view of acceptable risk on growers, then the very least they should do is ensure that the growers can get insurance to cover risks which are beyond their control. This type of insurance is not commercially viable so is not available - which is a clear case of market failure. Government should be directing some of the resources it already invests in the farming sector to underwriting this type of program - on the proviso that only growers who have prepared for risk would be able to access any form of government assistance.”

“The total lack of accountability by AQIS, to understand that the wider community does have significant constructive capabilities to input into preserving Australia's disease free record. [This is demonstrated by] their poor attitudes to returning correspondence. And if one tries to ring AQIS, 90% of the time a talking-head asks you to e-mail or fax the details. The time frame when the AQIS office is receiving phone calls is outmoded, and in today's commercial terms, when ports of entry operate 24 hours per day, AQIS offices should be able to be accessed with a broader span of hours.”

“There's an issue of inter-industry equity that needs to be addressed in dealing with IRAs. There have been major investments by large industries such as bananas and apples in making formal submissions to government on IRAs, which has led to the identification of flaws in the relevant draft IRAs. Changes and amendments to these drafts IRAs have only been achieved through this significant industry investment. On this basis, it would not be unreasonable to conclude that the Australian Government will only complete a thorough IRA when it is pushed into this position through significant industry agitation and investment. This is unacceptable. The process should be driven by science and risk assessments, rather than significant industry investments in submissions that scrutinize the IRAs and government's analysis. All industries (and the Australian community) deserve an exceptional level of service and professionalism in quarantine matters involving all IRAs. If this is not provided, we will be in a situation where those industries with larger capacity for investments in these issues will have a greater chance of maintaining relatively pest and diseases free industries whilst smaller industries will be vulnerable.”

### 3. RESOURCING LEVELS AND SYSTEMS AND THEIR ALIGNMENT WITH RISK IN DELIVERING REQUISITE SERVICES

Horticulture notes that the scale and complexity of the threat of pests and diseases is increasing globally; and, in conjunction with increased trade, this makes the task of assessing and managing risk - faced by BA and AQIS - ever more challenging.

- ❖ Horticulture's key concern is to ensure that there is a strengthening of the relationship (and communication/consultation) between BA and AQIS, in order to ensure that growers and industries are not impacted by incursions;
  - we note that since 2001, AQIS has employed an additional 1200 staff, deployed new technologies and increased intervention levels across import pathways, including international mail, containers, airports, seaports;
  - we also note that BA have expressed some frustration at the lack of properly qualified staff (for example, in the relevant scientific disciplines) to allow timely and expert assessment of IRAs, and other activities associated with market access requests;
- ❖ We are keen to see a review of the consequences analysis within the IRA process, as well as the use of appropriate expertise within (or outside) BA in undertaking this analysis;
- ❖ Many in industry are keen to be more engaged in AQIS consultative processes, to ensure their interests are represented and that they have sound understanding of how AQIS is handling key issues; and industry representatives want to be engaged before key decisions are made, and provided with the reasoning behind those decisions;
- ❖ See also points made in relation to AQIS internal operations, above;
- ❖ The cost-sharing arrangements (eg for the Emergency Plant Pest Response Deed) are a significant step in the right direction, but what of all the exotic pests and diseases not categorized in the cost sharing agreement? A pest of minor importance overseas could become a major pest when introduced to Australia.

#### Case study - Citrus

In 2007, the Citrus industry expressed its concerns about the possible loss of skills and expertise in citrus screening of imported budwood when the plant pathologist at PEQ Eastern Creek left to take up a position with Biosecurity Australia.

One year on and there is no permanent appointment to the vacated position and the employee carrying out the job has had no formal training in disease testing of perennial horticultural plants (he has a PhD in plant breeding). In addition, staff at PEQ Eastern Creek are isolated from contact with other pathologists, whereas at PEQ Knoxsfield staff benefit from collaboration with Vic DPI pathologists. On-job training, including attendance at overseas specialist courses (eg the citrus virus course at Bari Italy and attendance at citrus virus conferences), is essential for staff to obtain information on pre-border disease incidence, new detection techniques etc.

There has been a decline in the health status of imported citrus budwood.

Instead of new varieties being derived from overseas improvement programs and consequently of high health status, variety managers are now importing varieties with the potential for PBR and these are being sourced from orchards or breeding programs prior to pathogen evaluation - viz the risk of pathogen entry through legal importation of infested or infected material has increased.

A newly imported variety infected with an exotic (or even an endemic) pathogen, could have disastrous consequences for an industry.

AQIS should be carrying out risk analyses on each budwood or seed import to ensure that the testing in PEQ reflects the risk posed by the pathogens present in the country of origin eg citrus budwood from South Africa is now coming from areas with HLB – i.e. **there is a need for pre-border intelligence.**

The Federal Privacy Act<sup>4</sup> 1988 has limited the information on importations made available by AQIS to Australian perennial crop industries, yet detailed information is still recorded by AQIS in the Client Quarantine Registry. Until March 1996, when the last Fruit Imports Accession List was published, industries had available to them information (including accession numbers) of all imported propagating material and their sources. Now only information on the numbers of varieties and clones is available to industry (via the PEPICC<sup>5</sup> meetings of industry with AQIS).

#### Comments from industry leaders:

“[There is an] issue of capacity of the states to deliver on biosecurity outcomes. There’s a lot of cost-shifting and cost-cutting going on across the jurisdictions. Our experience here in Queensland shows that when there is a major outbreak, capacity is just not there. QDPI&F had all hands to the pumps for EI - which caused havoc with matters plant related. We could not get anything done at all. ICAs were backing up left right and centre - and, as a result, trade in some crops into some states ground to a halt. (This also raises the issue of the need for third party accreditation for ICAs to be put in place as a matter of urgency.). Heaven only knows what would have happened if there had been an outbreak of a major plant pest or disease while the EI response was in train (eg fireblight, or PFF, or black sigatoka, or citrus canker or .... the list goes on). QDPI&F would have had not a hope in hell of dealing with it - and I suspect other agencies would be in much the same position. There needs to be serious thought given to how state agencies are resourced to deal with EPPRDs – expecting them to deal with major emergencies out of their normal budgets is just not realistic.”

“Another issue is that of resource constraints for industry bodies, and ‘death by consultation’. Since the announcement of this review, there has been a tidal wave of horticulture-related IRAs. BA has years to do all the work they need to do on these; then expects us to respond within a short time frame (generally 60 days). That’s bad enough when there is only one crop of interest to an industry body (eg apples, bananas etc) but totally unreasonable and unmanageable when an industry group represents a cross-commodity membership. It limits our capacity to monitor potential impacts and to ensure that the process has at least been carried out in a thorough and transparent fashion.”

<sup>4</sup> <http://www.privacy.gov.au/act/privacyact>

<sup>5</sup> Post-Entry Plant Industry Consultative Committee

#### 4. GOVERNANCE AND INSTITUTIONAL ARRANGEMENTS TO DELIVER BIOSECURITY, QUARANTINE AND EXPORT CERTIFICATION SERVICES

Horticulture's key concern is to ensure that there is a strengthening of the relationship (and communication/consultation) between BA and AQIS. Industry appreciates the reasons for the current 'arms'-length' relationship. However, **we believe it is critical to maintain integration between quarantine policy and operational functions**, which currently appears to be absent or poor.

Communication and coordination between the organisations have been less than ideal, leading to poor implementation of the quarantine and biosecurity 'system' on the ground. We understand that there are now regular meetings between BA and AQIS, which is a pleasing development – but much more needs to be done, at all levels, to embed this cooperation and integration into the cultures of both organisations. As one example, awareness programs and education for exotic pests and diseases in Australia need a national approach:

- ❖ It has been near impossible to obtain pest/pathogen interception records. These should be more readily available (and published, as US records are) to enable improved risk assessments.
- ❖ There is little point in each state, BA, AQIS and PHA all producing their own pest/disease awareness sheets!

It is our belief that an intentional, concerted, institutional approach is required (not relying merely on the good-will of individuals or *ad. hoc.* meetings).

Horticulture does not have a view on how this outcome is best achieved – that is a matter for government; but such integration, communication/consultation, and mutual understanding is critical to achieve an optimal quarantine and biosecurity system for this country.