Questions and answers

Moving biosecurity risk off-shore

Is there greater risk with off-shore risk management?

In relation to section 4.14 of the draft pest risk analysis, why would the process be moved off-shore if integrity issues still exist?

"On-shore fumigation as a control has been effective and industry supports the reintroduction of the pre-March 2018 measures." (comment from forum participant)

Answer: The Department of Agriculture and Water Resources (the department) is committed to protecting and ensuring Australia's favourable biosecurity status and the over-reliance on one critical control point for managing risk (on-shore fumigation) was increasing the biosecurity risk to Australia.

That is why we're now focusing on managing the biosecurity risks off-shore and at key points along the import pathway. Compared with the previous import conditions which allowed for on-shore management, the new import conditions require cut flowers and foliage to be certified as free from pests, prior to export, by the exporting country's National Plant Protection Organisation (NPPO).

Australia's approach to managing arthropod pests on cut flowers and foliage off-shore is consistent with Australia's policy and the International Plant Protection Convention; that is, management measures for quarantine and regulated pests should be done in the exporting country and certified by the exporting country's NPPO, so that the risk to the importing country is minimised.

As part of the off-shore management approach, growers and exporters will need to meet the regulatory requirements (and certification processes) of the exporting country's NPPO.

The department requires a suite of management measures along the pathway so that the likelihood of a pest outbreak or incursion in Australia is reduced as much as possible.

A view shared by some industry members is that on-shore fumigation alone was effective in managing risks, because no pest outbreaks have been attributed to cut flower and foliage imports. However, the department contends that the pathway leading to the introduction of some pests found to be established in Australia is unknown.

The revised import conditions aim to significantly reduce the number of pests arriving with cut flower and foliage shipments at Australia's border by requiring that biosecurity risks are appropriately managed in the exporting country. This approach aligns with the approach for imported horticultural commodities.

Changing business practice to meet the new import conditions

With the high numbers of actionable pests recorded, despite the 15 month period already provided for importers to comply, why has this been allowed to continue for so long?

Answer: On 1 March 2018, the department put in place revised import conditions for cut flower and foliage imports.

The department provided a period of time (1 March 2018 to 1 June 2019) for the exporting countries and importers to transition to the new requirements.

During this time, the department:

- monitored the importation of cut flowers and foliage and recorded the number of live arthropod pests found on the imported consignments

- regularly notified exporting countries and importers of the live arthropod pests recorded on their consignments
- ensured that all consignments found with live quarantine pests were effectively treated.

During this time, some exporting countries demonstrated improvement in reducing the number of live arthropod pests found on their consignments cut flowers and foliage. Other countries have not improved and have continued to export cut flowers with a high pest load (up to 80 per cent of consignments found with live pests on arrival).

Under the revised import conditions, the department had expected that the number of live pests on cut flowers and foliage imports would reduce more rapidly.

To further reduce numbers of live pests arriving in Australia, the department is considering introducing import permits for the systems approach management option from countries that have not reduced the high pest loads arriving with their cut flower consignments by 1 June 2019.

If the department disallows a country using the systems approach as a management option, they will still be able to trade using other phytosanitary management options, such as pre-shipment fumigation or an alternative NPPO-approved treatment. Importers will be able to apply for import permits to continue to trade under the systems approach management option. The country can have the systems approach reinstated following a submission to the department outlining corrective actions they have undertaken together with evidence of its success.

Grouping cut flowers and foliage for a pest risk analysis

Questions were raised about the group approach to the pest risk analysis and how the pest risk analysis aligns with risk management principles.

Answer: The risk analysis being undertaken for the cut flower and foliage import pathway is an assessment of arthropod pests (and groups of arthropod pests) associated with the flower types (and countries of origin) that are allowed to be imported into Australia. Part 1 of the pest risk analysis assesses the three main pest groups being intercepted at the border on imported cut flowers and foliage – thrips, aphids and mites. Part 2 of the pest risk analysis assesses all other arthropod pest groups that are also found on the cut flower and foliage pathway such as, leaf miner flies, caterpillars and true plant bugs, including stink bugs.

The group approach is a practical consideration for pest risk analysis on this pathway. The risk analysis is appropriate to the circumstances and consistent with WTO SPS Agreement. The International Standard for Phytosanitary Measures No. 2 *Framework for pest risk analysis* permits a member country to analyse specific organisms in groups where individual species share common biological characteristics.

Most risk analyses conducted by the department have focussed on the pests associated with one plant species from one or a small group of countries. Given the number of pests addressed in this pest risk analysis with similar pathways, and that there are 15 species of flowers that are most commonly imported from at least 19 countries, a group pest risk analysis is an efficient, consistent and beneficial approach for all. The pest risk analysis determines the measures (or not) for a number of potential quarantine pests, across a number of flower species and countries, and this ultimately facilitates trade. Following the completion of the pest risk analysis, the department would consider equivalent phytosanitary measures on a case by case basis, for example, on a per country basis.

The department could conduct a risk analysis for each flower type from each exporting country but this would take many years. In order to do this, exporting countries would need to provide more comprehensive lists of pests associated with each of their flower species as well as detailed information supporting any pest free areas they wish to have considered in the assessment. Given the increasing biosecurity risk that we have identified with this pathway, we would have to consider suspending trade until those risk analyses could be conducted.

Inspecting consignments

Does the department have adequate funding and resources for inspection services?

What happens to the consignment during the time of pest identification?

Answer: The department resources its inspection services at ports of entry to meet known demand, which includes the flexibility to redeploy staff during high peak periods such as Valentine's Day and Mother's Day.

Consignments of fresh cut flowers and foliage are inspected as a priority on arrival. Depending on the size of the consignment, either all or a sample of cut flowers and foliage is inspected.

If any live pests are found, they are collected and sent to the department's laboratories to identify the pest. The consignment of cut flowers and foliage is held until a diagnosis is returned and the inspection officers determine the course of action that is needed for the consignment before it is released.

Delays in the release of consignments only occurs when consignments arrive with live pests. Importers can avoid their consignments being delayed by meeting Australia's import requirements and ensuring consignments are free of live pests.

Inspection and diagnostic services over the weekend

Why are the laboratories only available weekdays?

Is there a timeframe for considering provision of a weekend service?

Why not have inspection services available on weekends year round, instead of only on weekends around seasonal events, such as Mother's Day?

Answer: The department reviews its regulatory arrangements and settings on a regular basis to ensure it is responsive to changes in operations at the border. Any change in the current arrangements for the provision of diagnostic services would need to be based on the identification of an appropriate and sustainable resourcing model aligned to demand.

The department is currently considering a number options as part of its arrangements moving forward, including:

- extending diagnostic services to include weekends, which will depend on it being sustainable and aligned with the volume of work
- the use of third party providers for diagnostics.

The department is actively considering various models that are responsive to changes in volume and demand through a sustainable resourcing model.

Third party providers

Has the department considered engaging external entomology services?

Answer: As outlined above, the use of third party providers for diagnostics is an option that is being considered by the department as part of its arrangements moving forward.

The department already use third party providers for diagnostics in specific circumstances where in-house expertise is not available.

Maintaining the integrity of Australia's biosecurity system

What does the department do when there are known incidents of 'dodgy' dealings or offenders circumventing biosecurity risk management processes?

Answer: The department takes seriously any suggestion or concern around the integrity of its processes or officers. Anyone with concerns is advised to report their concerns immediately. The department's integrity hotline is – 1800 99 88 80.

While the hotline is anonymous, the provision of contact details of the caller can improve the department's ability to investigate the concerns that are being raised.

Pest resistance to pesticides

Why is there no testing for resistant strains of spotted mites?

"A 2017 report indicated that the rest of the world had resistant populations of spotted mites, except Australia." (comment from forum participant)

Answer: In Australia, there are records of arthropod pest species being resistant to pesticides. Being able to distinguish between 'home-grown' and introduced pests that are resistant to pesticide is not always possible.

If stakeholders have specific evidence of pesticide resistance in arthropod pests arriving on cut flowers, please forward that information to the department so it can be consider in the pest risk analysis for cut flowers and foliage imports.