



**Parliament of Australia  
The Senate Reference Committee on Rural and  
Regional Affairs and Transport**

**Inquiry into  
Biosecurity and Quarantine Arrangements**

**A Submission by  
Nursery & Garden Industry Australia (NGIA)**

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### INTRODUCTION

Nursery & Garden Industry Australia (NGIA) is the peak national industry body representing producers, retailers and allied traders involved in the production of plants across all states and territories of Australia. In partnership with state and territory peak bodies, NGIA is responsible for overseeing the national development of the Australian nursery industry. The nursery industry is a significant sector of the Australian horticultural industry and employs over 45,000 people in more than 20,000 small to medium sized businesses with a combined supply chain market value in excess of \$15 billion annually.

Table 1 shows the wide range of end users supported by the nursery industry. **Table 1:**

**National value of horticultural sectors supplied by production nurseries**

<b>Production Nursery</b>	<b>Horticultural markets</b>	<b>Economic value</b>
Container stock <sup>1</sup>	Ornamental/urban horticulture	\$2 billion retail value
Foliage plants <sup>1</sup>	Indoor display/hire	\$87 million industry
Seedling stock <sup>2</sup>	Vegetable growers	\$3.3 billion industry
Native and exotic forestry stock <sup>3</sup>	Plantation timber	\$1.7 billion industry
Fruit and nut tree stock <sup>2</sup>	Orchardists (citrus, mango, etc)	\$5.2 billion industry
Landscape stock <sup>1</sup>	Domestic & commercial projects	\$2 billion industry
Plug and tube stock <sup>2</sup>	Cut flower growers	\$700 million industry
Revegetation stock <sup>1</sup>	Farmers, Government, Landcare	\$109 million industry
Mine site revegetation	Mine site rehabilitation	Value unknown
<b>Total Horticultural Market Value</b>		<b>\$15.0 billion</b>

<sup>1</sup> Freshlogic (2008) Australian Garden Market Monitor for the Year Ending 30 June 2009

<sup>2</sup> Horticulture Australia Limited (2004) Australian Horticultural Statistics Handbook

<sup>3</sup> Australian Bureau of Agricultural and Resource Economics (2008). Australian Forest and Wood Products Statistics

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The Australian nursery industry has had a historically long and close relationship with Biosecurity and Quarantine agencies across Australia, particularly in relation to the interstate movement of plant material. High volumes of plant material, valued in the millions of dollars, are moved across all Australian jurisdictions on a daily basis and consequently, the industry is reliant upon robust, cost effective, efficient and reliable biosecurity and quarantine resources.

The Australian nursery industry supports a biosecurity system (pre-border/border/post border) that is robust, practical, risk assessed, supported by good science and one that accepts a unified Appropriate Level of Protection (ALOP). The industry wants to work with all biosecurity agencies to add value and contribute to the ongoing development along the Australian biosecurity continuum. NGIA believes that there are significant gains to be made in strengthening the Australian biosecurity system through sound industry/government relationships that will minimise costs and reduce red tape.

In recent years, it has been disappointing to have witnessed very little productive change along the biosecurity continuum. Indeed, industry perceives biosecurity and quarantine agencies across Australia to be grossly failing in their obligations to provide holistic, cost effective, appropriate, efficient and timely biosecurity services to Australian plant industries and the wider Australian community.

There has been a consistent lack of prioritisation by governments to the threats and costs, to the community and industry, of exotic plant pest incursions into the country over the past 10 years. Nursery production has borne the brunt of almost every exotic plant pest incursion over this time costing millions of dollars in crop losses, mitigation programs, compliance protocols and restricted or closed market access.

Over the past 15 years the industry has had to deal with a range of Emergency Plant Pests (EPPs) with some eradicated, others under management plans and the remainder

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recognised as endemic pests and treated as a normal plant pest within the production system (controlled).

The list below itemises a number of these recent EPP incursions

- Palm Leaf Beetle
- Mango Leaf Hopper
- Western Flower Thrips
- Silver Leaf Whitefly
- Crazy Ant
- Spiraling Whitefly
- Red Banded Mango Caterpillar
- South African Citrus Thrips
- Melon Thrips
- Red Imported Fire Ant
- Citrus Canker

- Tomato Yellow Leaf Curl Virus
- Sugar Cane Smut
- Electric Ant
- Impatiens Downy Mildew
- Mint aphid
- Lilly thrips
- Mango malformation
- Lettuce aphid
- Mango Leaf Gall Midge
- Fire blight
- Impatiens Necrotic Spot Virus
- Myrtle Rust

The Nursery & Garden Industry Queensland (NGIQ) surveyed production nurseries throughout Queensland on the impacts of one exotic plant pest incursion, Red Imported Fire Ant (RIFA), based on the interstate and intrastate movement protocols imposed. The results show that the **industry** is investing over \$18 million per year in the RIFA eradication program due to lost market access, RIFA compliance costs and protocol implementation totaling more than \$144 million over the past 8 years. Recent figures released show the entire cost shared national investment in the 10 year RIFA eradication program totaled approximately \$275 million to date. The above demonstrates that the industry carries a major burden, financially and operationally, when Australia has pre-border and border failures in excluding the incursion of exotic plant pests.

It has been observed that biosecurity and quarantine agencies, in relation to the export of horticultural commodities, are making the process cumbersome, difficult and costly. From January to December 2009 total plant exports amassed \$21.67 million, which has been in steady decline over the past 5 years. Indeed, this trend is across all Australian horticultural commodities which is in stark contrast with other Southern Hemisphere producers. It should be noted that the majority of production nurseries that export plants often export small quantities of plant material on a frequent basis with many consignments under 200 kg. Moreover, there are several production nurseries that focus entirely on plant exports.

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It is therefore imperative that all production nurseries exporting plant material are adequately supported enabling development and growth in the global market. Growth in exports will require world-class biosecurity and quarantine agencies that support and assist Australian plant producers develop international market access.

At present, there is a distinct lack of industry confidence and assurance in commonwealth and state/territory biosecurity and quarantine agencies, due to a myriad of reasons regarding process, general protocol interpretation, resource allocation and minimal consultation with industry on matters that have financial ramifications on business sustainability, including fee for service and cost reviews. This concern is warranted following the implementation of the removal of the AQIS 40 per cent fee rebate and revised fee schedule as of 1 July 2009 which was later disallowed on 15<sup>th</sup> September and then rescinded in November with fees returning to full cost recovery on December 1 2009. Although this coincided with the announcement of the Export Certification Reforms Package (ECRP), there has been negligible progress to date.

NGIA welcomes the opportunity to make a submission to the Senate Reference Committee on Rural and Regional Affairs and Transport inquiry into ***biosecurity and quarantine arrangements***.

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### **RESPONSE TO ISSUES**

#### **A) The adequacy of current biosecurity and quarantine arrangements, including resourcing;**

NGIA is concerned by the lack of state/territory and commonwealth targeted investment in maintaining Australia's plant biosecurity and quarantine arrangements. NGIA is disturbed at the lack of comment and implementation undertaken by state/territory biosecurity agencies and governments based on the outcomes identified through the Beale Review of 2008. NGIQ considers the domestic quarantine situation to have decayed further since the release of the above mentioned review and sees a definitive move by the commonwealth to divest itself of fundamental biosecurity responsibilities (see AQIS Post Entry Quarantine Review). This will result in the obvious costs being again passed onto industry.

The current domestic quarantine situation is rapidly deteriorating with a failure by state/territory governments to adequately resource the plant health sections within each agency. Furthermore this poor resourcing has left agencies without the capacity to deliver the appropriate responses to an EPP incursion **and** undertake normal biosecurity commitments. This in turn is affecting the delivery of pro-active biosecurity strategies and in how states/territories manage an EPP incursion.

This can be highlighted by two separate incursions of EPPs (Impatiens necrotic spot virus (INSV) and Myrtle rust) over the first 6 months of 2010. These plant diseases have, and are threatening the livelihood of many within the industry and impacting along the supply chain including retailers, florists, timber production and the environment. Myrtle rust has the potential to devastate many production nurseries and the hardwood timber industry across Australia. The disease, if allowed to establish, will reduce the amenity value of our urban parks/gardens and the environmental value of Australia's native bushland.

NGIA's involvement with these two incursions has highlighted severe deficiencies in biosecurity and quarantine arrangements to the point that these agencies are

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dysfunctional and not meeting their statutory obligations. This has been brought to fruition through ongoing declining investment across all levels and points in the biosecurity continuum.

Failures have occurred in the management of the above EPP incursions as follows:

- Failure to rapidly respond to the incursion and limited intent to eradicate
- Major failure to commit staff to the response
- Disjointed and incomplete response throughout the initial detection
- Failure of jurisdictions to assess the risk on its merits
- Lack of consistent positions on issues by jurisdictions
- Information flow to national committee's was incomplete and piecemeal
- Unwillingness to take pro-active action
- Failure to apply the recognised response system – PLANTPLAN
- Basic process failure – trace forward/trace back
- Dysfunctional sample testing, recording and reporting system
- General site testing and surveillance poorly conducted
- Failure to adequately undertake delimiting surveillance
- Poor management of stock movement off infected properties
- No harmonisation of movement controls across Australia

Further evidence of a disjointed national biosecurity system can be illustrated by the movement controls imposed by 4 jurisdictions addressing the Myrtle rust incursion. Not only do these 4 jurisdictions differ in the classification of the risk area, but not one has the same approved treatment (fungicide) with two jurisdictions refusing any import of host material from anywhere in Australia. With an industry such as nursery production many businesses trade with clients in multiple jurisdictions therefore the complexity and cost of meeting a huge diversification of non-harmonised movement controls (for the same pest) across their target markets is financially crippling and logistically impossible.

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Over the past few years industry has had a greater engagement with government on biosecurity directly as a result of the development of the Emergency Plant Pest Response Deed (EPPRD). This engagement has allowed greater scrutiny, by industry, of the biosecurity process and structure which in turn has highlighted the significant flaws in the system. Furthermore government has driven agencies to be cost recoverable and establish fee for service structures charging industry for all activities from document lodgement through to plant health inspections.

As a consequence, industry is demanding government actually deliver the service as any commercial fee paying client has the right to do however in this instance (biosecurity) government has the monopoly. Government is not only the sole service provider, they are also the architect of the rules/regulations and therein lies a fundamental conflict of interest particularly as industry expects regulatory efficiencies and value for money.

NGIA considers the overarching model of the Australian biosecurity framework to be one that can deliver a world class biosecurity system however at present this is not the case. The current attitude of government and agencies relating to plant health is obstructionist at best and incompetent at its worst with an adversarial odour hanging over many engagements. NGIA considers the Australian Biosecurity system to be one that focuses on managing the risk(s) associated with EPPs under the auspices of facilitating market access through ALOP. The domestic quarantine system has, and is drifting rapidly away from the above focus with evidence showing agencies are adopting the precautionary principle as opposed to one that is based on an assessed risk relevant to an ALOP.

Whilst on paper our biosecurity system looks robust and inclusive, in truth there are few checks and balances that can be applied to jurisdictions hence decisions can be made by individuals (regulatory) to suite a particular policy or political position as opposed to one based on an assessed risk. The Australian domestic biosecurity system allows personal, external policy and political influence to manipulate biosecurity decisions at state/territory level that is inappropriate and not in the best interests of all stakeholders.



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These decisions are often cloaked in dubious scientific rationale that, in most cases, find no support outside of the implementing jurisdiction.

Examples of the above can be clearly seen in recent decisions, by various state biosecurity agencies, that a robust risk assessment framework under ALOP has not been applied to a range of decisions from prophylactic pesticide treatments, draconian plant movement protocols through to complete market exclusions. These decisions do not stack up to scientific rigor and most can be clearly shown to be the result of external influence or professional incompetence. Furthermore industry, after scrutinising the requirements, have often considered the movement controls to be disguised restrictions on interstate trade – vigorously denied by the implementing jurisdiction.

A fundamental problem for industry is there is no avenue for redress, no vehicle that allows an incompetent agency to be challenged and no structure to ensure openness and transparency in the decision making process. There is no forum in which industry can present its case that will result in a binding decision requiring a jurisdiction to apply ALOP. Industry believes the establishment of a national pest risk assessment framework and the development of binding governance protocols on biosecurity decision pathways to be an essential component of ongoing reform.

In recent times, both on a national and state stage, NGIA has observed the failings of the domestic quarantine system in its most raw and recurring form(s). NGIA is calling for the downward trend in investment to cease and state and national governments to seriously embrace the '**Shared Responsibility**' of quarantine and biosecurity. NGIA is also calling on the federal government to take control of domestic quarantine with nationally consistent legislation that applies sound risk based assessments under ALOP and engage state/territory agencies as service providers.

### **B) Projected demand and resourcing requirements;**

NGIA expect that demand for world class biosecurity and quarantine arrangements will grow and require heightened investment at state and national levels. As mentioned

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above, the resourcing in plant health along the biosecurity continuum, at all levels, is currently **not** at an appropriate level therefore projecting forward is complex due to the distorted starting point. Furthermore, ensuring any increase in government investment is directed to the areas of greatest need is a major concern of industry.

The Queensland Farmers Federation (QFF) in its 2009 Queensland Election Statement called on the major parties to increase investment in plant health by an extra \$11.5 million. This increase, over and above current investment in plant health, was to address:

- \$5 million increase per year to establish and Emergency Response capacity as a permanent standing function within Biosecurity Queensland (BQ) separate from core ongoing activities
- \$1.5 million per year to develop improved strategic policy, analysis and information management capacity within BQ to better analyse and plan for risk management
- \$5 million increase in annual funding for Plant Biosecurity to bring it up to the same level as Animal Biosecurity. The new funding would be for core capacity building priorities necessary to reduce the risk of future biosecurity threats.

NGIA considers the above funding requirements to trend across Australia and its jurisdictions. Close scrutiny of state/territory/commonwealth budgets over the past 5 – 10 years clearly show a declining investment (in real terms) in plant health by all jurisdictions no matter the rhetoric of government.

The Beale Review 2008 identified that overall pressure on Australia's pest freedom status is and will continue to increase due to the greatest movement of the human population in history and a rapidly evolving world economy and trade. The demand for consumer goods (imported), tourism (international & domestic), and the variability of climate are all considered as growing threats to our pest free status.

Therefore it is obvious that government and industry will have to address the issues and apply the appropriate amount of funding/resourcing to biosecurity (plant health) into the

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future. Government must also look at ways, outside of the established paradigm, that Australia's biosecurity system can be enhanced while meeting all stakeholder needs. Truly engaging with industry through better information access, training and commonality of purpose is one such area that can deliver outstanding results. Reversing the antagonistic perception(s) and aligning to industry needs will build solid industry/government partnerships.

### **C) Progress toward achievement of reform of Australian Quarantine and Inspection service export fees and charges;**

NGIA express concern in relation to progress toward achieving reform of Australian Quarantine and Inspection Service (AQIS) export fees and charges under the Australian Governments Export Certification Reform Package (ECRP). To date, progress has been slow with NO identifiable outcomes towards improving efficiencies and reducing export fees relating to the horticultural export program (HEP).

NGIA has been represented on the joint Industry – AQIS Horticulture Export Ministerial Taskforce (MTF) since 1 April 2009. During this time, NGIA has been engaged in the majority of meetings, whether face-to-face or through teleconferencing to ensure that the industry maintains its presence in a sector dominated by larger horticultural industries such as citrus, cherries and grapes. During the initial period of consultation, the MTF worked on developing the Horticultural Industry Work Plan which agreed on key priority area to drive the reform process. This was fed into developing the official Work Plan that was published in March 2010; some 8 months after industry submitted the proposed work plan to AQIS on July 31 2009.

The Horticultural Industry Work Plan involved a 2 step process. Phase 1 of the Work Plan involved financial analysis to review existing fees and charges in order to identify possible efficiency gains. Other aspect of this phase included Process Mapping of Horticulture Export Practices to develop a process map that clearly defines the industry and regulatory processes involved in the export. Both of these projects were scheduled for completing in June 2010 and are still underway. The outcomes of these projects were to be used in

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order to determine the key priorities and level of investment in Phase 2 secondary projects; however this has not occurred and has consequently, significantly impacted on the ability to drive further efficiency gains and savings.

The Export Certification Reform Package (ECRP) will conclude in 11 months on June 30 2010, which means that urgency is required to deliver improvements to the HEP. At present, a review of existing legislation and consideration of possible amendments should be underway as specified in the official Horticultural Industry Work Plan in order to meet this deadline however, these have not commenced due to the inability of successful delivery of Phase 1 projects. Without legislative instruments in place, how will the outcomes from the Horticultural Industry Work Plan be realised?

Despite active industry presence on the MTF, these participants have been not been given the opportunity to sign off on all AQIS expenditure prior to commitment. This was evident with the current Supply Chain review project being undertaken by a third party consultant following their appointment by AQIS and not through the MTF. This has raised serious concern regarding the impartiality of the project with undue input from AQIS. Moreover, despite NGIA presence on the MTF, the Australian nursery industry was not included in the stakeholders being reviewed as part of this project. This is of significant concern and raises questions regarding the *modus operandi* of the proposed reforms and outcomes that are yet to arise.

### **D) Progress in implementation of the 'Beale Review' recommendations and their place in meeting projected biosecurity demand and resourcing; and;**

Whilst the Federal Government of the day agreed to all 84 recommendations contained in the Beale Review, there was no real increase in the investment by the commonwealth or by the state/territories. Consequently any advances made have been very limited and many have been cosmetic e.g. combining biosecurity agencies under one body – Biosecurity Services Group.

Other areas addressing the Beale Review recommendations that are currently under development, include the Intergovernmental Agreement on Biosecurity (IGAB), National

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Biosecurity Legislation, National Environmental Biosecurity Response Agreement (NEBRA), the AQIS 100% cost recovery drive and the Biosecurity Advisory Council.

NGIA appreciates that both the IGAB and the national legislation will address multiple Beale Review recommendations, however to date, industry has not had an opportunity to peruse a draft document of either. Therefore NGIA cannot realistically comment on the progress of the recommendation implementation meeting projected biosecurity demand and resourcing.

### **E) Any related matters.**

**Lack of transparency in development of protocols and processes (Biosecurity Australia (BA) & AQIS)** – the industry is often perplexed at the various processes, interpretations and rulings made by both BA and AQIS that impact on their businesses. The above bodies continue to hold information from industry and are selective in their classification of stakeholder(s) and therefore the stakeholder engagement process is not truly representative. This is demonstrated by the recent change to the importation of host material (other than tissue culture) of *Phytophthora ramorum* which now allows the importing of bud wood (*Rosa* species). The lack of transparency, in this instance, in the decision making process questions the general integrity of our national biosecurity system.

The process of determining acceptable risk must be holistic and include all stakeholders and not be limited to the industry seeking the application or challenging the application. Furthermore the decision makers need to assess on merit, not on generalities, the acceptable risk and through stakeholder engagement at all levels of the biosecurity continuum risk minimisation to ensure ALOP can be met.

**Increasing responsibility being devolved to industry (e.g. national surveillance)** – with the industry taking a more responsible role in national biosecurity (e.g. signatory to the EPPRD) through the concept of “shared responsibility” it is apparent that there will be greater expectations from government on industry’s capacity to deliver certain outcomes

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on its behalf. A significant area that is likely to be transferred to industry is as a contributor in demonstrating evidence of absence for EPPs. This World Trade Organisation initiative will provide Australian trading partners with confidence that Australia's declaration of pest freedom has substance through a national surveillance strategy. The concern industry has is the increased compliance costs through infield activities, administration and reporting associated with the requirements with little assistance provided by the regulator. Furthermore the industry is concerned that the grower's skills and information used to support evidence of absence to our trading partners will not be recognised as having the same value domestically for interstate pest freedom declarations and Interstate Certification Assurance (ICA) compliance.

The transfer of responsibility to industry must be supported through the development of resources for compliance, industry training and skill enhancement and the recognition of on-farm biosecurity programs. The costs associated with the national surveillance strategy and general biosecurity/quarantine compliance needs to be addressed to minimise 'red tape' and improve efficiencies including recognition of third party auditing of on-farm programs and ICA's.

NGIA considers it vital that the commonwealth offer financial assistance to plant industries to develop the systems and strategies that are required by industry at farm level. This is an appropriate request due to industry being forced to undertake a traditional role of government.

**EPP entry pathways are not regularly re-assessed** – there has been a declining investment in biosecurity across Australia at both a national and state government level for many years. This has been particularly noticeable within the plant industries where in some instances questionable off-shore and domestic facilities have gained AQIS accreditation which enhances the risk(s) of a border breach due to non-compliance, low skill levels, limited diagnostic capacity or poor facilities. The reduced investment has seen alternative strategies adopted to accommodate the requirements to protect our borders.

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The issue industry has with this approach is that some of the off-shore facilities are assessed and audited by governments that have a poor creditability record, staff that are unskilled and where corruption within agencies is known. This leads to a complete failure of the system and it is continuing to frustrate industry when these pathways are left open after successive emergency plant pests have been detected e.g. Potato Spindle Tuber Viroid (PTSVd) pathway on imported tomato seed (6 incursions since 2001).

It is a serious issue, potentially a significant flaw, which allows the existing system where AQIS sets the processes/protocols that are designed to mitigate the biosecurity risks at pre-border and border stages yet are not held accountable for the very failures at these points. The cost to industry has been calculated in the tens of millions of dollars with growers waiting many years before income begins to be produced off the new plantings. AQIS must be held accountable for its actions particularly as industry is being asked to contribute proportional amounts to the cost of an emergency plant pest eradication program that affects their cropping system(s). The signing of the EPPRD demonstrates industry's application of the recommendations from the "Australian Quarantine a shared responsibility" Nair Review 1996, however industry has the right to be closely engaged with AQIS and BA at all levels of the biosecurity continuum particularly in the risk assessment process and in defining what is "acceptable risk".

**On-farm adoption of biosecurity strategies** - One of the main difficulties in getting wide-scale improvements in risk mitigation on the ground is that growers lack a meaningful and immediate incentive to improve on-farm biosecurity practices. Certainly the market is not providing strong signals to growers to lift standards at this point in time. Plans to integrate biosecurity into existing enterprise management and quality assurance systems will provide a driver. However, if these are found to be too costly or onerous, they will fail. Solving this problem is of fundamental importance. Without near to universal grower participation, monitoring and surveillance systems will provide an incomplete picture of Australia's pest and disease status and expenditures on communications and behavioral change programs may be wasted.

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It is also important to understand that, while there are provisions for owner reimbursement costs in the EPPRD; these are minimal and relate only to the actual costs of an Emergency Plant Pest Response(EPPR). There is no provision for recoupment of costs not directly related to the EPPR including produce harvested but not yet sold which must be destroyed, loss of income as a result of destruction of trees, etc, wages for staff during non-production periods and so on. An affected grower would therefore suffer serious financial and operational impact if they were to be caught up in an EPPR, even if they were eligible for owner reimbursement payments. In past events, some affected growers have been driven out of business as a result of costs incurred.

It is all very well to base our quarantine system on an acceptable level of protection and risk. However, growers have no effective say in what is deemed an acceptable level of risk – even though they ultimately bear much of the cost burden in the event of an EPPR.

One possible solution to this would be for governments to underwrite an insurance scheme to enable growers to insure against losses from exotic pest and disease incursions. Presently, insurance of this type is not commercially available. This is a clear case of market failure. The insurance scheme could provide the incentive for improved on-farm biosecurity management by making access by growers contingent upon achieving threshold biosecurity standards. Such a scheme could be funded by diverting some funding currently allocated to Exceptional Circumstances assistance program. This is consistent with the philosophy of shared responsibility, and would ensure available assistance targets enterprises which have endeavoured to manage risks.

**Pest Quarantine Areas and pest freedom** – the fact that Australia operates under a federated system of government with independent state and territory governments under one federal government causes significant problems when managing a biosecurity incursion. The issues arise due to the statutory rights of state/territory governments to



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independently manage their biosecurity risks as they see fit. This therefore poses a problem of state borders and the “quarantine zone” around an EPP incursion.

Red Imported Fire Ant detected in South East Queensland (SEQ) in 2001 has its nearest identified nest approximately 100 km from the NSW border at Tweed Heads. The businesses, community and governments in NSW have no restrictions for the movement of plant material yet are closer to the outbreak than business approximately 1500 km in Cairns who do have quarantine protocols imposed. This is a system that expects EPP to recognise borders drafted onto maps. Other examples include Melon Thrips and Spiralling whitefly.

The entire system of zoning quarantine areas and identifying pest freedom areas must be addressed and developed into a streamlined practical system. The assumption that state borders will stop the movement of an EPP is dangerous and if the national standard risk management methodology was in place it would deem the risk equal to the distance from the incursion irrespective of state borders.

### **Conclusion**

The biosecurity processes and systems in Australia are complex, costly and burdensome to industry and are verging on becoming completely dysfunctional. The internal quarantine systems operating between states is heavily laced in red tape, has a lack of harmonisation and accessing information is difficult with up to date details often parked in obscure web addresses or in a single address emails. Terminology is legalistic and jargon based and is often vague and open to multiple interpretations by industry and regulators.

Serious issues surround the implementation of movement controls by jurisdictions and the lack of investment by all levels of government in plant health. Furthermore, industry needs a sound and binding dispute resolution process that can be implemented quickly to address jurisdictional anomalies. Re-thinking how Australia defines pest quarantine areas

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is needed to better reflect the true quarantine zone and to demonstrate to stakeholders that the risk and not the protection of markets is the driver.

Communication and stakeholder engagement (meaningful) between regulator and industry is poor and usually produces little in the way of progress whether it is one on one at state or national level or through comprehensive incursion reviews the same issues are tabled year after year. Industry requires funding support to drive change at farm level due to government handing more responsibility to industry and a greater expectation of participation in evidence of absence surveillance.

The plant industries of Australia are capable of working with biosecurity and quarantine agencies to progress a holistic biosecurity focus across all plant production systems. With the depth of knowledge that exists within the plant industries solutions to the most complex of issues can be realised that meet the needs of all stakeholders. With a true focus on a “**shared responsibility**” practical and effective strategies can be developed along the entire biosecurity continuum.

To achieve the above, governments need to commit and provide greater and appropriate investment, biosecurity agencies need to shift to a new paradigm by recognising industry as a true partner and industry must step up and address biosecurity in a structured manner.

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5/8/2010