

4 August 2010

Bromeliad Society of Queensland
C/- Mr Robert W Reilly

Senate Inquiry: Biosecurity & Quarantine Arrangements

Dear Sir

I am making this submission on behalf of Australian bromeliad societies through the Bromeliad Society of Queensland. I am happy to answer any queries from the Committee or its staff. My contact details are above.

The submission opens with some background, and then deals with two main issues. The first relates to the way in which Weed Risk Assessments are managed (primarily by AQIS and Biosecurity Australia---BA). The second relates to fumigation treatments for bromeliads (primarily managed by AQIS).

1. Background

There are over 3,200 bromeliad species and 10,000 hybrids (registered and unregistered). The number of species is increasing at around 100 per year, with over 500 new hybrids annually.

Bromeliads are widely grown in mainland Australia.

There are over 20 Bromeliad societies and discussion groups in Australia with a combined membership exceeding 3,000. There are over 20 nurseries, of a commercial size, that grow significant numbers of bromeliads. Most of these are in southern Queensland and northern New South Wales.

The importation of bromeliads is an important mechanism for obtaining new bromeliads (including forms of ones already in Australia) for both collectors and nurseries.

2. Weed Risk Assessments

2.1 Context

Prior to 2007, bromeliads could be imported into Australia under a mixture of what could be described as "genus level" and "species level" ICON (the list of plants that can be imported into Australia) approvals. (This approach continues for some plant families).

Thus, for certain genera, any species (including botanically-undescribed species) or hybrid could be imported ("genus level" approval). For other genera, an assessment was made by AQIS/BA of each species or hybrid ("species level" approval).

The overwhelming majority of genera of interest to collectors/nurseries were on the "genus level" approval system. This approach worked reasonably well from the

perspective of collectors/nurseries, although many people queried why all genera were not on the “genus level” system.

This is because no bromeliad has ever been rejected for inclusion onto ICON, nor has any ever become a state government-declared weed species in Australia.

BA changed the system in 2007 to require “species level” approval for all bromeliads. This was done without any consultation with bromeliad societies and little warning. It is understood that this decision was made on the basis that some (unspecified) bromeliad species had the potential to become weed species in Australia. BA has not disclosed the risk assessments on which this judgement was made.

It is debatable whether the current species level approval approach presents the best assessment cost (for both AQIS/BA and the people making assessment applications) – weed risk trade-off.

It is still our view that the best approach is a combination of genus level and species level approvals. At BA’s request, I submitted a draft proposal along these lines on 10 November 2009, as a basis for further discussion and negotiation. This was rejected by BA on 25 November 2009. BA advised the existing species-level approval approach would continue for all bromeliads. However, they will now accept any hybrid (without further assessment), provided all of the species of a given genus are on ICON. Currently, this has not been achieved for any genus.

To date, over three hundred dollars has been spent, and several thousand hours of volunteers’ time has been expended, on preparing the documentation required by AQIS/BA. This is a significant investment by a group of non-profit societies with very limited financial resources.

2.2 Issues

Assessments are made by AQIS/BA through one of two processes.

If a bromeliad is already growing in Australia, then a “relatively quick” assessment process is used. However, as at 2 August 2010, the assessment of over 300 species that were submitted up to 18 months ago, remains outstanding, even though BA acknowledged in April 2010 that were eligible for assessment under this process. (It is acknowledged that approximately 800 species have been assessed by AQIS/BA in early 2009 and added to ICON).

Because this assessment process appears to be relatively straightforward, we were working with AQIS/BA to maximise the number of plants that can be assessed using it. (This is despite the fact that it is less time consuming to submit the documentation needed to utilise the more complex process described below, and that all of the species mentioned in the paragraph above had been submitted for assessment under the more complex process.).

If the bromeliad isn’t growing in Australia, then a more complex assessment process (Individual Weed Risk Assessments) is used. Over 3,500 assessments are still outstanding, with more than 1,000 over 24 months old. 30 of these assessments have been completed by AQIS/BA in the last year. This outcome is of obvious concern given the backlog that has built up, and the fact that this process will need to be the primary assessment tool for remaining species/hybrids. While I could submit

an additional 8,000 species/hybrids for assessment using this process, it appears of little use to do so, given the backlog that already exists.

I have worked with AQIS to streamline the submission process as much as practical, but the assessment task is one for AQIS/BA. (I acknowledge the helpfulness of individual AQIS staff in this process – it is the overall speed of assessment that is the issue, and this reflects the resources allocated to this task).

AQIS/BA has consistently refused to state when the backlog will be addressed. At their current rate of progress, it will be some date post 2100. From our perspective, this situation is unacceptable.

They have also asked me to indicate priorities for assessment. However, while we are willing to do so, provided all are done within a reasonable time, this is of no value when AQIS/BA refuse to commit to an assessment timetable.

2.3 Conclusion

In essence, we find ourselves “between a rock and a hard place”.

On the one hand, we are told by AQIS/BA that we have to submit assessments for every species/hybrid. However, AQIS/BA then refuses to commit to when the assessments will be completed. **(Note that we are not asking for every species/hybrid to go onto ICON regardless of their weed potential. Rather, we are asking that the assessments be completed in a timely manner).**

In essence, AQIS/BA appears to have committed to a particular regulatory system, without the resources to implement it. In my experience, it is highly unusual to require a regulatory approval (i.e. before a bromeliad can be imported into Australia, it has to be approved for importation), and then refuse to say when an application for such an approval will be assessed.

We are seeking for service delivery standards to be set for these assessments.

A suggested approach is:

- For bromeliads assessed under the less complex process (see section 2.2): All assessments to be completed within four months of AQIS/BA accepting that the plants are in Australia;
- For bromeliads assessed under the more complex process: 95% of applications to be assessed within 12 months, with the balance within a further 6 months. For large number of applications from one person/organisation e.g. over 500, then these could be dealt with over a 5 year period, in accordance with a negotiated, prioritised timetable.

3. Fumigation

3.1 Context

Bromeliads that are imported are treated at the port of entry into Australia to ensure that pests are not imported into the country. There are two methods. The first requires fumigation with the highly poisonous gas, methyl bromide. Many bromeliads die as a result of this treatment.

The second involves the dipping of bromeliads in a chemical solution. Many fewer bromeliads die as a result of this treatment. It is only able to be used for plants that

AQIS recognises as being susceptible to methyl bromide. These are listed on the "dipping list". However, even for these plants, if any pests or diseases are detected, then they are treated with methyl bromide.

3.2 Issues

First, it is unclear why all bromeliads are not on the dipping list, given the safeguard of methyl bromide treatment if pests are detected in the shipment. If AQIS has a risk assessment that demonstrates why the current approach should be followed, then we would like a copy of it.

Second, a species/hybrid can only be added to the dipping list, if AQIS undertakes a trial, using methyl bromide fumigation, on plants that are already in Australia. However, this policy does not take into account the reality that people will (with the exception of a few bromeliads that are imported in commercial quantities) only wish to import plants that are not readily available in Australia.

AQIS collects plant mortality data for all shipments. Why cannot AQIS use this data to make assessments for inclusion onto the dipping list, and avoid the waste of resources inherent in the current approach?

Third, plant names change with increasing botanical knowledge. It is important to list these synonyms in the dipping list, to avoid unnecessary plant losses. However, BA will only accept a synonym after reviewing the actual scientific publication in which it is made. As many of these publications are difficult to access, this can result in delays of over 24 months. A better approach, from the perspectives of both timeliness and resource use, would be for BA to accept the list of synonyms prepared by bromeliad identification experts. One such list is on the Bromeliad Society of Australia's website.

A final point is whether methyl bromide should continue to be used at all. There are significant concerns about its continued use, both from a workplace health and safety perspective, and the fact that it is a "potent" greenhouse gas. However, it is acknowledged that this issue goes beyond its specific use as a fumigation chemical for bromeliads.

3.3 Conclusions

The following approaches would reduce resource requirements for both AQIS/BA and bromeliad importers.

- Place all bromeliads on the dipping list.
- If this is unacceptable, AQIS should use the plant mortality data that it already has, and is continuing to collect, to assess which bromeliads should go onto the dipping list.
- BA should use published lists of synonyms to deal with inclusions of synonyms onto the dipping list, rather than individually researching each synonym, through its original source of publication.

Yours faithfully

Robert Reilly