Committee Secretary
Senate Standing Committees on Rural and Regional Affairs and Transport
Parliament House
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Re: Senate Inquiry into the Proposed Importation of Potatoes from New Zealand

About the TFGA

The Tasmanian Farmers and Graziers Association (TFGA) is the leading representative body for Tasmanian primary producers. TFGA members are responsible for generating approximately 80% of the value created by the Tasmanian agricultural sector.

In 2009/10, the farm gate value of agriculture and fishing was $1.683 billion – which represented approximately 6% of the gross state product. More than seventeen thousand people are directly employed in farm related activities. Taking into account basic multiplier factors, this meant the farm dependent economy contributed c$5.4 billion dollars (18%) to gross state product and 1 in 6 jobs.

With our purpose being to promote the sustainable development of Tasmanian primary industries, the TFGA is committed to ensuring that the agriculture sector in Tasmania is profitable and sustainable. We are also committed to promoting the vital contribution the agricultural sector makes to the environmental, social and economic fabric of the Tasmanian community.

Background

The TFGA has made comment to the Department of Agriculture, Fisheries and Forestry (DAFF) Biosecurity recently released report, which proposes amendments to current quarantine measures that may allow the importation of fresh potatoes from NZ to quarantine approved premises for further processing in Australia.

We stated in our submission that we are opposed to these amendments and challenged them on a scientific basis as well as on an ethical/economic basis, both of which cannot be discounted in this debate.

It is the industry's position that DAFF Biosecurity has significantly underestimated the risk posed by the import into Australia of Solanaceous crops in general and fresh potatoes in particular.

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Conservative estimates, based on overseas experience, suggest that potential losses to the industry should Tomato-potato psyllid and its associated bacterium arrive in Australia could be in the order of $0.25 billion.

The farm-based gross value for Tasmanian potato production is $120m (2011/12). Approximately, three hundred growers produce 330,000 tonnes of potatoes for the market. The total Australian production value is $483 million, of which the Tasmanian industry contributes more than 24% of total consumption.

The future for Tasmania potato growers is already extremely fragile. Recent pressure by processors to cut tonnages and prices is forcing many growers to the edge of financial collapse. Processor decisions are being driven by the need to compete with cheaper imported potatoes. The consequential impacts may include a collapse of land prices - already being witnessed, increased unemployment and further loss of revenue for the Tasmanian economy.

Past experiences prove the massive implications to a sector when a disease outbreak occurs, for example, in 2004 the inadvertent introduction into Australia, of Citrus Canker had drastic financial implications for Queensland growers as large areas of production around Emerald had to be destroyed. A further consequence was a proclamation banning Queensland citrus fruit products from leaving the state. If states themselves are prepared to go to such measures, surely it is a double standard to risk Australia's disease status in allowing potential trade of a vegetable product where known disease such as zebra chip, exists. Other countries like South Korea have already taken steps to protect their growers from this devastating potato disease.

In our opinion, DAFF's assessment of risk is incomplete. Despite a considerable number of diseases and pests existing in NZ for potatoes, only three are considered by DAFF to merit consideration in the Review:

- Potato Cyst Nematode (PCN)
- Zebra chip complex
- Black Wart Disease

All other potential pests and diseases have been ignored. The Review and the supporting Final Pest Risk Analysis, which was also produced by DAFF (Biosecurity Australia, 2009) lacks rigour, objectivity, basic scientific method and provides selective presentation of data.

We also noted that similar concerns regarding rigour, lack of objectivity and poor science etc. are continually raised by other Australian industries when responding to DAFF and its work.

Importation of fresh potatoes from New Zealand will result in potatoes infected with *Candidatus liberibacter solanacearum* (the organism which gives rise to the condition commonly known as Zebra Chip) arriving in Australia. There is currently no non-destructive test for ascertaining whether or not potatoes contain *Liberibacter*.

It is regrettable that the DAFF review report didn't provide the standard of science and rigour that one would expect from such a document. Statements of opinion are expressed as fact and referencing other than to government publications is minimal. One can only assume that most of what is written is therefore opinion and does not qualify as science. This is unfortunate, as we are led to believe that Australia's approach to biosecurity must be science based.

No attempt has been made to keep abreast of the science, some of which contradicts or shows the Pest Risk Analysis completed in 2009 to be incorrect. At this current point in time, there is simply not enough evidence available to appropriately address the risk posed by allowing potatoes into Australia from New Zealand for processing and it is deceptive to claim otherwise.

It is our view that DAFF's Pest Risk Analysis (PRA) consistently makes statements as fact without providing any scientific references to backup its statements, making it easy to misinterpret fact from opinion.

DAFF has continually confused Absence of Evidence with Evidence by Absence, meaning they have failed to consider areas that have, as yet, not been researched, but may still be areas of considerable risk from a scientific perspective. This is inexcusable especially when DAFF claims that it uses a

science-based approach. A lack of research to-date into an area does not mean that it is an area not worth consideration.

We vigorously question the scientific principles and the rigour employed in this process. The lack of referencing or citation makes it hard to distinguish fact from opinion in both the Pest Risk Analysis (PRA) and the 'Draft Review of Import Conditions' unless one has made a study of the literature.

The most basic scientific referencing methods have not been employed. Minimum standards of sourcing and referencing expected in scientific submissions aren't employed and papers are selectively quoted, some data is demonstrably false, and the risk ratings do not appear to match the arguments presented. This makes following their arguments difficult.

DAFF Pest Risk Analysis

Examining the PRA in detail shows a number of problems:

For example on page 13 of the PRA it states that *"careful consideration was given to the potential pathways for entry of the bacterium and its vector B cockerelli into Australia". A*t the time of publication the biology and evolution of the psyllid and the Zebra chip disease was virtually unknown. The above statement cannot be justified and is deceptive language to an unfamiliar reader.

On page 27 the PRA makes a comment that the only way for potato tubers to become infected by Liberibacter is through its vector the Tomato-potato psyllid. This has been known to be incorrect since 2011. Evidence now shows we are seeing different species of psyllids acting as vectors. This egregious error alone destroys any credibility the PRA may have had and undermines the entire Import Risk Analysis.

The PRA is a deeply flawed document lacking. No attempt has been made to keep abreast of the science, some of which contradicts or shows the PRA to be wrong. We would argue that the document be excluded from consideration in the IRA process, as there is simply not enough data available to adequately address the risk.

The DAFF Review

The Review itself failed to even consider a large number of other pests and diseases that would be of concern from a quarantine perspective. The standard of work is so poor that one is left to wonder how DAFF can believe it should be taken seriously when it suggests it has assessed risks, premises and compliance and is able to set guidelines.

Examples of errors within the review include:

DAFF make several references to "Quarantine Approved Premises", "Specific Standards" and "measures" that will "prevent the Australian environment being exposed to any quarantine issues"

DAFF provide no data to backup any of these statements and its use of the word *"prevent"* implies zero risk, yet in its own risk based assessment DAFF acknowledges the area of risk assessment is based on probabilities and describes the risk as very low. DAFF continually describes a mix of conflicting positions.

On page 14 of the Review, DAFF writes a section about controlling Packing House Processes. DAFF state that the potatoes will need to be "practically free from soil" but cites no evidence proving that there is no potential for Potato cyst nematode to be transferred in this soil or even psyllid eggs being carried as residue on the potatoes. At the very least some form of documentation or reference should have been provided to support the assertion that risk of soil borne diseases and pests being imported into Australia will be reduced. It is clear from the Review that the authors have little understanding of how a vegetable industry or a vegetable packing house works; otherwise they would see this arrangement is unworkable.

On page 15 of the Review, DAFF refers to packing and labelling requirements stating that the potatoes must have a "one metre separation between them" in the packing house. Presumably there would be some scientific basis to claim that one metre is a critical distance to prevent the spread of any pest or disease, which is of quarantine concern. Currently, this section goes unreferenced citing no evidence to substantiate it and the opinion that this would somehow function is ill-informed.

On page 16, DAFF make one of the more ludicrous claims in the document in stating that containers of potatoes from New Zealand will be permitted to be opened, during transit, and on Australian wharves, to air the contents. There is absolutely no evidence provided by DAFF to suggest that such a practice poses a low risk of an incursion. A door being left ajar is the perfect opportunity for a flying insect to escape!

Based on the lack of rigour, poor application of scientific principles and lack of evidence that is presented in the Review, Australia can have little confidence in the ability of DAFF to assess risk and to manage the subsequent consequences should this proposal for imports go ahead as presented.

One can only echo the comments made by other stakeholders that DAFF has an illogical approach to IRAs; their rigour is low and seriously flawed. No peer review of their documents appears to have occurred (It is believed that the Expert Panel has not met in more than two years, DAFF pers. comm.), industry and scientific comment is not addressed directly and furthermore it is unclear as to how it is either dealt with or dismissed when it is submitted.

To conclude, TFGA wholeheartedly endorses the views expressed in the AUSVEG submission. Both the PRA and the Review are seriously flawed and should be rejected. DAFF needs to be more accountable in producing documents to an acceptable scientific standard and must recognise the risk to growers of such a dangerous change in processes.

The available data on TPP and Liberibacter is currently not adequate enough to conduct a thorough risk assessment and any proposed changes to importing conditions should be stopped until the biology and evolution of these potentially devastating insects and bacteria are more thoroughly understood. Import advice must consider all pest and diseases not just a few that DAFF consider worthy of merit and fail to justify why.

Standard risk management procedures, such as HACCP, should form part of every review so that a transparent and auditable procedure can be constructed. HACCP is a standard risk assessment tool and there appears to be no reason why it should not apply in biosecurity. Furthermore, in addition to noting potential risks HACCP provides an opportunity for highlighting weaknesses in current data and thus indicating areas for further research.

The TFGA is available to discuss any aspect of our submission further with the Senate committee.

Yours sincerely

Jan Davis
Chief Executive Officer

8 October 2012