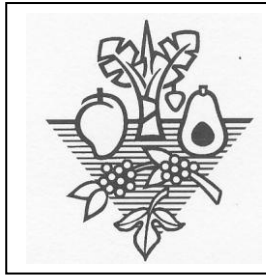


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SUBMISSION TO SENATE INQUIRY – GINGER IMPORTS

I welcome the opportunity to present this submission to the Senate Rural and Regional Affairs and Transport References Committee inquiry into the effect on Australian Ginger Growers of importing fresh ginger from Fiji as a member of the AGIA Technical Biosecurity Response Group.

My comments relate to process issues which have adversely affected the capacity of the Australian Ginger Industry Association (AGIA) to effectively present its concerns and respond to the risk assessments proposed in both the draft IRA and the provisional final IRA (PF IRA).

My concerns

Delay in accessing DAFF Biosecurity trip report

Despite the draft IRA stating (page 15) that the Trip Report undertaken by DAFF Biosecurity Officers in September 2007 “forms the basis for estimating unrestricted risk in this Import Risk Analysis”, access to the Trip Report when requested by the AGIA was denied. The report was finally supplied on 25 May 2012, just 3 weeks before the deadline for submission of responses to the draft IRA. This delay seriously restricted the time for the AGIA technical group to respond effectively.

Removal of reference to this Trip Report in the provisional IRA

Reference to the Trip Report by DAFF Biosecurity was removed in the subsequent Provisional Final IRA (PF IRA). This followed a meeting between AGIA and DAFF Biosecurity officers and QDAFF on May 31 in Brisbane where the AGIA industry and scientific panel outlined serious deficiencies of the Trip Report particularly in reference to the lack of scientific and technical detail regarding the occurrence and distribution of key pests and diseases in Fiji. There was also lack of detail on agronomic and cultural management of ginger in Fiji which restricted the ability of the industry panel to make a sound judgment on the potential risks. Also the credentials of the DAFF B trip team were not disclosed to industry other than “one was a plant pathologist”.

It is therefore difficult to understand how the risk management measures as proposed in the PF IRA can be justified.

If this Trip Report formed the basis of the draft IRA why was reference to it deleted?

Significant changes were made to the Draft IRA

The AGIA response to the draft IRA presented sound scientific and practical information relating to the pests, diseases and production practices both in Fiji and Australia, and provided detail to fill the information gaps in the DAFFB trip report and draft IRA.

As a result significant changes were made by DAFFB in preparing the Provisional Final IRA. Unfortunately the IRA process states that no further comment on the science is permitted once the PF IRA is released. Only comments on process issues are permitted under the IRA guidelines.

This clearly does not provide adequate opportunity for industry to ensure that the information in the PFIRA is correct in terms of its scientific rigour and practical risk management practices.

Delay in informing industry of import request

DAFFB received a submission requesting market access for fresh ginger from Fijian Biosecurity Authorities in November 2003. This submission included information on the pests associated with ginger crops in Fiji and further information was provided on the ginger production system in 2004 and 2007, outlining the land preparation, pest management, harvesting and post harvest handling.

It was not until August 2010, some 7 years later, that the Australian Ginger Industry was first advised of this import application request by Fiji for access to the Australian market.

Since August 2010 the Australian Ginger industry contributed scientific information to DAFF B. From the release of the Draft IRA the industry only had 60 days to respond. . To its credit the AGIA scientific and industry panel was able to address many of the deficiencies, misinformation and lack of detail contained in the Draft IRA within an unrealistically short time frame.

Surely it is in the interest of both the relevant industries in Australia and the country of origin to have a sound scientific assessment conducted so that the final IRA decision is based on the best available scientific and production management information. DAFFB had 7-8 years to conduct its draft risk analysis while industry had effectively less than 60 days to respond to the Draft IRA.

Industry is at a disadvantage following the release of the Draft IRA in that it only has 60 days to prepare the response which will inevitably mean undertaking research to respond to the scientific information contained in the Draft IRA.

Serious deficiencies in the Draft and PR IRA

- **Not applying the precautionary principle -**

The IRA assesses the consequences to native species and other potential hosts as “not discernible” on the basis that “there is no information available”. Surely the precautionary principle should apply here. If there is no information available then the risks must be rated as high or above the ALOP until the necessary research has been conducted. A properly conducted IRA would have at least attempted to provide some scientific assessment of these risks by discussing these risks with appropriate technical experts and industry, instead of dismissing the risk and rating it “not discernible” as this rating obviously decreases the final risk for a number of pests and diseases, reducing them to below the ALOP.

- **Assumptions reflect lack of understanding –**

The PFIRA reflects a complete lack of understanding of everyday reality when it dismisses the risks that consumers could potentially plant rhizomes purchased from retail markets “as this pathway cannot be effectively regulated. It is expected that volumes of ginger diverted to growing purposes by consumers would be small”.

The PFIRA also minimises the potential risk of soil as a vector of a range of pests. It is well understood that soil is a hitchhiker on a wide range of commodities entering Australia however the PFIRA fails to concede that the ginger rhizome is not a smooth conventional shape and contains crevices which commonly trap soil clods which cannot be effectively removed by conventional high pressure water treatment.

To assume consumers are not going to intentionally or unintentionally dispose of unused ginger rhizomes by planting them, throwing into a compost heap or the local rubbish refuse is unrealistic and naive.

- **Applying unproven risk management measures –**

The risk management measures proposed in the PFIRA are scientifically and commercially unproven and have not been technically or practically demonstrated. These deficiencies are detailed in the submission from the AGIA scientific panel and include -

- The lack of detail regarding the identification and epidemiology of key pests and practical management practices conducted in Fiji.
- Failure of the draft IRA to quantify the amount of soil required to present a risk for certain pests.
- The limited capacity of Fiji to effectively identify and manage the key pests is a serious concern for the Australian Ginger Industry, other industries and the Australian environment, which are all at risk from cross infection if imported fresh ginger from Fiji is permitted.

- **Systems approach not sustainable or realistic -**

Given the lack of evidence to support the risk management measures a “systems approach” to managing risk is therefore simply not sustainable or realistic.

- **Lack of genuine consultation –**

There appears to be a lack of desire of DAFFB to engage in meaningful consultation with industry and their scientific panel in developing a scientifically rigorous IRA. Instead of a culture of cynicism and a patronising insular mentality has persisted when communicating with industries, Australia’s Biosecurity organisation should be focused on genuine cooperation, consultation and communication with industry organisations facing the challenge of responding to an import application. Accepting data-free observations, non-peer reviewed trial results, poorly designed trial results and outdated research data from the exporting country is not conducive to a sound risk analysis.

The lack of open dialogue has caused unnecessary friction and mistrust of our national Biosecurity organisation. Australian industries need transparency and confidence in the technical capacity of DAFFB to undertake a rigorous, sound scientific assessment.

- **Our” low risk” policy –**

DAFF B has adopted a “very low” risk policy for the introduction of pests and diseases into Australia, setting an Appropriate Level of Protection (ALOP) for all IRA’s. This inherently acknowledges that some pests will enter the country. While we cannot effectively eliminate the risk of entry through a ‘nil’ risk policy, accepting that we will inevitably introduce foreign pests and diseases will eventually challenge our enviable clean, green status as an agricultural food production country. There will always be some “slippage” when standards are set. Why not set high enough standards so that the inevitable slippage does not compromise our rural industries?

- **“David and Goliath syndrome”**

Small and developing industries often do not have the financial, time and technical resources to mount the prolonged and expensive response required to meet the demanding requirements of Australia’s Biosecurity agency IRA process.

Significant time, effort and expertise is required to undertake the process with countless hours of unpaid work by industry leaders and their benevolent advisers being contributed often at the expense of their own business operations. Small, under-resourced industries should not be disadvantaged by a process which places them at a distinct disadvantage against a comparatively well resourced government agency which is supposedly there to protect Australia from the introduction of exotic pests and diseases.

- **Untimely release of draft reports for comment**

It would assist industries if reports for comment within a tight time frame were not released after COB at the end of the working week.

The PFIRA was released in this manner which effectively further restricted the available time for a response to be organised by the industry response team.

In summary, ALL IRAs should be sound scientifically rigorous documents with the final decision free of political and trade influences.

Yours sincerely

David Peasley
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11 October 2012