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Nursery & Garden Industry Australia

NGIA Response

Australian Quarantine and Biosecurity Review 2008

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1. Nursery Production in Australia

The Nursery & Garden Industry Australia (NGIA) is the recognised national peak industry body representing producers, retailers and allied trades involved in plant production across all states and territories of Australia. The industry nationally generates in excess of $5.5 billion annually and employs over 45 000 people. The Industry is the key communication point for consumers, gardeners, who "manage the greenlife" on over 50% of the urban land in Australia, that is the land that supports over 80% of the Australian population.

The nursery industry is highly diverse and grows greenlife for an array of end users including:

- Ornamental retailers – Urban horticulture
- Commercial/private landscapes – Landscape supply
- Advanced in-ground stock – Landscape supply
- Interiorscaping – Indoor display/hire
- Fruit orchardists – Fruit tree production
- Vegetable production – Vegetable seedlings
- Re-vegetation production – Landcare, farmers, etc
- Mine site rehabilitation – Mining industry
- Forestry – Timber production (plantation & farm)
- Cut flower growers – Starter crops

Nursery production supports the national horticultural industry, which is valued at over $7 billion annually, through the provision of greenlife as a starter crop or a finished product and operates in all states and territories of Australia. Due to the broad array of crops and production systems that constitute the industry, growers are potentially exposed to a wide range of plant pests and diseases that will require management should the controls offered by Biosecurity and Quarantine systems fail.

The Australian nursery industry has had a historically close and long relationship with the Biosecurity agencies across Australia particularly in relation to the interstate movement of plant material. The industry is not a large importer of greenlife and has had a traditionally small export focus however the current activities of the industry and access to improved plant varieties are vital to its survival and ongoing expansion.

The Australian nursery industry welcomes the opportunity to contribute to the debate on quarantine and biosecurity through this federal review. It is important to note that the industry, through both the national body and those of the states/territories, have been consistently providing input into the biosecurity agenda for many years. This has been in the form of individual issues such as a grower specific problem through to issues of national importance including reviews into the fire blight and citrus canker incursions. It has been disappointing to have witnessed very little productive change across the biosecurity continuum and to have seen increased exotic plant pest incursions occurring throughout Australia. It is further disappointing to observe the declining investment by government(s) in biosecurity across all levels and at all points of the biosecurity continuum. The current and potential economic, social and environmental impacts the incursion of exotic plant pests has, and could have, on the nation demands that this downward trend cease and state and national governments seriously embrace the **"Shared Responsibility"** of quarantine and biosecurity.

1.1 Australian EPP detections affecting nursery production

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 (EPP) with some eradicated, others under management plans and the remainder recognised as endemic pests and treated as a normal plant pest within the production system. NGIA has compiled a list below of some of the EPP's that have affected the industry in recent times:

- 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

The Nursery & Garden Industry Queensland recently surveyed the Queensland nursery industry 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 RIFA compliance costs and protocol implementation totalling over $108 million over the past 6 years. Recent figures released show the entire national investment in the 6 year RIFA eradication program totalled approximately $235 million to date. The above demonstrates that the industry carries a major load when Australia has pre-border and border failures in excluding the incursion of exotic plant pests.

The looming impacts of Climate Change/Variability will have a significant impact on the distribution of plant pests in Australia with potential temperate habitat extending into the southern regions of the continent. This will increase the potential distribution pattern of many EPP's with the likelihood of greater economic, social and environmental damage occurring. Temperatures in the north of Australia are expected to increase and as a clear pathway for EPP's into Australia this could result in EPP infestations populating at faster rates due to increased lifecycles (e.g. egg – adult). The faster development of large EPP populations will result in larger areas infested and reduce the practicality and cost/benefit of eradication. Industry will wear the cost.

It is estimated that Australia has approximately 40 exotic pest incursions each year and with the continuing push by governments and industry for participation in the global economy it is expected to put greater pressure on our biosecurity strategies. Greater access to and more frequent international travel by residents and tourists alike also increases the likelihood of our average exotic pest incursions climbing. With this in mind there must be significant change along the biosecurity continuum, including on-farm, to adapt to the biosecurity challenges that face the plant industries of Australia.

2. Nursery Industry Biosecurity Engagement

2.1 Plant Health Australia (PHA) Member

The Nursery & Garden Industry Australia is a member of Plant Health Australia (PHA). NGIA formally joined the Australian Commonwealth and State/Territory Governments as a signatory to the **Emergency Plant Pest Response Deed (EPPRD)** in mid 2005. The industry is an active member of PHA with participation on the PHA Members Committee and in a range of PHA forums. The commitment made by NGIA to join the members of PHA demonstrates a participation and willingness to embrace the "shared responsibility" identified in the Nairn Review of 1996.

2.2 Nursery Industry Biosecurity Plan

The Nursery Industry Biosecurity Plan was first developed in 2005 and has recently undergone a full review in 2007 to reflect the changes in industry developments. The revised plan was presented to the nursery industry in March 2008 at the National Conference in Adelaide. The nursery industry has identified the major EPP likely to affect the industry plus a number of initiatives that the industry has identified to provide growers with the tools and skills needed to effectively participate in a whole of industry biosecurity program.

2.3 National Plant Health Strategy

NGIA participated in the National Plant Health Strategy forum held in Canberra in February 2008. This strategy development offers significant opportunities to re-shape the biosecurity continuum across Australia and has provided an initial platform for open and constructive dialogue between all stakeholders. The National Plant Health Strategy also provides an avenue for many of the positive changes in biosecurity of recent times to be recognised and built upon. These include the signing of the EPPRD, development of Industry Biosecurity Plans and adoption of on-farm biosecurity programs.

2.4 On-farm biosecurity program

Nursery and Garden Industry Australia (NGIA) in partnership with Horticulture Australia Limited (HAL) has developed **BioSecure *HACCP,*** a set of guidelines that provides a systematic approach for production nurseries to assess their biosecurity hazards and responsibilities and manage the identified risks.

BioSecure *HACCP* is the on-farm biosecurity program for production nurseries in Australia. The program seeks to identify internal and external (endemic & exotic) threats to the integrity of a business's biosecurity process and preparedness.

BioSecure *HACCP* is the program that will provide growers with the decision making tools to support on-farm biosecurity and guide them in identifying the relevant risks and the steps needed to control them.

NGIA will continue to progress this on-farm program and from this initiative and investment expects recognition, from government agencies, of **BioSecure *HACCP*** as a fundamental basis for high health status and co-regulation with growers.

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3. General Comment

- **Poor stakeholder (peak industry body) engagement and involvement by AQIS –** the nursery industry is professionally structured both at a national and state level and is well placed to provide complete and considered input on behalf of the nursery industry. Through a MoU between the national peak industry body (NGIA) and the peak industry bodies of the Australian states/territories there is a well established communication network covering the Australian nursery industry. Furthermore the industry has a development strategy with on-ground state based support officers engaging the growers at a farm level including providing assistance with implementing industry environmental and natural resource management, best management practice and on-farm biosecurity risk management.

  The nursery industry has had very little input into the strategies and decisions made by AQIS that have impacts on nursery production. Recent events surrounding the AQIS restriction of entry to host material of *Phytophthora ramorum* demonstrates the poor engagement of all stakeholders. AQIS has yet to provide the nursery industry with the opportunity to provide input relevant to this decision and allow NGIA to table its concerns on this important issue.

- **Limited communication to industry (growers) by AQIS (e.g. document changes) –** the nursery industry operates, like many small businesses across Australia, with a need to respond to market enquiries/opportunities rapidly and accurately. Having the confidence in the processes required to import/export a plant product allows growers to provide clients with accurate delivery dates, shipment/freighting procedures and product pricing.

  Currently there is a distinct lack of industry confidence in the AQIS controlled processes due to the high frequency of change in documentation, inspection/quarantine processes and general protocol interpretation overseen by AQIS. These changes are not distributed to industry in a timely and practical manner with many growers informed at the time of export/import. The cost of these changes to small businesses is high and has been the catalyst for businesses to cease importing/exporting greenlife. Industry peak bodies are a vehicle to disseminate information to industry plus the AQIS register of importers/exporters.

- **Lack of transparency in development of protocols and processes (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 Appropriate Level of Protection can be met.

- **Limited timelines & excessive volume of material provided for consultation, review and comment –** the requirement by government that dictates the various statutory agencies must 'consult' industry over specific changes, additions, etc to their operation(s) is a double edged sword for industry. Whilst industry is keen to participate government departments or sections that are accustomed to a strong regulatory role have difficulty in the process of consultation and make it difficult for industry to meaningfully participate. The dominant trend observed by industry is to be swamped by documents that are complex and sometimes incomplete or have attachments (not attached) with requests from departments for a response by an unrealistic date. Industry does not have the capacity to respond, in a considered and meaningful way, under these tight timeframes and excessive volumes of material. AQIS and BA must have an established policy that dictates the distribution and consultation phase of any activity with minimum response times set at 6 months and a commitment to provide concise and clear summaries of the issues and criteria being considered.

- **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 on its behalf. A significant area that is likely to be transferred to industry is as a contributor in demonstrating evidence of absence for exotic plant pests. This WTO 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 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.

- **Reduced funding into state agencies to administer national quarantine facilities –** industry is being asked to pay a higher component of the national biosecurity cost via increased fees, applied by AQIS, through state government agencies managing quarantine facilities across Australia. The industry has seen a significant rise in fees over the past 3 years without any improved service from AQIS that demonstrates the value of the increases. The integrity and service capability of these facilities must be of a high standard and must be transparent in their activities to ensure that imported plant material is assessed to a degree that results in a high level of confidence that it is pest and disease free. This will only be achieved with adequate resourcing including skilled staff, world class facilities and holistic stakeholder participation. As a fee paying customer the industry is entitled

to get the full service as offered, biosecurity failures have a significant impact (cost, reputation, market access) on the affected businesses and industry(s).

- **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. 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 Emergency Plant Pest Response Deed (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 behavioural change programs may be wasted.

  It is also important to understand that, while there are provisions for owner reimbursement costs in the Emergency Plant Pest Response (EPPR) Deed; these are minimal and relate only to the actual costs of an 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.

- **Quarantine zones 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 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 1500km 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 Spiraling 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.

4. Importing

- **Pre-border certified facilities (questionable accreditation in some countries) –** the accreditation of pre-border facilities is a strategy supported by the industry however the wide spread use of this strategy appears to have allowed a lowering of standards in some countries. The industry would like to see a more rigorous and transparent system of approval applied to this strategy that takes into consideration the country of origin's diagnostic capacity, biosecurity system (internal & external), grower skill levels, professionalism of regulatory officials, on-farm programs, etc. The accreditation of highly professional businesses, pre-border, with sound government (country of origin) support will provide a high degree of confidence to the Australian government and industry that our biosecurity requirements are being met under the "Appropriate Level of Protection".

- **Recognition of industry on-farm biosecurity programs and third party auditing –** the skill level of the Australian horticultural/agriculture industries has advanced significantly over the past 10 – 15 years with creditable resources and support strategies in place and overseen by industry peak bodies and various government departments. With community expectations raising in the areas of environment and natural resource management many in the regulatory field(s) are turning to on-farm programs to provide the way forward and gain maximum industry participation at a reduced cost.

  As the cost of biosecurity increases it is imperative that we seek to minimise the on-farm impact through recognition of programs that address biosecurity at a business level and maintain the scientific rigor through 3rd party program auditing. Industry programs that address a regulatory requirement are entitled to be recognised as the uptake by growers is generally voluntary and has a better "fit" to the business model of that production system. The result of this "fit" decreases the cost of implementation and is aligned to businesses productivity, profitability and sustainability whilst achieving the desired outcome such as enhanced biosecurity on-farm.

- **Out dated quarantine protocols –** a number of existing protocols required by AQIS for the growing of plants in quarantine facilities need to be advanced to accommodate industry best practice. This is particularly relevant to the growing media and nutritional aspects of plant production undertaken at these facilities. AQIS needs a system that provides an avenue for industry to advice on sound plant management techniques.

5. Exporting

- **Inconsistent phytosanitary interpretation across AQIS officers (inter & intra state) –** the nursery industry has had vast experience across Australia witnessing the diverse interpretation of international phytosanitary documents by AQIS personnel. The interpretation differences can exist within a region between AQIS officers based at the same facility to broad based interpretations differing between states. It is not appropriate that AQIS officers, or any biosecurity officer, over interpret phytosanitary requirements and therefore require growers to undertake actions/protocols over and above those required by the importing country. There appears to be a significant need to standardise documents across Australia and improve the way documents are written or at the least interpreted by a competent officer and distributed nationally to AQIS staff.

- **Lack of uniform protocols within AQIS for export inspections of nursery stock –** this item follows from that above and again it is the interpretation of the phytosanitary requirements that causes AQIS staff to differ in their application of the believed requirements. A central "clearing" house for all international documents should be established by AQIS for the standardisation of interpretation and meaning of phytosanitary documents. The "clearing" house would provide AQIS staff with a clear interpretation and work procedure that is unambiguous and practical to implement at an on-farm level This would allow uniformity and consistency between AQIS staff and regions and provide industry with a high degree of confidence in AQIS activities.

- **Co-regulation agreements –** the current system of growers applying for co-regulation recognition has a very specific focus on the individual business. This

adds to the complexity for growers who do not have experience in drafting such complex documents. The potential for recognising industry on-farm biosecurity programs exists and should be explored by AQIS. Programs (on-farm) that are scientifically sound, rigorous, skills based and audited should be considered as the documentation required by AQIS for co-regulation agreements. Many of the outcomes being sought by agencies are equally desired by industry however growers find it difficult to practically implement the mandated processes, systems, treatments and actions within their current profitable business models. This is where on-farm programs have strength and are capable of meeting the needs of the grower and the regulator as they avoid the generic edicts favoured by government and focus on specific cropping systems.

- **Fee's and charges –** general fee's and charge's have increased over the past 5 years to a level that in some instances reduces the financial viability of the activity (import/export). With the items above referring to differing interpretations of phytosanitary requirements it is clear that this causes differences in AQIS time allocation to a particular activity therefore varying costs to growers are incurred. AQIS needs to establish clear work procedures that define the time required to undertake certain activities that can be reasonably measured. An example of this could be the inspection of sample sizes by container size (potted plants) or carton.

6. State Issues

The Australian nursery industry believes that a number of state based issues cannot be ignored by a federal Quarantine and Biosecurity Review. The biosecurity continuum has both national and state components and as such the two are intrinsically linked along with industry in ensuring the integrity of the various biosecurity strategies, processes and activities.

The continuing budgetary constraints imposed by successive governments, national and state, have seen Biosecurity Departments down sized to the extent that they lack the capacity to provide:

- on-going high quality state wide exotic pest surveillance
- emergency response capacity without ceasing all other activities (e.g. Citrus Canker & Equine Influenza)
- innovative market access strategies and policies
- simultaneous incursion management and market access support based on a new exotic pest affecting a range of commodity groups
- proactive industry awareness, communication/liaison and training
- co-regulation development (Interstate Certification Assurance (ICA) arrangements for exotic pests) and links to industry programs (e.g. on-farm biosecurity programs)
- timely plant consignment inspections facilitating market access
- industry representation on market access issues at national committee level

The nursery industry considers the following broad items to be critical in maintaining the integrity of the national biosecurity continuum and must be addressed within the holistic review of Quarantine and Biosecurity in Australia. The Australian biosecurity agencies are faced with:

- Decreasing national and state resources committed to biosecurity & quarantine
- Loss of technical expertise in national and state agencies – declining skill base and diagnostic capacity

- Limited stakeholder consultation & recognition
- Failure to recognise industry on-farm biosecurity programs
- Paper based interstate documentation (opportunity to go electronic)
- Poor capacity to attend to pro-active market access strategies (e.g. development of EPP Interstate Certification Assurance arrangements – ICA's)
- Lack of state quarantine and biosecurity uniformity (restrictions, quarantine zones, pest freedom & protocols) across Australia

Interstate biosecurity is a major issue for the Australian nursery production sector with market access and cost minimisation priority areas that require greater attention and resourcing by national and state Biosecurity Departments. A needs based assessment undertaken by NGIA has identified a number of criteria that need to be addressed by national and state biosecurity agencies including; market access driven strategies and policy, industry training, preparedness support plus systems recognition through on-farm biosecurity programs (Farm Management Systems), cost minimisation including on-farm inspection fees, resourcing allocated to the development of pest specific certification guidelines (ICA`s) and the upgrading of the outdated paper based tracking systems and record keeping to an electronic format. The following describes the issues in some detail:

- Investment is required in supporting industry to develop on-farm tools that support a greater participation in pest & disease surveillance by growers and up-skill industry in all aspects of biosecurity from pest identification and monitoring to record keeping and on-farm capacity building to address biosecurity risks. Further investment is required in developing technical guidelines and linking on-farm programs under the Nursery Production Farm Management System umbrella with potential to align to co-regulation with government agencies (State & Federal).

- There are significant differences between states and territories in the processes taken to identify pest risks which in-turn drive the variations in the risk mitigation, compliance evaluation and treatment protocols established by each state/territory. These protocols dictate the volume of red tape and compliance costs borne by industry. This can be demonstrated by the pest Spiraling Whitefly. Western Australia has a prescribed protocol that requires compliance if a business is within a 500 km radius of a known detection, all other states/territories have a 10km radius requiring the application of protocols. These inconsistencies across the country raise major questions surrounding the science that supports such significant differences between departmental experts. A nationally adopted and implemented process that mandates the uniform processes for plant biosecurity across Australia and ensuring the protocols are relative to the risk needs immediate action.

  The current system employed by the national and state/territory governments in assessing the risk of an EPP is ad-hoc and lacks any sign of common ground and consensus amongst the various agencies. That an EPP can be viewed by different agencies as such divergent risks demonstrates a need for national action. A National Emergency Plant Pest Risk Assessment Methodology is required across Australia (states & territories) for the uniform application of EPP management strategies.

- With interstate agencies recognising the value of on-farm self certification for area and property freedom of plant pests the nursery industry requires the development of Interstate Certification Assurance (ICA) arrangements for a

number of EPP in Australia. This would allow growers to be trained to detect the specific pests, enhance on-farm systems and meet self certification requirements that minimise inspection fees and releases departmental officers from compliance action to undertake industry training and support plus participate in pest surveillance programs across the states/territories. Furthermore this increased industry skill level will value add the overall participation of industry in state based plant pest surveillance for inclusion in a national strategy.

- Electronic document creation, record keeping and transfer for interstate plant movement must be an immediate target for investment by state and federal agencies. The process at present is paper based and costs industry in time and resources. With the international trade in plants fully supported by electronic documentation it is clearly possible to implement at a state/territory level to facilitate interstate trade.

- National and state/territory agencies must recognise that on-farm biosecurity programs can be a valued and efficient mechanism for maintaining and/or gaining market access. By providing the support services to industry national and state agencies can have an active and positive role in driving change at a farm level. The on-farm programs that have been developed by industry for industry offer the most likely vehicle to bring growers forward in the area of biosecurity.

7. Conclusion

The biosecurity processes and systems in Australia are complex, costly and burdensome to industry. The internal quarantine systems operating between states is heavily laced in red tape and seeking information is difficult with up to date details often parked in obscure web addresses or in a single address emails.

Communication and stakeholder engagement (meaningful) between regulator and industry is poor and usually produces little in progress including one on one at state and national levels to complete incursion reviews where the same issues are tabled year after year.

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. With a true focus on a “shared responsibility” practical and effective strategies can be developed along the entire biosecurity continuum