

AQIS/BA REVIEW

28, April, 2008

Dear Sirs, Madames,

I wish to submit to your review aspects concerning AQIS and Biosecurity Australia which I feel affect my livelihood as a researcher and Director of a Botanic Garden, and which may have flow on affects on Australia's agricultural and horticultural industries.

With regards to Import Plant Risk, some policy making, decisions, notifications and correspondence from AQIS/BA have at times been not clearly thought out, addressed or transparent.

In an era where climate change will change the face of Australia's agriculture and horticultural industries, it appears that a narrow perspective of a long-term goal determined policy to the possible detriment of those industries.

For the past 30 years I have been a researcher involved with tropical plants concerning health and nutrition from a sustainable and regenerative agriculture perspective. I work with a broad range of tropical plants that are relevant to this field, both domesticated, semi-domesticated and wild species. Often I am involved in botanical expeditions to remote places where we engage in research that uncovers new species, or improperly known species.

Recent directions and decisions by AQIS and Biosecurity Australia put this research (and others) at risk, either by outright prevention of introductions that have time limitations or delays that may hinder current research.

1. Public Consultation regarding Plant Risk and the Permitted Seed/species list, whilst admirable in the intended goals, was poorly administered, hastily implemented, and led to examples of glaring mistakes in both the science and processes.

While the terms of reference seem to not specifically deal with the above list or Weed Risk Assessments, they can be included under broader terms relating to processes and industry interactions.

2. Cost recovery should be based on the relative size of the industry or imports, not necessarily the number of species. For researchers and Botanic Gardens that may wish to introduce a larger number of species, but much less volume of plant material, there seems to be an unfair burden of cost relative to an importer bringing in a large volume of just one species.

My organization, The Botanical Ark, has a long history of cooperation and positive interaction with AQIS and more recently Biosecurity Australia. We fully respect and approve of the regulations intended to achieve minimum risk and protect this country. On almost a daily basis I inform visitors to our garden the importance of strict quarantine measure for Australia and the individual's role in assisting the goals.

However, when I see a system or process becoming more difficult to work with I clearly worry that if the process becomes too difficult or expensive then others may choose to go outside the regulatory authorities and put our industries at severe risk.

Minimum risk versus severe risk? A no-brainer. How do we achieve minimum risk? By working with industries to enable the safe and accessible and do-able to happen. I believe we were on the correct path, but the lack of public consultation has led us astray.

I am able to offer specific examples of the points raised in my submission, and look forward to the opportunity to do so.

Yours, in the interest of a better Quarantine system,

Alan Carle
Director,
The Botanical Ark
P.O. Box 354, Mossman, Q4873

Ph: 07 40988174
Fx: 07 40988173
email: info@botanicalark.com