

Submission to:

Quarantine and Biosecurity Review
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Pacific Seeds Pty Ltd

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Background:

Pacific Seeds is firmly established in Australia and has been an agricultural seed market leader for over 45 years, providing a wide range of seed and seed technology solutions, both domestically and internationally.

Acceptance by all links in the production chain has resulted in Pacific Seeds' product success in a wide range of Australian and international markets. Pacific Seeds' Australian bred varieties are market leaders in many crop types and many countries.

As agricultural production throughout the world is revolutionised through advances in science and technology, Pacific Seeds remains focused on delivering real benefits and improved production to Australian producers.

As a member of the Advanta group of companies, Pacific Seeds has access to a wide range of germplasm and the latest breeding techniques. This close relationship with sister companies throughout the world ensures Pacific Seeds' growers have access to the world's best germplasm and seed technology.

Pacific Seeds has one of the largest private seed and plant research facilities in Australia, together with co-operative R&D programs that extend around the globe and have a working relationship with AQIS and Biosecurity Australia Officers.

Submission:

General

Pacific Seeds has had a long history and working relationship with the Australian Quarantine and Inspection Service (AQIS) and Biosecurity Australia (BA), one which we are keen to continue and improve. As a company we are mindful of and fully support Australia's obligations under the International Plant Protection Convention (IPPC). We recognise the assistance we have received from BA for example in regarding our experiences in the Pest Risk Analysis (PRA) process.

We commend the minister for announcing this review into the functions of the Australian Quarantine and Inspection Service and Biosecurity Australia however we consider that there should also be a process by which AQIS, BA and Industry are able to meet and resolve as efficiently as possible, significant matters of concern.

While we appreciate that AQIS officers are required to be able to deal with many technical aspects of many different commodities and their associated technical peculiarities, we do consider that a higher than general level of expertise and understanding is required in dealing with perishable, living commodity such as agricultural seed. Particularly in understanding the intent of various rules and requirements and in ensuring that the levels of control are proportional to the level of risk.

Seed Exports

Field Inspections – Under the principles of shared responsibility we suggest that AQIS could accept reports issued by company agronomists regarding details of field inspections for the presence of weeds and diseases. Such a system would be fully auditable with regards to training, performance of the actual inspections and record keeping. The logical progression from such a step would be for Plant Health Australia to also adopt this information in maintaining the Australian Plant Pest Database.

PHYTO database - When planning the export of seed, whether they are samples of a few grams of seed or whole consignments consisting of multiple containers, our arrangements relating to meeting phytosanitary conditions rely heavily on the information contained in the AQIS PHYTO database. While this is an excellent source of information that is easy to use, there are a couple of problems. One is that as the information is only updated based on import permits received by exporters. If the phytosanitary conditions have changed for the importing country but not changed in the database, all preparations carried out to meet the phytosanitary conditions will have been in vain, requiring new conditions to be met. If it was possible for BA and/or AQIS to be more proactive in obtaining current phytosanitary conditions and maintaining this information in the PHYTO database this would reduced the incidence of delayed shipments and lost opportunities. Another problem relates to that mentioned previously and that is the training received by AQIS officers. At times when we ask for clarification of an issue relating to information in the database, we can get different interpretations from different AQIS officers. We understand that AQIS officers are required to deal with an almost infinite variety of situations and commodities, however knowledge associated with understanding seed science is quite specialised and the consequence of misunderstanding the intent of relevant technical requirements can be quite significant.

Seed Imports

Airport clearance – When importing seed samples and consignments into Australia delays commonly occur, even when all the documentation required by AQIS is in place. While we appreciate that airport staff are required to have expertise assessing risk in a very broad spectrum of possibilities particular frustration is experienced when, for example, samples are declared to a Quarantine officer by a Pacific Seeds officer returning from overseas and the onus is on the Pacific Seeds officer to explain what is required to happen to the sample and how it is to be processed. On occasion it has been up to the travelling individual to correct the AQIS officer after being directed to follow an incorrect procedure. There must be a more efficient and effective way to manage such situations.

Accredited laboratories – As the International Seed Testing Association (ISTA) is the accepted world authority on seed testing, it would make sense for AQIS to recognise the accreditation of all ISTA accredited laboratories worldwide, rather than just a handful of laboratories that are currently now accredited by AQIS. It would be a far better use of AQIS resources to recognise the accreditation of a world authority such as ISTA rather than to accredit each laboratory individually as they apply. Such recognition could still be subjected to an audit system of conformational testing, to confirm that the desired level of risk is not being exceeded in accepting certificates from these laboratories.

Quarantine glasshouses - Pacific Seeds is losing more and more opportunities to become a global hub of plant breeding and research and development in agricultural seeds through inefficiencies in Australia quarantine protection system. We are often forced to conduct winter nurseries in other locations, such as New Zealand as the requirement in Australia to produce a generation in a quarantine glasshouse can prove to be prohibitively expensive. A more reasonable alternative would be to allow the use of open field quarantine. This can be carried out with minimal increased risk and far more cost effectively and have the added bonus of providing enabling the associated technical and monetary benefits to remain in Australia.

Conclusion

Pacific Seeds looks forward to maintaining and increasing the close working relationship we have enjoying in the past with AQIS and BA. We welcome this review and look forward to seeing the positive actions recommendations that will follow, particularly in relation to assisting seed industry in reaching it's potential as a production and technical centre of excellence and efficiency.

Should you have any questions regarding this submission please contact me at the following address details.

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