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Mr Roger Beale AO
Chairman, Quarantine and Biosecurity Review
C/ Quarantine and Biosecurity Review Secretariat
Department of Agriculture Fisheries and Forestry
GPO Box 858
Canberra ACT 2601

By email: quarantinebiosecurityreview@daff.gov.au

24th April 2008

Dear Mr Beale

I refer to your call for submissions to the independent Quarantine and Biosecurity Review (QBR) that you are undertaking for the Minister for Agriculture, Fisheries and Forestry.

A3P – the Australian Plantation Products & Paper Industry Council – is the national industry association representing the interests of all segments of the plantation-based wood products and paper manufacturing industry. A3P members employ more than 13,500 people in plantations, sawmills and paper manufacturing plants, mainly in rural and regional areas. Each year A3P members create and sell more than \$4 billion of products, produce more than 12 million cubic metres of logs, 3 million cubic metres of sawn timber and more than 2 million tonnes of paper.

A3P Involvement in Quarantine and Biosecurity

A3P has a substantial interest in quarantine and biosecurity issues from a number of different perspectives. A3P members own and/or manage some 900,000 net hectares of commercial hardwood and softwood plantations located in the higher rainfall coastal and tableland areas in all States. The Australian plantation estate now totals some 1.8 million net hectares of plantations, approximately 1 million hectares of softwoods (predominantly species not-native to Australia) and 800,000 hectares of hardwoods (predominantly eucalypts).

A3P members are also exporters of logs, sawntimber, other wood products and paper products and are therefore subject to the quarantine requirements of other countries

In recognition of its interest in quarantine and biosecurity issues A3P is a member of Plant Health Australia representing the Australian plantation

timber resource. A3P is not a signatory to the Emergency Plant Pest Response Deed (EPPRD) at this time but is currently giving consideration to the costs and benefits associated with becoming a signatory. A3P monitors developments in relation to the EPPRD via its membership of PHA. There are a number of factors contributing to the fact that A3P has not signed the EPPRD including:

- A3P was one of the later plant industries to join PHA.
- The structure of the plantation timber industry is different to many other plant industries because of the relatively small number of growers but the large size of these growers and their tendency towards self insurance against major risks such as fire;
- The high level of State government plantation ownership via their forest management agencies which have been corporatized as government business enterprises to varying degrees;
- Complications associated with pests that impact timber in use over its very extended life cycle (in excess of 50 years in some cases) as distinct from pests which impact on the living tree crop.

In 2000 the Forest Health Committee of the Standing Committee on Forestry published a Generic Incursion Management Plan for the Australian Forest Sector (GIMP). In 2007 the Plantation Timber Industry Biosecurity Plan was released. This Plan was developed by Plant Health Australia under the guidance of an Industry Biosecurity Group and with funding from Forest and Wood Products Australia. The plan draws substantially on the original GIMP but puts the plantation timber industry on a consistent footing with other plant industries and with PlantPlan.

Risk of Exotic Pest and Disease Introduction

A3P notes the acknowledgement in the QBR Issues Paper (para 16) that "*the rapid growth and changing patterns in international trade mean Australia faces increased risks that exotic pests and diseases can be accidentally introduced by passengers, imported commodities, packaging material and transport vessels (such as cargo containers)*". A3P is concerned that, with respect to forest pests at least, the Australian quarantine arrangements are too focused on imported commodities (primarily sawn timber) and not sufficiently focused on packing materials (often made of low grade wood) and cargo containers which are likely to represent a much higher risk. Packing materials and cargo containers are of significant concern because of their widespread and unknown movement both within Australia and in other countries.

A3P acknowledges the progress which has been made in the implementation of *International Standards for Phytosanitary Measures No. 15: Guidelines for regulating wood packaging material in international trade* (ISPM 15). However, A3P remains concerned that packaging timber originating in other countries and moving throughout the world represents a significant risk to Australia's plantation estate. Australian exporters have invested significant funds in meeting ISPM15 requirements but it is not clear that exporters in all other countries are meeting the same standard.

Border and Immediate Post Border Quarantine Arrangements & Port Trapping Programs

The QBR Issues Paper (paras 29-31) notes that importance of the quarantine and biosecurity continuum and draws a distinction between “border” and “post-border” measures. A3P is concerned that this distinction and the division of responsibilities between AQIS and State Governments may be resulting in a suboptimal outcome with respect to the monitoring and management of the areas immediately adjoining ports which represent a major risk and opportunity with respect to the establishment or control of exotic forest pests.

A3P has been encouraged by the increased investment in pest trapping programs at ports in Australia by various governments. A3P requests that the Australian Government make further investment in this area as it is essentially a part of the border and provides a most effective means of monitoring for border breaches. However, there is some concern that, partly as a result of the large number of organizations with an interest in this surveillance work (e.g. AQIS, Biosecurity Australia, DAFF, State agencies etc), there has not been sufficient information made available to relevant industries such as research, developments or findings concerning intercepted pest and diseases, new trapping methodologies, location of trapping systems etc.

The Australian plantation timber industry does make a substantial investment in forest health surveillance and this will help to identify exotic pest incursions which may occur in the plantation estate. However, the majority of the commercial plantation estate in Australia is located a long way from the major risk areas (ports) and there are a large number of potential host trees (parks, gardens, conservation reserves etc) which are more likely to be infested by exotic pests long before there is an infestation of a commercial timber plantation. It seems highly likely that, in many instances, if a pest is found in a commercial plantation it will already be widespread and difficult to eradicate.

Technical Capacity in Forest Biosecurity

A3P is concerned about the ongoing decline in technical capacity in forest biosecurity. This decline had been documented for a number of years and has occurred primarily as a result of changing priorities and structure of State government forest management agencies and CSIRO Forest Biosciences (formerly the CSIRO Division of Forestry and Forest Products).

A3P contends that Governments have an ongoing role of ensuring that there is appropriate technical capacity available within Australia to identify and manage forest pest and disease incursions.

Specific Quarantine Requirements

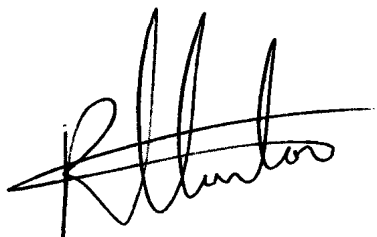
A number of A3P members have expressed concerns about the scientific justification, efficiency and effectiveness of import and export quarantine arrangements managed by Biosecurity Australia and AQIS. It is difficult to provide details of these incidents without descending to a very detailed level and engaging in discussion which will be uncomfortable for the parties concerned and possibly not particularly helpful. However, A3P considers that it is appropriate to place on the record generic concerns with Biosecurity Australia and AQIS operations including:

- Tardiness in performing their tasks and making decisions with no explanation or apology for delays.
- Inconsistency in decision making.
- Lack of scientific justification for decisions.
- Inefficiency in inspection and export clearance processes which should be streamlined to reduce costs and tensions in relation to cost recovery.
- Lack of understanding of exporters and importers operations and lack of acknowledgement of their capabilities leading to unnecessarily expensive requirements. This may lead to additional costs not consistent with those encountered by competitors in other countries.
- Inconsistency between quarantine restrictions that are applied between Australian states and those which are applied to trade between Australia and other countries. Such constraints can effectively give imported products an advantage over domestically produced products in domestic markets with justification.

If and when appropriate A3P and/or A3P member companies may be able to provide the Review Panel with more information to illustrate the above issues.

Given the plantation products and paper industry's interest in quarantine and biosecurity as outlined above, I would be grateful if you would keep me informed of developments and involve A3P in any industry consultation process. If you have any questions in relation to the matters raised above please contact me (02 6273 8111 or richard.stanton@a3p.asn.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Richard Stanton', with a stylized, cursive script.

RICHARD STANTON
Manager - Policy