



15 October 2012

Committee Secretary
Senate Standing Committee on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra, ACT, 2600
AUSTRALIA

By email: rrat.sen@aph.gov.au

Dear Sir/Madam

Re: The Effect on Australian Ginger Growers of Importing Fresh Ginger From Fiji: A Submission from the Biosecurity Authority of Fiji

As the National Plant Protection Office (NPPO) representative for Fiji to the International Plant Protection Convention, the Biosecurity Authority of Fiji welcomes the opportunity to make its submission to the Senate Standing Committee on Rural and Regional Affairs and Transport.

We trust the submission will assist the Committee to develop a balanced view of Fiji's application for fresh ginger exports to Australia giving due consideration to international obligations set out by the World Trade Organization and supported by validated scientific evidence.

The Biosecurity Authority of Fiji looks forward to working with Australia's Department of Agriculture Forestry and Fisheries to further assist with the development of agricultural trade in Pacific Island communities such as Fiji whilst preserving Australia's quarantine integrity.

Yours sincerely

Elvis Silvestrini
CHIEF EXECUTIVE OFFICER

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The Effect on Australian Ginger Growers of Importing Fresh Ginger from Fiji

**Fiji Submission to the Australian Senate Standing Committee
on Rural and Regional Affairs and Transport.**

**Biosecurity Authority of Fiji
15-Oct-12**

EXECUTIVE SUMMARY

Fiji believes that the Provisional Final IRA for fresh ginger from Fiji recommends excessive quarantine requirements. Parts of the assessment are not justified and are inconsistent with Australia's international obligations for these types of assessments.

In particular, the Draft IRA correctly indicated that the burrowing nematode (*Radopholus similis*) is present and widespread in Australia and also occurs in Fiji and is therefore not of quarantine concern. However, the Provisional Final IRA has recommended measures for the burrowing nematode without validated scientific evidence to support these measures. The evidence that has been provided is insufficient and flawed. Fiji looks forward to the removal of these unjustified measures in the near future.

Further detail on Australia's intended next steps to approve and then review the importation of fresh ginger from Fiji is also keenly anticipated.

SUBMISSION

The Fiji Government welcomes this opportunity to make a submission to the Australian Senate inquiry into the importation of fresh ginger from Fiji.

Existing trade

Large volumes of fruit, vegetables and processed products are exported from Australia to Fiji and in return Fiji exports small volumes of papaya, taro and some processed products into Australia. We are also hoping to commence exports of high quality fresh ginger to Australia in the near future. Whilst the volumes of horticultural produce exported from Fiji are relatively small by global standards, their importance to the Fijian economy and the well-being of our citizens cannot be over emphasised.

At the centre of this growing trade in agricultural products between our countries is an understanding of the need for sound quarantine management. Fiji has no desire to compromise Australia's quarantine integrity and stringently applies all required quarantine protocols to export products.

Terms of Reference: *(a) the scientific basis on which the provisional final import risk analysis report regarding the importation of fresh ginger has been developed & (b) the adequacy of the pest risk assessments contained in the provisional final import risk analysis report for fresh ginger from Fiji.*

Quarantine requirements based on science

Fiji and Australia are both members of the World Trade Organization (WTO) and contracting parties to the International Plant Protection Convention (IPPC). As such we are bound to consider requests for market access of plant-based agricultural products in accordance with the WTO's *Agreement on the Application of Sanitary and Phytosanitary Measures* (SPS Agreement) and the guidelines as outlined within the international standards for phytosanitary measures (ISPMs) developed under the IPPC. Over 35 ISPMs have now been published by the Food and Agriculture Organisation of the United Nations (FAO) including one specifically on conducting risk analysis.

In simple language, a science based approach with clearly identified rules must be applied to assess the potential risk posed by imports of agricultural products. Australia thoroughly details its process for assessing proposals to import horticultural and other goods in its *Import Risk Analysis Handbook 2011*. Whilst in principle this process is designed to be consistent with Australia's international obligations, in practice we do not consider it has been applied in this way for the assessment of fresh ginger from Fiji.

Draft and Provisional Final Import Risk Analyses

The Australian Department of Agriculture, Fisheries and Forestry (DAFF) released the Draft Import Risk Analysis (IRA) for fresh ginger from Fiji in April 2012. The Draft IRA identified eight pests of potential quarantine concern and recommended a system of farm and packing house registration, pre-export inspection and certification, and on-arrival inspection including verifying freedom from an insect pest and any other regulated articles.

Fiji provided comments on the Draft IRA and overall our scientists considered that it was reasonable although estimates of risk for some pests were too high. Importantly, the burrowing nematode species *Radopholus similis* was not considered to be a quarantine pest due to it being present and widely distributed in Australia. That decision was in line with international standards for risk assessment.

The Provisional Final IRA released by DAFF in August 2012 identified nine pests of quarantine concern due to the addition of a “putative intraspecific ginger variant” of the burrowing nematode. The recommendations of the Provisional Final IRA also included either a systems approach to manage the burrowing nematode or fumigation with methyl bromide.

Fiji strongly disagrees with this addition of a “variant” of burrowing nematode as a pest of quarantine concern and the associated additional management measures. The new scientific information provided by other stakeholders (Australian Ginger Industry Association - AGIA) and DAFF Queensland)) is not considered sufficient to justify DAFF’s provisional acceptance of this pest as being of quarantine concern.

Justification of a “variant” of *Radopholus similis*

Fiji agrees with DAFF’s view (p86, Provisional Final IRA) that “...there are significant deficiencies in the evidence provided in the AGIA and DAFF Queensland submissions.” Our own review of the information came to the same conclusions regarding the lack of scientific rigour in the evidence provided.

The scientific papers cited by AGIA and DAFF Queensland in support of a potential new strain of nematode are Turaganivalu *et al.* (2012); Smith *et al.* (2012); and an unpublished trial by Cobon *et al.* (2012 *in press*).

Turaganivalu *et al.* (2012) notes that *Radopholus similis* was observed to cause severe impact on ginger at some locations in Fiji and that this impact was associated with poor seed preparation and continuous cropping practices. Further, when ginger was grown in rotation with cassava and taro, *Radopholus similis* levels in the crop declined to undetectable levels. The paper makes no comment on differences in pathogenicity of Australian and Fijian strains at all. Basically, the paper attributes the nematode impact to poor crop management practice not strain issues.

Smith *et al.* (2012) is the ACIAR project under which the study by Turaganivalu *et al.* (2012) was conducted. This report makes no comment on potential strain or sub-species issues.

The Cobon *et al.* (2012) paper does not provide any comprehensive evidence of a strain issue and essentially highlights a fundamentally flawed scientific experiment for the following reasons:

- No positive control was included in the experiment, this is a very basic requirement for scientific experiments of this kind;
- The important physical parameters of moisture and temperature were not measured, or controlled;
- The study included only one nematode isolate from Australia but none from Fiji. This means that there was no comparison conducted between potentially different strains under any form of standardised conditions; and

- The study actually showed the Australian isolate of the nematode hosted ginger, which directly contradicts the AGIA claim that *Radopholus similis* does not infest ginger in Australia.

I understand that claims were even made by AGIA that the Fijian species of *Radopholus similis* does not attack bananas. This simply is not the case and is scientifically incorrect as the nematode does occur on bananas in Fiji, as in Australia. This fact provides further evidence that they are the same species and not different strains.

The lack of data would suggest that these claims should have been dismissed by DAFF during consideration of stakeholder comments. As mentioned previously, Fiji has no desire to compromise Australia's quarantine integrity but there appears to be no valid scientific evidence provided to date, to justify the provisional quarantine status of *Radopholus similis*.

Article 5 of the SPS Agreement also requires that DAFF "...shall seek to obtain the additional information necessary for a more objective assessment of risk and review the sanitary or phytosanitary measure accordingly within a reasonable period of time." DAFF, at least partially, acknowledges this obligation in the Provisional Final IRA (p56) by stating that they are obliged to review the conditions within a reasonable time and that this is determined to be a period of one year from the implementation of policy. However, it is not clear how the additional information will be obtained or how adequate scientific rigour can be assured.

Fiji seeks greater detail on DAFF's intentions on how the additional information will be obtained, what expectations there are for Fiji to contribute, and the scope of the intended review.

Terms of Reference: *(c) the risk and consequences of the importation resulting possibly in the introduction of pest species or diseases and soil-borne diseases & (d) the adequacy of the quarantine conditions recommended by the Department of Agriculture, Fisheries and Forestry*

Fiji considers that the management measures recommended in the Draft IRA would appropriately manage the risks associated with importation of fresh ginger into Australia. Sufficient evidence has not been presented to justify that different forms of the burrowing nematode exist in Fiji and that they present additional risks to Australia.

The additional quarantine conditions recommended by DAFF in the Provisional Final IRA specifically for the burrowing nematode are considered to be excessive and not justified by the evidence presented.