22 August 2002 Ref:

Dr John Carter
The Committee Sectetary
Joint Committee of Public Accounts and Audit
Parliament House
CANBERRA ACT 2600

Dear Dr Carter,

Botanical Resources Australia Pty Ltd Submission to the JCPAA Review of Australia's Quarantine Function

There are new emerging industries in many regions of Australia and the pyrethrum industry in Tasmania is one of these emerging new industries. Botanical Resources Australia Pty Ltd (BRA) is the contracting growing, processing and exporter of natural pyrethrum products to the USA, Europe and Asia. BRA is the world's second largest and most technologically advanced producer of natural pyrethrum products and is the world leader in this field. Currently, BRA contracts some 200 growers in Tasmania to grow pyrethrum, there are 2,200 ha of pyrethrum crops and BRA has a FTE workforce in excess of 60 as well as many contractors for harvesting, planting etc. The growth of this industry has provided the vegetable and poppy growers in Tasmania with another economic and useful crop for their production program. This industry is very innovative and has been very successful in obtaining R&D funding support from HAL, RIRDC, Aus-Industry and others. BRA has invested considerable resources into evaluating the potential of growing pyrethrum in many mainland states.

The potential of the BRA pyrethrum industry is to double production in the next 3-5 years and become the largest supplier of pyrethrum products in the world. To achieve this potential, the BRA pyrethrum industry must continue to improve productivity, especially the cost of production as well as the reliability of supply to the export market.

For the long-term productivity of the BRA pyrethrum industry and other similar emerging regional based industries, there need to be:

- Greater identification of potential risks for emerging regional based industries, ie better pre-border quarantine management
- Greater co-ordination between AQIS and local agencies
- Make much greater use of Import Risk Analysis and the science used in this process
- Greater industry and public awareness of quarantine matters

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During the last 2 years, BRA has been involved in a very time consuming, difficult and unnecessary quarantine issue. During early 2001, BRA was made aware by an independent industry party that a very large consignment (several hundred kgs) of pyrethrum seed has been imported into Tasmania and there were serious quarantine issues associated with this seed importation. Many time consuming and difficult meetings have been held between government, quarantine officials and various industry parties and it has been very difficult to resolve this issue in a satisfactory manner.

Involvement in this matter has highlighted to BRA the need for improvements to the Quarantine functions so that other small emerging regional based industries will be able to avoid similar difficult situations in the future.

Suggestions for improvements include:

- Greater co-ordination between AQIS, local agencies and industries to identify potential risks for industries, especially emerging regional based industries such as pyrethrum. In our situation, the difficulties experienced by all parties may have been avoided /greatly reduced if there were specific procedures laid down for the importation of commercial quantities of pyrethrum seed.
- An import risk analysis should be mandatory AQIS requirement for the importation of all commercial size seed consignments, especially where there is an existing industry already in Australia
- AQIS and local agencies should identify local regional differences in risk for emerging as well as existing industries and these regional risk factors should take precedence in importation matters.
- AQIS to have a greater local regional presence and have a greater industry and public awareness
 of quarantine matters. Peak industry bodies are an important mean for AQIS to communicate to
 industry, but AQIS also need other venues to communicate with emerging industries, especially
 those that are not directly associated with a peak industry body.

I hope these comments will be of value to the JCPAA. I would appreciate an opportunity to discuss these comments with the Committee at a suitable hearing. Can you please advise me of the date for the next Hobart hearing of the JCPAA so I can be available if required.

Please contact me if you wish to discuss any matters raised in this letter.

Yours Sincerely,

Brian Chung Manager, Product Development