The Australian nursery and garden industry (NGI) is reliant upon robust, cost effective, efficient and reliable quarantine resources. This is due to the high volumes of plant material valued in the millions of dollars, which are imported, exported and shipped across all Australian jurisdictions on a daily basis.

The industry is a significant user of post entry quarantine (PEQ) and ‘approved facilities’ to import new germplasm in various forms, including tissue culture, vegetative cuttings, seed and whole plants. This supports a diverse range of crops in the food, fibre and foliage industries valued at more than fifteen billion dollars nationally.

Although the industry has traditionally had a small export focus, the richness of Australian Flora offers ample opportunity for export growth. To ensure the longevity of the industry and the protection of the Australian environment, plant industries and the wider community, it is essential pest risks are identified, prepared for and effectively managed. These biosecurity responsibilities must be shared equally between governments, industry and the community. Accordingly, the NGI has a lead role to play in the biosecurity continuum through information dissemination, grower education, on-farm management and risk reduction strategies.

The industry is strongly committed to effectively reducing the potential for incursions of exotic plant pests (EPPs) that could adversely impact domestic and international trade, regional and national economies and the Australian environment. It is committed to ensuring responses to any EPP incursions are undertaken as efficiently and effectively as possible to minimise the cost to growers, the industry, other plant industries, government and the wider community. To support these objectives, the Australian NGI requires a robust, resourced, practical and
Climate change and variability are global issues of high importance shaping the future of the Australian nursery and garden industry (NGI). These issues have an impact across the entire nursery supply chain and present a myriad of challenges for the industry. Unlike agriculture, the finished product arising from nursery production is live plant material and therefore, consideration of the ongoing maintenance of this living commodity is required. Access to secure and clean water at both the production and end user level, as well as selecting the right plant material for the right climate, will be key issues for the Australian NGI to consider under a changing and variable climate.

To respond to these issues, the Australian NGI must act on several fronts including:

1. Leadership in policy development and investment in the area of quarantine and biosecurity – this recognises the impacts of policy decisions and investment on businesses and their customers.

2. Harmonised delivery of quarantine and biosecurity arrangements – establish a National Pest Risk Assessment Framework which delivers a world class biosecurity and quarantine system to whole of industry.

3. Investment in on-farm support to address quarantine and biosecurity – the realignment of investment and a commitment by governments to support on-farm practices, innovation and incentives to adapt, manage and respond to biosecurity and quarantine.

4. Recognition of established industry best management practice – this recognises and supports the Nursery Production Farm Management System (NPFMS) as a third market access instrument for the industry and investment in research, development and extension activities.

5. Implementation of a national greenlife producer communication and information scheme – this is designed to secure the reputation of the Australian NGI through knowledge based decision making.

6. Build greater stakeholder engagement and involvement to deliver a national communication network – this will assist in building industry confidence.
One of the greatest threats facing the Australian environment is the introduction of EPPs. To date Australia has remained relatively free from many pests due to its geographic isolation and a biosecurity system that has limited the introduction of high risk materials. This is changing however due to ease of travel and the freeing up of world markets.

To ensure Australia remains relatively pest free, a rigorous scientifically sound biosecurity system is required. The key elements of this include a combination of pre-border, border and post border management of pest threats. The program needs to clearly articulate the importance of maintaining Australia’s plant health status and explicitly state that biosecurity is a ‘whole of community’ responsibility involving state and federal governments, industry and the wider public.

The Australian NGI acknowledges it plays a vital role in this biosecurity continuum and is actively engaged in several biosecurity initiatives across Australia. These include on-going investment in research, development and extension initiatives, including on-farm programs driving change from the bottom up.

Nursery & Garden Industry Australia (NGIA) is also a member of Plant Health Australia (PHA), which has demonstrated its willingness to participate and contribute in this arena. Accordingly, it is pertinent that its contribution in the biosecurity continuum is duly acknowledged and all parties maintain their responsibilities in this shared approach.

The National Nursery and Garden Industry Biosecurity Plan developed in 2005 provides a blueprint for the exclusion, eradication and control of key pests relevant to the Australian NGI. As a living document, the plan is reviewed every five years to embrace changes to industry biosecurity needs.

This plan is vital to the industry as it has the capacity to minimise pest risks and respond effectively to any pest threats. It also ensures the future sustainability and viability of the NGI is maintained.

As part of the National Nursery & Garden Industry Biosecurity Plan, NGIA has developed contingency plans for key threatening pests. These provide background information on the pest biology and available control measures to assist with preparedness in the event of an incursion. Each contingency plan provides guidelines to assist in developing a response plan to the specific pest incursion. It is vital this information is embraced and considered should there be an incursion.

In 2005, NGIA became a signatory to the Emergency Plant Pest Response Deed (EPPRD). The EPPRD is a progressive
partnership arrangement between governments and industries that sees them cooperating as equal parties in the management of EPPs. As a signatory, NGIA is at the forefront of developments in biosecurity complementing its historical investment in biosecurity related research, development and extension activities.

In recent times, there has been a consistent lack of prioritisation by all levels of government to the threats and costs associated with EPP incursions facing the industry and the wider Australian community. Nursery production has borne the brunt of almost every EPP incursion and this has cost millions of dollars in crop losses, mitigation programs, compliance protocols and restricted or closed market access. Despite this, NGIA remains committed to the EPPRD.

Over the past 15 years, the Australian NGI has dealt with a range of EPPs, with some eradicated, others under management plans and the remainder recognised as established pests and treated as a normal plant pest within the production system (controlled). Historically, the industry carries a major burden, both financially and operationally, when Australia has pre-border, border and post-border failures in excluding the incursion of EPPS.

In relation to the export of horticultural commodities, it has also been observed that biosecurity and quarantine agencies, are making the process cumbersome, difficult and costly. From January to December 2010, total plant exports amassed $18.28 million*, a figure which has been in steady decline over the past six years. To reverse this trend, production nurseries exporting plant material must be adequately supported to enable development and growth in the global market.

This export growth will require world-class biosecurity and quarantine agencies supporting and assisting Australian plant producers develop international market access.

Similar observations have been made about the importation of plant products. Over the years, the industry has seen inconsistencies in both the interpretation of inspection procedures and protocols as well as outcomes following post border assessments. This has resulted in significant delays in moving perishable plant products and in some cases, the loss of whole consignments.

Compounding this is the uncertainty surrounding the future operations of PEQ facilities. The industry supports the need for PEQ facilities in Queensland, New South Wales, Victoria and Western Australia, with each facility aligned to the Department of Agriculture, Fisheries and Forestry (DAFF) Biosecurity as either a DAFF Biosecurity managed facility, or managed by a state or territory government contracted as a DAFF Biosecurity service provider. The industry further supports “approved facilities” for private providers excluding material designated as high risk.

Historically, the Australian NGI has had a long and close relationship with biosecurity and quarantine agencies across Australia, particularly in relation to the interstate movement of plant material. Despite this, the industry has identified support components that will be required so it can continue to maintain its role in the biosecurity continuum.

The Australian NGI has the capacity to play a key role in proactively and responsibly maintaining Australia’s ‘pest free’ reputation. In doing so, it will also ensure a sustainable future for the industry itself.

Policy development by state, territory and federal governments has significant implications for the Australian NGI. Rapid, poorly designed and orchestrated policy development has greater impacts on the industry than those governments currently associated with the delivery of quarantine and biosecurity arrangements across Australia. Therefore, the opportunity to provide input into strategies and decisions made by commonwealth, state and territory quarantine and biosecurity agencies is urgently required.

The Australian NGI expects to be consulted and given adequate time to respond to issues regarding current and future changes to plant health arrangements. This is to ensure the industry has a real opportunity to contribute meaningfully in these discussions and take ownership of decisions made.

At present, there is a distinct lack of industry confidence and assurance in quarantine and biosecurity agencies, due to numerous reasons related to process, general protocol interpretation, resource allocation and minimal consultation with industry on matters with financial ramifications on business sustainability. These include fees for service, red tape, market access and cost reviews.

Currently, several issues mar the delivery of quarantine and biosecurity arrangements in Australia. These include:

- lack of state, territory and commonwealth targeted investment in maintaining Australia’s plant quarantine and biosecurity arrangements;
- lack of comment and implementation undertaken by state, territory and commonwealth governments quarantine and biosecurity agencies based on the outcomes identified through the Beale Review in 2008;
- state, territory and commonwealth governments failing to adequately resource the plant health sections within each agency;
- lack of resources restricting the ability of these agencies to deliver appropriate responses to an EPP incursion while undertaking their normal biosecurity commitments;
• looming closure of PEQ facilities and the uncertainty surrounding importation of plant products; and
• increases in fees and charges associated with plant health programs coupled with reductions in service levels and calibre of delivery.

These issues are affecting the delivery of pro-active quarantine and biosecurity strategies and are jeopardising the pest free status of Australia by increasing the risk of future EPP incursions. The Australian NGI calls for increased investment and resource allocation to plant health to sustain our pest free status.

Additionally, several recent EPP incursions have had a significant impact on the Australian NGI and highlighted the severe deficiencies in quarantine and biosecurity arrangements to the point where agencies were unable to meet their statutory obligations. This is the result of the ongoing declining investment and the lack of resources right along the plant health biosecurity continuum.

System failures have occurred in the management of EPP incursions which include:

• failure to rapidly respond to the incursion and limited intent to eradicate;
• major failure to commit staff to the response;
• disjointed and incomplete response throughout the initial detection;
• failure of jurisdictions to assess the risk on its merits;
• lack of consistent positions on issues by jurisdictions;
• incomplete and piecemeal information flows to national committees;
• unwillingness to take pro-active action;
• failure to apply the recognised response system (PLANTPLAN);
• basic process failure (trace forward/trace back);
• dysfunctional sample testing, recording and reporting systems;
• poorly conducted general site testing and surveillance;
• failure to adequately undertake delimiting surveillance;
• poor management of stock movement off infected properties; and
• no harmonisation of movement controls across Australia.
The NGI considers the Australian biosecurity system to be one that focuses on managing the risk(s) associated with EPPs under the auspices of facilitating market access through ALOP. The domestic quarantine system has, and is rapidly drifting away from this focus, with evidence indicating agencies are adopting the precautionary principle as opposed to one based on an assessed risk relevant to an ALOP.

NGIA supports a conservative approach to managing quarantine and biosecurity risks based on an Australian ALOP which sets a low level of risk. NGIA recognises that zero risk is unachievable due to the multitude of unregulated pathways into and across Australia. NGIA expects jurisdictions to accept this reality and develop risk based entry requirements that address the specific pathway and pest of concern.

Whilst on paper our biosecurity system looks robust and inclusive, in truth there are few checks and balances. This means decisions can be made by individuals (regulatory) to suit a particular policy or political position, as opposed to one based on an assessed risk. The current Australian domestic biosecurity system allows inappropriate personal, external policy and political influence to manipulate biosecurity decisions at state and territory level. These decisions are often cloaked in dubious scientific rationales that, in most cases, find no support outside the implementing jurisdiction. This is obviously not in the best interests of all stakeholders due to increased costs of compliance and lost markets.

Examples of this situation can be seen in recent decisions made by various state biosecurity agencies. It is clear a robust risk assessment framework under ALOP was not applied to a range of decisions stretching from prophylactic pesticide treatments to draconian plant movement protocols and complete market exclusions. These decisions have lacked scientific rigor and are often the result of external influence or professional incompetence. Furthermore, it has become evident movement controls are disguised restrictions on interstate trade, which is unacceptable and unconstitutional.

The Australian NGI calls for the establishment of a national pest risk assessment framework and the development of binding governance protocols on biosecurity decision pathways as an essential component of ongoing reform.

At present, the lack of an avenue for redress is a major concern for the Australian NGI. There is no vehicle allowing an agency to be challenged and no structure to ensure openness and transparency in the decision making process. Moreover, there is no forum in which the industry can present its case and achieve a binding decision requiring a jurisdiction to apply ALOP.

The NGI is also calling on the commonwealth government to take control of domestic quarantine with nationally consistent legislation applying sound risk based assessments under ALOP and engage state and territory agencies as service providers.
Interstate biosecurity is a major issue for the Australian NGI production sectors with market access and cost minimisation priority areas requiring greater attention and resourcing by national and state biosecurity departments. A needs based assessment undertaken by NGIA has identified a number of criteria to be addressed by national and state biosecurity agencies. These include:

- market access driven strategies and policies;
- industry education and training;
- industry preparedness support;
- systems recognition through NPFMS;
- cost and red tape minimisation (including on-farm inspection fees);
- improved service delivery with a ‘customer’ focus;
- improved resource allocation for the development of pest specific certification guidelines (interstate certification assurance’s or ICA’s);
- national interstate movement controls database;
- adjustment support for industry to assist in transitioning; and
- upgrading of out-dated paper based tracking systems (certification/record keeping) into an electronic documentation format.

Currently there are significant differences between states and territories in the processes used to identify pest risks. These differences drive variations in the market access risk mitigation, compliance evaluation and treatment protocols established by each state and territory.

These protocols dictate the volume of red tape and compliance costs borne by industry, which can be demonstrated by the pest Spiraling White Fly. Under current requirements one jurisdiction has a prescribed protocol requiring compliance if a business is within a 500km radius of a known detection while all other states and territories have a 10km radius. Such inconsistencies raise major questions about the science supporting such a significant difference in views between departmental experts. Clearly, nationally adopted and implemented systems and protocols mandating the uniform processes for plant biosecurity across Australia is urgently required.

The present system employed by the commonwealth, state and territory governments to assess the risk of an EPP is ad-hoc and lacks appropriate consensus amongst the various agencies. As an EPP can be viewed by different agencies of a different level of risk, a national emergency plant pest risk assessment methodology is needed to ensure the uniform application of EPP management strategies.

With interstate agencies recognising the value of on-farm self-certification for area and property freedom of plant pests, the NGI requires the development of ICA arrangements for a number of EPPs in Australia.
This would allow growers to be trained to detect specific pests, enhance on-farm systems and meet self-certification requirements to minimise inspection fees and give greater flexibility in product movement. It would also release departmental officers from compliance action to undertake industry education, training and support, plus participate in pest surveillance programs across the states and territories. Furthermore, this increased industry skill level will value add the participation of the NGI to the state-based plant pest surveillance.

Interstate biosecurity agencies need to address internal resourcing and customer service issues as a matter of urgency. As a service provider charging fees for service, it is unacceptable that the current service offered is delivered in an unprofessional manner and lacks value for money. As government holds a monopoly over this service, industry cannot change or seek a more competitive bid due to poor service delivery.

Electronic document creation, recordkeeping and transfer for interstate plant movement must be an immediate target for investment by state and federal agencies. The current process is paper based and costly for industry both in time and resources. With the international trade in plants fully supported by electronic documentation, it is clearly possible to implement such a system at a state and territory level to facilitate interstate trade. Further adoption of technology would allow for a web based data storage and retrieval system. This system would bring together all interstate plant movement requirements and be easily accessible to both industry and government.

As government continues to abdicate or devolve its responsibilities and reduce investment along the biosecurity continuum, industry is being expected to take over many activities previously in government hands (e.g. market access negotiations, pesticide registration and industry communication) or through increased on-farm compliance and fee for service verification services.

This shifting paradigm is happening quickly with industry struggling to keep pace. Government has not assisted industries to adjust to the new environment and in many cases is blocking industry attempts to meet new expectations. State, territory and federal governments need to provide transitional packages to assist industry in the change process. This in turn is likely to increase the rate of change and maintain the integrity of the biosecurity continuum.
One of the main difficulties in achieving wide-scale improvements in risk mitigation on-ground is that growers lack a meaningful and immediate incentive to improve on-farm biosecurity practices. The NGI is calling for the integration of biosecurity into existing enterprise management and quality assurance systems to provide a driver for enhanced on-ground risk management practices in nursery production across Australia.

Linking on-farm programs under the NPFMS umbrella, with potential to align to co-regulation with state, territory and federal government agencies, is also urgently required. (This initiative is discussed under Strategy 4). Without near to universal grower participation, monitoring and surveillance systems will provide an incomplete picture of Australia’s pest and disease status and expenditures on communications and behavioural change programs may not penetrate as expected.

The Australian NGI supports government policy regarding on-farm practices, innovations and incentives to adapt, manage and respond to quarantine and biosecurity threats. Indeed, a critical area of preparedness for pest and disease emergencies is the need to educate key stakeholders about their roles and responsibilities in the event of an outbreak. Ongoing investment is required by the Australian Government into the DAFF National Communication Network, as this plays a critical role in terms of preparedness activities involving biosecurity education and awareness.

The industry also supports research, development and extension programs to equip production nurseries with tools and resources to support concepts such as best management practices (BMP), environmental management systems (EMS) and integrated pest management (IPM) whilst maintaining market access.

Programs that support greater grower participation in pest and disease surveillance and up-skill industry in all aspects of biosecurity (e.g. pest identification and monitoring, recordkeeping and on-farm capacity building to address biosecurity risks) are urgently required.

Further investment is also needed to develop technical guidelines to assist with this process. The industry also supports programs providing access to safer, less toxic, new and advanced pesticide chemistries through label registration and provision of minor use permits. This will ensure the application of pest management tools that fit the strategies employed by growers to meet their obligations for reduced and specific pesticide use, safe work places and environmental stewardship.

While there are provisions for owner reimbursement costs in the EPPRD, these are minimal and relate only to the actual costs of an emergency plant pest response (EPPR).
There is no provision for the recoupment of costs deemed not directly related to the EPPR, however the business has incurred these costs because of the EPP and the response. Affected growers therefore suffer a serious financial and operational impact if they are to be caught up in an EPPR, even if they are eligible for owner reimbursement payments. In past EPPR events, some affected growers have been driven out of business due to the costs incurred. The Australian NGI calls for a review of the mechanism for grower reimbursement to ensure it is equitable to all parties involved in an EPPR.

Currently, growers have no effective say in what is deemed an acceptable level of risk, even though they ultimately bear much of the cost burden in the event of an EPPR. One possible solution would be for governments to underwrite an insurance scheme to enable growers to insure against losses from exotic pest and disease incursions.

Presently, insurance of this type is not commercially available, which could be viewed as a clear case of market failure requiring government intervention. Such an insurance scheme could provide the incentive for improved on-farm biosecurity management by making grower access contingent on achieving threshold biosecurity standards. This is consistent with the philosophy of shared responsibility, and would ensure the available assistance targets enterprises which have endeavoured to manage the risks they face through investment, education and process management.
The Australian NGI seeks recognition and support of its NPFMS by all levels of government. This strategy supports Action 1.5 of the NPBS, which calls for the ‘Review of domestic and international phytosanitary certification processes for the movement of plants and plant products, focusing on the national adoption of electronic systems for certification by government inspectors and by businesses accredited under approved schemes’.

The NPFMS is an industry driven best management practice program providing production nurseries, greenlife markets and growing media suppliers with a framework for sound on-farm risk management in relation to biosecurity. It is imperative businesses possess the relevant knowledge and skills to make informed management decisions and at the same time, maintain their obligation under the shared responsibility of biosecurity.

The NPFMS incorporates the nursery industry accreditation scheme Australia – best management practices (NIASA-BMP), EcoHort® (which promotes best management practices in environmental and natural resource management) and BioSecure HACCP (which promotes best practice in pest and disease management and biosecurity risk assessment and management). BioSecure HACCP is a set of protocols and procedures enabling a business to manage biosecurity risks while establishing an effective internal quarantine process for both imported and exported plant material.

The BioSecure HACCP risk management system encourages a business to maintain the strictest internal quarantine procedures possible while recording the actions taken at critical control points. With improved hazard analysis and control measures in place, the business is better protected in the event of a biosecurity threat or impact. Importantly, the process will support future market access both domestically and internationally. BioSecure HACCP is a key component of the industry wide risk mitigation strategy designed to operate at a grower level by addressing issues such as monitoring and surveillance, traceability, access restrictions, importing and treating plant material.

It is imperative these programs utilise the best available science and are regularly updated as research evolves and new findings on innovative practices and technologies become available. Investment in research and development into these best practice programs is vital to ensure these programs are relevant and in line with innovation and technological advancements in biosecurity.

To further assist in building capacity for the Australian NGI, research into issues such as pests that pose high risks of spread given new climate conditions is necessary. Climate change and variability will have a significant impact on the distribution of plant pests in Australia, with their potential temperate habitat extending into the southern regions of the continent.
This will increase the possible distribution pattern of many EPPs creating the likelihood of greater economic, social and environmental damage. Temperatures in northern Australia are also expected to increase and as a clear pathway for EPPs into Australia, this could result in EPP infestations populating at faster rates due to increased lifecycles (e.g. egg to adult). The faster development of large EPP populations will result in increased areas of rapid infestation, reducing the practicality and cost/benefit of eradication, with costs borne by industry.

To minimise the on-farm impact, NGI advocates recognition of the BioSecure HACCP as a third legal instrument in market access, as it provides an efficient mechanism for maintaining and/or gaining market access. By providing support services to industry, national, state and territory agencies can have an active and positive role in driving change at the farm level.

Industry programs addressing a regulatory requirement are entitled to be recognised, as the uptake by growers is generally voluntary and has a better ‘fit’ to the business model of that production system. The result of this ‘fit’ decreases the cost of implementation and is aligned to businesses productivity, profitability and sustainability, whilst also achieving the desired outcome such as enhanced biosecurity on-farm.

Ongoing investment is also required to ensure the necessary resources are available to deliver this valuable program to whole of industry through a skilled industry development officer (IDO) extension network. Extension activities will ensure businesses can apply the outcomes of the NPFMS, and implement the outcomes of government and industry research and development programs to directly address biosecurity and quarantine risks.
Biosecurity in Australia is undergoing significant change with complete paradigm shifts in areas such as government and industry investment and participation, plus grower roles and responsibilities. NGIA has observed the increasing role peak industry bodies (state and national) are playing in the biosecurity areas of grower education, training and communication. Furthermore, these bodies are assisting government in establishing the vital details of the industry (distribution, numbers, crops, etc.) to ensure biosecurity strategies and programs are more effectively undertaken. Growers are also playing a greater role in activities relevant to their property and crop with an emphasis from government on shared responsibility, which represents a paradigm shift from total government control.

Industry cannot perform these functions under the old system and government must provide the tools (both regulatory and financially) for industry to adjust and participate in an efficient and effective manner.

If there is an incursion of an EPP, the Australian NGI does not have the ability to directly contact growers in the immediately affected region, or to quickly distribute relevant alerts to the national industry as there is no national database. The industry also lacks a national communication system to ensure biosecurity preparedness training, information and education tools are delivered to all stakeholders.

To remedy this, an opportunity exists to create a single national greenlife producer communication and information scheme. This would be based on property registration and would capture information that includes:

- contact details (name, address, phone, email);
- crops/produce (type, volume, markets);
- location (geographic locator and land tenure);
- standards (accreditation/certification schemes);
- business information (ABN, type).

Such a property registration scheme must focus on property types rather than individual growers. However, details on individual growers (contact details, crops and locations) are required for implementation, particularly in the event industry needs to respond quickly if an EPP is detected. The ability to identify and reach growers quickly would improve both the efficiency and effectiveness of this response.

The scheme needs to be mandatory to ensure the information is of sufficient quality to meet its intended uses and its key features should include:

- compulsory national registration for all greenlife producing properties;
- a condition of sale that all produce has greenlife property identification codes;
- annual register services (property registration and issuing of property identification codes); and
- future option of collecting greenlife property identification codes in the supply chain (e.g. at the same time as the collection of producer levies).

The scheme should be industry led and financed by an annual registration fee sufficient to maintain the scheme. Industry and government will need to provide both funds to establish the scheme and enact the necessary commonwealth and state legislation.
To ensure the issues contained in this Policy Position are understood by all sectors of the Australian NGI, effective communication to relevant parties is important to assist with effective business management and decision-making. The NGIA will ensure growers are equipped with the tools and resources to assist them meet their on-farm obligations as part of the biosecurity continuum. It is important growers also receive information about government policies that may impact on their operations, such as changes in work plans, protocols and intake inspection procedures. This will build industry resilience and its capacity to assess opportunities and impacts.

The Australian NGI supports the Australian Government’s National Communications Network as a valuable resource to address the risk of poor public communications and inconsistent messages which undermine both domestic and international confidence in an EPPR and exacerbates disease control efforts. It offers a means by which information and issues are rapidly moved between local, state and national agencies and industry.

While the network is crucial in managing a crisis situation arising from an EPP, it is vital the information flows between relevant parties in a timely and effective manner so all stakeholders are informed.
Further information

If you would like further information about Reducing the Pest Risk - The Australian Nursery & Garden Industry Position on Quarantine and Biosecurity, contact:

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