

**Australian
Seed Federation**



**Review of
devitalisation
requirements for
cut flowers and
foliage:
*Draft report***

17 February 2026

Department of Agriculture, Fisheries and Forestry
Plant Systems and Strategies
Stakeholder Engagement team
GPO Box 858
Canberra ACT 2601, Australia



Sent via: Have your say portal

Dear Plant Systems and Strategies Stakeholder Engagement team

Re: Review of devitalisation requirements for cut flowers and foliage: draft report

Thank you for the opportunity to provide comment on the Review of Devitalisation Requirements for Fresh Cut Flower and Foliage Imports – Draft Report.

The Australian Seed Federation (ASF) supports the draft report's conclusion that devitalisation requirements are not scientifically or technically justified as biosecurity measures.

However, while ASF is comfortable with the biosecurity conclusions of the draft report, we consider that an important adjacent risk has not been fully addressed. Namely, the potential for propagation and germplasm acquisition through the cut flower pathway if devitalisation requirements are removed.

ASF members have raised concerns that, in the absence of devitalisation or alternative safeguards, imported cut flowers may provide a practical avenue for deliberate seed production or breeding activity outside established and highly regulated seed import pathways. While such activity may fall outside traditional pest risk assessment frameworks, it raises legitimate questions about market integrity, regulatory equity, and the consistency of Australia's plant import controls.

Accordingly, ASF's submission supports removal of devitalisation requirements on biosecurity grounds, but seeks assurance that the Department has fully considered how propagation risks will be managed through alternative mechanisms, including clear policy statements, compliance activity, and pathway monitoring.

We appreciate the Department's engagement on this matter and would welcome further discussion as the review progresses.

Yours sincerely

A handwritten signature in black ink, appearing to be "Katherine Delbridge", written in a cursive style.

Katherine Delbridge
Chief Executive Officer

INTRODUCTION



The ASF is the peak national body representing the interests of Australia's sowing seed industry at the state, national and international levels. The ASF membership base comprises stakeholders from all sectors of the seed supply chain including plant breeders, seed growers, seed processors and seed marketers, all of whom were consulted in the preparation of this submission.

In Australia, the seed industry is a vital link in the development of crops that are critical to the country's agricultural productivity, sustainability, and food security.

Feedback of devitalisation requirements for imported cut flowers

The Australian Seed Federation (ASF) welcomes the opportunity to provide comment on the *Review of Devitalisation Requirements for Fresh Cut Flower and Foliage Imports – Draft Report*. ASF supports science-based, proportionate and internationally consistent biosecurity regulation that protects Australia's Appropriate Level of Protection (ALOP) while avoiding unnecessary regulatory burden.

ASF recommends that DAFF:

- Proceed with the removal of devitalisation requirements for imported cut flowers, on the basis that they are not scientifically or technically justified as biosecurity measures.
 - Recognise the potential germplasm and market integrity risks associated with the removal of devitalisation.
 - Consider complementary measures to deter deliberate misuse of the cut flower pathway, such as
 - Clear policy statements reinforcing that propagation from imported cut flowers is prohibited.
 - Targeted compliance and surveillance activities.
 - Engagement with industry to ensure awareness of obligations and consequences.
 - Ensure regulatory consistency between cut flower imports and seed import pathways to avoid unintended inequities.
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Devitalisation as a biosecurity measure

ASF acknowledges and supports the draft report's conclusion that Australia's current devitalisation requirements for imported propagable cut flowers are not technically justified on biosecurity grounds. ASF notes that:

- The available scientific evidence does not demonstrate that devitalisation reliably prevents propagation or effectively mitigates pathogen risk.
- Glyphosate-based devitalisation can be reversed and does not eliminate plant pathogens.
- Compliance testing is inefficient and unreliable.
- Australia and New Zealand are international outliers in applying devitalisation to cut flower imports.
- The draft pest risk assessments conclude that unrestricted personal and commercial diversion from intended use (DFIU) achieves Australia's ALOP without devitalisation.

ASF agrees that, from a biosecurity pest and disease risk perspective, the continued application of devitalisation requirements for imported cut flowers is not supported by current scientific evidence.

ASF further acknowledges Australia's obligations under the Sanitary and Phytosanitary (SPS) Agreement administered by the World Trade Organization, which require phytosanitary measures to be science-based, technically justified and no more trade-restrictive than necessary.



Recognition of intended use and proportionality

ASF supports the clear distinction between commodities intended for planting and those intended for time-limited decorative use. ASF agrees that:

- Imported cut flowers present a fundamentally different biosecurity risk profile to imported nursery stock.
- The likelihood of pathogen establishment from cut flowers is inherently low due to:
 - Their limited lifespan.
 - The need to transfer to a suitable host.
- Phytosanitary measures should be proportionate to the risk associated with the declared intended use, consistent with ISPM 32 and international guidance developed by the Food and Agriculture Organization of the United Nations under the International Plant Protection Convention (IPPC).

Germplasm access and market integrity

While ASF supports the scientific findings of the draft report, ASF members have raised an **important non-biosecurity concern** that warrants consideration alongside the proposed removal of devitalisation requirements. ASF member feedback highlights that:

- Removal of devitalisation requirements may allow imported cut flowers to produce viable seed, creating the potential for:
 - Deliberate acquisition of new germplasm via the cut flower pathway.
 - Circumvention of established seed import, quarantine and regulatory frameworks.
- Such activity could:
 - Undermine legitimate and highly regulated seed trade pathways.
 - Disadvantage Australian seed producers and plant breeders.
 - Create regulatory inequity between seed imports and cut flower imports.

Policy gaps between biosecurity risk and pathway misuse

ASF is concerned that removing devitalisation requirements without alternative safeguards may unintentionally create incentives for pathway misuse. ASF notes that while the report appropriately addresses biosecurity risks associated with DFIU:

- The analysis does not consider broader industry integrity risks that fall outside traditional pest risk assessment frameworks.
- While devitalisation is not an effective biosecurity tool, it has functioned as a practical deterrent to misuse of the cut flower import pathway for propagation or breeding purposes.

Shared responsibility and enforcement

ASF supports the principle of shared responsibility underpinning Australia's biosecurity system. However, ASF notes that shared responsibility requires:

- Clear regulatory expectations.
- Strong deterrence against misuse.
- Confidence that enforcement mechanisms are sufficient where economic incentives to bypass regulated pathways exist.

While DFIU remains illegal under the Biosecurity Act, ASF considers that enforcement alone may not be sufficient if policy settings inadvertently enable misuse.



Conclusion

ASF supports evidence-based reform of Australia's biosecurity framework and agrees that devitalisation requirements for imported cut flowers are not justified on pest or disease risk grounds.

However, ASF considers that removal of devitalisation without complementary safeguards may create unintended incentives for misuse of the cut flower pathway for propagation or germplasm acquisition. While such activity may not materially increase pest risk, it raises legitimate concerns regarding regulatory consistency, market integrity and equity between import pathways.

ASF therefore urges DAFF to ensure that any regulatory change is accompanied by clear and enforceable measures that deter deliberate propagation from imported cut flowers and maintain confidence in Australia's seed import framework.

ASF stands ready to work constructively with the Department to ensure that reform delivers both scientific integrity and practical pathway security.