

To whom it may concern,

My name is Carl Gilsenan. My Brother and I are in the process of starting a kava plantation on Rotuma, an outer island in Fiji. We are one of many traditional growers on the island. We are also in the process of setting up a processing plant and an export operation for local growers, to give them an opportunity to access overseas markets.

Growing up in Australia with roots back in Fiji gives us a unique position to be able to help growers with parts of the supply chain that they do not have the skills to navigate. Hence our interest in the Australian governments pilot program of Kava importation. In regards to the regulatory framework being proposed, I would be in favour of Option 1. Kava to be imported similar to New Zealands regulations should be adequate, assuming the following issues are addressed in consultation with importers and processors.

After researching the Fiji Kava industry we would conclude that the 2 main areas that require regulation and some form of oversight would be – Handling and processing of Kava, so as to be able to offer the best quality product to overseas consumers.

- Adulteration of Kava. Both of these areas overlap each other and I would suspect the solutions for both areas would be much the same.

Handling and processing of Kava. Most of the businesses in Fiji that buy Kava from growers and process it in into a powder form to sell to local consumers are a long way away from having the ability to export overseas. Not that they cant, but more that they do not conform to any sanitary or OHS norms. Kava is a live product like food. The longer it is out of the ground the easier it is to lose its potency and therefore its benefits and also to degrade to the point of being non useable. Without proper processing procedures, equipment and sanitary conditions, the more likely this is to occur. Proper packaging, handling and storage all along the supply chain is also a very important factor, as to the quality of the product that consumers in Australia will end up purchasing. Some form of regulation by governing bodies is required to make sure that food grade standards are applied to the processing, packaging and handling of Kava for export to Australia. This must be done in collaboration and consultation with interested parties, so as to be viable and applicable.

Adulteration of Kava. This is possibly the most important issue facing Kava consumers. As the price of Kava is at record highs, unscrupulous processers are bulking up the powdered Kava root with non Kava material. How to mitigate against this without penalising organisations who are doing the right thing is something that needs further investigation.

I believe, that if we can address the above issues with workable solutions, than we can allow some of the primary producers in these regions to showcase the fantastic products that they produce and also as a consequence stimulate the local economies of these regions through trade in a primary industry they have generations of experience in producing.

Thanks for your time. Regards Carl Gilsenan.