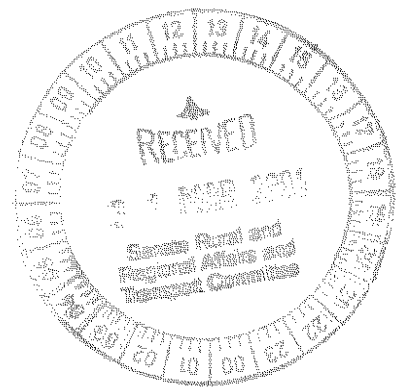


The Chairman  
Senate Rural And regional Affairs And Transport Committee  
S G 62 Parliament House  
Canberra 2600  
19-3-04



Dear Chairman.

I am writing this letter to your committee in relation to the latest draft Biosecurity Australia IRA document in relation to the proposed importation of New Zealand apples into Australia.

As a Fruit Growers Association based mainly in the Yarra Valley comprising over twenty pome fruit growers we are extremely concerned at the future of the fruit industry in Australia if following the allowed importation of apples from New Zealand or apples from any other source that has unknown fire blight infestation were to create a situation of infestation in the pome fruit industry within Australia the effects on the industry in general would be enormous and to particular local areas such as the Yarra Valley and Goulburn Valley could spell economic disaster.

As the revised IRA document is a very wide ranging and complex document that according to organizations with far greater capacity than our small group is able to provide deem that many of the statements in the draft appear to conflict.

It is with interest that apparently Biosecurity Australia has been reported to have been forced to reconsider its draft recommendation re the importation of bananas from the Phillipines due to some failure in its wording or its study integrity .

Biosecurity Australia is undertaking the study process in an environment of intimidation due to the possibility that if New Zealand does not like what is proposed then they can take Australia to the WTO on the basis that the available science does not support the proposed measures and that they are too trade restrictive.

The WTO does not always have a history of totally reliable decisions in relations to an opposing country such as New Zealand disagreeing with the scientific based decision of another country in this case Australia .

#### PROTOCOL.

VISUAL INSPECTIONS. Apparently Biosecurity Australia admits on page 86 that Fireblight cannot be detected by visual inspections and also on page 96 Bacteria is not visible and will almost certainly survive quality inspections.

CHLORINE TREATMENT. There is sufficient scientific evidence to show conclusively that dipping apples in any solution does not disinfect the calyx area of apples due to the formation of air pockets.

Biosecurity Australia recognizes that Bacteria especially those inside the protected calyx cavity would not be removed in the water dump due to the air pocket formation in some fruit.—page 92.

The calyx of an apple can have a higher concentration of fire blight bacteria due to the protection of sunlight and also from latent infection from the flower remnants according to a large body of scientific opinion.

If the dipping action does not have the capacity or ability of sterilizing the calyx and the variable effectiveness of chlorine as a disinfectant would not assist in lowering the risk of infected apples being imported.

Continued page 2.

COOL STORAGE FOR SIX WEEKS. There is sufficient scientific evidence to demonstrate that cool storage does not have a significant impact on fire blight survival.

There is one scientific paper that even draws a correlation with pre bloom freezing as being a vector for fire blight. Powell 63.

Obviously fire blight survives sub-freezing conditions in severe winters in Europe and the US.

OTHER PROTOCOL RELATED ISSUES. Some factors listed below are not included in the Biosecurity Protocol .

Historical infection in orchards.

Proximity of infected hosts to blocks from which exports are sourced.

Cross contamination by machinery .

Ability to remove symptoms pre inspection.

Contamination of fruit during packing process.

Ability of other pests to act as vector during cool storage.

Possibility of fruit from non designated blocks being included in process.

Climatic conditions during harvest.

Due to the above stated reasons and bearing in mind the current political climate of the Australian Governments apparent subservience to foreign countries in regard to free trade matters one cannot be very hopeful that in the final analysis of the long running dispute of the importation of foreign produce into Australia and in this particular instance it involves apples from New Zealand that due regard will be given to the protection of our current pristine fruit quality and the economic survival of many country towns that rely on the pome fruit industry .

Thanking you for the opportunity to make a submission to your committee.

Yours Faithfully

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*Ivan Peter-Budge*