

April 1, 2004

Submission to Senate Committee Inquiry

Re. The revised draft import risk analysis report for apples from New Zealand.

Dear Sir or Madam,

The objective of this submission is to communicate my reservations about the quality of the revised import risk analysis published by Biosecurity Australia.

1. This import risk analysis is meant to be a rigorous science-based process for addressing quarantine risks however, many of the conclusions have no scientific justification.
2. It is stated in the method for pest risk assessment that when scientific evidence was not available, expert judgements were used instead. This demonstrates that much of this analysis was not based on proven scientific facts. It is not acceptable for scientific publications to base conclusions on information that is not supported by experimental data or published literature. **No confidence can be put in a conclusion that is based on expert opinion in lieu of scientific evidence.**
3. It should also be noted that scientific evidence varies in its quality. Information from journals that are peer reviewed is scientifically sound whereas information that has not been peer reviewed is not considered reliable. Peer review involves rigorous scientific scrutiny, and reports that are unpublished have not demonstrated that the information contained is valid. With this in mind, it is alarming that the 'scientific evidence' for the efficacy of chlorine as a risk management measure is drawn from an unpublished report. **This is not reliable scientific evidence.**
4. The scientific quality of the import risk analysis prepared by Biosecurity Australia is lower than that demanded in peer reviewed, scientific journals or in an academic thesis. Was this a true science-based process, it would not be acceptable to include information without an appropriate reference. It would not be acceptable to substitute an opinion in place of scientific evidence.
5. Given that the potential repercussions of this risk analysis are so significant, conclusions should be based on high quality scientific fact. In absence of the scientific facts, Biosecurity Australia are simply hypothesising about the quarantine risks that New Zealand apples pose to Australia. **This is not a rigorous science-based process.**

I have recently completed a research-based PhD thesis. I have been trained in the preparation of scientific publications, and understand the standards that are expected of

scientists that publish their research in scientific journals or in a thesis. I hope this submission serves to draw attention to the lack of reliable scientific justification for many of the conclusions contained in the Biosecurity Australia risk analysis report.

Yours faithfully,

Sally Francis
Business Development Manager
Plunkett Orchards

Submission authorised by Andrew Plunkett, Director.