

# **A submission on the revised draft import risk analysis for the import of apples from New Zealand**

**Prepared by:**

The Western Australian Fruit Growers Association

**For:**

The Secretary

Senate Rural and regional Affairs and Transport Legislation  
Committee

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WESTERN AUSTRALIAN  
FRUIT GROWERS' ASSOCIATION  
INCORPORATED

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## **About WAFGA**

The Western Australian Fruit Growers' Association (WAFGA) is the peak pome (apple & pear), stone (summer) and citrus fruit industry body in WA representing more than 700, growers across the state.

Founded over 80 years ago, WAFGA is an agri-political organisation, which also funds research and promotion activities on behalf of fee for service paying growers.

WAFGA's structure comprises a Management Committee and three semi autonomous commodity councils (Apple and Pear, Citrus, and Summer Fruit). Delegates on each of the commodity councils are appointed from the Association's five regional zones (Northern, Perth Hills, Central, Southern and South West).

WAFGA's primary objective is to ensure a profitable and sustainable industry for all WA fruit growers through its agri-political, research and promotional activities.

## **Introduction**

In this submission the WA Fruit Growers Association will primarily focus on regional differences in pest status and risk as the national issues are likely to be addressed by other groups such as Apple and Pear Australia Limited.

It is important to note from the outset that WA is the only commercial apple production area in the world that is free from the most economically destructive disease of apples worldwide - apple scab. Our industry is very proud of the fact that we are free of both Codling Moth and Apple Scab and we have spent considerable money and resources over the years to maintain our freedom status.

Listed in this submission are 7 key concerns that our Association has with the Draft IRA document. We have not provided a profuse amount of detail in relation to each issue, as our primary objective is to raise awareness of the issues. If the committee requires further detail we are happy to attempt to further explain our concerns.

## **Improper Consultation**

- The WA Fruit Growers Association is not aware of Biosecurity Australia ever consulting with WA over regional risk (likelihoods of entry, establishment and spread and consequence) issues for apple scab or codling moth or any other regional pest in the preparation of the revised draft IRA. It was consulted on current pest status but not on risk. This constitutes a breach of the Import Risk Analysis Handbook. Step 12 of the "Steps in Import Risk Analysis" listed on page 15 of the Handbook clearly states that,

*"The IRA team, on the basis of its research, and using input from TWGs and consultants as necessary, prepares a Draft IRA Report, taking into account submissions received on the technical issues paper and other input derived*

*through consultation with stakeholders. As at other stages, relevant State and Territory agencies are consulted on regional pest status and risk issues."*

Questions need to be asked of BA as to why they did not consult with the relevant WA agencies on risk (likelihoods of entry, establishment and spread and consequences of regional quarantine pests and diseases)

### **Consequences for WA**

- There appears to be inconsistency in the IRA document in relation to economic consequences of disease outbreaks. Apple Scab is the most economically damaging disease of apples worldwide and this fact is supported by numerous scientific references. It therefore should follow that the economic consequences for WA growers should be rated higher than that of Fire blight to Eastern States growers. Yet in the document the overall consequence of Fire blight is rated as High, and Apple Scab is rated Moderate. We believe this inconsistency should be investigated.

The Consequences for WA growers are further exacerbated by the fact that they and the State Agricultural Department will have to meet any costs associated with eradication without any assistance from the Commonwealth or Eastern States growers (for all regional quarantine pests and in particular Apple Scab and Codling Moth). This is in contrast to Fire Blight, where the federal and state governments along with growers would fund eradication. We do not believe Biosecurity Australia should have the power to force the Western Australian industry into a position where it has to allow imports of apples from a region that has significant pest and disease threats and then leave it to fend for itself with no assistance from the national industry or commonwealth if there is a subsequent outbreak.

### **No Access to the IFP Manual**

- The Integrated Fruit Production Manual is not publicly available to either the WA Department of Agriculture or industry for review. A lot of weight is placed on this document and we are being asked to have faith in a document that is not available for review. The use of a document that underpins the analysis and in particular the measures that cannot be reviewed by stakeholders should be investigated.

### **Lack of Detail of Pre Export Inspections**

The Document contains no details of how the pre harvest inspections are going to be conducted in New Zealand. There are no details on sampling intensity or procedure. In the cases of apple scab and European canker, the pre harvest inspections are basically the first and last line of defence, with no requirement for chlorine treatment, or any other measures to prevent entry. How can the WA apple and pear industry possibly comment on the adequacy of the IRA document without knowing what these inspection protocols will involve? WAFGA understands that details of pre export inspections for arthropod pests

are often prescribed in IRAs why then have they not been provided in this instance? Has there been a deliberate move to exclude them from the IRA process?

- Biosecurity Australia can not possibly expect WA to change legislation prohibiting entry of apples and pears into the state without knowing the full detail of orchard inspections for pests and diseases in New Zealand prior to export.
- WAFGA believes it is unclear how fruit production regions in NZ will achieve and/or maintain area freedom from pests and diseases. On page 494, the IRA draft document states that,

*“If symptoms of fire blight, and European canker, and, for export to Western Australia apple scab, symptoms are detected in an orchard registered for export, the affected orchard shall be suspended from the export program.”*

Yet WAFGA understands that Brian Stynes, General Manager, Plant Biosecurity, has given evidence to the senate inquiry that it will be “blocks” within orchards that must not display symptoms of disease. If this is the case it would surely have a significant impact on the risks associated with a number of the importation steps. We believe it would be considerably easier for New Zealand Growers to set up a block within an orchard that is free from disease symptoms than it would be for the same grower to ensure that their entire orchard is free of symptoms. The level of risk associated with harvesting fruit from a symptom free block within an infected orchard would surely be greater than harvesting fruit from an entire orchard that has been certified free of symptoms. The potential for cross contamination from equipment, picking bags, machinery and people would unquestionably be greater within in an orchard than between orchards. This inconsistency is of great concern to the WAFGA and should be investigated.

### **No Requirement for On-Arrival Inspections (Apple Scab)**

- At this point Australia does not accept NZ phytosanitary certificates attesting to freedom from quarantine pests<sup>1</sup> such as arthropods where the quarantine measures required are inspection. Despite freedom certification Australia applies a verification inspection on arrival. Quarantine pests are regularly detected in consignments certified as free. Yet for apples we are expected to accept assurances from MAFNZ that the as yet to be determined procedures have been applied and that fruit has been sourced from an area assessed by MAFNZ as free from disease symptoms of apple scab with no effective verification measures applied on arrival.

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<sup>1</sup> Phytosanitary certificates generally state that plants and plant products have been inspected and found free from quarantine pests, substantially free from other injurious pests and are considered to conform with the phytosanitary requirements of the importing country.

## **Movement of NZ Fruit within Australia**

- The WA Fruit Growers Association would also like to know who is going to take responsibility for ensuring that apples arriving from New Zealand that do not comply with additional phytosanitary procedures for Western Australia (Apple Scab and Codling Moth) are not traded across the Western Australian border along with apples from New Zealand and the Eastern States that have met the additional requirements.

## **Miscalculation in Importation Step 4 in Relation to Apple Scab**

### Unrestricted risk

The Draft IRA states (page 296) that the likelihood for Imp4 is very low because there would be a low level of fruit infection in the orchard as a consequence of good management. However The impact of good management has already been taken into account in Importation steps 1 and 2 (source orchards and harvesting of fruit for export), and should not be a factor in Imp4. Importation step 4 should only deal with the likelihood of apple scab surviving routine processing procedures in the packing house. The IRA document admits that the conidia survive all of the routine processes and the likelihood assigned to Imp4 should reflect this fact and be amended to a High likelihood. The impact of a High likelihood needs to be assessed.

### Restricted risk

The draft IRA states that *“In the unrestricted risk assessment for apple scab Imp4 (processing of fruit in packing house) was assessed considering all the procedures that take place in New Zealand’s packing houses. This includes the use of sanitisers and short-term cold storage by some packing houses. There is no evidence in the literature showing any ability of these procedures to mitigate symptomless infection. Therefore, it is not feasible to seek measures to reduce the likelihood allocated to Imp4.”*

This contradicts the assessment made for Imp4 where the assessment is based on,

*“However, the likelihood for Imp4 was assessed as very low because there would be a low level of fruit infection in the orchard as a consequence of good management”.* (page 296-297)

Inconsistencies in the document such as this and others we have identified seriously undermine the confidence stakeholders have in the analysis. Given that should these measures fail the burden of eradication will fall on the WA government and local growers we need to have a high level of confidence in the document.