SUBMISSION IN RELATON TO REVISED DRAFT IRA REPORT Importation of Apples from New Zealand

Supposedly science based risk assessment.

Where is the science that demonstrates that all Australian indigenous plant species have been evaluated for their resistance to all of the potential risks from the importation of fresh apples from New Zealand?

There is a heavy reliance upon the prevention steps.

Factors needed to be considered:

Development of procedures overseen by a body; which should include Australian industry Representatives.

Implementation and infrastructure requirements overseen by a body including Australian Industry Representatives

Application of procedures on a trial basis overseen by a body; which should include Australian Industry Representatives.

Regular policing of established procedures and application of such; be overseen by a body including Australian Industry Representatives.

Comments on contents of current Revised Draft IRA Report Part A February 2004

Page 495 3rd last dot point states, that a packing station has to have ISO 9002 Certification. What is the difference between a packing <u>station</u> and a packing shed? I would have thought that packing shed would have been more appropriate terminology.

Page 497 2nd dot point states, if trash is found in a carton. Then fruit from, in this case only the offending orchard would need to be withdrawn.

The packing shed is the one at fault for not adequately checking and removing trash during the packing process. A poorly performing packing shed should be removed from the program as well.

Would C.A storage in conjunction with the 6 weeks cold storage, and the use of M.A packaging add any significant level of protection?

Regards Richard Aumann 125 Harris Gully Road Warrandyte Victoria 3113