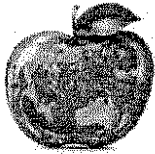


Australian Farmlink Pty Ltd

ABN 91 087 011 541



TO: Secretariate 15/06/04
Senate Rural & regional Affairs & Transport & Communication
Rm SG62 Parliament House
Canberra ACT 2000

Australian Farmlink Pty Ltd is a Horticultural Export Company with close ties to the Apple industry in Australia

This is our Response to the Draft IRA for Import of New Zealand Apples

There is a great threat to Australian Apple and Pear Industry by importation of pests and diseases as well as apples.

Although Australia is at risk by insects that currently aren't present here, our main dilemma is contracting Fire Blight

We believe counter measures don't offer enough protection as there are too many opportunities for the Fire Blight bacteria to enter Australia

In Orchards

Visual inspections cannot guarantee all infections will be identified

Buffer zones cannot guarantee that infections won't be spread by insect and human interaction between blocks of infected and non-infected orchards

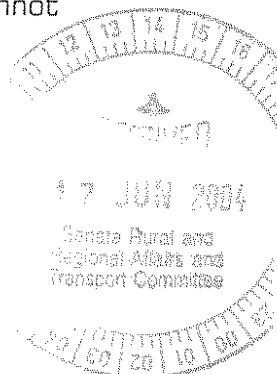
Storage bins and picking bags hygiene cannot be guaranteed to prevent cross contamination

The Antibiotic to be used is banned in Australia

In sheds

Shed hygiene procedures between packing infected and non-infected apples cannot be assured. The procedure would be so inefficient to packhouse production in practical terms and would not be implemented

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Chlorine dips cannot be 100% guaranteed to treat all areas of an apple

Packed cartons cannot be 100% free of leaves and twigs which are carriers of the infection. It is not possible to make this guarantee.

Phytosanitary Inspections pre-shipment cannot detect a fire blight bacteria infection as this is invisible to the naked eye

Even a 1% chance of infection guarantees that every single carton of apples has the potential to carry the fire blight bacteria.

As almost every country in the world has fire blight as a result of importing affected fruit or root stocks, its highly infectious and fast spreading nature, guarantees Australia will also fall victim, if New Zealand apples are allowed in.

The Effects on the Australian Industry

Fire Blight is more devastating in warmer climates, on dwarf rootstocks, and on new varieties such as Pink Lady. Many Australian apple growing areas are located in warmer climates than New Zealand (such as Orange, Adelaide Hills, Goulburn Valley and Western Australia) and most of our apple production is from Dwarf Rootstocks. There are large plantings of Pink Lady's in these warmer areas, as this variety grows best in this climate. There has been a large investment in Pink Lady apples in Australia, as it is one of the few hopes for both our domestic and export industry returns.

There is such vulnerability associated with Fire Blight that the demise of this variety alone, will destroy the profitability of the Australian apple industry.

New Zealand does not have a pear industry, because Fire Blight has made this impossible. Australia does have a vibrant pear industry, and this too would disappear should Fire Blight take hold.

With Australia's large areas of untenable land, and shortage of water we are left with few opportunities to develop our horticulture industries. With our small population contributing to our GNP we as a nation cannot afford to lose any multi-million dollar industries we have. (Especially to overseas competition which will take our monetary funds off shore)

The impact on employment and secondary industries and rural communities would be devastating.

Yet if we as an industry wish to develop with new varieties, the importation of new rootstock is held in quarantine for many years, undergoing stringent testing, to prevent the spread of possible disease from other countries. It appears to be a hypocrisy under the present application.

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One other import factor largely being ignored, is the shrinking of our apple and pear export opportunities to countries which don't have Fire Blight, if this disease should take hold in Australia. Protocols to China, Japan, Korea are costly and already extremely difficult to comply with for Australian Horticulture. The costs of more treatments will ensure we are even less competitive.

Our only competitive edge as an horticultural export nation, at present is our Clean, Green, and Chemically responsible image. If we have are forced to apply more chemicals and treatments to counteract Fire Blight and other new pests and diseases, which may be imported with New Zealand Apples, we will lose this edge.

We cannot believe that our Government and their Departments are ignoring the impact that Fire Blight would have on Australia.

Regardless of trade issues, due to our sensitivity to WTO recriminations, it is most obvious that our horticultural activities will be severely affected.

Food for thought

The USA at present is having tariffs applied against their exported fruit to Europe, due to the USA applying tariffs to imported fruit, to cover the subsidies they issue to their farmers. We in Australia, have no price protection nor subsidies.

Yours Faithfully

H. Churchill

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Chairperson -Australian Horticultural Exporters Association

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