

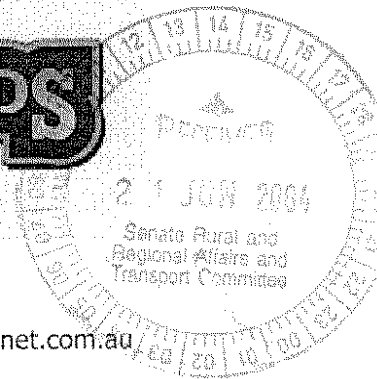


PLUMMERS BORDER VALLEY **ORCHARDS**

ACN:067 524 369

PLUMMER ROAD, LENSWOOD, SOUTH AUSTRALIA 5240

Telephone: 61 (0)8 8389 8318 **Fax:** 61 (0)8 8389 8547 **Email:** plummers@senet.com.au



To: Secretariate
Senate Rural & Regional Affairs & Transport & Communication
RM SG62
Parliament House
Canberra ACT 2000

I write this submission on behalf of Plummers Border Valley Orchards Pty Ltd, a family business established in 1900
Our business employs 31 full-time employees and 80 casuals as well as three generations of family in management

Our business, like most others in the Adelaide Hills had a very modest beginning and have required many generations of hard work to achieve what exists today
In all that time there have been many financial and personal hardships and setbacks
The impact of the establishment and spread of Fire Blight and the other pests and diseases dealt with in this Draft IRA far outweigh the setbacks endured through climate disease, fire, market and Government policy at any time in the 104 year history of our Company.

As an Australian I demand and expect that agencies charged with the responsibility of protecting the Australian environment from pest and disease incursion, do so without showing fear or favour to those wishing to export products to Australia, and exercise our right to impose measures that offer the maximum level of protection for our environment

The Draft Import Risk Analysis for the Importation of New Zealand Apples does not adequately address the major issues which are the most concern to me as an Australian apple and pear grower.

The possibilities of importation of fruit with the fire blight bacteria and several other pests is acknowledged in the revised Draft IRA Report, yet the proposed protocols to protect our industry from these pests and diseases do not offer an appropriate level of protection for our industry. There are too many opportunities for Fire Blight bacteria and other pests to avoid detection and to enter Australia
The proposed protocols allow orchardists to remove fire blight disease symptoms at any time, yet we are relying on growers and MAF agents to give the level of protection we desire.



The critical component of this draft IRA is the once yearly visual orchard inspection to be carried out during the blossom period. A visual inspection of this type is no guarantee that fire blight is not present in the orchard. The fact that apple trees stand at a height of 4-5 metres and have varying amounts of foliage depending on the time of inspection make the detection's of visible symptoms of fire blight a less than satisfactory measure of protection of our industry and environment.

The risk to our industry resulting from human error in a once a year inspection for disease symptoms of fire blight does not appear to fulfil the critical level of protection our industry requires.

Bio-security is not insisting on Block, Orchard or any other form of freedom from Fire Blight

Given that the disease fire blight is endemic in all apple growing regions in New Zealand one would think that some history of area freedom would be a basic requirement of any protocol designed to give an appropriate level of protection for Australia

The risk assessment also makes reference to various management practices used in NZ orchards to maintain the freedom of disease symptoms yet the industry has not been able to stop the spread of the disease to all growing regions in New Zealand

Australian growers and Bio-security officers attending the Ninth Annual International workshop on Fire Blight in Napier New Zealand October 18-20th 2001 observed a pear orchard 15 km from the nearest pome fruit orchard which was devastated by fire blight. Is this the type of protection that Australian apple and pear growers can expect in the future from the various management practises carried out by New Zealand Growers

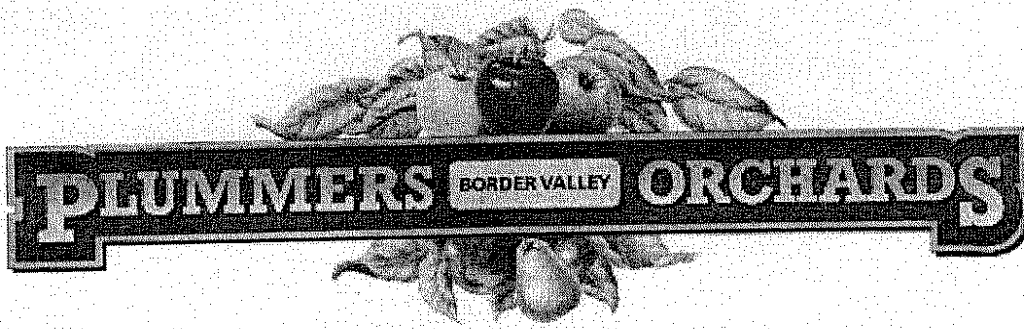
The use of Chlorine treatments has been recognised as not to be fully effective against bacteria protected in the tissue, including those occupying in infested calyxes or in symptom less infected fruit.

Again the doubt surrounding human element of maintaining chlorine at 100 PPM and ensuring immersion for at least one minute, cannot be guaranteed.

The Draft IRA does not address the issue of trash

An undertaking of MAF that all fruit will be packed free from trash is an unachievable position. Those of us who are involved in growing and packing of apples and pears know that it is impossible to guarantee fruit will be packed trash free. The standard AQIS sampling protocol of inspection of 600 units per homogenous consignment does not offer an ALOP for trash

The area of product integrity is not addressed in this draft and is of great concern to me. What are the protocols to guarantee that there is not deliberate or unintentional substitution of fruit at any stage of the production chain.



Again we will be asked to place our trust in MAF and AQIS officers and their protocols.

The protection of the Australian Agricultural industries as well as the environment from the other pests and diseases dealt with in this Draft IRA are no less important than Fire Blight and in some cases may pose a greater risk. We are being asked to accept this IRA as it is science based and meets the requirement of being the least trade restrictive and yet provide our industry with a level of protection. E Billing and AM Berrie in a presentation at the Ninth International Workshop on Fire Blight titled a Re-examination of Fire Blight Epidemiology in England stated that rare risks and rare circumstances should not be overlooked when studying the introduction and spread of Fire Blight. As the science currently available in regard to the introduction and spread of the disease is limited and inconclusive it should be noted that "Scientific Knowledge" is a body of statements of varying degrees of certainty

SOME MOST UNSURE

SOME NEARLY SURE

NONE ABSOLUTELY CERTAIN (Feyneman 2000)

Our concern is that this draft IRA is more about Bio-security Australia being seen to be imposing the least trade restrictive measures to the importation of New Zealand apples and less about protecting Australian industries and environment from pest and disease incursions, by insisting on measures that will protect our environment, industry and livelihood.

Yours Faithfully

John Plummer
Chairman Plummers Border Valley Orchards Pty Ltd