

03 9744 4980

Australian Fresh Fruit Company Pty Ltd

Level 1, Unit 9 57-59 Home St, Sunbury, Vic 3429

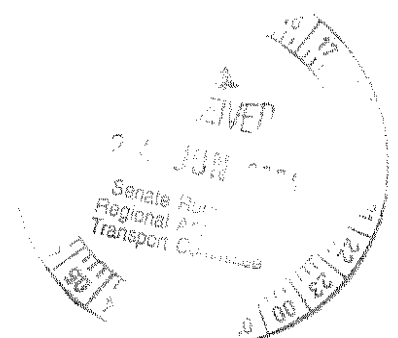
Ph 03 9744 3133 Fax 03 9744 4980

E-mail ardick@affco.com.au

Ms Maureen Weeks
Secretary
Senate Rural and Regional Affairs and Transport Committee
Room SG.62,
Parliament House, Canberra, ACT 2600

By fax 02 62775811

23 June 2004



Dear Ms Weeks

Submission to the Senate Enquiry re RDIRA New Zealand Apples

We are an organization that represents some of Australia's leading apple and pear growers. As a commercially based organization accounting for well over 50% of Australian apple production, we fully support the submission made by Apple and Pear Australia (APAL) regarding the latest RDIRA.

We have been extremely concerned about the possibility of New Zealand apples entering Australia and remain concerned that the Biosecurity Australia (BA) protocols do not provide enough confidence to Australian growers that the devastating disease, Fire Blight, will not eventuate at enormous and irreparable cost to the Australian apple and pear industries.

Whilst our involvement in the process has been limited (this has been the role of APAL with whom we have a partnership agreement) we have been concerned about the RDIRA on a number of fronts.

We therefore ask the following questions:

1. Why should growers, who have seen three NZ applications rejected in the last eight years with the full weight of scientific knowledge, believe that all solutions have now been found?
2. What confidence can growers have in the process and the protocols when they were told at a BA regional meeting that the three key protocols (involving

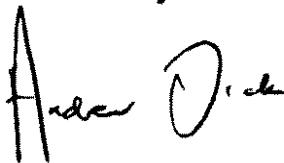
03 9744 4980

Chlorine dipping, cold storage and orchard selection) have not even been drafted?

3. Why should growers have confidence that the process has had no political interference when three IRA's involving three different products were released by BA on the same day so soon after the announcement of the US Free Trade Agreement?
4. What confidence can growers have in a statistical system that has recently been queried and altered for bananas and now has some questions raised regarding the apple import request?
5. Why has the RDIRA only considered the risk of infection over one year when presumably the expected trade would take place over a number of years?
6. Why do we understand that the team putting together the Draft IRA did not fully utilise independent reviewers which they are entitled to under handbook guidelines? (Comment - it is disappointing that BA appear to have taken little account of the expertise that was available to them through industry working groups).
7. How can BA independently and objectively assess criticism of two years of its staffs' hard work and endeavour? How can BA retain its independence in such a situation when it has adopted such a "fixed" approach in the meetings around the country? (Having been present at the last two meetings at Knoxfield it has been disappointing to find an apparently "arrogant" approach adopted by BA representatives which suggests that "we are right and you are wrong". Quite clearly BA has not always been right in the past).

We therefore have very serious reservations about the process and protocols for the latest draft apple IRA and call on the Senate Enquiry to recommend that BA withdraw and re-draft it with a more suitable process in place before any apples should be allowed into Australia.

Yours sincerely



Andrew Dick
General Manager