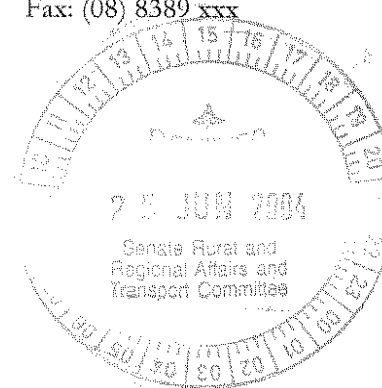




Joyson Orchards
Coldstroe Road
LENSWOOD SA 5240
Ph: (08) 8389 8506
Fax: (08) 8389 xxx

Ms Maureen Weeks, Secretary
Senate Rural and Regional Affairs and Transport Committee
Room SG.62, Parliament House
GPO Box 858
CANBERRA ACT 2600



Dear Sir/Madam

RE: REVISED DRAFT IRA – NEW ZEALAND APPLES

I wish to lodge a response to the Revised draft IRA on New Zealand Apples and its impact on the Australian apple industry should the suggested recommendations be adopted. We are apple grower with extensive orchards in both South Australia and Victoria.

We firmly believe that apple imports should NOT be permitted from New Zealand, it is our considered opinion that the industry risks associated with the importation of such apples are still too great despite the suggested protocols.

The primary risks to the industry following the introduction of New Zealand apples include:


- The issue of trash has not been considered in sufficient depth in the RDIRA and trash is a significant vector for pests and disease
- The issue of handling errors and illegal acts have not been taken into account despite the fact that WTO has specifically ruled that both be taken into account.
- The risk assessment undertaken by RDIRA is for a one year period and as stated in the IRA report the risks will increase over time.
- The data showing the extent to which exported New Zealand apples are found to be contaminated with insects has not been taken into account in the RDIRA. The incidence of US inspectors finding apple leaf curling midge (ALCM) is as high as 60% and yet the RDIRA rates the risk for the insect entering and becoming established in Australia as low.

Australian apple growers only real international competitive advantages is the fact that they are largely free of pests and disease. The potential import of apples from New Zealand places Australia's "clean green" reputation at significant risk.

If as a result fire blight were found in Australian orchards the only effective commercial treatment is via spray of an antibiotic which will negatively impact on consumers perception and purchasing habits.

There remains significant doubt as to the completeness and accuracy of the Revised draft IRA on New Zealand Apples. This issue will impact on the Australian industry at all levels and to make a final decision based on current available information is not in the best interests of anyone associated with the apple industry in Australia.

Kind Regards


William Joyce
Joyson Orchards