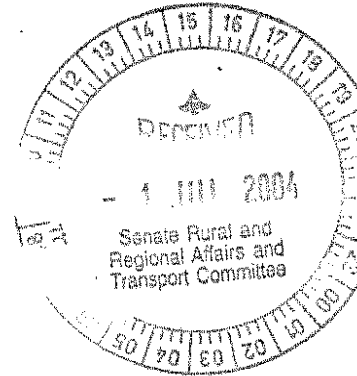


Filsell's apples

T/As K.R. FILSELL & SONS ABN 370 5736 0735

Deviation Road Forest Range
PO Box 26 Forest Range SA 5139

Packing Shed: Ph 8389 8249 Fax 8389 8150
Market: Store 9, Hillview Fresh Ph/Fax 8349 9993



28th June 2004

Technical and Administrative Services
Plant Biosecurity – attn Fireblight in apples BA
Department of Agriculture, Fisheries & Forestry
GPO Box 858
CANBERRA ACT 2601

c.c.

The Secretariat
Senate R&RA&TC
Room SG.62
Parliament House
Canberra ACT 2600

Dear Sir/Madam,

Response to the revised draft IRA on New Zealand apples.

I grow 48 ha of apples in partnership with my parents and two brothers at Forest Range (Lenswood) in the Adelaide Hills of South Australia.

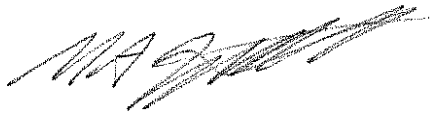
The importation of apples from New Zealand should not be allowed because the risks, particularly fire blight are too high despite the protocols. Our climate is highly conducive to fire blight; wet springs, humid weather at flowering plus the probability of hail all pointers to rapid spread and disaster. eg A fire blight outbreak in Michigan state (USA) in the late 1990's lost approx. 2,000 acres of apples in one such event. How would it get in? Apples grow on trees. It's difficult to separate the wood from the trees, or the apples 100%. ie The issue of trash has not been considered sufficiently in the RDIRA and trash is a significant vector for pests and diseases.

The Western Flower Thrip/Fire Ants were introduced to Australia through handling errors/illegal acts and now cost Australia tens of millions of dollars. What would the ongoing cost of fire blight etc be? And some costs can not be quantified. Many of the newer apple varieties and rootstocks are highly susceptible to fire blight. Pink Lady is the most susceptible. Lovers of this popular apple may find it disappears. Our plantings would be wiped out. It should be of note that New Zealand has a smaller pear industry than Australia with one main variety, no choice. Over the past eight years we have spent a large amount of time and money expanding, and replacing old orchard with new varieties eg Pink Lady, Sundowner, Fuji and newer cultivars of Royal Gala. I believe the issues of handling errors and illegal acts have not been taken into account despite the WTO ruling to that effect.

I object to International Standard Phytosanitary Measure 10 being misinterpreted as fire blight being a suitable disease for symptom freedom = disease freedom when this is patently not so. The concern over this devastating disease is impacting on our business decisions. I employ with my family about twenty fulltime equivalent employees. We have put on hold a long anticipated project to double our cold storage.

The points made above are sufficient to preclude apples being imported from New Zealand, or anywhere where that has fire blight. Thank you for your consideration.

Mark Filsell



Ian Filsell



Bill Filsell R.Dip.App.Sc.Ag.



Orchardists
Partners KR Filsell & Sons