

Rural and Regional Affairs and Transport Legislation Committee

SUBMISSION COVER SHEET

Inquiry Title: Import Risk Analysis for Apples

Submission No: 9

Date Received: 28 April 2004

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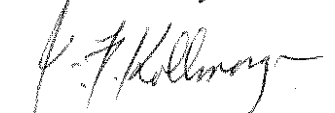
Monday, 26 April 2004

The Secretariat
Senate Rural and Regional Affairs and Transport Committee
Parliament House
CANBERRA ACT 2600

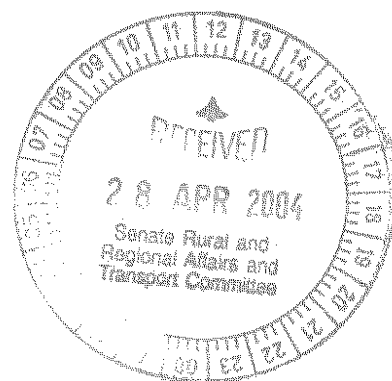
Dear Secretariat

Please find enclosed a submission for your consideration regarding the Importation of New Zealand Apples into Australia.

Yours sincerely



Professor James Kollmorgen



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COMMENTS ON PROPOSAL TO PERMIT THE IMPORTATION OF NEW ZEALAND APPLES INTO AUSTRALIA AS DETAILED IN THE REVISED DRAFT IRA REPORT, "APPLES INTO AUSTRALIA"

Potential risk of introducing fireblight into Australia

1. The key issue is the transfer to Australia of *Erwinia amylovora* (causal bacterium of fireblight) on the fruit surfaces, as well as the bases of stem and calyx.
2. The document gives detailed information on losses that would occur if fireblight became established in Australia and those losses are extensive. It is important to know what the "triple bottom line" benefits to Australia would be if NZ apples were a permitted import into Australia. In other words do the benefits outweigh the risks ?
3. Australian agriculture has experienced devastating losses through the introduction of diseases. For example, stripe rust caused by *Puccinia striiformis*. It would only require one fruit or part thereof, contaminated with *E. amylovora* to initiate fireblight epidemics in the wider Goulburn Valley.
4. The proposal is a desktop analysis of available research information. A significant problem however, is that it only provides a prediction of the potential risk to Australia. The report is therefore punctuated with words reflecting uncertainty viz: "if, most, would, unlikely and rarely". From a theoretical standpoint it may be appropriate to conclude that there is little likelihood of introducing the disease but there is certainly no guarantee. Quarantine should be about absolute exclusion, not a strong likelihood of exclusion.
5. The Proposal (Page 475) states "there were no individual measures identified that would by themselves reduce the risk associated with fire blight to within Australia's ALOP". It would therefore appear that there can be no absolute guarantee that the systems approach using a combination of controls would eliminate risk of entry of the bacterium into Australia. This is especially true of those components vulnerable to "human fallibility."
6. The document is both speculative and theoretical. The issue at hand requires a research initiative that will provide quantitative scientific information to advise decision re importation of apples. My recommendation therefore, is that fruit akin to that proposed for import as well as that known to harbour the disease be subjected to the recommended "elimination measures" and then evaluated for the efficacy of those measures. This work would require large samples and could be undertaken in either Australia or NZ. Such research over several seasons would provide the information necessary to make an informed and credible decision.

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