

20 February 2009

The Secretary  
Senate Standing Committee on Rural and Regional Affairs and Transport  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Dear Secretary,

**Re: IRA for the importation of Cavendish bananas from the Philippines**

I am writing to provide support for the Australian Banana Growers' Council Inc (ABGC) submission to the Committee's inquiry into the import risk analysis (IRA) for the importation of Cavendish bananas from the Philippines.

Growcom is the peak representative body for the Queensland horticulture industry and subsequently represents around 90% of growers in the Australian banana industry. We support the ABGC submission on behalf of these growers, as ABGC have been involved in the IRA process for almost 10 years and therefore has extensive knowledge and experience to allow them to provide a worthwhile contribution to the inquiry.

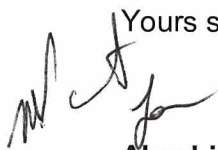
Growcom is supportive of the concerns raised by ABGC regarding Biosecurity Australia's failure to specify the risk management measures that would apply to the importation of bananas from the Philippines. This has led to the determination of these risk management measures occurring outside of the IRA process. As the IRA handbook states that an IRA must specify what measures should be taken to reduce the risks from pests and diseases associated with the import proposal to an acceptable level, Growcom supports the ABCG recommendation that the Committee inquire into why the IRA was released without this required information. This is fundamental to the risk issues associated with imports.

We are also concerned about the ability of Philippine banana growers to comply with the risk management regime that is put in place. There are strong economic incentives for non-compliance by Philippine banana growers due to the initial and ongoing financial and operational burdens of complying compared with the economic benefit of accessing the Australian market. This leads to the serious concern of whether the monitoring and enforcement strategies put in place will be effective in ensuring compliance with the risk management regime.

Unless 100 per cent of critical failures in the application of risk management measures are detected in time for immediate action, Australia's ALOP will not be achieved, placing Queensland's \$430 million banana industry at risk of a serious biosecurity incursion. As a result, we are supportive of the Committee further investigating the capability of the Australian Government and the Australian Quarantine Inspection Service to monitor and enforce compliance with the risk management measures and operational arrangements.

Growcom welcomes the opportunity to provide feedback into the inquiry and anticipates that the feedback provided by Growcom and the ABCG will be taken into consideration during the Committee's deliberations.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Alex Livingstone', written in a cursive style.

**Alex Livingstone**  
Chief Executive Officer