Submission to Senate Inquiry into the Import Risk Analysis for the Importation of Cavendish Bananas from the Philippines

13 February 2009

Joint Submission by Mackay Estates and Scientific Advisory Services Pty Ltd, Tully

Introduction to Stakeholders

For the information of the senators **Mackay Estates** is a large family-owned business involved with the production of bananas over an area of 2000 ha and is comprised of 4 separate farms in the Tully River valley. A total of 2 million, 13kg cartons of bananas are produced each year. The business has been in existence since 1945 when the founder Mr Stanley Mackay OAM first started growing bananas in the Mission Beach area. Mackay Estates provides employment for over 350 people.

Scientific Advisory Services is a small company set up some 16 years ago jointly by the Mackay family and Mr Richard Piper, an entomologist who had previously been working with bananas pests and diseases in the Queensland Department of Primary Industries for 4 years. Mr Piper has been engaged as a consultant entomologist with the Australian Banana Growers Council, undertaking work relevant to the Philippines banana IRA and has visited the Philippines and observed banana growing, packing and export operations. Mr Piper represented the ABGC at the previous Senate enquiry in Brisbane in 2004 and has a strong interest in plant quarantine.

Why Have We Made a Submission to the Senate?

Both Mackay Estates and Scientific Advisory Services have been stakeholders in Biosecurity Australia's import risk analysis of Philippines bananas since 2002 and have submitted responses to all the Draft IRA's. We have attached a copy of each of these submissions for your information. You will see that we have embraced the opportunity for the public to be part of Australia's quarantine system and have tried to have a positive input into the process, pointing out along the way the various matters which we considered deserved further attention in earlier drafts.

We welcome the Senate Inquiry as we have grave concerns that there are a number of areas in the Final Draft IRA, where the standard of scientific scrutiny may be inadequate for various reasons. This seriously jeopardises our relatively "clean" industry in Australia as we are free of many of the serious diseases and other pests found in the Philippines.

Furthermore we consider that Biosecurity Australia has not sufficiently and rigorously assessed the risk to Australia's unique environment posed through banana imports. We work closely with government and university researchers investigating pest and diseases, amphibians, rodents, plants, fish and soil biology on our farms. In addition we work with chemical companies undertaking new product trials.

We are regular attendees at Banana Congresses at a national and international level and would consider that we conduct our farming operations using world's best practices. We take biosecurity issues very seriously on our farms and practice inter-farm, inter-paddock and even inter-plant quarantine measures.

A. Biosecurity Australia's Administration of the IRA Process

We have lacked confidence with the administration of the IRA process due to a perceived lack of accountability in relation to the keeping of written records of meetings in the past. Because many of the discussions held early in the process by the IRA Team were not recorded/reported in any detail this made our understanding of risk assessment judgements sometimes difficult.

The complete turnaround from the first draft IRA which considered the risks posed by pests and diseases too great to allow importation of fresh bananas, to the subsequent drafts which have suggested measures could be used to meet Australia's ALOP's for each pest and disease gave us cause for concern. The subsequent findings of the Senate enquiry and changes in senior staff caused further loss of our confidence in the IRA process.

We welcomed the review of the IRA process and the time constraints that have been placed upon conduct of IRA's. For the past 7 years the banana industries both here and presumably, in the Philippines have been in a 'state of limbo'.

We asked for a possible extension to the appeal period following the release of the final draft IRA but this was not granted. We found it difficult to read and digest the 600 page document to determine what changes had been made from the previous draft, as we understand other stakeholders have also found, in this short space of time.

It seems that BA has had forever to get this IRA right, yet an extension for stakeholders has been rejected now that they find themselves under pressure to have this IRA finalised. It must be acknowledged that throughout the banana IRA, it has been the inputs of stakeholders that have helped to remove errors and ensure that good science is being practiced. Another 30 days would surely not have been a major imposition on a system that has taken more than 7 years to get to this critical stage.

B. The Scientific and Technical Information Relied upon by the IRA Team

As stakeholders we have never been consulted at any stage directly by Biosecurity Australia in relation to any of the concerns raised in our submissions. This is a little surprising, as we would have expected at least some two-way communication to be undertaken in the scientific scrutiny of such an important document. Surely there must have been some points raised in our submissions that might have prompted a discussion between us and BA.

A number of reports commissioned by experts in their field for the Australian Banana Growers Council were provided to BA in 2002. For example, Dr Ken Aplin from the CSIRO provided a report on "Accidental Importation of Amphibians with Banana Fruit from the Philippines- Assessment of Likelihood and Potential Impact on the Australian Environment" and Professor Rick Speare, from James Cook University provided a report on disease issues Risk Assessment of diseases imported with Amphibians from the Philippines. We wonder whether BA ever picked up a phone to ask these international experts for any further clarification or questions arising from their reports.

Our greatest concern with the banana IRA lies with the apparent lack of attention paid by BA to environmental issues that might be associated directly or indirectly with imported bananas from the Philippines. This issue was also referred to by the ESG – " The ESG considers, however, that the technical responses regarding potential impacts on the environment, while sufficient, could have been more comprehensive."

We are alarmed that the wording of their statement suggests that there may well be matters that have received insufficient attention. The unique Australian environment is possibly being placed at risk because the assessment of potential impacts on the environment "could have been more comprehensive".

For some peculiar reason the issue of hitchhiker organisms has been 'brushed off' (Section 8.3) in the final IRA as being an AQIS responsibility yet in the earlier drafts had received some attention. As a stakeholder in the world Pineapple IRA and the Thailand mangosteen IRA, it is apparent that greater attention was given to non-pest/hitchhiker organisms such as ants, snails and weeds in those IRA's than in the banana IRA.

Though we pointed out to BA that the rat species, *Rattus exulans* is not found in mainland Australia and is a recorded pest of bananas this information has not been referred to in the IRA. Rats could remain alive under the conditions of cool storage on a ship with an adequate supply of bananas for food.

It is well known that frogs and other small vertebrates such as bats, lizards, snakes and snails can travel with banana consignments and these hitchhikers need to have more attention paid to them we believe. The term 'banana box

frogs' has been used to refer to those frogs frequently found in banana boxes. BA cannot just say that AQIS will deal with these organisms at point of entry if found, as BA is responsible for assessing the risk of pests carried on the imported product. At the IRA stage there is an opportunity for stakeholder discussion on these matters, whereas once the IRA is finalised, AQIS becomes responsible for developing the working procedures and the unique nature of the hitchhikers and the imported cargo is not necessarily given the attention we consider it deserves.

As stated in the "Import Risk Analysis Handbook 2007 "The objective of Australia's biosecurity policies and risk management measures is the prevention or control of the entry, establishment or spread of pests and diseases that could cause significant harm to people, animals, plants and other aspects of the environment. In conducting a risk analysis, Biosecurity Australia:

- identifies the pests and diseases of quarantine concern that may be carried by the good
- assesses the likelihood that an identified pest or disease or pest would enter, establish or spread, and
- assesses the probable extent of the harm that would result."

The exotic frogs, lizards, ants, spiders, other organisms, and the exotic diseases they may carry are extremely important as they pose a threat to our native environment. The possible volumes of imported bananas mean that the likelihood of such organisms entering is far greater than for many horticultural imports. Furthermore the storage temperatures for bananas means that many organisms will survive the journey. These points have not been touched upon in the IRA's to date.

In our opinion a much more thorough assessment of the risk posed by hitchhiker organisms on bananas should be undertaken by BA because of the well known role of this commodity in carriage of hitchhiker organisms in the past and the present. Such an assessment should be performed because this IRA concerns the possible importation of far larger volumes and on a year round basis of a horticultural commodity compared with any others, with which AQIS has previously been involved.

In the report of the Quarantine and Biosecurity Review Panel, entitled "One Biosecurity: a working partnership" (2008) the panel stated "In the past, the environment—terrestrial and aquatic—has received less priority than agriculture". The Panel has concluded that a more significant effort is needed in these two areas in the future, reflecting the nature of the incursion risks involved. We believe the Panel's comments are very relevant to BA's treatment of environmental risks associated with imported bananas.

C. The Feasibility of the Risk Management Measures and Operational Arrangements Proposed in the final IRA

Having visited the Philippines and inspected the banana growing operations and shipping facilities we are aware of the nature of the farming areas, disease and pest issues and social issues. Areas of low pest prevalence may be difficult to achieve and maintain yet there will be great pressure placed upon inspection staff to ensure sufficient areas are available to provide export fruit.

A great problem in the Philippines commercial banana production areas is the extent of relatively untended bananas growing either wild or as backyard bananas for home consumption. These bananas provide pests and disease inoculum for the commercial bananas and can make management difficult. Risk management measures such as low pest prevalence will be difficult to achieve where the export plantations have untended bananas adjacent to the export bananas.

Accredited persons who undertake the plantation inspections for black Sigatoka, Moko and freckle can be “BPI staff, agency staff, plant pathologists or other accredited persons”. Accredited persons can presumably be plant pathologists or others working for an export plantation as this is not clarified in the Final Draft IRA. Many of the measures will depend on honest reporting and monitoring, yet one has to wonder why an employee would report on pest and disease levels that would see the business he or she works for closed for export.

Corruption is a way of life for some in the Philippines and the quarantine ethos found in Australia is not as evident in the Philippines. We must be vigilant to ensure that our countries quarantine services overlies the Philippines system, so that the system is made secure.

D. The Capability of the Australian Government and, in particular the Quarantine and Inspection Service to monitor and enforce compliance with the risk management measures and operational arrangements proposed in the Final IRA report.

We cannot speak of the capability of the AQIS personnel, however consider that they will be faced with a formidable task to undertake the necessary audits while inspecting fruit exports and must be adequately resourced to undertake these functions.

"The necessity of effective auditing and monitoring to ensure compliance with the standards set by the IRA was raised in a significant number of submissions. Specifically, the ESG advises that BA should consider providing greater detail in how it would anticipate the protocols being developed for the implementation of the IRA recommendations in response to stakeholder comments concerned with the issue of confidence in the process to be used by AQIS to ensure compliance by the Philippine Government and their banana growers with import requirements."

This above comment by the Eminent Scientists Group in their report curtly refers to the lack of confidence in the Philippines system by some stakeholders and need for an effective AQIS capability for monitoring and compliance enforcement.

We again here draw the Senator's attention to the matter of contaminant organisms, such as amphibians, molluscs and rats which have been given only cursory attention by BA in the IRA. AQIS should undergo a detailed assessment of the risks posed by these organisms as they pose an enormous threat to our environment both native and manmade. The potential volumes of imported bananas and the fact they are likely to be year-round would make this the largest item of fresh horticultural produce to ever enter Australia, and this surely is deserving of a special investigation by AQIS.

The list of organisms found in the Philippines which are likely to pose a threat in imported banana consignments should be drawn up, countries importing bananas from the Philippines should be asked to provide lists of interceptions of such organisms and the Philippines Government should also be asked to supply such a list. Species of organisms that have invaded the Philippines (such as some frogs and snails) should be considered closely as they have already shown their ability to gain entry, establish and spread in a foreign country.

A Final Thought

While not necessarily related to BA's handling of the IRA it is interesting to read a comment made by Dr John Manners from the CSIRO (Program Leader, Crop Physiology and Genetic Improvement CSIRO Plant Industry; Deputy Chief Executive Officer, CRC for Tropical Plant Protection) in a speech delivered to the National Academy of Science Conference on "Emerging Diseases- Ready and Waiting" in Canberra in 2004.

"One of the difficulties with plants is that I can't put the fear of God into you with various human diseases, and I also can't get great votes of sympathy with piles of burning cattle. The most I can do, probably, is to get some sympathy around some burning trees or some wheat chaff or something like that. The issue of plant diseases is an issue for primary production, for natural ecosystems. It is not a metro-issue and it is probably an issue that illustrates the division between city people and country people. A plant disease that cuts production in half, say in the banana industry or in the sugarcane industry, has major economic impacts on regional towns in Queensland; we might get a ripple here in Brisbane. So it is a different type of impact.

I will just deal with one issue here, such as banana diseases. Some of you may have read in the press that there has been a lot of debate about whether we should allow importation of bananas from the Philippines. I should indicate that the Australian banana industry is probably one of the cleanest in terms of pesticide use in the world. In Australia we spray probably 12 to 14 times a year to control this disease, yellow sigatoka. The rest of the world, particularly Central America, has this disease, black sigatoka, and there is weekly spraying, say 40 to 44 times a year, during the production growth period. Because of politics we may want to import bananas from the Philippines, but of course the banana industry is very concerned about the impact that may have on its disease status and its green image."