

**Primary Industries & Resources SA
Response to**

**REVISED DRAFT
IMPORT RISK ANALYSIS REPORT
FOR
APPLES FROM NEW ZEALAND**

March 2006



Government of South Australia
Primary Industries and Resources SA

BACKGROUND

On 1 December 2005, Biosecurity Australia released the Revised Draft Import Risk Analysis Report (IRA) for the importation of apples from New Zealand. This comprehensive three part document was been released seeking public comment by 30 March 2006.

PIRSA staff formed a small technical reference group to evaluate these documents. This team comprised:

Mr Barry Philp	Manager Industry Development – Horticulture PIRSA
Mr David Cartwright	Manager Plant Health Policy - PIRSA
Dr Trevor Wicks	Senior Research Scientist – Horticulture Pathology - SARDI
Mr Greg Baker	Crops Entomology - SARDI

This technical reference group examined the range of technical information contained in Parts A, B and C of the Draft Import Risk Analysis. The group also discussed issues of concern to the SA apple industry with General Manager of Apple & Pear Growers of SA, Mr Trevor Ranford.

Overall the team found that this version of the Draft Import Risk Assessment documentation was easier to follow and understand than the 2004 version. It also identified that many of the issues previously raised with the 2004 IRA have been addressed in this latest version.

This report provides comment on a range of technical issues identified as points of concern in the December 2005 Revised Draft IRA.

RISK ASSESSMENT

Comments in this report relate to the following 8 pests and 2 diseases (identified in the draft IRA) as being a risk to Australia:

- Apple leafcurling midge
- Garden featherfoot
- Grey brown cutworm
- Leafrollers (5 species)
- Fire blight
- European canker

These comments do not take account of the 6 pests and pathogens of further concern to Western Australia.

RISK MANAGEMENT STRATEGIES

The majority of comments in this report relate to risk management issues, particularly those to be adopted in orchards and packing sheds in NZ.

This Revised Draft IRA provides a better indication of the information that will be incorporated in the subsequent detailed operating manual / Work Plan. However it is

vitaly important that procedures presented throughout this IRA are fully reflected in the Work Plan/Program when it is prepared.

Orchard Inspections

The IRA proposed process to identify orchards or blocks symptom free of fire blight. This involves inspection of orchards 4 – 7 weeks after flowering.

Overseas experience indicates that severe weather events such as hailstorms create conditions conducive to significant fire blight outbreaks. Based on this well known risk, consideration should be given to requiring a further orchard inspection for fire blight symptoms within a prescribed time after a severe weather event such as hail. Such an event may result in damage to either the skin of the developing fruit and/or the fruiting spurs or the peduncles of the fruits and permit endophytic infection of subsequent mature fruit.

It could be prudent to allow for some form of follow up inspection if this is deemed necessary. Several computer models have been developed in the USA, UK, etc that enable data from orchard weather stations to be used for predicting development of fire blight. These could be installed in export orchards to more accurately prescribe timing of follow up inspections.

Disinfection Chlorine Dip Monitoring

This Revised Draft IRA contains much better detail about the process for monitoring and maintaining chlorine dip levels above 100 ppm (P 295 Part B). It is important that the requirements specified in this section are translated into the Work Plan.

Management of Leafrollers

Provision is made for inspection of 600 units of fruit for the detection of leafrollers and quarantine pests including contaminant pests (Part B, P 299).

The randomly-selected fruit are to be removed from the box and externally examined. However, leafroller biology information provided in Part C (P144) indicates that leafroller larvae bore at a low frequency into the calyx end of apples and feed internally. Detection of such infestation would require the fruit to be destructively sampled by cutting them open at the calyx end. Will the internal examination by cutting open of fruit be included in the Work Plan, and if so, what percentage of the 600 fruit units will be cut open for detection of internal leafroller larvae?

Freedom from Trash

Provisions are made for inspection of 3000 units of fruit (Apple leaf curling midge Part B, P 297) for quarantinable diseases, arthropods, trash and weed seeds.

Appropriate steps for handling quarantinable diseases and insects are specified. However, there is no protocol or handling procedures specified for trash. P 296 specifies that apples for export must be free from trash. Does this mean that consignments of fruit containing the occasional leaf will be rejected for export or be required to be repacked – this issue is not clear?

Management of Storage Conditions

Part B, P 294 specifies "Packing sheds must provide details of layout of the premises including storage areas and procedures for product segregation. It also specifies the requirements for appropriate records and tracking systems. This does not prescribe distances or barriers to be used for segregation? Will this detail be included in the Work Plan?"

Alternate Entry Pathways

The principal entry pathway for introduction of *E amylovora* was considered to be via fruit that moves through the normal retail chain and is consumed. Consideration was also given to fruit and trash being dumped as waste from repacking or prepacking operations or as waste from wholesale operations. The majority of packing operations with equipment to handle repacking of apples are in close proximity to orchard areas.

While the studies identified low risks associated with potential contamination of orchards with infected imported waste, repacking at orchard based pack-houses is one of the most logical paths for disease entry, especially where waste is fed to livestock. It would be preferable to minimise this risk by requiring repacking of imported apples to be undertaken in urban areas.

The entry pathway risk analysis process took no account of the economic impacts of an outbreak of *E amylovora*. An outbreak in an orchard area is going to be far more expensive in terms of financial impact on industry and for Government agencies to control. Further consideration should be given to minimising risks associated with this entry mode.

Integrity of Fruit Identification

The whole process of accrediting orchards, packing line and other treatments is of no value if the identification of fruit destined for export cannot be assured. The Work Program needs to ensure there is a reliable process of fruit identification along the whole picking, packing and shipping chain that provides minimal opportunity for tampering.

CONCLUSIONS

The process of converting the recommendations of the Revised Draft Import Risk Analysis Report for Apples from New Zealand into meaningful protocols that support the assumptions made in this document is critical. Key industry and specialist scientific staff need to be involved in the development of any future detailed Work Plan should a decision be made to allow future imports of mature symptomless apples from New Zealand.

Hon Rory McEwen MP
MINISTER FOR AGRICULTURE FOOD AND FISHERIES
MINISTER FOR FORESTS