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Biosecurity Plant  
Department of Agriculture  
GPO Box 858  
CANBERRA ACT 2601  
Australia

ABN: 25 107 507 559  
ACN: 107 507 559  
PO Box 138  
Camberwell VIC 3124  
Level 2, 273 Camberwell Road  
Camberwell VIC 3124  
T (03) 9882 0277  
F (03) 9882 6722  
E [info@ausveg.com.au](mailto:info@ausveg.com.au)  
[www.ausveg.com.au](http://www.ausveg.com.au)

**Submission to the Australian Government Department of Agriculture regarding the  
Draft Import Risk Analysis Report for Fresh Salacca (Snake Fruit) from Indonesia**

**About AUSVEG**

AUSVEG is the National Peak Industry Body representing the interests of Australian vegetable and potato growers. We represent growers around Australia and assist them by ensuring the National Vegetable Levy and the National Potato Levy are invested in research and development (R&D) that best meets the needs of the industry.

AUSVEG also makes representations on behalf of vegetable and potato growers to ensure their interests and concerns are effectively communicated to all levels of government, in the public sphere, and throughout relevant areas of the private sector.

AUSVEG executes its brief by delivering national projects in the areas of communication and the environment, as well as by providing leadership for our sector on a range of key issues.

**Queries**

For more information regarding this submission please contact AUSVEG Manager of Industry Development and Communications, Mr Andrew White, on (03) 9882 0277 or at [andrew.white@ausveg.com.au](mailto:andrew.white@ausveg.com.au).

Yours sincerely

A handwritten signature in black ink, appearing to read "Richard J Mulcahy". The signature is fluid and cursive, with a large initial 'R'.

Richard J Mulcahy  
Chief Executive Officer

## Introduction

The Commonwealth Department of Agriculture (DA)'s Draft Import Risk Analysis Report for Fresh Salacca (Snake Fruit) from Indonesia encompasses a number of potential biosecurity threats relevant to the Australian vegetable industry. In order to ensure adequate risk management procedures are implemented for these threats, AUSVEG has provided the following submission.

## General Comment

Salacca is a genus of about 20 species, many of which produce edible fruit. It is unclear whether all species of Salacca are covered by this report or only *S. zalacca*. Based on the information in this draft and a limited search of other material not cited in the Department of Agriculture (DA) report, the known pests and diseases affecting this fruit appear to have all been identified.

From a vegetable industry perspective, it is difficult to ascertain to what extent, if any, the pests and diseases identified in this report pose a threat. This is because, for most of the organisms listed, there is either very little known about them or no records exist. It is this latter fact which causes the greatest concern.

Despite conceding that very little is known about many of these organisms or even their taxonomy, DA suggests that they pose no threat and their likely risk does not exceed Australia's Level of Protection. This is, to say the least, astounding and highlights the evidence of absence issue which is consistently noted in DA Import Risk Analyses. This can be succinctly put as 'no evidence no problem'. It is interesting to note that such an approach is not used in human health, food safety or OHS, but is consistently applied to risk management by DA.

It is even more concerning when one considers that some of the fungal genera referenced in Appendix A have many different isolates, yet no attempt has been made to cross check with Australian isolates. Thus, problematic genera (from a disease management perspective) such as *Fusarium*, *Cercospora*, and others where the identity is not certain, require more than the cursory dismissal provided in Appendix A.

It is also noted that Salacca fruit are very prone to spoilage (AgroForestry Tree Database, 2014) and that the slightest wound can induce decay. Thus, if the fruit are brushed and feeding mealy bugs are removed from the fruit by this process (p. 35), then the resultant wound is likely to become infected. It is assumed that the packing grading lines are not sterile and therefore will contain residue from all fruit that have gone before.

Given the poor state of knowledge (acknowledged in Appendix A) regarding the potential post-harvest diseases of the fruit, one questions how the potential fungal pathogens of fruit pose no biosecurity risk. A transit time for airfreight of up to one week is more than enough for diseases to appear, whilst if fruit is surface shipped in containers then there is considerable potential for decay to arise.

No consideration appears to have been given in this report of seed borne diseases. It is not uncommon for people to plant seeds of exotic fruits for the home garden, thus what is the likelihood of disease entering Australia via this route?

Mealybugs (*Dysmicoccus sp.*, *Planococcus sp.*, *Pseudococcus sp.*) are awarded a moderate probability of entry, a moderate probability of distribution, a high probability of establishment and a high probability of spread. However, the unrestricted risk of Mealybugs is calculated as Very Low, which achieves Australia's ALOP. This result is concerning and indicates risk management geared toward import approval.

The grading setup as shown on page 29 (Fig 15) appears to be completely inadequate for fruit inspection given the volume flowing over the line. One would not expect that even standard manual grading of 90% detection would occur on a line such as this. Illumination also appears to be inadequate. How long does the fruit stay on the roller/brushes? The following term "extended period of time" as used by DA in the IRA is not particularly informative and is completely subjective.

It is difficult to take seriously in a purported scientific appraisal the use of the words/phrases such as "an extended period of time" and "would likely remove". These words/phrases need further elaboration and quantification.

One would also expect minute cracks to form on fruit dropping from the line into the bottom of handling crates, and this would once again provide an entry point for disease. It is also noted that the holes in the crates (Fig. 17) do not appear to be insect proof. This is not what is considered sealing. Again it is noted that there is no physical barrier between fruit destined for export and other destinations apart from a gap which is unspecified.

## **Conclusion**

DA considers (p. 47) that Indonesia's existing commercial production practices (pre-harvest, harvest and post-harvest practices) for the production of fresh salacca for export, and a system of operational procedures, will provide an appropriate level of protection against quarantine pests associated with the trade. It is our opinion that the material provided in this IRA does not support this contention.

## **References**

AgroForestry Tree Database, World AgroForestry Website. Accessed 14/03/2014 from <http://www.worldagroforestry.org/sea/Products/AFDbases/af/asp/SpeciesInfo.asp?SpID=18094>