From: Sent: To:

Subject:

jwplummer@chariot.net.au Sunday, 3 July 2011 12:07 PM BA - Plant Biosecurity Contact Apple Imports from New Zealand

Office of the Chief Executive,

I am writing to express my concerns regarding the draft report for the importation of New Zealand apples into Australia.

I am involved with a family business which has been growing apples for over 100 years. During this time Plummers Orchards have sold apples to the Australian markets including 40 years as a supplier to Woolworths and have exported apples to a number of countries including England and Europe.

I believe we have some understanding of the requirements necessary to satisfy the requirements of these importing countries. What I do not understand is the complete surrender of Australian Biosecurity in regard to the importation of New Zealand apples.

Biosecurity Australia invested a great deal of resources over a long period of time to safe guard our industry from pest and disease incursion from imported fruit. I understand that with the outcomes from the World Trade Organisation ruling against Australian protocols for the importation of New Zealand apples Biosecurity Australia was compelled to revisit the protocols for the entry of New Zealand apples into Australia.

The World Trade Organisation ruling did not force Biosecurity Australia to completely abandon its duty of protecting Australias Biosecurity.

Australia has a right to uphold its Biosecurity integrity and to impose measures less trade restrictive to New Zealand and other countries who would also wish to send apples to Australia than those ruled against by the World Trade Organisation but still offering Australian apple and pear growers some confidence in the Biosecurity process.

The draft reports recommendation that fruit produced using New Zealand standard commercial practices is sufficient to allow exports to Australia is completely unacceptable to the Australian apple and pear growers.

This situation is a surrender of our Biosecurity to another nation.

Having been involved with a number of Quality Assurance and Integrated Production systems I know the limitations and loopholes that will be used to comply with the New Zealand standard practices that are proposed to protect our industry.

Few countries free of Fire Blight, European Canker and apple leaf curling midge would accept importation of apples from anywhere with such lax protocols and I believe Australian apple and pear growers, primary producers and the Australian public expect and demand stronger protective measures.

I and my industry colleagues believe that the following changes should be implemented before the draft recommendations for New Zealand importers are accepted.

That where a pre-harvest outbreak of fire blight is detected, fruit from that block or orchard should be excluded from export to Australia.

When a heavy infestation of apple leaf curling midge or leaf rollers occurs in an orchard, that either the fruit be excluded or fumigated.

That from each consignment, 600 cartons be inspected to ensure that no trash is entering the country via the cartons. Trash is leaves and small twigs that are universally recognised as carriers of fire blight. Should cartons contain trash, those suppliers should be excluded from exporting to Australia until a review of procedures is completed.

That high risk areas for European Canker such as Auckland and Otago be excluded from exporting to Australia.

That should there be a regional outbreak of fire blight, trade be suspended until a review of procedures is completed and alternative protocols are established.

We believe these practices are consistent with practices applied by other countries to implement their sanitary-phytosanitary agreements and there is no reason why Australia should not adopt the same standards.

By trusting New Zealanders without verifying their practices through an open and transparent audit system, we are putting our industry in the hands of growers in another country who stand to gain commercially from exporting to Australia.

I therefore plead that the above measures be implemented to protect our industry, our families and our communities from the worst known pest and disease in horticulture.

Yours Sincerely,

John Plummer, On behalf of the Plummer Family.