

From: Imelda & Michael Nicol [mknicol@clearmail.com.au]
Sent: Monday, 4 July 2011 12:01 AM
To: BA - Plant Biosecurity Contact
Subject: Submission: Draft Report New Zealand Apple Imports

To The Office of the Chief Executive
Biosecurity Australia

Dear Sir,

As an Australian Apple and Pear Grower, based in the Adelaide Hills in South Australia, it gives me great concern that apples that could carry Fireblight, will be imported in to Australia from New Zealand with the only orchard requirements being, a standard integrated fruit production program, or commercial production methods, as seen fit by New Zealand producers. There are no legally enforceable requirements of any components of these programs. Integrated fruit production and accepted standard production methods can be interpreted in many and varied loose fashions, giving no clear or precise guidelines. With several exporters and many different production districts, the opportunity for abuse and or misinterpretation is high. To reduce this risk I suggest the following:

A mandatory IFP program be introduced for Export Fruit

Registration of all Orchards by Block for Export Fruit verified by AQIS

Mandatory inspection and verification of adherence to IFP Program by AQIS

Notification, traceability and exclusion of blocks used for export, that are infected with disease or insect pests; notably fireblight, European canker, leaf curling midge by AQIS.

Another vital issue is the detection in packed export cartons of leaf twigs or any other orchard trash that can carry fireblight, European canker or leaf curling midge.

The inspection of 600 fruits per lot by AQIS, (too few in my opinion) needs also to include carton inspections for trash, particularly the bottom layers as trash will shake to the bottom of cartons. There is a very real risk of these diseases and pests becoming established in Australia carried in on trash from cartons. Repacking of imported fruit carried out in apple production areas of Australia is a commercial possibility, and the very real scenario of fireblight infections rising from trash or damaged fruit discarded in this process is alarming. This is one reason why detection of the trash vector is paramount.

The detection of fireblight in any of South Australia's Apple and Pear growing regions would bring into play South Australia's own biosecurity plan:

Quarantining orchards allowing no fruit movements for a 5km radius

A 20km radius plant movement ban

A 10km radius ban for nursery plant movement with a spring and autumn inspection for registered nurseries.

This would have a devastating effect on growers and their families, packers and nurseries. Loss of income for growers, loss of markets for packers and nurseries, loss of jobs for staff and the loss of part of an industry that has been the fabric of many communities. This will have a snow balling effect on businesses that service the apple and pear industry.

I ask that in your deliberations you seriously consider these points.

Yours sincerely

MICHAEL NICOL

On behalf of MK and IA Nicol
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