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Sent: Monday, 4 July 2011 1:55 PM
To: BA - Plant Biosecurity Contact
Subject: Submission to Biosecurity Australia in response to the Draft report for the non-regulated analysis of existing policy for apples from New Zealand

Submission to Biosecurity Australia in response to the Draft report for the non-regulated analysis of existing policy for apples from New Zealand

My name is Rob Cathels and I am the second generation of my family to produce and sell Australian Apples. My brother operates our 3 orchards in Batlow, NSW and I operate 5 divisions in the Sydney Markets. My children and their cousins, the third generation have their futures dramatically impacted, should the pest and diseases from NZ enter our orchards.

- **Transparency for Australian Growers:**
 - We should have the right to see the Integrated Fruit Production manual (Pipfruit NZ Inc).
 - We should have the right to comment on the NZ standard practices.
 - Are their practices guaranteed to be implemented and are they audited?
 - Do NZ orchards have to declare a Fire blight outbreak?

- **Australian authorities should be auditing NZ export orchards and packhouses:**
 - Is the Integrated Fruit Production manual audited?
 - If a fire blight outbreak is detected, the orchard should be excluded from exporting to Australia.
 - We should not relinquish pre-border biosecurity responsibility to the NZ industry that stands to gain commercially if Australia becomes infected with foreign pest and diseases.

- **Dangerous Precedent:**
 - European Canker was mitigated against for Chinese apple imports via Area Freedom. Why have high-risk European Canker infected growing regions of NZ been ignored?
 - Will China expect their protocols to be relaxed further for apple imports?
 - What precedent is set if we accept the use of an exporter's standard orchard practice to protect our environment?

- **Fire Blight:**
 - No chemicals are registered in Australia to control Fire blight (*Erwinia amylovora*)
 - There are no chemicals available in Australia to control Fire blight
 - If the chemical is used on Australian trees, the MRL for human consumption is zero, and therefore our apples will not be able to be sold or consumed.
 - Visual inspections (600 pieces of fruit) will not identify Fire blight as it is not visible to the human eye.

- **Trash:**
 - Trash is proven to carry Fire blight pathogen
 - Inspection in packhouses in NZ are necessary, especially the mechanical packer and tray fillers which cannot detect trash.

- o The cartons need to be inspected prior to export for trash, so the pathogen does not reach our shores.

Thank you,

Rob Cathels
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