

Office of the Chief Executive
Biosecurity Australia
GPO Box 858
CANBERRA WA 2601

4th July 2011

Dear Sir

SUBMISSION
BIOSECURITY DRAFT REPORT ON AUSTRALIA'S IMPORT POLICY FOR NEW ZEALAND APPLES

In this submission, I will be primarily focussing on the pest risks for Western Australia in relation to importation of apples from New Zealand and how this will affect my constituents in my electorate of O'Connor. My electorate staff and I have had discussions with orchardists in the O'Connor electorate and also FruitWest, the representative body for all Apple, Pear, Citrus and Stone fruit producers in Western Australia.

WA is unique in the world, where our State is free of codling moth, and Australia is free of Fire Blight, Apple Canker and Apple Leaf Curling Midge. Apples coming from the Eastern States into Western Australia must meet WA's strict quarantine standards.

I am concerned that parts of Western Australia, which include some of Australia's major apple growing regions (including Manjimup in my electorate of O'Connor), have suitable climates for European canker. There is a climatic similarity between parts of Australia and those areas of the world where European canker is present.

It is extremely concerning to read that fire blight, once established, has never been eradicated from any country that is has infested

Manjimup has recently been devastated by the collapse of the timber industry and an outbreak of any of these diseases would seriously economically affect not only the apple producers but the wider community.

Of course, any pest or disease outbreak in any apple orchard will be devastating for the whole industry.

Manjimup apple growers are passionate about producing the best-tasting fruit and cleanest apples in one of the last remaining havens in the world free of these pests and diseases, but their hands are tied with the proposed new importation measures.



I am of the view that importation of NZ apples cannot begin until appropriate quarantine measures that protect Western Australia, and Australia, has been properly agreed upon between major stakeholders.

Biosecurity Australia's draft report recommends that New Zealand's standard commercial practice be permitted, subject to verification that standard orchard and packing house practices have been followed. The report also suggests that these practices will be accepted as 'quarantine standard'.

Biosecurity Australia has also commented that "...no additional quarantine measures are recommended, though NZ will need to ensure that the standard practices detailed are met for export consignments".

The report only sets out a very basic overview of what these proposed commercial practices will be and O'Connor orchardists, Fruitwest and myself are unsure how NZ orchardists will be held accountable for their own quarantine measures. .

I note that quarantine inspectors in New Zealand will be able to inspect fruit and conduct regular audits of export facilities to ensure import conditions are being met by exporters. I am concerned how often and in what circumstances these inspections will occur.

It could also eventuate that NZ orchardists may easily and unintentionally misinterpret and apply what the 'standard practices' will be.

I would question why New Zealand is allowed to conduct its own quarantine measures for Australia, and also question Biosecurity Australia's proposal to outsource Australia's quarantine regime.

I note also, there is no risk protection proposal in case of an outbreak and no outline of what measures should be undertaken if this is to occur.

Self regulation undertaken in a foreign country has been proven inadequate – as recently demonstrated in the live cattle trade – and such 'outsourcing' of Australia's quarantine protection should be vigorously challenged.

I would also ask what regulations are in place to stop the practice of non-registered orchards sending fruit to registered packing houses.

Local orchardists face stringent inspection regimes when exporting to other countries. These inspections are usually carried out at the orchardist's own expense by inspectors from the importing country. To me, this is not a level playing field.

I note that no other importation regulations of fruit into Australia have the same 'quarantine standard' as that of the importation of NZ apples into Australia. No other country is responsible for regulating their own export standards to Australia.

Mr Harvey Giblett, a Manjimup orchardist, has outlined some very important changes that need to be implemented before NZ apple import 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 an 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 no trash (ie. leaves and small twigs that are universally recognised as carriers of fire blight) is entering the country via the cartons. Should cartons contain trash, those suppliers should be excluded from exporting 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 must be suspended until a review of procedures is completed and alternative protocols are established.

I am also concerned about a precedent being set for other countries who want to import apples into Australia. Japan may tighten its import policy if Australia accepted apples from New Zealand. If any outbreak of Fire Blight were to occur, Japan would stop trade immediately. It would possibly take years for Australia to implement any Japanese protocols they required.

I look forward to the final report of the review of the import risk analysis on this issue.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tony Crook', with a stylized, cursive script.

TONY CROOK