



DPI response to Biosecurity Australia's Draft report for the analysis of existing policy for apples from New Zealand.

June 2011

SUMMARY

- DPI agrees with the risk ratings for apple leaf curling midge (ALCM) and European canker and the adequacy of the proposed mitigation measures based on NZ Integrated Fruit Production (IFP) manual of pre harvest and post harvest procedures and phytosanitary inspection requirements.
- DPI agrees with the risk ratings for establishment, spread and consequences for fire blight.
- DPI have some concerns with the fire blight distribution risk rating of extremely low, as there is inadequate scientific evidence for this, particularly given the expected large import volumes of fruit and their widespread distribution .
- DPI contends that the distribution risk is manageable, provided that the complementary risk rating for the import step is kept at moderate or lower by rigorous audit and verification of the measures in the work plan based on those in the IFP manual.
- DPI views as essential the preparation of a documented work plan, which describes in some detail the pre and post harvest phytosanitary procedures and requisite records for the pests of quarantine concern (fire blight, apple leaf curling midge and European canker). DPI would value having input to such a document.
- DPI would like to see the AQIS Biosecurity Services Group (BSG) and MAF NZ clearly document in the work plan the minimum requirements for meeting the phytosanitary measures which address these three pests. The IFP manual, which is the basis of the standard commercial practices for production of export grade fruit, is not available to stakeholders because of “commercial-in-confidence”.
- DPI considers that the audit of standard commercial practices (as documented in the work plan) should be ongoing by BSG rather than an initial audit in the first season of export as proposed.
- DPI considers that the scope and intensity of BSG audits after year one should be based on annual reports of seasonal orchard pest and disease levels from the major export regions (Hawkes Bay, Nelson and Central Otago) in NZ.
- DPI considers that more information is required about the definition of standard commercial practices. For example, organic fruit production comprises 11% of NZ apple production and the pest management methods for organic production are not equivalent to those of standard commercial production. DPI wants to see evidence for the equivalence of measures.
- DPI queries what measures are in place to ensure that the high pathogen levels on fruit resulting from trauma blight near harvest are reduced before export? Trauma blight (fire blight resulting from storms, high winds, hail or frosts) can occur any time during the growing season. Appropriate monitoring and mitigation should be incorporated into the work plan.
- DPI notes that phytosanitary inspection is normally carried out by trained packing shed staff monitored by an Independent Verification Agency and would want assurance of appropriate levels of MAF input into the inspection of apple consignments destined for Australia.
- DPI recommends that these and other issues mentioned below are addressed by Biosecurity Australia before the final Import Risk Analysis is prepared.

INTRODUCTION

In 2007 the Director of Animal and Plant Quarantine made a policy determination for the importation of apples from NZ subject to quarantine measures to manage identified pest and diseases. New Zealand appealed to the WTO against this policy on the basis that the measures for fire blight, apple leaf curling midge and European canker were unnecessarily restrictive and subsequently in November 2010 the WTO ruled that Australia’s quarantine measures were unjustified.

Biosecurity Australia has reviewed the existing policy for New Zealand apples for the three pests at dispute, as part of our international obligations (Biosecurity Australia (2011) Draft report for the non-regulated analysis of existing policy for apples from New Zealand). This review took into account the WTO decision of 2010 and was issued on 4 May 2011 as a draft report for stakeholder comment within 60 days. A final report will be published in August following consideration of all comments.

BA's draft report recommends that New Zealand's standard commercial practice for production of fruit as contained in the NZ pipfruit Integrated Fruit Production (IFP) System is sufficient to achieve Australia's appropriate level of protection. This differs from their previous assessment (2006) which concluded that significant measures were necessary to mitigate the risk from the quarantine pests. The key mitigation measures proposed in the previous assessment, such as orchard inspections and remedial treatments for fire blight and sanitisation of fruit in the packing shed prior to packing are also covered in the IFP system, although verification is less formalised.

BA recommend that a documented work plan will be prepared, describing the phytosanitary procedures for the pests of quarantine concern. This document will be the basis of audit by MAFNZ and BSG.

DPI officers in Biosecurity Victoria have evaluated the draft IRA and make the following comments.

RESPONSE

Particular issues with the IRA are reported below:

- DPI agrees with the risk ratings for ALCM and European canker and the proposal that mitigation and phytosanitary inspection measures are included in a work plan based on NZ IFP manual.

Fire blight management (p 22)

- DPI agrees with the risk ratings for establishment, spread and consequences for fire blight.
- DPI have some concerns with the distribution risk rating as extremely low, as there is a lack of scientific evidence about this step. This particularly applies to the likelihood of low levels of inoculum being transferred (vectored) from the imported fruit to infect nearby host plants.
- DPI believes that any additional distribution risk would be alleviated provided that the risk rating for the import step of the process is kept at moderate or lower by ongoing audit and verification of the mitigation measures which need to be more clearly specified in the IFP manual.
- The risk period for fire blight – no mention is made of the occurrence of trauma blight, which can result from storms at any time during the growing season. Trauma blight – the non-specific infection of leaf, fruit and bark associated with injuries caused by late frosts, hail or high winds during storms - can be significant in other fire blight regions of the world (Steiner 2000) and can occur close to harvest. This must be addressed in the work plan.

Draft Import Conditions/Proposed mitigation measures

- DPI would like to have input into the documented work plan (p 124), and would expect that plan to describe in detail the phytosanitary procedures for the pests of quarantine concern (fire blight, apple leaf curling midge and European canker).
- DPI would like to see BSG and MAFNZ clearly document in the work plan the minimum requirements for meeting the phytosanitary measures which address these three pests. These

requirements would allow for a more objective audit program. The IFP manual, which is the basis of the standard commercial practices for production of export grade fruit in NZ, is not available to stakeholders because of “commercial-in-confidence” but is outlined in BA’s draft report.

- DPI considers that the audit of standard commercial practices should be ongoing by AQIS (p124) rather than an initial audit in the first season of export as proposed.
- DPI considers that AQIS audits after year one could be based on annual reports provided by the NZ fruit industry of seasonal conditions and orchard pest and disease levels from the major export regions (Hawkes Bay, Nelson and Central Otago) in NZ. BSG should require the annual report by February of each export season about the conditions for pests and diseases of concern to Australia from these three regions before fruit is exported that season. This report would allow BSG to target fruit from particular regions for certain pests/diseases including on arrival.
- DPI considers that more information is required about the definition of standard commercial practices. For example, organic fruit production comprises 11% of NZ apple production and the pest management methods are very different from fruit produced under standard commercial pest management practices. The efficacy of organic pest management measures is not equivalent to the efficacy of standard commercial pest management practices (Tate et al 2000). Fruit produced under these systems should not be approved for export to Australia unless additional mitigation measures are applied.
- DPI queries the measures in place to ensure that the high pathogen levels on fruit resulting from trauma blight near harvest are reduced before export. Trauma blight (fire blight resulting from storms, high winds, hail or frosts) can occur any time during the growing season, and “its widespread occurrence throughout an orchard strongly supports the concept of epiphytic populations of the pathogen that persist through much of the season” (Steiner 2000). Appropriate monitoring and mitigation should be incorporated into the work plan.
- DPI notes that phytosanitary inspection is normally carried out by trained packing shed staff monitored by an Independent Verification Agency and would want assurance of appropriate levels of MAF input into the inspection of apple consignments destined for Australia.

RECOMMENDATION

DPI recommends that the issues listed in the summary (above) are addressed by Biosecurity Australia before the final Import Risk Analysis is prepared.