



# Philippine Banana Growers & Exporters Association, Inc. (PBGEA)

183 Rizal Street, Davao City 8000 Philippines

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April 30, 2007

Ms. Louise Van Meurs  
General Manager  
Plant Biosecurity  
Biosecurity Australia  
GPO Box 858  
CANBERRA ACT 2601

RECEIVED

15 MAY 2007

Plant Biosecurity  
Biosecurity Australia

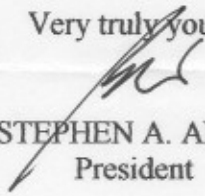
Dear Ms. Van Meurs:

Greetings!

As private sector stakeholder for the ongoing negotiations on the entry of Cavendish Bananas from the Philippines, please find attached the comment of the industry on Australia's *Revised draft import risk analysis report for Cavendish bananas from the Philippines*, released in February 2007.

Thank you..

Very truly yours,

  
STEPHEN A. ANTIG  
President

cc: Undersecretary Segrefredo R. Serrano, DA Policy & Planning  
Mr. Joel S. Rodinas, Officer-in-Charge, BPI  
Excom - PBGEA  
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**PHILIPPINE BANANA INDUSTRY'S COMMENTS ON THE  
FEBRUARY 2007 REVISED DRAFT IMPORT RISK ANALYSIS  
REPORT FOR THE IMPORTATION OF CAVENDISH BANANAS  
FROM THE PHILIPPINES  
(APRIL 2007)**

In all of thirteen (13) years since the Philippines first proposed to export Cavendish bananas to Australia, the Government of Australia's (GOA) actions (and inactions) reveal a pattern that can only be interpreted as protectionism in the guise of plant quarantine concerns. The scheme involves delaying tactics to put off any resolution until it can come up with reasons to reject the application or make importation not viable for the purpose of protecting its local banana industry from competition. The application was shelved in the initial years until June 2000 when Minister Mark Vaile, after much prodding from his Philippine counterpart, Secretary Edgardo Angara, officially communicated that the Pest Risk Analysis (PRA) was initiated and made a commitment that the process would be finished by mid-2002. But a series of organizational restructuring and changes in the procedures and in key personnel in-charge of the Import Risk Analysis (IRA) took place. The said changes and many revisions of the draft IRA reports were the GOA's response to excessive pressure from its local banana industry for protection from competition.

In all these years, the Government of the Philippines (GOP) and the Philippine banana industry, represented by the Pilipino Banana Growers & Exporters Association, Inc. (PBGEA) diligently and comprehensively complied with all application requirements. This includes reiteration/resubmission of information



already supplied in previous official responses/comments when the same issues were revived. Many of the said comments had been largely ignored or not given enough weight in the subsequent drafts of IRA report, including the current one. Furthermore, in instances where GOP/PBGEA's comments seemed to have made an impact, the IRA Team always managed to come up with modifications in the process so that the subsequent revisions and addendum always come out in favor of the position of Australia's local banana industry.

While Biosecurity Australia (BA) claims that IRA reports are science-based, in reality it is science combined with extraordinary imagination. BA often makes strained interpretations of scientific studies while failing at the same time to present scientific evidence. It also resorts to quoting results of scientific studies out of context if only to lay down and justify a premise. Its risk scenarios and the probability of entry, establishment and spread (PEES) of pests and diseases belong to the realm of science fiction: little science and a lot of imagination. These were expertly written, verbose but hardly believable even to a novice banana plant pathologist/entomologist.

Generally, BA undertakes PRAs using a qualitative approach. A semi-qualitative risk assessment approach was adopted by BA in the 2004 draft IRA report supposedly to reinforce transparency and objectivity and in response to issues raised by stakeholders. In the 2007 revised draft, BA used a "revised quantitative framework to assess PEES, supplemented with qualitative analysis of consequences", which is all but a façade to its intention of putting up barriers to trade in the form of very low appropriate level of protection (ALOP) that is



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practically zero and stringent risk management measures that are essentially unattainable. In modelling the importation, distribution and transmission pathways, the distribution and values used in the model represent the IRA Team's best biased judgment, based on selected fragments of available data to favor Australia.

There is no doubt whatsoever that the IRA process is fundamentally flawed, unfair and biased - it has lost credibility. It is merely undertaken to come up with justifications to deny importation of Cavendish bananas into Australia. Therefore, without abandoning earlier submitted comments/information, PBGEA finds it prudent to withhold any comprehensive comments to the current draft pending issuance of the final IRA report to expedite the closure of this rigged process.