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Branch Support
Plant Biosecurity
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Re.Revised Draft Import Risk Analysis Report

Dear Sir,

BananasNSW believes that the risk management procedures that are proposed in the most recent Revised Draft Import Risk Analysis Report for the Importation of Cavendish Bananas from the Philippines are inappropriate.

Of particular concern is the emphasis on self assessment of inspection, detection and reporting that BananasNSW believes will inevitably lead to the introduction of Philippines pest and diseases to Australia.

Control of endemic banana plant pest and diseases in Australia as in the Philippines is first and foremost the responsibility of the grower who should regularly inspect, detect and destroy all diseased plants on a plantation.

Human failures with respect to any self assessment regime, whether accidental or intentional, leads to poor pest and disease monitoring and or control outcomes.

Philippine plantation workers may also feel pressured to under report the level of pest and disease present in a plantation because the corrective action required to rectify the problem may put at risk the 'approved for export' status of the plantation and could lead to job losses.

Obviously, for an infected plantation to be declared free of pest and diseases when it is not, is a quarantine concern to Australia, and could present a threat to Australian plantations. It only takes one undetected infection to create a disaster through the introduction of an exotic disease or pest to Australia.

BananasNSW is particularly concerned about the risk posed by insect transmission of Moko disease in Philippine plantations and does not believe that the proposed risk management measures, adequately address this issue given the lack of any requirement for buffer zones.

Naturally Growing

In Northern NSW and South East Queensland, there are two devastating banana disease, Banana Bunchy Top Virus (BBTV) and Panama (Fusarium) with which subtropical banana producers have first hand experience.

BUNCHY TOP

BBTV has been in Australia since the early 1900's and all but wiped out the banana industry in the 1920's.

The NSW banana industry has adopted different strategies over time in their efforts to eliminate the disease but has been unable to do so. Instead the industry has maintained a containment strategy with varying degrees of success.

Perhaps the greatest risk and source of disease infestation to the majority of our commercial plantations is from backyard or non commercial plantings.

The industry had introduced a banana planting permit system in order to help prevent the spread of disease however, despite ongoing education and campaigns, the urban population plant bananas without permits or move infected vegetative material between properties and consequently spread BBTV and other pest and diseases. We believe this experience would be repeated for any Philippine banana pest or disease outbreak that were to occur here.

Environmental amenity is valued highly by most urban dwellers many of whom also compost their fruit and vegetable scraps for use in their gardens. This is where the urban bananas are grown and from which they are frequently illegally distributed. Introduction of diseased imported composting material could lead to a disaster in the adjacent commercial banana industry.

In the majority of outbreaks the only eradication method is to destroy the whole of the infected plantation as non-detectable infections have caused the disease to spread into adjacent areas.

With the ever increasing population growth along the coastal areas and especially to the subtropics of Queensland and NSW, banana pest and disease management will become an even greater challenge.

The direct introduction of exotic banana pests and diseases to Australian plantations may be shown as statistically low with IRA computer modelling but we believe that such modelling does not adequately address the issue of establishment of an exotic pest or disease if the outbreak occurs in an urban environment where it may go undetected for many months or even years.

PANAMA

Panama has been responsible for the elimination of large areas of banana lands for the growing of the Ladyfinger variety.

Once again the use of infected vegetative material was the greatest contributor to the spread of panama.

Over many decades the Ladyfinger variety was used by Cavendish growers as a wind break along ridge tops and along property boundaries. A lot of this Ladyfinger planting material was infected with panama race 1 to which the Cavendish variety were resistant. Over time through vehicle, animal, soil and water movements, panama disease was unknowingly spread through out these plantations.

Many of these panama infected soils were established with Cavendish planting material obtained from approved sources and as the vegetative material was sold to other growers in other districts, the spread of panama continued.

BananasNSW believes that the introduction of Moko disease to Australia would be spread in a similar fashion and would quickly decimate infected plantations and render them economically unviable.

Moko would be spread as easily as BBTV and Fusarium has in the vegetative planting material within the urban and semi-rural population.

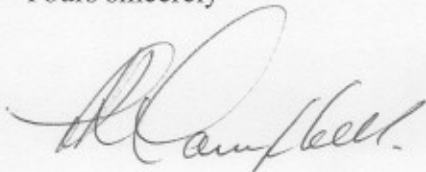
There is also a large illegal movement of banana planting material as the banana is seen as a 'Tropical Palm', cheap, easy to grow and treasured by many.

Used banana cartons, inners (bottoms) and lids are recycled through the community.

The reused imported cartons will have contaminants such as leaf and soil which will contain pest and diseases that will have a direct pathway to the agricultural and non commercial sectors.

The experience of the Australian banana industry cannot be ignored.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'Bob Campbell', written in dark ink.

LRV (Bob) Campbell
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Agronomist
Banana Industry Committee
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