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Plant Biosecurity  
Biosecurity Australia

28 June 2007

General Manager  
Plant Biosecurity  
Biosecurity Australia  
GPO Box 858  
Canberra, ACT, 2601

Dear Sir / Madam,

Please find attached my submission in relation to the Revised Draft Import Risk Analysis Report for Bananas from the Philippines.

Yours sincerely

Andrew Cripps MP  
**Member for Hinchinbrook**



**ANDREW CRIPPS MP**

**MEMBER FOR HINCHINBROOK  
SHADOW PARLIAMENTARY SECRETARY TO THE  
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**SUBMISSION**

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**SUBMISSION TO  
BIOSECURITY AUSTRALIA  
IN RELATION TO THE  
REVISED DRAFT IMPORT RISK  
ANALYSIS REPORT FOR  
BANANAS FROM THE PHILIPPINES  
BY  
ANDREW CRIPPS MP  
MEMBER FOR HINCHINBROOK**

# **SUBMISSION TO BIOSECURITY AUSTRALIA IN RELATION TO THE**

## **REVISED DRAFT IMPORT RISK ANALYSIS REPORT FOR BANANAS FROM THE PHILIPPINES**

**BY ANDREW CRIPPS MP - MEMBER FOR HINCHINBROOK**

### **Introduction and Opening Comment**

I appreciate the opportunity to make a submission to Biosecurity Australia in relation to the Revised Draft Import Risk Analysis Report for Bananas from the Philippines and submit the following comments for consideration.

### **Background**

Biosecurity Australia issued a revised draft import risk analysis (IRA) report for the importation of Cavendish bananas from the Philippines to stakeholders on 1 March 2007 for comment by 30 May 2007. Time available for comment was extended for a further 30 days until close of business Friday 29 June 2007.

In December 2004 the Australian Government announced that Biosecurity Australia would review import risk analyses (IRA's) then in progress and reissue them for a further period of public comment. The IRA for bananas from the Philippines was one of the affected IRAs.

The report identified several pests and diseases of concern, notably Moko and Black Sigatoka. The report by Biosecurity Australia proposed quarantine measures to manage risks to what Biosecurity Australia considered a very low level, consistent with Australia's conservative approach to quarantine (appropriate level of protection).

The measures contained in the draft report included:

- potential exports only from areas that demonstrate low pest prevalence;
- registration of export blocks;
- inspections to detect the presence of any diseases;
- ongoing inspections of blocks and fruit, including by AQIS inspectors;
- disinfection and fungicide spraying;
- mandatory pre-clearance arrangements with the presence and involvement of AQIS inspectors in the Philippines in applying quarantine conditions in the field, including in packing houses
- tight auditing and verification by AQIS of systems and processes used by the Philippines to certify any exports
- combinations of measures for specific pests to be used in an integrated system, recognising that no single measure is considered sufficient to manage each of the risks
- detailed data and documentation to be provided by the Philippines for consideration by Australia prior to any exports to verify and validate quarantine measures to be implemented by the Philippines.

A minority view from a member of the expert team undertaking the analysis has been included in the draft report concerning the proposed risk management measures for Moko. This minority report was proven to be 100 per cent justified when the data used by

Biosecurity Australia to develop the previous draft of the IRA was discredited by independent scientific advice provided by the Australian Banana Growers Council.

Those endorsing the majority report from previous Import Risk Assessment should be concerned at the rigour of the data used to formulate these reports. The reputation of Australia's quarantine standards owes much to the Australian Banana Growers Council and the individual lodging the minority report in relation to the previous draft IRA.

### **Hinchinbrook Electorate**

As the Member for Hinchinbrook, I am extremely concerned about the revised Draft Import Risk Analysis report for the Importation of Cavendish Bananas from the Philippines released by Biosecurity Australia in March 2007, particularly in relation to its recommendation to permit the importation of Philippine bananas into Australia, despite being subject to the application of a number of risk management measures.

Approximately 65 per cent of Australia's bananas are grown in the Hinchinbrook electorate. The banana industry is an extremely important economic driver for the Hinchinbrook electorate and any exotic pest or disease outbreak that poses a significant threat to the banana industry also poses a major threat to the local economy, local jobs and thus the welfare of local families and communities.

Much of the banana industry in the Hinchinbrook electorate is located in the Tully and Murray Valley floodplain and as such is subjected to regular flooding. Significant flooding takes place elsewhere in the electorate. As such, any outbreak of a banana disease in these areas can be readily transmitted by flood waters or soil in the floodwaters. This would limit the effectiveness of eradication programs.

Similarly, an outbreak of exotic disease in the banana plantations of the Hinchinbrook electorate, being the major banana growing region in Australia, would have a very serious, dramatic and devastating impact on the economy of the region, as a result of the quarantine restrictions preventing the movement of fruit to southern markets.

An exotic disease outbreak affecting the banana industry in the Hinchinbrook electorate would also mean a dramatic increase in the application of agricultural chemicals as growers seek to control the spread of the disease. The industry operates between two sensitive environmental areas, being the World Heritage listed rainforests of the Wet Tropics and the World Heritage listed Great Barrier Reef Marine Park.

The current situation where the Australian banana industry is relatively clean and green means the use of agricultural chemicals is kept at a minimum. Potential exposure to a range of pests and diseases not currently in Australia from imported bananas means that this poses an additional environmental threat which can be avoided by keeping imported bananas out of Australia.

### **The Australian Banana Industry**

In 2005, Australia's 1850 banana growers are estimated to have produced over 20.4 million 13-kilogram cartons of bananas with an estimated wholesale value of AU\$320-350 million. During the period 1993 to 2004 volumes of Australian bananas through the central markets fluctuated from 234,703 tonnes in 1993 to a low of 206,343 tonnes in 1999 and a record 275,945 tonnes in 2003.

Bananas are predominantly consumed as fresh product with Cavendish bananas accounting for approximately 95% of the market. The remaining 5% is represented by Lady Finger bananas and other cultivars such as Goldfinger, Ducasse, FHIA 18, Red Dacca, Sucrier and Plantain. The latter cultivars together represent less than 1% of the total market.

There is limited production in Australia of other products from bananas and banana plant fibre. Items as diverse as banana puree, dried banana, banana wine and handbags are produced on a very small scale. While approximately 55% of all fruit and vegetables are sold through the two major supermarket chains as much as 70% of all bananas may be sold through these two chains.

Using the 2003 market throughput figure of 275,945 tonnes (21,226,551 13-kilogram cartons) as an example, an industry Farm Gate value of AU\$295 million (estimated high end) would represent an average return to growers of about AU\$13.90 per carton which in turn represents an average retail price of about AU\$2.28 per kilogram.

Compared with other banana production areas around the world, Queensland is at present relatively pest and disease free. However, because the Queensland banana industry is so clean and green, it faces comparatively high biosecurity costs to maintain strong quarantine standards. The impact of a foreign pest or disease outbreak in Queensland would be very significant.

In 2003 there were about 870 banana plantations in Queensland, mostly along far-north Queensland's wet tropical coast area between Cardwell and Babinda. In recent years there has been an increase in the number of farms on the Tablelands around Mareeba and Walkamin. Queensland growers produce approximately 265,000 tonnes of bananas each year, which equates to about 90 per cent of production in Australia.

Australian quarantine restrictions on imported bananas are in place to reduce the risk of exotic pest and disease incursions. The banana industry faces comparatively high biosecurity risks compared with other Queensland plant industries because the commercial production of bananas in Queensland is dominated by the cavendish variety, which has a limited resistance to many of the major pests and diseases that affect banana production.

Commercial varieties of the cavendish banana are sterile and produce no seed. As such, propagation is undertaken through the use of plant tissue, cuttings and suckers. This increases the risk of transferring pests and diseases through the plant material. The lack of seeds means that it is difficult to develop resistant hybrid varieties from the cavendish.

Therefore the banana industry has limited ability to overcome serious pest and disease threats through breeding programs and it is thus exposed to a greater degree to outbreaks of a range of pests and diseases from overseas which are currently not present in Australia.

On top of this, some serious pests and diseases affecting the banana industry would be very difficult to eradicate if an incursion occurred. There are a limited number of chemical controls available to implement large-scale control programs for a particular pest or disease. That is also related to the fact that the banana industry has a continuous harvesting cycle.

There are a group of particularly disastrous diseases that, if they took hold of the banana industry in Queensland, would certainly undermine its viability. The bunchy top virus, fusarium wilt, also known as Panama disease, black sigatoka, the moko virus, the banana bract mosaic virus and freckle disease are certainly amongst these serious diseases.

An outbreak of black sigatoka occurred several years ago in the heart of Queensland's banana growing region, the Tully Valley. An enormous surveillance and control effort was

undertaken and for the first time ever the black sigatoka outbreak was eradicated while production continued.

A disease of considerable concern is fusarium wilt. A variation of the disease broke out in the Northern Territory recently. Fusarium wilt is highly destructive as far as banana plantations are concerned and it is wide spread throughout the neighbouring countries of Indonesia and Papua New Guinea.

The significant risks and potentially high costs of an emergency pest or disease incursion warrant extensive ongoing surveillance to ensure early detection and diagnosis. Research and development on pest and disease resistance and management strategies is critical. The banana industry has consistently demonstrated a strong commitment to the surveillance, containment and eradication of pests and diseases by providing funds through levies for research and development to many government and non-government agencies.

Developments in relation to biosecurity at the national level, including the signing of the national emergency plant pest response deed in 2005 with Plant Health Australia, support the view that vigilance is still paramount as far as pests and diseases are concerned.

It has been suggested that with biosecurity legislation largely moving to the Commonwealth a clearer division of responsibilities is emerging between government and industry in relation to the management of emergency pest and disease incursions with increased industry self-management of established pests and diseases.

Australia needs to ensure that an appropriate level of monitoring for exotic pests and diseases, especially on Cape York, is carried out. This is the most likely pathway for any future exotic banana pest or disease to enter the country. We need to ensure that the department of primary industries maintains a core capacity to undertake research as it is widely acknowledged that many of the most significant gains in banana productivity have been through the results of research.

We need to ensure that an approved nursery banana tissue culture regulatory scheme is maintained. Without clean planting material, as I mentioned earlier, the establishment and spread of many banana diseases is inevitable. We need to ensure that the movement of banana plants and planting material within the state and across state borders.

The banana industry is of significant value to Australia, both in an economic sense and in terms of the number of jobs that it provides for many families. It provides a quality, clean and green product to the domestic market—a product that almost everyone puts in their shopping trolleys. As such, I feel it is incumbent on the government to ensure that the banana industry is well supported as regards its ongoing biosecurity efforts and industry development activities.

### **Evaluation of the Import Risk Assessment**

I am particularly concerned about the use of words in the draft IRA such as "initial trade", "initial stages" and "initially", which imply a time constraint on the subject matter being discussed. There is a distinct lack of clarity in relation to whether or not the proposed field inspections will be done by the Australian Quarantine Inspection Service in the first instance and into the future.

This is an extremely important point to ensure that the rigour of the inspections is maintained at a standard consistent with Australia's high quarantine requirements. Examples of these concerns in relation to the draft IRA include:

- Page 260 *"For the initial trade pre-clearance will be used"*. This is too ambiguous.
- Page 263 *"Inspections and audits at various points along the export pathway including cooperation with AQIS officers initially stationed in the Philippines to undertake audits and pre-clearance inspections."*

This suggests that at some point AQIS officers will not be stationed in the Philippines, logically leaving the Philippines in charge of quarantine at their end. This is unacceptable, as the Philippines is known not to have quarantine standards as rigorous as Australia.

Most of the risk management measures for declaring a plantation an 'Area of Low Pest Prevalence' rely on proper weekly inspections and reporting of disease levels by Philippine growers. It is unacceptable to rely on Philippine inspectors given the level of corruption and the degree of intimidation plantation workers could be exposed to by Philippine export plantation owners.

The estimated volume of imported bananas from the Philippines, some 40% of bananas consumed in Australia, does not take into account the fact that in some years, the volume of trade may be more than 40%. For example, in a year such as 2006 when Cyclone Larry flattened Australia's major banana growing area between Cardwell and Babinda, an increase in the volume of imported bananas would automatically increase the risk of importing pests and diseases.

The effectiveness of visual inspections has been questioned. In the minority report contained in the previous Import Risk Assessment the following comment was made:

*"There is insufficient evidence to conclude that any measurable effect would result from visual inspection and corrective action. This is because symptomless infected fruit is not detectable and vascular discoloration can be caused by factors other than Moko. Visual inspection and corrective action to remove all bananas showing discoloration that is interpreted as symptomatic of Moko is likely to result in infected fruit being admitted to the export pathway while excessive quantities of non-infected fruit will also be removed."*

I am advised that the use of chlorine as a risk management measure as recommended in the IRA has been proven to be ineffective in field studies commissioned by Australian Banana Growers Council. I understand that this report has been made available to Biosecurity Australia and is a public document.

The study was carried out by the Queensland Department of Primary Industries & Fisheries. As such, the research is independent. I am concerned that such a quarantine measure would again be proposed if it has already been proven to be ineffective.

## **Summary & Conclusion**

The release in March 2007 of the latest Import Risk Assessment by Biosecurity Australia, regarding the latest application by the Philippines to import bananas into Australia, provided no final answers to the question which has created significant uncertainty for the Australian banana industry for several years.

A statement from Biosecurity Australia advised that the report would be a draft and that there would be a consultation period for stakeholders to comment on the report, which runs over 500 pages across three volumes. Following this consultation period, further scrutiny of the report will be undertaken by more committees.

I am extremely concerned that the report appears to provide for the importation of bananas into Australia, notwithstanding the extensive range of quarantine measures proposed by Biosecurity Australia designed to prevent the spread of diseases.

I represent the electorate of Hinchinbrook, an area of Queensland which grows at least 65 % of Australia's bananas. The banana industry is a major employer and income generator for the communities that I represent. As such, I am completely opposed to the importation of bananas into Australia.

I certainly hope Biosecurity Australia will take particular notice of the submission by the Australian Banana Growers Council, the peak representative body of banana growers in Australia. It fell to the ABGC to expose the scientific flaws in Biosecurity Australia's own report the last time it considered this matter. That Biosecurity Australia's own Import Risk Assessment was exposed as being fundamentally flawed by the submission of independent science paid for levies collected from Australian banana growers must have been terribly embarrassing for Biosecurity Australia.

I have nothing but the highest respect for the Australian Banana Growers Council and the banana industry, which spent \$1.7 million through voluntary levies on growers to engage consultants during scrutiny of the last application from the Philippines to point out the holes in the science put forward by Biosecurity Australia.

The Philippines application to import bananas into Australia has been ongoing for several years. This has created significant uncertainty in the industry which needs to be brought to an end. The latest Import Risk Assessment delivers no answers to this long running debate, so I sympathise with the industry's frustration. The constant threat of imports acts as a permanent investment warning on the Australian banana industry, preventing meaningful investment in research and development, the expansion of the industry and effort in innovation as far as farming methods are concerned.

I am particularly concerned by the suggestion that the Philippines may be involved in enforcing compliance of certain quarantine measures proposed by this Import Risk Assessment. The Australian banana industry could have no confidence in such arrangements, which could compromise Australia's strong quarantine standards.

Indeed, I request that Biosecurity Australia initiate an independent inquiry to determine if the Australian Quarantine Inspection Service has the capacity and resources to undertake and maintain the range of quarantine measures proposed in the revised draft IRA.

I appreciate the opportunity to comment on the revised draft Import Risk Assessment for the importation of bananas into Australia from the Philippines.



**Andrew Cripps MP**

***Member for Hinchinbrook***