

13th June 2007

**Comment –**

**The Revised Draft Import Risk Analysis  
Report for the Importation of Cavendish Bananas from the Philippines  
(February 2007)**

This comment is in response to the third draft IRA for bananas from the Philippines. The latest draft does little to materially improve on the previous version in published in February 2004. The latest offering provides considerable detail on the methodology of the risk analysis. Critical comment on the science and mathematics used is beyond the resources of this committee.

Pest categorisation has changed in the latest IRA and it seems that Australia's ALOP varies. Chapter 1.5 describes the ALOP as Very Low or better. Yet the analysis for Banana Bract Mosaic Virus finds the unrestricted risk to be LOW and yet meeting ALOP (chapter 12.11). This was classed as Very Low in the 2004 IRA. Chapter 12.11 also introduces the concept of "standard practices". These are not clearly identified and chapter 5.1.3 states that the use of so called 'standard practices' are not to be considered when evaluating the unrestricted risk. There may be other similar instances involving other pests in the group of quarantine pests but seeking them out is time consuming. Suffice that one instance is enough to place doubt on the overall accuracy of the IRA.

**Risk Management**

The IRA proposes that where pests have an unrestricted risk in excess of the ALOP then risk management measures will lower the risk to a level that conforms to the ALOP. The PRA devotes 262 pages to the background, identification and analysis of the risks posed by the pests that exceed the ALOP and only 15 pages to the risk management measures at chapter 20.

The risk mitigation measures in this version of the IRA are little different to those in the 2004 version. Once again there is reliance on BPI auditing, training and supervision of monitoring and inspections in the Philippines plus random audits by AQIS that will verify compliance. If we are to have any faith in the proposed process to establish ALPP and to maintain that status we will need assurance that a truly independent (not BPI or its agents) inspection service is based in the Philippines full time.

In the response to the last IRA (2004) we expressed our doubts about the application of this concept. Those comment are repeated here

*The proposed measures to mitigate the risk are based on the North American Plant Protection Organisation's (NAPPO) "Guidelines for the Establishment, Maintenance and Verification of Areas of Low Pest Prevalence for Insects". We have been unable to locate a similar publication for diseases and assume the RAP has adapted the insect ALPP to suit their needs.*

*This approach is considered unsound. Virus diseases are often hard to detect and usually they are slow, difficult and costly to identify. We challenge the use of this methodology when applied to diseases.*

*NAPPO guidelines list the specific requirements for establishing an area of low pest prevalence to include*

- *The biology of the target pest(s)*

- Available technology and technical expertise required to establish and maintain an ALPP
- Geographic, operational and economic factors
- Legislation and regulations required for the NAPPO to carry on all activities necessary to establish and maintain the ALPP

*We doubt that BA can provide assurance that these criteria can be met.*

*The concept of an Area of Low Pest Prevalence (ALPP) was used in the Draft IRA dated February 2004 and loosely defines a production area as a plantation or even part of a plantation. This is simply not good enough. (Now modified to include exact boundaries) The IRA states that there are no existing international standards for each pest or disease and that using a combination of a Standards Working Group findings and the NAPPO process, formulas were evolved to calculate the risk level. We note that for Moko disease, data from the Philippines Dept of Agriculture (BPI) was used to estimate the number of Moko cases per year. This is not good science and is very flimsy evidence on which to declare there is a Very Low Risk.*

*We believe that the concept of ALPP has never been previously applied to an IRA in Australia. We are strongly of the opinion that the use of this method is dangerous considering that there are many gaps in the understanding of Moko and it may well be that ALPP is quite inappropriate as a biosecurity measure. Moko is a disease with many scientific unknowns and asymptomatic characteristics and a prudent person would test the theory before committing to such an irreversible course of action.*

The risk management chapter provides little data as to the 'nuts and bolts' of the inspection and verification process and merely states that AQIS will develop a plan after this IRA is approved. We do not believe this is good enough. AQIS will have to rely on the veracity of the paperwork alone as it seems there is no intention to base officers permanently in the Philippines.

We note that the term "standard commercial practice" appears here also but again no detail. All risk mitigation measures need to be spelled out for our evaluation.

Packing shed disinfection relies on fungicides and chlorine. The effectiveness of such treatments is dependant on the method of application and the maintenance of the chemical concentration. Chemicals are usually stripped from the mix by becoming bound to dirt and plant matter from the product. This can reduce the concentration to an ineffective level very quickly. Sophisticated analytical equipment would be necessary to continuously monitor and top up the chemical concentration. There may be alternative techniques such as spray application that is not recirculated, provided it can be proved to be 100% effective. The detail of the methods to be used are not stated in the IRA

## **Conclusion**

This IRA attempts to be more transparent in explaining the methodology. Unfortunately it is not an improvement on the 2004 version with respect to the matters raised here. We have no faith in the risk mitigation measures proposed as they rely entirely on the veracity of the BPI or its agents. Standards in the Philippines are not the same as those in Australia. Reliance on the audit of records alone will not provide an acceptable level of confidence that Australia's ALOP will not be exceeded.

The difficulties experienced by the IRA team in accessing quality data on pest incidence in the banana production regions of Mindanao confirms our doubts that accurate scientific evidence is available.

The generalisation of pest management measures and the lack of specific detail has resulted in our conclusion that the IRA is not complete and in its present form we are unable to support the notion that bananas from the Philippines can achieve Australia's appropriate level of protection.

This IRA process has already used a lot of costly resources for little gain. We wonder how many more years it will take before someone decides to deny the Philippine request.