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Carnarvon Growers Association Inc. is the Peak Body for the Growers in the Carnarvon region, Western Australia and as such represents these Growers of Bananas in this Region.

The following 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. We believe this latest draft does not improve on the previous version published in February 2004. We represent Producers who understand the risks involved from Pests and Diseases in the real world of "growing" and we offer the opinion that the IRA is not an improvement on the 2004 version with regard to the actual "application of risk mitigation measures"

We, can only comment as we understand at the "hands on" level of coping with Pests and Disease and we are totally unable to comment on the scientific data used in the stated Risk Analysis.

Note:

If certain diseases are found in Australia, it will destroy the Banana Industry, an economically and viable developing Industry, because we would be totally unable to effect control by chemical use as the required measures for same would not be tolerated in Australia. In Western Australia Bananas are grown in a virtual "clean and green environment".

The Carnarvon Growers Association Inc. works closely with the Carnarvon Banana Industry Biosecurity Committee and we will now repeat our comments from our response to the last IRA (2004).

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.

Summary

1. **Standards in the Philippines are not the same as those in Australia.**
2. **Reliance on the audit of records alone will not provide an acceptable level of confidence that Australia's ALOP will not be exceeded.**
3. **It appears that there will be no AQIS officers permanently based in the Philippines and that reliance will be on the audit of records alone.**
4. **We are unable to support the notion that bananas from the Philippines can achieve Australia's appropriate level of protection and**
5. **the possible damage to a economically viable developing Industry in Australia relatively free of pest and disease is simply not acceptable.**

Yvonne Fahl (Mrs)
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