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General Manager
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Biosecurity Australia
GPO Box 858
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Re: **REVISED DRAFT IMPORT RISK ANALYSIS REPORT FOR
BANANAS FROM THE PHILIPPINES (1/3/2007)**

Dear Sir/Madam,

I am writing to express my concern about the proposed measures to combat the entry and spread of pests and diseases from bananas imported from the Philippines. As a graduate in Agricultural Science and having resided in Davao City, Mindanao for two years, I consider the proposed measures in the Philippines for exports only coming from areas that demonstrate low pest prevalence, the registration of export blocks and meaningful inspections to detect the presence of any diseases would be impossible to implement.

Essentially I agree wholeheartedly with the minority view expressed in Section 6 of Part A that "areas of low prevalence of disease cannot be defined, implemented or maintained in the Philippines." This person was concerned about Moko, but this view also applies to other exotic pests. I consider inspections to detect the presence of diseases would be absolutely meaningless for three reasons: the size of the plantations, the skill level of local workers and the prevailing nature of Philippino culture.

1. Size of the plantations

When I drove through one banana plantation north of Davao City, I was absolutely astounded by its size. We drove for over 10 kilometres with banana trees on either side of the road. The immense size of this enterprise makes the physical inspection of trees extremely difficult.

2. Skill of Philippino workers

Most Philippino workers on farms have very limited education. It has to be doubted that the identification of diseases, already identified by the report as being difficult, would be impractical to implement.

3. Philippino Culture

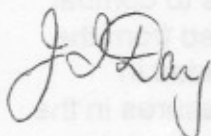
Having lived in the Philippines from 2000 to 2002, I have seen the insidious culture of the bribe. The paying a premium above the standard fee to expedite service is almost "normal" in many government and non-government areas. I am unable to believe that the presence of AQIS officers would be adequate to

prevent the compromising of the bureaucratic structure designed to reduce the risk of diseases entering Australia from Philippino bananas.

As the Draft Report correctly states, there are risks from importing these bananas. Despite the assertion in the report that these are low and can be adequately addressed, I totally disagree. Chapter 20 Risk Management and draft Operational Framework provides a loose and totally inadequate response. Specifically, it does not address the issue of AQIS staffing numbers, location or their training. It depends substantially on the Philippine Bureau of Plant Industry (BPI) to perform tasks essential for the integrity of the process.

In conclusion, I consider that the risks of importing bananas from the Philippines to Australia are too great and cannot be ameliorated by the measures suggested Biosecurity Australia.

Yours faithfully,



James I Day