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Plant Biosecurity
Biosecurity Australia

April 30, 2007

General Manager
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Biosecurity Australia
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Australia

Dear Sir:

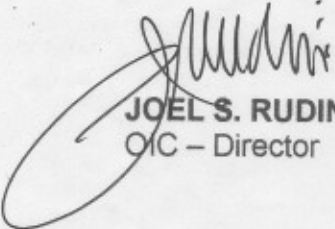
We are submitting herewith the Bureau of Plant Industry comments/suggestions on the revised draft of the Import Risk Analysis (IRA) for the intended export of Philippine Bananas to Australia.

1. The Philippine government and the Banana Industry have provided comments through submission of relevant information on issues related to the previous IRAs. However, many of these comments were not evaluated/considered as such, similar queries are being ask in the current IRA draft.
2. We also noted that additional requirements are imposed with each draft, becoming more stringent and can be interpreted as "protectionism" in the guise of plant quarantine concerns.
3. There were 27 quarantine pests reported for bananas in the Philippines and 9 pests required further assessment. While it is true that Australia proposed some risk management measures for these pests, the effectiveness of these measures needs to be verified through commercial trials. This means another set of experiments to be pursued by the Philippines. For how long will these experiments be conducted, not to consider the manpower needs and expenditures.
4. A mandatory pre-clearance is also required by Australia involving AQIS officers before any export can occur. We think that this is unnecessary since our experience with mango export to Australia showed that only the export protocol was discussed and agreed upon by both countries. BPI plant quarantine officers ensured the phytosanitary requirements for the export of mangoes to Australia and this can also be done for bananas.

5. The Philippines has been growing bananas for more than 50 years and exporting them to several countries following high quality standards and strict implementation of quarantine to address pest problems. Australia should in a way consider these efforts and provide more realistic IRA for banana in the context of trading partners. After all, if we assess the trade between the 2 countries, Philippines is importing more products from Australia than what it can export.
6. Some pests of banana in the Philippines were already reported to occur in Australia (Moko disease). It should have been included in the voluminous documents provided, particularly on Part C (technical details on the full range of pests). As such, this could have "relaxed" the stringent mitigating measures for the disease.
7. The Bureau of Plant Industry and the Philippine Banana Industry considered Australia's ALOP unreasonable and management to address the quarantine pests can hardly be met in the field. Moreover, despite the low consequences for Freckle disease and many insect pests of banana, the risks involved still exceeds Australia's ALOP. The proposed risk management measures using the system approach could have modified the values of ALOP to an acceptable level..
8. The operational arrangements proposed by Australia particularly sampling, monitoring and reporting will be mainly done by the plant quarantine officers of BPI. This will require more personnel to do full time job to handle the activities.
9. The requirements for banana exports are stringent. However, it does not include trading aspects. The demand (volume) and frequency for banana exports are not known.
10. There is also a need for Bio-Security Australia to evaluate and review comments sent by the Philippine government for objectivity, clarity and transparency.

Thank you.

Very truly yours,


JOEL S. RUDINAS, CESO IV
OIC - Director 