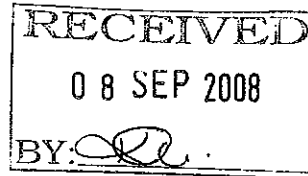




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2 September 2008



Ref: **RP/03/0221**

Dr Colin Grant *21/9/08*
Chief Executive Plant Biosecurity
Biosecurity Australia
Agriculture Fisheries and Forestry - Australia
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Robell → Anne G.
→ David Carter

Dear Dr Grant

DPI RESPONSE TO THE ISSUES PAPER FOR THE IMPORT RISK ANALYSIS FOR FRESH APPLES FROM THE PEOPLE'S REPUBLIC OF CHINA

Thank you for your memorandum of 8 July 2008, notifying the Department of Primary Industries (DPI) of the release of the Issues Paper for the Import Risk Analysis for fresh Apples from the People's Republic of China for comment.

Specialists within the DPI have examined the Issues Paper and have made the following comments:

1. The main issues relate to the authority of the pest and disease records and the management and cultural practices used in apple production in China.
2. Evidence of the pest and disease status of apples in China must be examined very thoroughly. In particular, convincing evidence for freedom from Fire blight and other key pests and diseases is crucial to any apple IRA. An indication that the record may be incomplete can be seen by comparing the number of plant pathogens recorded in China (in this Issues Paper) with the number recorded in USA (in the Issues Paper for the IRA for fresh apples from USA). This shows that there are more than 4 times the number of pathogens listed in the Issues Paper for apples from USA than listed in the Issues paper for apples from China (over 200 for USA compared with 53 for China). See sections 3.1, 3.2 and Appendix A.
3. Evidence of the pest and disease status is apparently limited mainly to unpublished letters and reports which cannot be accessed; e.g. AQISQ 2005, 2008, CIQSA 2001a, 2001b, GAIN reports. These documents must be available to all stakeholders.
4. The overview of cultivation and management practices is very superficial, apparently based on a letter and an unpublished document both from the exporting government, and a report by a US consultant. These documents must be available to all stakeholders. See section 2.3.



5. Evidence must be provided that all export apples produced in China are bagged for pest and disease control and that this practice controls the relevant pests/diseases. Evidence must also be provided and how can this be verified, as an existing mitigation measure, for export apples to Australia?

Thank you for the opportunity to provide comments on the Issues Paper and I look forward to being notified of the progress of this IRA.

Yours sincerely

A handwritten signature in black ink, appearing to read 'H. Millar', written in a cursive style.

HUGH MILLAR
Acting Executive Director Biosecurity Victoria