

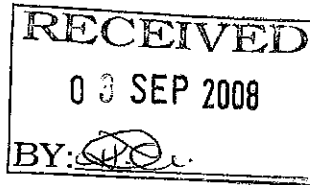
New South Wales

**DEPARTMENT OF PRIMARY INDUSTRIES**

DGO08/640

Dr Colin Grant  
Chief Executive  
Biosecurity Australia  
GPO Box 858  
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dh 3/9/08



28 AUG 2008

→ Neil Mc Waters  
Adviser

Dear Dr Grant

I refer to the release by Biosecurity Australia (BA) in July 2008 of the issues papers for the import risk analyses (IRA) for fresh apple fruit from the People's Republic of China and from the United States of America, for which stakeholder comment was requested.

Comments by NSW Department of Primary Industries (NSW DPI) in the context of recent draft IRA submissions continue to be pertinent to these proposals.

The issues paper for apples from China states that BA is planning to use the 2005 risk analysis undertaken for pears from China as its basis. The 2005 IRA assessed importation of ya and Asian pears from Hebei, Shandong and Shaanxi provinces and fragrant pears from Xinjiang Uigur Autonomous Region. The 2005 IRA was an extension of a 2003 policy which allowed importation of ya pears from two provinces on China's mid-north coast. The application from China to export apples to Australia is not restricted to provinces previously assessed in the pears IRA. It applies to "all commercial apple-producing provinces and all commercially produced apple cultivars in China". NSW DPI's submission on the pears IRA commented on this piece-by-piece extension approach rather than independent investigations of the different risks which would be encountered through importation of fruit from diverse geographic and climatic regions of China. This comment is still applicable. China is a huge country. Scale is a significant aspect of the scope of an IRA and needs to be considered.

In the apples from China issues paper it is claimed that "many of the pests of apples are the same or similar to those associated with pear production in China" but BA also acknowledges that the pest list presented in the issues paper is incomplete. For example, the recently released draft IRA for Unshu mandarins from Japan mentions *Nezara viridula* as attacking shoots and fruitlets of apples in China and *Bactrocera tsuneonis* as 'distributed' in southern China but these exotic pests are not listed in the Chinese apples issues paper pest list. Two *Alternaria* species are listed as associated with apple production in China. In our submission on the China pears IRA NSW DPI raised concerns about the accurate identification and epidemiology of plant pathogens such as the *Alternaria* species complex. Rusts of the genus *Gymnosporangium* are listed in both the issues papers for China and USA. Cedar apple rust, for example, completes part of its

lifecycle on apples and the other half on gymnosperms and it may impact both apple production and plantation timber industries.

Fire blight remains a risk and a concern to Australian pome fruit growers. The issues paper for apples from USA states that "fire blight is widespread in USA" and "outbreaks have occurred in apple orchards of Washington State every season since 1991". Scrutiny of the draft IRA for apples from USA will be required when it is released to assess whether the level of risk of fire blight can be acceptably managed.

European canker is listed as a pest associated with apple production in the USA. NSW DPI submission to BA on the IRA for apples from New Zealand identified that BA had underestimated the potential for entry, establishment and spread of European canker and the consequences that may occur, including impacts on urban amenity trees. Technical errors were detected in BA's discussion of fungicide use in New Zealand orchards resulting in a misinterpretation of the implications for integrated fruit production and European canker control. The approach taken by BA in addressing this pathogen in the draft IRA for apples from the USA will guide our assessment on whether the level of risk can be acceptably managed.

The risks posed by exotic spider mites in the IRA for stone fruits from the USA Pacific Northwest states were raised as a matter of concern in our submission. The stone fruits IRA examined a number of species as a single assessment, which minimised the potential risks of some of these species. One of the significant exotic spider mites mentioned in the USA stone fruits IRA is not included in the USA apples IRA. NSW DPI submission on stone fruits noted that one *Tetranychus* spider mite which is widespread in Australia is morphologically very similar to an exotic spider mite present in USA. As BA frequently recommends fruit inspection as a mitigation measure for small, cryptic arthropods such as mites, spider mites and scale insects, an exotic species, if detected, could easily be misidentified and disregarded by AQIS at the border.

The brevity of detail regarding operational management of orchards has been a recurrent issue in IRAs. Lack of detail or presenting certain practices as optional increase the level of uncertainty for stakeholders attempting to determine whether identified risks are able to be mitigated to acceptable levels.

Thank you for the opportunity to comment on these issues papers. I assume that BA's responses to the issues that have been raised in this submission will be clearly evident in the draft IRAs when they are released.

Yours sincerely



**RICHARD SHELDRAKE**  
**DIRECTOR-GENERAL**