

Summerfruit Australia Ltd submission to Biosecurity Australia on the draft import risk analysis report for stone fruit from the USA.

Introduction

Summerfruit Australia Ltd (SAL) is grateful for the opportunity to comment on this draft IRA document on behalf of its members. Industry supports and endorses some areas of the report. However, industry has also identified several areas of concern or points requiring clarification and these have been outlined below. Importantly, industry would like to express disappointment and object to the fact that consultation did not occur regarding the scope of this IRA, under the new regulated process. Industry feels that there are several complex science and biosecurity related issues within the document that should have been outlined in an issues paper, as per the expanded process. This would have provided an opportunity for increased discussion and consultation to resolve some industry concerns associated with the draft IRA and helped to foster a partnership approach between industry and Biosecurity Australia (BA).

Specific issues raised

Scope of the IRA

Industry requests that BA provide specific justification for the inclusion of the US Stone fruit import risk analysis (IRA) in the standard rather than expanded process. Industry considers that the complexity of the science and nature of biosecurity risks considered within the IRA are such that the use of the expanded IRA process, as outlined within the 2007 IRA Handbook, would have provided for a more thorough and consultative IRA process. Further, the IRA Handbook clearly states that the first step in the IRA process would be consultation on scope and approach. Industry has not been approached regarding the scope of the IRA within the new regulated process to date, and considers this to be a major omission of the described process as per the Handbook. Three key biosecurity issues are highlighted below in support of the expanded rather than standard IRA process.

Key biosecurity issues in support of an expanded IRA

- A. The IRA considers stone fruit from California and the Pacific Northwest of the US. Two fruit fly species of the genus *Rhagoletis* have been identified to be of concern. The two species are pests of serious economic concern as identified within the IRA, and have a wide host range of commercial crops and some non commercial plants present within Australia. Industry endorses BA's analysis of risk and proposed risk management measures. However, there currently is no provision for monitoring for these species post barrier, as they do not respond to the trap types used within the Australian exotic fruit fly monitoring grids. Whilst

this does not represent a flaw within the analysis, industry is unsure how BA and post border biosecurity authorities would confirm that the adopted risk management measures for these fruit fly species have been effective? Has BA discussed this issue with post border authorities prior to the determination of the scope of the IRA and if so what was the outcome?

- B. The IRA also indicates that California and the Pacific Northwest are free of the plum pox potyvirus (PPV) and BA correctly indicates that this virus is a devastating affliction of *Prunus* species. The disease was detected in Pennsylvania in 1999 and despite an extensive quarantine and eradication program was detected in New York and Michigan in 2006. Outbreaks continue to be detected in the New York counties of Niagara and Orleans. This would indicate that the disease has been able to spread despite efforts by quarantine authorities for several years, or it has remained undetected for many years acting as a reservoir for further infestation over a much wider area. Florida

Industry acknowledges that extensive surveys have been conducted on commercial species in some US states, and nursery stock movement restrictions exist in some areas. However, the survey level of native species that may act as a reservoir for the disease and the level and extent of surveys conducted within the PRA area are not clearly defined. Industry has, in the past, indicated to BA that an incursion of PPV would decimate the industry and we would like to work closely with BA to ensure that US stone fruit is not a pathway for the introduction of this serious disease. Industry feels that a discussion paper on the risks posed by PPV, as the first step of an expanded IRA, would have been an appropriate and essential first step to assure industry that all of the relevant factors associated with PPV in the US had been considered.

- C. The IRA correctly identifies a range of lepidopteran borers that may be associated with US stone fruit. The fruit borers have also been correctly determined to be above Australia's appropriate level of protection (ALOP) and a range of possible risk management measures have been suggested for peach twig borer (*Anarsia lineatella*), cherry fruit worm (*Grapholita packardii*) and lesser apple fruit worm (*Grapholita molesta*). However, BA indicates that 'detailed efficacy data on treatments is not available for the quarantine pests identified and would need to be provided by the exporting country before these treatments can be finalised and final import conditions developed.'

The lack of efficacy data for risk management measures and no suggestion of preferred measures by the exporting country would once again suggest that a discussion paper outlining these issues and inviting comment, as part of an expanded IRA, would have been an appropriate and essential first step. Under the current standard process industry will now be excluded from commenting on risk management measures for these pests before a provisional final IRA report is published which is deemed unacceptable.

SAL considers that the complexity of the science and potential biosecurity impacts of the significant quarantine issues outlined above warrant an expanded rather than standard IRA. SAL is disappointed that consultation regarding the scope of the IRA did not occur and would like to request that BA provide a detailed and comprehensive response regarding justification for the use of a standard

rather than expanded IRA to ensure a cooperative and transparent IRA process that can be supported by industry.

Specific issues

1. **Visit to US production areas.** Industry is aware that BA representatives visited US stone fruit production areas prior to the commencement of the IRA. Could BA indicate what areas were visited and what factors were considered and reviewed that are relevant to the US stone fruit IRA? The provision of this information to industry will assist in the understanding of the work conducted and factors considered by BA prior to the commencement of the IRA.
2. **Spider mites.** BA has determined the unrestricted risk for spider mites to be very low and no risk management required, with a probability of importation to be moderate. This would suggest that there is approximately a 50% chance that the pest will be imported but no risk management measures would be applied. If the pest is detected would risk management measures be applied (consequences have been determined as low)? If the pest is detected and consignments consequently treated would the policy for this pest require revision?
3. **Walnut husk fly and apple maggot.** BA indicated that 'there are no selective trapping measures implemented to effectively detect *Rhagoletis* species in Australia. This would likely increase the potential for the establishment of this species...' SAL considers this to be a serious national issue that may have serious economic consequences upon a number of horticultural industries should the pest enter, establish and spread. As part of the National Plant Protection Organisation (NPPO) responsible for regulatory issues, has or will BA raise the lack of post border security regarding this pest genus with the relevant industries and post border regulatory authorities, in light of the development of the US stone fruit IRA?
4. **Plant bugs (*Lygus* spp.).** BA has determined the unrestricted risk for plant bugs to be very low. If the pest is detected would risk management measures be applied (consequences have been determined as moderate)? If the pest is detected and consequently consignments treated would the policy for this pest require revision?
5. **Armoured scales.** BA has referred to a previous import assessment for NZ stone fruit. Could BA clarify if the policy reference refers to imports to the east coast of Australia or more recent policy into WA? Does BA have recent interception data for NZ stone fruit into Australia that may be provided to industry to assist with the understanding of BA considerations?
6. **Peach twig borer.** This pest has been determined to be above Australia's ALOP and only potential risk management measures have been suggested. Industry understands that if data has not been presented BA cannot propose specific risk management measures. However, determination of risk management measures, after the comment period on the draft IRA has elapsed, is not a consultative approach and is not in the interests of BA and industry cooperation. As stated previously, this problem should have been addressed in an initial

discussion paper as part of the expanded IRA process. In the interests of a comprehensive and collaborative approach, industry requests that BA provide an additional opportunity for all stakeholders to comment on determined risk management measures prior to the release of the provisional final IRA report.

7. **Leafrollers.** Reference is made to leafroller interception data on NZ stone fruit in 2003 and 2006. Can BA provide industry with the NZ stone fruit interception data to assist with industry understanding of the issues considered?
8. ***Grapholita* spp.** BA has referred to a previous import assessment for NZ stone fruit. Could BA clarify if the policy reference refers to imports to the east coast of Australia or more recent policy into WA? Does BA have recent interception data for NZ stone fruit into Australia that may be provided to industry to assist with the understanding of BA considerations?

Cherry and lesser apple fruit worms have been determined to be above Australia's ALOP and only potential risk management measures suggested. Industry understands that if data has not been presented BA cannot propose specific risk management measures. However, determination of risk management measures, after the comment period on the draft IRA has elapsed, is not a consultative approach and is not in the interests of BA and industry cooperation. As stated previously this problem should have been addressed in an initial discussion paper as part of the expanded IRA process. In the interests of a comprehensive and collaborative approach, industry requests that BA provide an additional opportunity for all stakeholders to comment on determined risk management measures prior to the release of the provisional final IRA report.

9. **Cherry leaf spot.** Cherry leaf spot had been previously considered in the risk assessment for US cherries and area freedom recognised for the export areas. Could BA indicate when the area freedom arrangements were last reviewed for cherry exports from the US and if they were reviewed in light of the US stone fruit IRA?
10. **Plum pox potyvirus (PPV).** BA has indicated that the risk posed by PPV is that infected fruit and/or seed may enter Australia and result in the establishment of the virus and industry agrees with this assessment.

Industry understands that BA visited the US and reviewed US stone fruit production areas prior to the commencement of the IRA. In light of the extremely serious nature of this disease did BA review the PPV quarantine, containment and eradication program as part of this visit? If a PPV review was conducted industry suggests that the presentation of the findings from that visit may have helped answer some of the questions raised below.

The initial PPV detection was in Pennsylvania in 1999 and despite an extensive quarantine and eradication program was detected in New York and Michigan in 2006. Outbreaks continue to be detected in the New York counties of Niagara and Orleans. This would indicate that the disease has been able to spread despite efforts by quarantine authorities or that PPV has existed in these states for several years undetected, acting as reservoirs for

further infestation. The difficulties in detecting PPV, as it may only present early symptoms at certain times in the growth cycle, would suggest the latter. Has BA reviewed the US survey program and methodologies?

Industry understands that controls are in place for the movement of *Prunus* nursery stock from quarantine areas as stated by BA. However, the draft IRA has not clarified what other restrictions and measures are in place for fruit and the 30 plus native *Prunus* species susceptible to PPV. Industry understands that fruit movement is not restricted and movement requirements for approximately 30 additional native and ornamental *Prunus* species are unclear. Surveys are underway within the quarantine zones on commercial species but the status of surveys on native and ornamental species is unclear.

Industry understands that the ongoing freedom of the PRA area from PPV is maintained by ongoing national surveys of commercial orchards. Are there additional survey requirements for export orchards? Are surveys conducted at times when symptoms are likely to be detected? Do national surveys extend to native and ornamental *Prunus* species?

Pathways for re-entry of the pathogen into the US exist through imported nursery stock. Industry assumes that BA has reviewed this prominent pathway as part of the draft IRA, but this work is not included in the report and now request this information.

As outlined above there are various questions that have not been addressed or presented within the PPV PRA. Industry would appreciate the opportunity to clarify these issues with BA to be sure that these have been considered and addressed. Industry has, in the past, indicated to BA that an incursion of PPV would decimate the industry and we would like to work closely with BA to ensure that US stone fruit is not a pathway for the introduction of this serious disease. As mentioned previously, industry feels that a discussion paper presenting BA findings and outlining the issues associated with PPV, as the first step of an expanded IRA, would have been an appropriate and essential first step to assure industry that all of the relevant factors associated with PPV in the US have been considered.

11. **Unrestricted risk.** The pest risk management section suggests that the unrestricted risk estimates have been considered including an on-arrival randomly selected 600 unit sample conducted by AQIS. Unrestricted risk estimates in previous BA IRA documents have only considered AQIS documentation verification procedures, but not a 600 unit inspection.

Industry feels that the inclusion of the 600 unit sample within the unrestricted risk estimate would reduce the unrestricted risk estimates for the pests considered, in light of previous policy documents that have not incorporated a 600 unit sample as part of the unrestricted risk estimates. Industry feels that if the 600 unit sample is retained as part of the unrestricted risk estimate, comparisons to existing policy (where the 600 unit sample has not been incorporated) would be invalid. Clarification of the use of the 600 unit sample within unrestricted risk estimates would aid industry's understanding of the draft IRA.

12. **Proposed risk management measures.** The IRA correctly identifies a range of lepidopteran borers that may be associated with US stone fruit. These fruit borers have also been

correctly determined to be above Australia's appropriate level of protection (ALOP). A range of possible risk management measures have been suggested for peach twig borer (*Anarsia lineatella*), cherry fruit worm (*Grapholita packardii*) and lesser apple fruit worm (*Grapholita molesta*). However, BA indicates that 'detailed efficacy data on treatments is not available for the quarantine pests identified and would need to be provided by the exporting country before these treatments can be finalised and final import conditions developed.' The lack of efficacy data for risk management measures and no suggestion of preferred measures by the exporting country would once again suggest that a discussion paper outlining these issues and inviting comment, as part of an expanded IRA, would have been an appropriate first step. Under the current standard process, industry will now be excluded from commenting on risk management measures for these pests, before a provisional final IRA report is published.

- 13. Action for non-complying lots.** Industry recognises that feedback on non-compliance for import policy from AQIS is an essential mechanism to ensure that quarantine policy is operating effectively and Australia's biosecurity integrity is maintained. However, feedback to industry on non-compliance issues has been limited to date. Can BA indicate what feedback mechanisms are currently in place for existing plant import policy between AQIS, BA and industry and how these might be improved to ensure that industry remains well informed of import non-compliance issues in the future?