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# Response to Draft Import Risk Analysis Report for Table Grapes from the People's Republic of China

This is a response to the draft Import Risk Analysis (IRA) for table grapes from the People's Republic of China by the Australian Table Grape Association.

The ATGA has consulted with respected research scientists, exporters and table grape growers along with a meeting with Biosecurity Australia discussing the draft IRA. The ATGA has argued for a systems based approach for quarantine control of Australia's pest and disease so it is understandable that China would request the same. Systems based methods however rely on growers complying with the quality procedures but more importantly, our inspection processes are critical in ensuring that the growers have adhered to the requirements of any systems based control measures. That is one aspect that needs to be thoroughly communicated to the Chinese and procedures developed by AQIS to ensure that what we accept as control measures by the Chinese under a systems based regime is actually happening at the farm.

The following comments are offered in response to the draft document.

**Table grape culture in China**

1. The spray program (p 23) is rudimentary, most likely effective for downy mildew suppression, but it will not be effective in control of common mite pests (two spotted mite, "red mite") or insects.
2. Bagging grape bunches is likely to increase humidity and favour particular pests and diseases that are present within the bunch before bagging (eg mealybugs).
3. Yunnan is within a fruit fly zone (D. dorsalis) and exports red globe.

**Pest and disease assessments**

4. The pest and disease assessments are very conservative in terms of impact, being based on overseas experience and in situations where the pest/disease has stabilized its population and impact. The normal course of events is that new introductions go through a massive expansion phase (because there are unlimited food sources, no natural controls or competitors) in the first few years. Examples — Lucerne aphids, ash whitefly, cane toads, downy mildew

etc. The real effects of the potential introductions are under rated for this reason.

5. Any pest or disease that is present in bunches is a high risk — eg Harlequin ladybird, grape berry weevil, Japanese beetle and other Ruteline beetles. It is difficult to understand the difference in rating between Japanese beetle and the other Ruteline beetles.
6. Grape Midge P.74. This apparently lays an egg within a berry, and larvae and pupae can be present in grape bunches. The chances of entry are listed as low — but there is no information on what larval instar stage overwinters on the fruit, but larvae can survive the cold storage and transport phase. You could argue that : Within Australia, the movement of wine and table grapes is only partially limited due to phylloxera — there is still free movement within the main production areas of the eastern states. The source of export grapes (by district in China can and will probably change over time. To say that the likey import regions of China is not known to have Cecidomysia sp. Is not very convincing.
7. Grape phylloxera, p.93. Impact score was rated as "significant at the regional level". This assessment would seem to be a conservative rating and is a good example of the conservative ratings through the document. Grape phylloxera costs infested vineyards over $20,000 per ha, restricts access to markets, and has ruined wine production in whole districts (Geelong, Rutherglen, Goulburn Valley). Phylloxera is a major pest that has and still does impose a set of trade and economic restrictions on grape production. This is clearly of a major significance nationally.
8. European grape berry moth, P.104. The risk is that eggs and larvae may be imported on grapes. This pest is discounted because there are no records of the insect on table grapes in China, yet it is established in China in the provinces next to those producing grapes? That asks some questions. The probability of entry is rated "low" based on scant information but for a leaf roller pest that can be in grape bunches the probability of entry may be greater. The pest is a moth and should be classed as similar to light brown apple moth.
10. Grape Plume moth, P. 110. Eggs, larvae and pupae can be imported in table grapes, pupae may survive the cold chain or may not, therefore risk must be supposed in the absence of data, and the possibility of entry is moderate, not low. There is no evidence that pest control practices in Australia will control the pest, although suppression not elimination is likely. If established, the probability of spread is at least moderate, based on the wide distribution in Asia. This is possibility an under rated pest.

11. Apple Helionoid, P. 116. A pest of fruit with little information on grapes, but rated as a quarantine pest for Korean table grapes to the USA. Eggs are inconspicuous but eggs and larva can be on grapes. "Moderated by no report from table grapes in China" — no reports can mean no systematic survey, misidentification, or lack of interest. The case could be argued for more information before an assessment of entry can be made or assumed to be low!

12. Information on the pathogens for Grape Cluster Black Rot *(Physalospora baccae)* and Spike Stalk Brown Rot *(Alternaria viticola)* was limited. Pathogens for Grape Cluster Black Rot and Black Rot *(Guignardia bidwel/ti)* have wind-borne ascospores and the pathogen for Black Rot has wind-born dark, multi-celled conidia. Pathogens for Grape Cluster Black Rot, Spike Stalk Brown Rot and Black Rot could be present in bunches/berries as symptomless infections and there was no indication that storage procedures would eliminate these infections.

**Pest Risk Management**

13. "Area freedom" eg for phylloxera, must be based on climatic, regulation, non host and/or other logical reasons why a pest is not present, and must be substantiated by surveys, traps etc. Lack of information or records is not a basis for area freedom from phylloxera. There is no information on management or biological reasons why phylloxera would not be distributed throughout China's grape areas.
14. Fruit bagging (P. 189) appears sound as a management technique, but also provides a modified microenvironment which may increase the incidence of some pests and diseases. Presumably, it also restricts the opportunity for preharvest sprays.
15. The difficulties of visual inspections (eg. P. 191) are recognised.
16. Pre shipment fumigation with $CO_2$ and $SO_2$ are good practices. However recent research in Australia has demonstrated the efficacy of ethyl formate with $CO_2$ , which in combination with standard $SO_2$ pads and cool storage should be even more effective.
17. Pest risk management for Grape Cluster Black Rot and Spike Stalk Brown Spot would require pest area freedom as indicated in the IRA. However, pest vineyard freedom was also a proposed option in the IRA. More information about this option should be requested. Issues of concern would be the size of the vineyard to be registered as 'disease free', its distance from diseased vineyards or other sources of the pathogen(s) [e.g. urban, wild or native vines that are alternative hosts in vineyard surrounds] and procedures to guarantee vineyard freedom. These issues should be considered in relation to knowledge of spread of the pathogens. Vineyard freedom could be compromised if the vineyard area is too small and/or not far enough away from sources of the pathogen(s) and/or there are extreme weather events promoting pathogen spread.
18. Experiences with extreme weather events and the unexpected spread of diseases such as black rot (USA) and black spot (Australia) into and within biosecurity trial sites should be taken into consideration.