No.20-7015 Food Safety and Consumer Affairs Bureau
25 Sept 2008

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Department of Agriculture, Forestry and Fisheries

Exportation of Japanese unshu mandarins bound for Australia

Regarding the above mentioned issue, Australia published the draft report of the import risk analysis (IRA) on 29 July 2008 concerning Japanese unshu mandarins and is calling for comments on the said draft report.

We hereby submit Japan's opinions on the said draft report as below.
In addition, we submit Japan's request(s) as per annexed sheet about the draft of the plant quarantine measures based on this IRA along with our opinions. We request that [our requests] be considered in setting the plant quarantine measures in Australia.

Note

Regarding Citrus Canker disease, based on investigation and research up to date, we think that the possibility that Citrus Canker disease will invade and spread in the importing country through fresh fruit of unshu mandarins is at a negligible level, and that special plant quarantine measures are not necessary. At least currently, we think that the strict plant protection measures that the IRA draft report is trying to set are not necessary; however, we set the early achievement of the exportation of Japanese unshu mandarins to Australia as our priority, and we submit our opinions on the below points only regarding the IRA draft report of this time. In regard to relaxation of the plant protection measures, we wish to discuss based on technical documents between the plant quarantine authorities of both countries in the future.

In the IRA draft report of this time, it proposes prohibition of movement and cultivation of *Rutaceae* plants other than unshu mandarins in the designated exporting area(s). However, we think that cultivation of *Rutaceae* plants that are less sensitive [to Citrus Canker disease] in the designated exporting area(s) excluding the designated exporting orchard(s) does not increase the occurrence risk of Citrus Canker disease. This is approved as the export conditions of unshu mandarins bound for the United States of America (Attachment 1).

Therefore, concerning the designated exporting area(s) excluding the designated exporting orchard(s), it should be "prohibition of movement and cultivation of *Rutaceae* plants that are more sensitive to Citrus Canker disease than unshu mandarin."

In addition, we would like to add that we submitted a thesis on the Citrus Canker disease resistance in person at the meeting with Mr Lois Ransom on 13 June 2007 as per request from Australia (List of references: Attachment 2).

Also, we send the thesis on the Citrus Canker disease resistance (Attachment 3) again, which we additionally submitted to the Australian Embassy in Tokyo on 23 August 2007.

Yoshio Tokura
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Food Safety and Consumer Affairs Bureau
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(Annexed sheet)

(1) New designation [Addition] of exporting area(s)
The IRA draft report that Australia published this time does not propose the conditions for new designation of exporting area(s).

We wish to newly designate [exporting] areas in addition to 4 areas in Fujieda city, Shizuoka prefecture, if there is not an occurrence of Citrus Canker disease in the areas like the above said areas [in Fujioka city].

Therefore, please advise the procedures for Australia to newly designate [area(s)] as exporting area(s).

(2) New designation [Addition] of packing facilities
Australia suggests that 4 areas in Fujieda city, Shizuoka prefecture be designated as the designated exporting areas of Japanese unshu mandarins [bound for Australia] and that Ministry of Agriculture, Forestry and Fisheries of Japan register the packing facility of JA Oigawa only as the packing facility.

As mentioned in the above (1), we will require to register packing facilities other than [that of] JA Oigawa in the case where the exportation of [Japanese] unshu mandarin bound for Australia occurs from area(s) other than Fujieda city, Shizuoka prefecture.

Therefore, please advise the concrete procedures that Australia considers to newly register packing facilities.

Attachment 1

Guidelines for Quarantine of Unshu Mikan for Export to the US

History

9 October 1968	43 NOSEI B No. 345
30 September 1970	45 NOSEI No. 4646
17 July 1978	53 NOSAN No. 4941
21 October 1985	60 NOSAN No. 5986
8 September 1987	62 NOSAN No. 5668
12 January 1989	1 NOSAN No. 38
29 September 1994	6 NOSAN No. 5528
1 November 1995	7 NOSAN No. 1
5 January 2001	12 NOSAN 9156
30 June 2003	15 SEISAN No. 2459 Partially amended

Intention

No. 1 Quarantine of unshu mikan exported to the USA to the states of: Alabama, Alaska, Arkansas, Colorado, Connecticut, Delaware, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin and Wyoming, and to the District of Columbia, (hereafter, 'Mikan for Export to the US') will be implemented in accordance with the stipulations of the Plant Protection Law (hereafter, 'the Law'), the Plant Protection Law Enforcement Regulation (hereafter, 'the Regulation'), the Export Plant Quarantine Regulation (hereafter, 'the Export Regulation') and these Guidelines.

2 The Growing Site Inspection Implementation Bylaw (dated 9 April 1957 32 SHINKYOKU No. 1065) does not apply to quarantine of Mikan for Export to the US.

Deployment of an Assistant

No. 2 To assist the clerical work of inspections carried out by Plant Protection Officers, the Director of a Plant Protection Station will appoint as an assistant in the inspection of Mikan for Export to the US, a person with knowledge of pest and disease who is not a person with a direct interest in the sale and purchase of Mikan for Export to the US (hereafter, 'the Assistant'), and will issue the appointment in writing on the appended Form 1.

2 The aforementioned Assistant will be appointed from among persons recommended by the Governor of the Prefecture in which Mikan for Export to the US are grown (hereafter, 'the Prefecture').

Establishment of a Growing Region for Export Mikan

No. 3 The agricultural cooperative (hereafter, 'the JA') to which persons producing Mikan for Export to the US are affiliated, will establish growing sites, comprising disease-free zones and buffer zones (hereafter, 'the Growing Region for Export Mikan') under the guidance of the Prefecture.

2 The aforementioned disease-free zones must satisfy each of the following conditions.

(1) No citrus other than unshu mikan.

(2) Complete prevention of inward transport of plants of the citrus genus and the trifoliate genus, other than unshu mikan nursery stock or scions.

(3) Surrounded by a buffer zone as stipulated in the following section.

(4) No trees infected with citrus canker.

3 The buffer zones in Section 1 must satisfy each of the following conditions.

(1) No plants of the genus citrus other than: unshu mikan, hyuga orange, Kiyomi, hassaku orange (*Citrus hassaku*), hyuganatsu orange (*Citrus tamurana)*, Hirado buntan pomelo, Vietnamese buntan pomelo, mandarin orange (*Citrus reticulata*), yuzu (*Citrus junos*) and kumquats (Kumquats *fortunella*) (excluding Hong Kong kumquat).

(2) Located around the perimeter of the disease-free zone in a band of width 400 metres.

(3) No trees infected with citrus canker.

Submission of applications for inspection

No. 4 By March 31 of each year a true copy of an Application for Inspection of Growing Site (Regulation form 12-3) will be submitted through the Prefecture by the Chair of the JA that established the Growing Region for Export Mikan, and 30 days prior to export a true copy of an Application for Export Inspection (Regulation form 14) will be submitted through the Assistant by a person seeking to export Mikan for Export to the US, to the Plant Protection Officer at the Plant Protection Station that has jurisdiction over the region (including substations or branch offices. Hereafter the same).

2 When the Plant Protection Officer receives the aforementioned Application for Inspection, they will forward a copy to the Assistant.

3 For applicants for inspection of growing sites, the Plant Protection Officer will cause to be erected in clearly visible positions at each growing site Regulation form 13-2-1 name plates in the disease-free zones, and Regulation form 13-2-2 name plates in the buffer zones, numbered according to growing site.

Notice of inspection

No. 5 The Plant Protection Officer will notify the Assistant in advance of the date of an inspection the officer will themselves conduct, or of an inspection conducted jointly with Japanese and American plant protection officers (hereafter, 'Joint Inspection'), and the requirement to be in attendance for that inspection.

2 The Assistant will notify the applicant in advance of the date of an inspection the Assistant will themselves conduct, of an inspection conducted by a Plant Protection Officer, or of a Joint Inspection, and the requirement to be in attendance for that inspection.

Growing area inspection

No. 6 An immediate post-petal fall inspection as per Regulation 1-3 will be carried out by the Assistant in respect of an entire Growing Region for Export Mikan. Based on those results the Plant Protection Officer will carry out their inspection, and areas that pass inspection by the Plant Protection Officer will be subject to Joint Inspection. Joint Inspection of a Growing Region for Export Mikan that has passed a previous year's Joint Inspection may be foregone.

2 A pre-harvest inspection as per Regulation 1-3 will be carried out by the Assistant in respect of an entire Growing Region for Export Mikan. Based on those results the Plant Protection Officer will carry out their inspection and the bacteriophage test specified at 8, and areas that pass inspection by the Plant Protection Officer will be subject to Joint Inspection by Japanese and American plant protection officers. The results of bacteriophage tests conducted by the Plant Protection Officer will be submitted to the American plant protection officer in advance of a Japan-America Joint Inspection. An inspection by the Assistant is to be be carried out 30 days or prior to harvest.

Export inspection

No. 7 An export inspection will be carried out for each consignment to inspect for pest and disease, the presence or otherwise of marks (packaging and boxes), and whether sterilization of fruit surfaces and measures to prevent mixing of other fruit with mikan have been completely carried out.

2 In an inspection by the Assistant, the sample size for the aforementioned inspection for pest and disease will be no less than ten per cent, and in an inspection by a Plant Protection Officer, no less than five per cent, where a consignment has already passed inspection by the Assistant. Joint Inspection will be conducted of consignments that have passed inspection by the Plant Protection Officer.

3 Inspection for the presence or otherwise of marks, sterilization of fruit surfaces and measures to prevent mixing of other fruit will be carried out on consignments that have passed inspection for pest and disease, and an inspection by an Assistant will be of an entire consignment and by random sampling in a Joint Inspection.

Bacteriophage tests

No. 8 The bacteriophage test at 6-2 will be carried out in accordance with a method separately stipulated by the Director-General of the Food Safety and Consumer Affairs Bureau of the Ministry of Agriculture, Forestry and Fisheries in respect of the results of sampling in the ratio of one kilogram per hectare of a disease-free zone.

Inspection records

No. 9 The Assistant will record findings of inspections they themselves conduct using the appended Forms 2 and 3, and will submit the findings to the Plant Protection Officer in advance of the officer's inspection.

Site of inspection

No. 10 Bacteriophage tests will be carried out at the Plant Protection Station, and export inspections will be carried out at a packing shed designated by the Plant Protection Officer.

Criteria for a pass

No. 11 The criteria for a pass in a growing site inspection or an export inspection are as stipulated in the sections following, through to section 4.

2 In a growing site inspection (excluding a bacteriophage test) the conditions at 3(2) and 3(3) must be satisfied.

3 In an export inspection the following conditions must be satisfied.

(1) In the inspection for pest and disease there must be no presence of citrus canker lesions or arrowhead scale (Unaspis yanonensis (Kuwana)), and no other pest and disease.

(2) The following text must be printed on the packaging or box:
Grown in Japan. Prohibited entry into Am. Samoa, Ariz., Calif., Fla., La., N.Marianas, P.R.Tex. and V.I. Permitted entry into rest of the U.S.

(3) Surface sterilisation of the fruit must be conducted by dipping for two minutes in a solution of sodium hypochlorite (effective chlorine concentration of 200 ppm). Sterilisation of the fruit must be conducted prior to the wax coating of the fruit.

(4) No mikan from other than the disease-free zone may be mixed in.

4 A bacteriophage test must reveal no presence of the citrus canker pathogen.

Notification of a fail

No. 12 When the Plant Protection Officer determines that the result of an inspection is a fail, through the Assistant the officer will notify the applicant of the reasons for the fail, and when a fail is decided for a growing site inspection, will advise that the 4-3 name plate must be removed.

Issue of certificate

No. 13 For each Growing Region for Export Mikan that passes pre-harvest inspection, the Plant Protection Officer will issue a pass certificate (Regulation form 19-2).

2 For consignments passing export inspection, the Plant Protection officer will record matters relating to sterilisation in the sterilisation column, and will issue a pass certificate (Regulation 18 form RO) bearing the following notation:

This is further to certify that this shipment of Japanese Unshu Orange is believed to be free from the citrus canker disease (Xanthomonas citri (Hasse) Dowson) and meets all the requirements specified in Quarantine No. 28 U.S.D.A.

3 The Plant Protection Officer will obtain the signature of the US plant protection officer present for the Joint Inspection in the blank space on the aforementioned certificate.

Form 1
Form 2
Form 3

Management supervisors: Yokohama Plant Protection Station and domestic quarantine supervisor

Attachment 2

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List of references that we would like copies of (in Japanese, if that is the only version available):

①**Koizumi, M (1978)** Varietal resistance to citrus canker disease. *Shokubutsu Boeki* (Plant Protection) 32: 207-211. in JAPANESE

②**Koizumi M** and **Kuhara S (1982)** Evaluation of citrus plants for resistance to bacterial canker disease in relation to the lesion extension. *Bull. Hortic. Res. Stn.* Ser. D (Okitsu) 4: 73-92.

③**Ohta T (1969)** Studies on the period of infection with citrus canker of spring leaves and…. *KyushuAssoc Plant Protect Proc*, 1969, 15: 57-59.

④**Sakata H, Ohta T, Nishino T, Ohgushi R (1968)** Studies on the spray program for the control of citrus canker. E. Effect of spraying time for infestation upon fruit. *KyushuAssoc Plant Protect Proc* 1968, 14: 82-83.

⑤**Serizawa S, Inoue K (1978)** Studies on citrus canker. IV. Influence of rainfall on the residual effectiveness of Bordeaux mixture and inorganic copper*Xanthomonas citri*. *Bull ShizuokaPrefect Citrus Exp Stn.* Shimizu-shi, Shizuoka Kankitsu Shikenjo Aug 1978 (14) P. 13-38. Ill.

⑥**Serizawa S, Inoue K, Suzuki M (1985)** Studies on citrus canker disease. IX. Seasonal changes in disease development and correct bactericidal applications. *Bulletin of the ShizuokaPrefectural Citrus Experiment Stn.* 1985, No.21, 35-43; 1 p.

⑦**Serizawa S, Inoue K and Goto M (1969)** Studies on citrus canker. I. Dispersal of the citrus canker organism. *Bull Schizuoka Pref Citrus Exp Stn* 8:81-85 in JAPANESE

⑧**Serizawa S, Inoue K (1982)** Studies on citrus canker disease *(Xanthomonas campestris pv. citri)*. VII. Effectiveness of control and phytotoxicity of combined applications and short-interval alternating applications of Bordeaux mixture and inorganic copper with oil emulsifiable concentrate or with mancozeb wettable powder. *Bulletin of the ShizuokaPrefectural Citrus Experiment Station* 1982, No. 18, 73-83.

⑨**Serizawa S, Inoue K (1983)** Studies on citrus canker disease caused by *Xanthomonas campestris pv.* citri (Hasse 1915) Dye 1978. VIII. Examining the percentage of diseased leaves and the severity of lesions as a standard for forecasting its occurrence. ShizuokaKankitsu Shikenjo Kenkyu Hokoku, *Bull ShizuokaPrefect Citrus Exp Stn.* ShimizuShi, ShizuokaKankitsu Shikenjo. Apr 1983 (19) p. 51-58. ill.

⑩**Yoshida T, Ueno I, Shichijo T, Yamada Y, Kihara T, Nishiura M, Hidaka T, Ito Y, Nesumi H, Iwasaki**

T(1991) New citrus cultivar ' Kousyun Ponkan' . *Bulletin of the Fruit Tree Research Station* 1991, No. 21, 67-74.

⑪Koizumi M (1981)Resistance of citrus plants to bacterial canker disease: a review. International Citrus Congress (4th: 1981: Tokyo, Japan) *International Society of Citriculture* 1: 402-405.

⑫Koizumi, M (1982)Resistance of citrus plants to bacterial canker disease. Proc. Int. Soc. Citriculture: 402-405. *[heritability of resistance to CC]*

⑬Koizumi M (1985)Citrus canker: The world situation. Pages 2-7 in: Citrus Canker: An International Perspective. L. W Trimmer, *Ed. Univ. Fla. Inst. Food Agric. Sci., Gainesville.*

⑭Koizumi M, Grierson W (1979)Relation to temperature to the development of citrus canker lesions in the spring. 1977 International Citrus Congress, Florida. *Proceedings of the International Society of Citriculture* 1979, 3: 924-928, 3 fig, 2 tab; 13 ref.

Attachment 3 provides the publication of:

Goto M (1962) Studies on citrus canker. *Shizuoka University Agricultural Research Report* **12**, 3–72. [in Japanese]