



Our reference: eA59660  
AG&W F2006/000424  
Please refer to: 2008/23

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15 September 2008

Plant Biosecurity  
Biosecurity Australia  
GPO Box 858  
CANBERRA ACT 2601

Dear Sir / Madam

**Response to Draft Import Risk Analysis Report for fresh Unshu Mandarin  
Fruit from Japan**

Thank you for the opportunity to comment on the recently released Draft Import Risk Analysis for fresh Unshu Mandarin Fruit from Japan (Biosecurity Australia Advice 2008/23 – 29 July 2008).

Please find attached the formal response from Primary Industries and Resources SA (PIRSA).

Should you or your staff have any queries on any of the comments from PIRSA, please do not hesitate to contact Mr David Cartwright, Manager Plant Health Policy on (08) 8226 9825 or via e-mail at: [cartwright.david@sa.gov.au](mailto:cartwright.david@sa.gov.au)

Yours sincerely

A handwritten signature in black ink, appearing to read 'Geoff Knight'.

**Geoff Knight**  
CHIEF EXECUTIVE

**PIRSA RESPONSE TO:**

**BIOSECURITY AUSTRALIA ADVICE 2008/23  
DRAFT IMPORT RISK ANALYSIS REPORT FOR FRESH UNSHU  
MANDARIN FRUIT FROM JAPAN**

Primary Industries and Resources SA (PIRSA) have considered the recent Draft Import Risk Analysis Report for fresh Unshu Mandarin Fruit from Japan (Biosecurity Australia Advice 2008/23 – 29 July 2008).

The following comments are provided following our analysis of the document:

**PEST RISK ASSESSMENTS****Citrus Red Mite**

Please note that the citrus red mite is a declared disease under the State's *Fruit and Plant Protection Act 1992*. Although no specific restrictions for CRM apply to fruit, citrus planting material is required either to be sourced from an area free of the pest or to be subject to insecticide treatment in accordance with Condition 5 of the Plant Quarantine Standard – South Australia (July 2006).

**Citrus Canker**

South Australia has some concern over the “equivalence” of actions undertaken in relation to produce movements from Queensland during the recent response to the outbreak of citrus canker in Emerald and the proposed Unshu mandarin protocols. It is also important that proposed import requirements do not jeopardise exports of Australian citrus to international markets that may be “sensitive” to the presence of citrus canker.

**Japanese orange fly**

The pest categorisation process identified Japanese orange fly (*Bactrocera tsuneonis*) as a quarantinable pest present in Japan. It was not however subject to pest risk assessment on the basis that the intended export areas are considered to be Pest Free Areas (PFAs) – Appendix D.

Japanese orange fly is a significant pest of citrus that is present in some Japanese citrus production areas. PIRSA is of the view that a pest risk assessment should be undertaken for *B tsuneonis*. Such an assessment should justify the procedures in place to demonstrate PFA status for this pest.

**Leafhopper species**

A series of leafhopper species are reported on citrus from Japan as follows:

- Apheliona ferruginea* - citrus leafhopper
- Bothrogonia japonica* - black tipped leafhopper
- Edwardsiana flavescens* - green leafhopper
- Empoasca arborescens* - leafhopper
- Empoasca onukii* - tea green leafhopper
- Zyginella citri* - smaller citrus leafhopper

Whilst PIRSA acknowledges that the adults are unlikely to be associated with the pathway, do any of these species oviposit on citrus fruit and thus pose a potential risk of introduction via eggs on or embedded in imported fruit?

### **Exotic Scale species**

Of note, the following armoured scales are not known to occur in SA:

*Howardia biclavis* - mining scale

*Lepidosaphes gloverii* - glover scale

*Morganella longispina* - plumose scale

*Parlatoria pergandii* - chaff scale

*Pseudaonidia trilobitiformis* - trilobite scale

### **Mealybugs**

The consequences of the four listed mealybug species becoming established in Australia is given a LOW rating. PIRSA questions this rating as mealybugs cannot be controlled with petroleum spray oils, and therefore require synthetic pesticides, which are generally highly disruptive to the citrus IPM systems.

The only alternative to synthetic pesticides is to try and introduce host-specific parasitoids, a very costly and time-consuming process. Under current import and clearance arrangements this is likely to cost around \$0.7-1.0 million per bio-control agent. At least 1-2 agents are likely to be required per mealybug species. These costs seem to have been too readily discounted by the authors of the draft report and PIRSA recommends reconsideration of the analysis on the basis of these comments.

## **PEST RISK MANAGEMENT**

### **Japanese orange fly**

The draft IRA Report notes in Appendix D that Japan has a fruit fly monitoring program in place covering the four export production areas in the Shizuoka Prefecture. Traps at the twelve monitoring sites are installed on a 2 km grid overlaying these export areas. In the absence of information to the contrary, PIRSA believes the risk to Australian host production areas from *B tsuneonis* warrants a more intensive monitoring program to continue to demonstrate the PFA status.

Japanese orange fly males are not known to be attracted by any synthetic lure (White and Elson-Harris 1994). The recent draft Annex 1 (Fruit Fly Trapping) to ISPM 26 (Establishment of Pest Free Areas for Fruit Flies (Tephritidae)) indicates that Protein Attractants are commonly used to detect this pest species. Further the draft Annex 1 indicates in Table 5b that the trap densities for food lures in the scenario of "Detection survey for exclusion" should be 1 / sq km for production areas and 2 – 5 / sq km in urban areas.

We note that the indicated detection level used by Japanese authorities is a 2 km grid across both urban and production areas and therefore question why BA is proposing that we accept this significantly reduced level of trapping to

that which would be required for Australian fruit fly PFAs by a number of our key trading partners?

It is further considered that the PFA monitoring for Japanese orange fly should be included as a specified part of the pest management procedures for future imports from the region.

#### **Pink citrus rust mite / thrips species**

In Section 5.1.1, the phytosanitary measure recommended to mitigate the risk of introducing the pink citrus rust mite (*Aculops pelekassi*) and the three listed thrips species is "inspection and remedial action". PIRSA believes that it is difficult enough to ensure detection of thrips by an inspection process, but simply unrealistic for an eriophyid mite. These mites are not visible to the naked eye or hand lens, and are often very difficult to detect with a low-power stereo-microscope. Given that most AQIS inspections occur unaided or at best with a hand lens, the proposed measure is a non-effective measure and should be reassessed.

#### **CONCLUSION**

PIRSA recommends that Biosecurity Australia carefully consider the above during the next phase of its analysis of the import request for fresh Unshu mandarin fruit from specified production areas in Japan.

Primary Industries and Resources SA  
September 2008