



Reference: 13293/09

Department of
Primary Industries and Fisheries

21 DEC 2009

Dr Colin Grant
Office of the Chief Executive
Biosecurity Australia
GPO Box 858
Canberra ACT 2601

Dear Dr Grant

Biosecurity Australia Advice 2009/26 – ‘Draft import risk analysis report for fresh apple fruit from the United States of America Pacific Northwest states’

I refer to the ‘Draft import risk analysis report for fresh apple fruit from the United States of America Pacific Northwest states’ (US PNW) (draft IRA report) and your request for comments by 21 December 2009. The draft IRA report proposes that the importation of fresh apple fruit from the US PNW be permitted subject to specific quarantine measures.

The Department of Employment, Economic Development and Innovation (DEEDI) notes that Biosecurity Australia has identified 34 quarantine pests of apple fruit that require risk mitigation measures to reduce the risks to an acceptable level. The draft IRA report proposes a combination of risk management measures and operational systems to ensure the phytosanitary status of consignments.

DEEDI has reviewed the draft IRA report and has made a number of recommendations as detailed in the attached document.

Thank you for the opportunity to comment on the draft IRA report. DEEDI will appreciate receiving a response on how the issues raised are to be addressed in any further review leading to the finalisation of this IRA.

If you require any further information regarding this matter, please do not hesitate to contact Dr Fiona Giblin on telephone 07 3239 3472 or email fiona.giblin@deedi.qld.gov.au.

Yours sincerely



Robert Setter

Associate Director-General

Agriculture, Food, Tourism and Regional Services

Department of Employment, Economic Development and Innovation

Att

**Department of Employment, Economic Development and
Innovation's response to the
*Draft import risk analysis report for fresh apple fruit from the
United States of America Pacific Northwest states***

**Biosecurity Australia Advice 2009/26
December 2009**

1. Fire blight

a. The Department of Employment, Economic Development and Innovation acknowledges Biosecurity Australia's comments regarding fire blight. Concern remains that the importation of apples from the United States of America Pacific Northwest states (US PNW) poses a high-risk pathway for entry of the fire blight pathogen, *Erwinia amylovora*. As the potential volume of fruit to be imported into Australia from the PNW is considerably greater than compared with New Zealand, the probability of entry is higher, given that the fire blight pathogen is abundant in US PNW (refer page 36).

Potential mitigation measures for fire blight are discussed in detail on pages 251-253, 260 and 267. A high rate of inspection is required, along with associated analysis, review and reporting. It is anticipated that all relevant information would be made available to stakeholders on an ongoing basis.

Recommendation: That stakeholders are given an opportunity to comment on proposed mitigation measures for fire blight and on any changes in status that may occur in the future.

b. Insufficient weight is given to the findings of Ordax *et al.* (2009) (page 36) (now published in the Journal of Applied Microbiology in July 2009 (Volume 107, issue 1, pages 106-116). The researchers demonstrate that *Erwinia amylovora* could survive desiccation and starvation for at least 35 days in mature apple calyces. The authors suggest that *E. amylovora* could go unnoticed in the fruit due to the lack of symptoms and, therefore, that the healthy appearance of fruit is not evidence that it is free of the pathogen. They also determined that cold conditions used on long-distance transport of fruit actually increase the survivability of the pathogen in the fruit calyces.

Recommendation: That the paper by Ordax *et al.* 2009 is given more consideration in the report as this work is extremely pertinent to this IRA.

2. Waste disposal

a. The issue of trash disposal continues to be a concern as it provides a pathway for many pests and diseases. It is realistic to assume that trash cannot be fully eliminated from packing trays. In addition, there is the ongoing problem of disposal of excess or unsaleable fruit as well as disposal of apple cores (with calyces) by consumers into growing areas and the environment. There is also concern with disposal of packing material. This risk is high, especially when considering the research provided by Ordax *et al.* (2009) in relation to the survival of *E. amylovora*. The location of packing houses and disposal of unsaleable fruit and fruit remnants in production areas increases the likelihood of pathogen entry and establishment in apple orchards.

Recommendation: That trash and waste from imported consignments of imported apples be treated as quarantine waste.

b. Ingels *et al.* (2008)¹ should be cited in this IRA as the authors discuss the potential for movement of *E. amylovora* from infected cuttings after chopping of prunings on the ground of an orchard. This floor trash is a viable source of inoculum which can be swept up into the canopy. Although it may not increase the incidence of infection in an already infected orchard, it would definitely be a risk to dispose of infected trash as chopped mulch on the floor of an uninfected orchard.

Recommendation: That the paper by Ingels *et al.* (2008) be considered in the apple IRA report.

3. Coprinus rot

4.17.5 Consequences

The indirect consequences in international trade of the presence of the fungus, *Coprinopsis psychromorbida* (page 126), has been rated as 'D'. The fungus, *Phyllosticta arbutifolia* (apple blotch), has been rated as 'E'. Both pathogens would have serious implications on market access to countries such as Japan and, therefore, it is considered that *C. psychromorbida* should have an equal rating of 'E' which would then increase the overall consequences to MODERATE.

Recommendation: That the indirect consequences in international trade for Coprinus Rot should be consistent with Apple Blotch, so that the overall consequences are rated appropriately.

4. Management for *Sphaeropsis pyriputrescens*, *Phacidiopycnis piri*, *Phacidiopycnis washingtonensis* and *Truncatella hartigii*

It is stated that APHIS is required to provide information on possible treatment options to mitigate risks associated with these pathogens (page 256). It is anticipated that APHIS will have complied by the Final IRA report.

Recommendation: That stakeholders are given an opportunity comment on proposed mitigation measures for these pathogens.

5. Errors and Omissions

On page 19, the Table 3.1 does not list European canker in the pest control program.

On page 32, apple scar skin is inappropriately included in the Domain Fungi section of Table 4.1a.

¹ Ingels C.A., Lindow S.E. and Koutsoukis R. (2008). Movement of *Erwinia amylovora* from fire blight cuttings after chopping. Proceedings of the Xth International Pear Symposium, Peniche, Portugal, 22-26 May 2007, International Society for Horticultural Science (ISHS).