



WESTERN AUSTRALIAN
FRUIT GROWERS' ASSOCIATION
I N C O R P O R A T E D

5th September 2008

Mr. John Cahill
Chief Executive
Biosecurity Australia
GPO Box 858
CANBERRA ACT 2601

Dear John,

Submission to the issues paper for the import risk analysis of fresh apple fruit from the United States of America.

The Western Australian Fruit Growers' Association (WAFGA) welcomes the opportunity to provide a written submission to the issues paper for the import risk analysis of fresh apple fruit from the United States of America (the Issues Paper).

WAFGA is the peak pome (apple and pear), citrus and stone fruit industry representative body in Western Australia, with a membership of more than 600 commercial fruit growers. WAFGA conducts agri-political representation, research and development, communication and promotional activities with the primary objective of ensuring both a profitable and sustainable industry for all Western Australian fruit growers.

In making this submission, WAFGA's approach is to remain consistent with its previous submissions, and focus on the risks to the Western Australia pome fruit industry. WAFGA is a member of Apple and Pear Australia Limited, and we support their stated position in regard to the risk of exotic pests and diseases to Australia. As such we feel it unnecessary to duplicate those concerns in this submission.

WAFGA notes Biosecurity Australia's reference to existing policy, particularly the most recent of these, the Final import risk analysis report for apples from New Zealand, (November 2006). WAFGA notes that on Page 1 of Part A of that document it states: *No satisfactory risk management procedures could be identified for apple scab disease. Therefore, it is proposed that imports of New Zealand apples into Western Australia not be permitted.*

Biosecurity Australia has already identified the presence of apple scab in the United States of America (the Issues Paper, page 30). WAFGA therefore expects consistency with the existing policy and that Biosecurity Australia will recommend that the importation of fresh apples into Western Australia is not permitted through this process. It would appear to be the only course of action for Biosecurity Australia.

Biosecurity Australia has also identified the presence of codling moth the United States of America (the Issues Paper, page 19), a declared species in Western Australia under the Agriculture and Related Resources Protection Act (1976). On this, WAFGA believes that Biosecurity Australia consistently underestimates the consequences of the importation, (as

opposed to the consequences of entry, establishment and spread) of codling moth into Western Australia. WAFGA therefore requests that as part of this review, Biosecurity Australia reviews WAFGA's comments on the likely impact of codling moth in our submission on the Draft Import Risk Analysis Report for Fresh Stone Fruit from California, Idaho, Oregon and Washington (July 2008).

This import risk analysis also presents Biosecurity Australia with an opportunity to review two additional areas of concern for WAFGA, (1) the need to quantify the level of increased risk that occurs with an increased volume of fruit trade; and (2) the variation in the risk mitigation activity which occurs in the exporting country.

1. In considering risk, Biosecurity Australia should recognise the significant differences in potential volumes of trade which exist between this applicant and the existing policy (New Zealand). In the recently released Draft Import Risk Analysis Report for Fresh Stone Fruit from California, Idaho, Oregon and Washington (April 2008), Biosecurity Australia stated that *'One factor affecting the likelihood of entry is the volume and duration of trade. If all other conditions remain the same, the overall likelihood of entry will increase as time passes and the overall volume of trade increases'*.

In its final import risk analysis report for apples from New Zealand (November 2006), Biosecurity Australia estimated a likely volume of trade as 200 million apples – about 34 000 tonnes of fruit. In 2003, total apple production in the United States of America was 3.9 million metric tonnes, and its exported 546 000 metric tonnes of fresh fruit (World Apple Report, 2005). Given this relative sizes of the American and New Zealand apple industries, WAFGA believes that the import risk analysis should assess the likely volume of fruit to be imported from the United States of America, and if there is a marked difference between that estimated from New Zealand, then the resultant risk should be considered prior to the release of the relevant import risk analysis.

2. In the Draft Import Risk Analysis Report for Fresh Stone Fruit from California, Idaho, Oregon and Washington (April 2008), Biosecurity Australia highlights the importance of the New Zealand's Summergreen program as a risk management process, which includes (a) appropriate field sanitation programs, and (b) cultural and chemical control programs. Despite this, it did not appear to call for similar mandatory processes for stone fruit producers in the United States of America.

WAFGA calls on Biosecurity Australia to assess production practices in the United States of America's apple industry against those of existing policy and ensure at least a similar mandatory process through the import risk analysis process.

Could you please ensure that you formally acknowledge receipt of this submission and advise WAFGA on any future developments in the preparation and release of the relevant import risk analysis?

Yours Sincerely



Alan Hill
Executive Manager
Western Australian Fruit Growers' Association