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Comment on draft report for the non-regulated analysis of existing policy for fresh strawberry fruit from the Republic of Korea

About AUSVEG

AUSVEG is the National Peak Industry Body representing the interests of Australian vegetable and potato growers. We represent growers around Australia and assist them by ensuring the National Vegetable Levy and the National Potato Levy are invested in research and development (R&D) that best meets the needs of the industry.

AUSVEG also makes representations on behalf of vegetable and potato growers to ensure their interests and concerns are effectively communicated to all levels of government, in the public sphere, and throughout relevant areas of the private sector.

AUSVEG executes its brief by delivering national projects in the areas of communication, biosecurity and the environment, as well as by providing leadership for our sector on a range of key issues.

Queries

For more information regarding this submission please contact AUSVEG National Manager – Science and Extension, Dr Jessica Lye on (03) 9882 0277 or at Jessica.lye@ausveg.com.au.

Yours sincerely

Jessica Lye
National Manager – Science and Extension

Preamble

The Australian vegetable industry is committed to biosecurity planning, preparedness and response activities. AUSVEG, the peak industry body for vegetable growers, has assigned National Manager – Science and Extension, Dr Jessica Lye and Biosecurity Advisor, Dr Kevin Clayton-Greene, to oversee the development of robust biosecurity preparedness and response programs and to evaluate existing mechanisms for exotic pest and disease incursion management.

General Comments

Although this document is concerned with strawberry fruit there are a number of potential pests that would be of concern to vegetable producers. These includes a number of moth spp., various thrips and some viruses and fungi. Of particular concern are cabbage flea beetle, tortrid moths, and *Mamestra brassicae* all of which feed on various vegetable species. Whilst the broad conclusions as to achieving Australia's ALOP would appear to be satisfactory for these particular pests, there are nonetheless some areas listed in this submission that warrant clarification or further discussion. In addition, there are also some general issues associated with this analysis that seem to perpetuate the errors of the past reports regarding scientific rigour. We would also ask why quality standards that have no relevance to biosecurity are included in this analysis?

Finally, according to the Manual of Importing Country Requirements, strawberries from Australia are not listed as permitted into South Korea. Therefore, AUSVEG would question why in previous correspondence some justification for import has cited reciprocity. It is noted that South Korea currently prohibits imports of fresh strawberry fruit from anywhere. See the following: http://pflanzengesundheit.jki.bund.de/dokumente/upload/b6c01_kr3-einfuhranforderungen.pdf and also http://www.freshplaza.com/article/160051/Korean-strawberry-exports-falling-every-year.

Specific Comments

AUSVEG would note that the analysis contains some errors including contradictions, such as those around *Monolepta quadriguttata* whereby the analysis states '*No there is little specific information available on this species. Species of Monolepta are known to feed on fruit, flowers and foliage (Erichsen, McGeoch & Schoeman 1993; Gök, Gül Alsan & Aslam 2005; Murray 1982) However, in these cases, damage had been described as rendering fruit unmarketable, decreasing the possibility that these damaged fruits would be harvested. Additionally, no records of association with strawberry fruit have been found*.' Based on this statement, there is an apparent contradiction between the underlined statements that would indicate a selective use of data and requires clarification.

Of more concern is the lack of investigation into the potential of strawberry seed as a pathway, yet nowhere in the report is this seen as a potential risk for importation of pathogens. It is the view of AUSVEG that this should have been considered and subject to risk assessment. This is particularly the case when it comes to considering seed-borne pathogens such as viruses and fungi.

The treatment of viruses also lacks vigour and the statements made in Appendix p124 with reference to Tomato ringspot virus are not supported by the data presented in Tables 3.1 & 3.4 on pages 23 and 26 respectively. There is no mention of Tomato ringspot virus in either Table 3.1 or 3.4.

Tomato Ringspot virus is of particular concern and AUSVEG does not accept that there is no requirement for additional measures to prevent its import through fresh strawberry fruit. The virus is seed-borne and strawberries in particular are singled out as hosts.
See:https://www.eppo.int/QUARANTINE/data_sheets/virus/TORSV0_ds.pdf

Furthermore three other mosaic virus spp. (Alfalfa, Apple and Cucumber) are also not mentioned in these two tables yet are listed in Appendix A. Conversely two other viruses are mentioned in Tables 3.1 and 3.4 yet are not covered in Appendix A; Arabic mosaic and Strawberry necrotic spot virus.

With both viruses and fungi AUSVEG would also argue, given current scientific evidence, that species names are irrelevant when it comes to pathogen risk. Pathotypes and serotypes have far more relevance. In fact, it has been argued that species such as *Fusarium oxysporum* and *Verticillium dahliae* are vast complexes with numerous forms that can be quite host specific.

Although it is not a pest of direct concern to AUSVEG the report comments on spotted wing Drosophila also merit comment. The analysis makes the inference (p58) that strawberry imports have been occurring from California, USA and NZ for over twenty years and current import conditions have not lead to an introduction of *Drosophila suzukii*. It is important to note that this species has only been an issue for United States biosecurity for 6 years and was only first reported in California in 2008 or 2010 depending upon the source. See: http://spottedwing.org/content/distribution-spotted-wing-drosophila-us-august-2011 or *Final Pest Risk Analysis Report for Drosophila suzukii 2013 – (p4).* Furthermore the pest is not present in New Zealand.

This is a pest of concern to Australia and it is therefore concerning that the Department would consider a glasshouse to have area freedom as suggested in the statement *'Drosophila suzukii is widespread in Korea (Asplen et al. 2015; CABI 2016; Lee 1966) as it is native to the East Asia region (Walsh et al. 2011); therefore, pest free areas may not be a viable option for Korea. However, since Korean strawberries for export to Australia are grown in greenhouses, there may be potential to establish pest free production sites.*

Should Korea wish to use area freedom as a measure to manage the risk posed by D. suzukii, QIA would need to provide Australia with a submission demonstrating area freedom for consideration by the Australian Government Department of Agriculture and Water Resources.

If area freedom could be demonstrated, the likelihood of importation of this pest with strawberries would be reduced to at least 'extremely low'. The restricted risk would then be reduced to at least 'very low', which would achieve the ALOP for Australia.'

AUSVEG would query, can the Department provide evidence of where Australian glasshouses are considered to have area-freedom by Australia's trading partners, and if so, under what biosecurity conditions?

In conclusion, AUSVEG welcomes the opportunity to provide feedback on the draft Report for the Non-Regulated Analysis of Existing Policy for Fresh Strawberry Fruit from the Republic of Korea, and would suggest that this report requires clarification on several outstanding points as stipulated in this submission.