



25 October 2016

Ms Amber
Biosecurity Liaison Officer, Industry Engagement
Biosecurity Policy and Response Branch
Department of Agriculture and Water Resources
GPO Box 858
Canberra ACT 2601

(By email)

Dear Amber

RE: Draft report for the non-regulated analysis of existing policy for fresh strawberry fruit from the Republic of Korea

Thank you for the opportunity to comment on the above report.

Raspberries & Blackberries Australia Incorporated is the industry body representing the raspberry and blackberry (*Rubus*) industry in Australia. While the *Rubus* Industry is one of the smaller horticultural industries, it is also one of the most rapidly expanding horticultural industries, having trebled in size within the last five years to an estimated annual Gross Value of Production of over \$100million.

While *Rubus* production used to be confined to southern States, crops are not grown in subtropical areas of Queensland, northern New South Wales and north of Perth, Western Australia for winter harvest and in Southern New South Wales, Victoria, Tasmania and South-west Western Australia for harvest in the remainder of the year.

RABA has a particular interest in the proposal by the Republic of Korea for market access to Australia for fresh strawberry fruit from a biosecurity perspective. *Drosophila suzukii*, Spotted Winged Drosophila, (SWD) is the highest biosecurity threat for the Australian *Rubus* Industry as identified in Plant Health Australia's *Rubus* Industry Biosecurity Plan (2013).

As the Draft Report states, SWD is endemic to South Korea and RABA agrees to the assessment that SWD should be considered a high risk of entry into Australia as a result of any trade in fresh strawberries from Korea.

Experience with SWD incursions in United States and United Kingdom shows that SWD readily establishes in berry crops once the incursion occurs. The subsequent increased use of pesticides and loss of integrated pest management has seen the costs of production rise significantly in these countries. Should SWD become established in Australia, it is envisaged similar increased pest management costs would occur to the point where *Rubus* production could become uneconomical in many areas of Australia. Our costs are already higher than the UK and USA due mainly to the relatively high cost of labour. *Rubus* production is a labour intensive industry.

Just as risk management measures were included in the import conditions for strawberries from California, RABA considers that an appropriate level of protection (ALOP) be placed on any import conditions for South Korean strawberries. As SWD is endemic in South Korea, pest free areas (PFAs) are not an option. Even with greenhouse production, the use of PFAs would not be an option due to varying standards of greenhouse technology. Greenhouses are not necessarily fail safe barriers to entry of insects.

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RABA agrees with the proposed postharvest treatments of either methyl bromide fumigation or irradiation as suitable ALOPs. However, the Draft Report proposes dosage rates of 40g/m³ which conflict with that required for Californian strawberries exported to Australia. Department of Agriculture & Water Resources *Australian Biosecurity Import Conditions* (BICON) states that Californian strawberries exported to Australia require fumigation with methyl bromide prior to shipment. BICON reads: 'Methyl bromide fumigation must occur at the rate of 48g/m³ for 3 hours at a pulp temperature of no less than 18°C'. This is based on the research carried out by Spencer Walse *et al*, United States Department of Agriculture, and reported in *Journal of Asia-Pacific Entomology* 15 (2012): *Postharvest treatment of strawberries with methyl bromide to control spotted wing drosophila*. Walse concludes that "commercial 3 hour fumigations with an applied MB dose of 48mg/L at strawberry pulp temperature ≥18°C is efficacious against SWD at levels consistent with Probit 9 phytosanitary standards".

Consequently, RABA considers the same postharvest treatment protocol for Californian strawberries be applied as the ALOP for South Korean strawberries.

I would welcome further discussions with the Department's Biosecurity Policy & Response Branch on this matter.

Yours sincerely



Jonathan Eccles
Executive Officer