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Department of Agriculture, Water and Environment
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10.08.2020

To whom it may concern,

Re: Pest Risk Analysis for Cut Flower and Foliage Imports

Apple and Pear Australia Limited (APAL) is the national industry representative body and non-profit membership organisation that supports Australian apple and pear growers. There are approximately 550 commercial apple and/or pear grower businesses with more than 9,375 hectares planted to apples and 3,175 hectares planted to pears across Australia. In 2018-2019, production of apples and pears was valued at $628 million.

One core function of APAL is to manage the biosecurity interests on behalf of the industry.

APAL welcomes the opportunity to comment on the Risk Analysis for Cut Flower and Foliage Imports and appreciates the Department's 30-day extension to the public response time. The draft is comprehensive and long and contains a number of pests of concern to our levy payers. APAL also notes the continuing improvement in quality of the Risk Analyses from the Department over recent years.

Unfortunately, and no doubt exacerbated by the length and complexity of the document, there are areas of confusion and contradiction that require clarification. It would perhaps be of benefit to have produced individual pest analyses based upon the major taxa groupings within this draft. This would have made the review task easier.

1. How will risks associated with pathogens be addressed?

APAL notes that the current document only addresses the risks posed by arthropods but does not address risks presented by cut flowers and foliage through the carriage of pathogens (eg. fungi, bacteria, viruses etc.). It is not clear whether risks associated with pathogens are addressed elsewhere? How are these pathogen-associated risks to be addressed? Will there be an additional document that covers these pathogens?

We do note that thrips, mites and aphids were evaluated in Part 1 of this review.

2. Appendix D.

The Draft Risk analysis makes the case that a review is warranted and notes that since revised conditions were issued in 2018 that interceptions have declined. This is not always evident from the data supplied. The terminology used in Appendix D is inconsistent – The term 'interception' is used in the first tab of the spreadsheet to describe a record of a pest(s) detection. In subsequent tabs, the term 'incident' is used to present records of pest detections. Are these the same?

Assuming that an 'incident' equates to an 'incursion' the data in Appendix D appears to contradict the claim that interceptions have declined as it shows that incidents post import condition changes have increased. As an example, for arachnids the number of incidents per year pre and post condition changes are 332.14 and 585.85 (sic) per month, respectively.

APAL also notes that the data presented should reflect significant figures – presumably there were no incidents which were fractions of an incident? The same pattern of change in incident numbers is also shown for other taxa in the table in Appendix D. It is also not clear how the data in Appendix D relates to the discussion in Ch 5 and the heat maps.

It would be useful if the reason for the disproportionate number of arachnid interceptions was explained. There is at least an order of magnitude more insects than arachnids in the environment, yet they only differ in interception by around 10%. Is this a reflection of the disinfestation treatments being less effective on arachnids?

3. Continuation of imports despite non-compliance/non-conformance

APAL is also concerned at the ongoing high level of non-compliance/non-conformance of some countries and asks why imports are permitted to continue under such circumstances? It is of concern that there still appears to be significant non-compliance with some countries. We question to what extent the comment on page 72 about import permits providing a greater degree of assurance is justified?

4. Appendices F and G

Of particular concern is the categorisation in Appendix F and Appendix G.

There are concerns with both definitions and classification. What is a potentially regulated pest?

How were the determinations made as to what is or is not a pest of quarantine concern? Although it is noted that some explanation is provided, it is both confusing and difficult to follow. There are many instances, but the case of *Monomorium antarcticum* and *M. salomi*s is a good example.

The table in Appendix F notes for the former under 'Potential for economic consequences':

> "***Yes.*** *Invasive ant species will compete for resources with native species (Department of the Environment and Heritage 2004; GISD 2019). The potential impact on native invertebrates in regions lacking native predacious ants is particularly great and invasive ants have been implicated in the decline of many non-ant invertebrates (GISD 2010). Therefore,* M. antarcticum *has the potential to cause negative environmental consequences in Australia*."

The table also notes that it is not a quarantine pest as follows:

> *" **No**. Not a plant pest. Contaminating pest (predator and nuisance)."*

However, for *M. salomis* the following is written on the potential for economic consequences:

> **"*Yes.*** *Monomorium salomonis is known to feed on nectar and seeds and will tend sap-sucking pests present on plant hosts (CABI 2019a). Therefore, M. salomonis has the potential to cause negative environmental consequences in Australia*."

Then, in the next column the response to the quarantine question is:

> *"**Yes**. Not a plant pest. Contaminating pest (predator and nuisance)."*

Furthermore, in Appendix G the answer to this question is '**No'**.

APAL queries what the criteria are for these classifications, not only for these two taxa but throughout the draft document where similar claims are made. In the case of the *Monomorium salomis* which of the two statements is correct regarding quarantine status? It is unfortunate, but errors and inconsistencies of such a nature have a tendency to undermine confidence across other areas of the document. The discussion in the text around non-quarantine organisms is neither easy to follow and, as portrayed in Appendix F, suggests that for a number of potentially deadly organisms (eg. mosquitos carrying diseases) they are of no concern to Australia. APAL suggests that a more expansive line of reasoning should be provided around these organisms.

Similarly, APAL would also like clarification around the terms 'potentially regulated article' and a 'non-quarantine pest' and again requests that this be included where it applies in Appendix F.

In the case of the former does this mean it will be regulated, is under consideration for regulation, or just could be. If the latter, how does this differ from a myriad of other organisms?

5. Hymenoptera analyses?

The pest risk analysis does not consider that a risk review is warranted for the phytophagous Hymenoptera which on face value would seem acceptable, however APAL notes that while the risk of importation is regarded as low, the potential consequences are high particularly for the pests they may also carry and suggests that they should have been included. For the Hymenoptera that were classified as quarantine pests but not assessed as they were "intercepted in low numbers", the Department states it will continue to monitor these interceptions and conduct a risk assessment if they are intercepted. The draft document indicates that these have been intercepted, albeit in low numbers. Based on this, APAL would argue that they should be included in the current draft document.

6. Chapter 7.

The Chapter on Pest Risk Management (Ch 7) has a number of areas about which APAL would seek clarification.

On p. 71 it is noted that "*Visual inspection alone is not considered to be a feasible measure to verify freedom from these pests in fresh cut flowers and foliage.*"

If visual Inspection is not considered a feasible measure to verify freedom from these (sic) pests then how is the performance of any measures, particularly a systems approach, monitored?

7. Pre-import treatments

APAL notes that Methyl bromide a treatment option and a table of time vs temperature is provided. However, data provided earlier in the draft document suggests that there is still, with a number of countries, a significant level of pest interceptions even when this treatment is applied. APAL believes that more stringent guidelines and monitoring need to be provided to ensure that the temperature throughout the container of material reaches the temperature required and that the concentration is also at the required level. Both these points are significant due to the way containers are stuffed and the fact that there are a number of instances occurring where full pest control has not been achieved.

APAL also queries the statement in 7.4.1 that Australia will accept any pre-treatment from a country. Surely some form of verification or supporting data is required and this should be of peer reviewed science as to efficacy?

8. Meshing on cartons

Lastly, APAL notes the comments about meshing on cartons. This has been raised in earlier submissions and it is noted that there exist international standards for pest free mesh and that these are used in the context of greenhouses etc. for pest free places of production. It would seem appropriate to use the same criteria for carton vent mesh.

We look forward to your response.

Sincerely
Rosalie Daniel
APAL, Technical Manager