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## **Draft Pest Risk Analysis for fresh pomegranates and processed “ready to eat” arils from India**

The NSW Department of Primary Industries (NSW DPI) appreciates the opportunity to provide comment on Department of Agriculture’s (DA’s) draft report for the review of biosecurity import requirements for fresh pomegranates and processed “ready to eat” arils from India (consultation period closes on 17 December 2019). NSW DPI considers this draft report informative and thorough. NSW DPI also appreciated the opportunity to participate in DA’s jurisdictional stakeholder teleconference on 13 November.

### ***Specific comments:***

#### ***Existing policy***

The report notes (p4-5) that Australia already imports horticulture commodities from India and for which appropriate import requirements are already established. The report goes on to note that DA has considered existing policies and the latest literature in this risk assessment, however there is no mention of the level of compliance with existing requirements for the importation of horticulture commodities from India.

**NSW DPI requests** that the draft report include information regarding the level of compliance with existing biosecurity import requirements for horticulture commodities from India, including any remedial action that may have been required for non-compliance.

#### ***Post harvest and packing house processes: whole fruit and arils***

The report states (p26) that packing houses have guidelines to differentiate damage caused by pests/diseases vs physical damage, and that packing houses then determine whether damaged fruit “can proceed to grading/sorting and packaging for export, based on type of damage (pest-related or physical).” It was noted during the stakeholder teleconference on 13 November that it is doubtful it’s possible in a packing house to accurately determine the cause of fruit damage (pest or physical). It was further noted that physical damage to fruit provides an entry point for pests.

**NSW DPI requests** that:

- the draft report be amended to read “damaged fruit (whether pest-related or physical) will not proceed to grading/sorting and packaging (including as whole fruit or ready-to-eat arils) for export to Australia” (second last dot point on p.26)
- the following be added to the first paragraph of 3.6.1 (p.27) “Fruit that show signs of any damage (physical or pest-related) are excluded from the production of ready-to-eat arils for export to Australia.

### ***Likelihood of distribution***

The report includes a number of statements (eg pp.48, 50, 58) regarding the likelihood of distribution via pomegranate waste, such as (p.48):

“infested pomegranate waste is likely to be disposed of as municipal waste or compost, from where it is unlikely to distribute *Deudorix* into the environment.”

By definition compost is designed to be “distributed into the environment”. It is therefore far more likely that compost may be deposited into urban, periurban and agricultural situations, and hence into the environment.

**NSW DPI requests** the removal of “or compost” from this sentence and other similar sentences throughout the report. NSW DPI further requests “or compost” be added to the following sentence (on p.48) regarding the disposal of litter, and to similar sentences throughout the report.

### ***Consequence of almond mealybug (*Drosicha dalbergiae*) establishment in Australia***

The report notes that *Drosicha dalbergiae* is a pest of a number of horticulture crops, including apples and citrus. Assessment of the consequence of its establishment in Australia (p68-69) includes that the direct impact on plant health would be significant at the district level, and the indirect impact on international trade would be significant at the local level. NSW DPI considers both impact assessments to be too low, as both apples and in particular citrus are important horticultural crops in Australia.

**NSW DPI requests** that the consequence impact assessment for *Drosicha dalbergiae* be reviewed.

### ***Food safety issues - washing***

Under food laws in Australia, it is an offense to sell food that is unsafe or unsuitable. From a food safety perspective, our main concerns in the IRA relate to the effectiveness of the washing and handling process for pomegranate fruit and processing of arils, both pre- and during packhouse handling (Section 3.6 of the report). These concerns are supported by a recent outbreak of hepatitis A in Australia linked to pomegranate arils sourced from Egypt. Hepatitis A is endemic to many parts of India, but is not common to Australia.

It is noted that Section 3.6 of the report includes a description of several washing steps involved at various stages of the production process. Controls must be in place to ensure that none of the water used is untreated or sourced from potentially contaminated areas (such as reused water, areas prone to runoff, close proximity to livestock, human dwellings), where there is a potential for the presence of hepatitis A or any other viral, bacterial, or parasitic pathogens.

**NSW DPI requests** the inclusion of specific controls to ensure that none of the water used is untreated or sourced from potentially contaminated areas (such as reused water, areas prone to runoff, close proximity to livestock, human dwellings), to reduce the risk of potential presence of hepatitis A or any other viral, bacterial, or parasitic pathogens.

### ***Food safety issues – use of sanitiser***

The report notes (p. 27-28) that at the packhouse level “Tsunami” or a chlorine-based sanitiser is used for the processing of pomegranate arils. However, there is no information provided on the strength of this sanitiser, how often it is applied or renewed, what concentration this is applied at, and the contact time with the fruit. There needs to be a comment on the effectiveness of these sanitisers against viral pathogens, such as hepatitis A.

**NSW DPI requests** the inclusion of information on the strength of the sanitiser used, how often it is applied or renewed, at what concentration it is applied, and the contact time with the fruit; and the inclusion of a comment on the effectiveness of these sanitisers against viral pathogens, such as hepatitis A.

***Food safety issues – testing***

The report mentions (p. 30) that food safety testing is undertaken on the finished product. What tests are carried out and at what frequency? Does this include any screening for viral pathogens? Is this testing undertaken using internationally accredited and approved methods, in an accredited laboratory?

**NSW DPI requests** the inclusion of information on the nature and frequency of tests carried out on the finished product, if this includes any screening for viral pathogens, and if this testing is undertaken using internationally accredited and approved methods, in an accredited laboratory.

***Food safety issues – training of workers***

Finally, the report notes (p.32-33) that workers receive training. NSW DPI assumes that this training would include instruction on worker health and hygiene, and a requirement to report any potential gastroenteric illness, and exclusion of affected workers from food handling until symptoms have passed.

**NSW DPI requests** inclusion of details of worker training to ensure that it includes instruction on worker health and hygiene, a requirement to report any potential gastroenteric illness, and exclusion of affected workers from food handling until symptoms have passed.

***Editorial comments and suggestions***

NSW DPI has also made a number of suggested editorial amendments – these are tracked on the report and returned to DA with this submission for consideration.

Thank you once again for the opportunity to provide comment. NSW DPI looks forward to continuing its participation in the review of biosecurity import requirements for pomegranates and ready-to-eat arils from India.

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