

Our ref: CTS 13822/26

31 JUL 2026

Dr Sarah Bruce
Assistant Secretary
Plant Systems and Strategies
Department of Agriculture, Fisheries and Forestry
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Dear Dr Bruce,

Thank you for your letter of 4 June 2026 regarding the release of the *Issues Paper on the assessment of alternative measures for fresh Cavendish bananas from the Philippines* (the Issues Paper). The Department of Agriculture, Fisheries and Forestry (DAFF) has invited stakeholders to review the Issues Paper and to provide scientific and technical information relevant to the Biosecurity Import Risk Analysis (BIRA) process.

Queensland's banana industry is of critical economic and strategic importance, producing 94% of Australia's bananas, with Cavendish bananas dominating production. It is therefore essential that the proposed BIRA process thoroughly addresses the potential biosecurity risks associated with the proposed importation.

The Queensland Department of Primary Industries (QDPI) has reviewed the Issues Paper and requests that DAFF addresses the following matters in the draft BIRA report provided for stakeholder consideration.

- **Inclusion of *Eumusae leaf spot (Mycosphaerella eumusae)***

QDPI welcomes the inclusion of Eumusae leaf spot (*Mycosphaerella eumusae*) in the proposed assessment. Given its biosecurity significance and the potential for its symptoms to be confused with black Sigatoka, QDPI recommends that the draft BIRA report clearly document the evidence used to determine its pest status in the Philippines, including relevant official surveillance data, diagnostic methods and the basis for any conclusion regarding its presence or absence.

- **Risks associated with Banana Freckle**

QDPI is concerned that early-stage or latent banana freckle (*Phyllosticta cavendishii*) infections may not be visually detectable on mature hard green fruit. QDPI recommends that the assessment specifically examine the sensitivity of proposed inspection and treatment measures, including whether infected fruit may remain viable or capable of sporulation following washing and the post-harvest treatments proposed by the Philippines.

- **Assessment of New Pest List**

QDPI notes that the assessment will consider whether the GCTCV-218 cultivar and production in Davao de Oro Province present biosecurity risks additional to those identified in the 2008 import risk analysis. QDPI recommends that the draft BIRA report transparently describe the pest initiation and categorisation process, including the data sources used to identify cultivar- and province-specific pest associations, the criteria applied to screen potential pests, and the basis for determining which pests progress to detailed pest risk assessment.

QDPI supports DAFF's stakeholder engagement process and looks forward to reviewing the draft BIRA report, expected in early 2027. Given the long history and significance of this matter, it is important that the BIRA process is scientifically rigorous, transparent and addresses all relevant biosecurity risks.

If you require further information, please contact Dr Abu-Baker Siddique, Plant Biosecurity and Product Integrity, QDPI on 0422 348 033 or by email at Abu-Baker.Siddique@dpi.qld.gov.au

Yours sincerely



Graeme Bolton
Director-General
Department of Primary Industries