

Plant Sciences and Risk Assessment
Department of Agriculture, Water and the
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To Whom It May Concern:

We appreciate the opportunity to comment on the Draft group pest risk analysis for soft and hard scale insects on fresh fruit, vegetable, cut-flower and foliage imports ('the Draft').

Apple and Pear Australia Limited (APAL) is the national peak industry body representing Australia's commercial apple and pear growers. The Australian apple and pear industry provides almost all of Australia's apple and pear requirements (99.7%). There are about 560 commercial apple and pear growers with production in all states. The industry creates thousands of jobs in regional and rural areas and is valued at \$632 million per annum.

APAL has considered the Draft risk assessment for scale insects against risk assessments for pests of concern to the Australian apple and pear industry and has identified some points for which we request further information or clarification.

We note that the risk assessments for nearly all scale insects (soft and hard) has been upgraded to Low and this exceeds Australia's ALOP of Very low. This is welcome.

The Draft for scale insect risk analysis makes the point that it is for indicative risk only, and that the commodity specific risk analysis will address the specific risk. It is worth noting that this Draft risk analysis post-dates existing PRA, for example for China and Japan, and also that for the current Review of apple imports from the Pacific Northwest states of the USA (*Draft report of the review of biosecurity import requirements for fresh apple fruit from the Pacific Northwest states of the United States of America*).

APAL would like more information around how this upgrading of risk, particularly around likelihood of entry, will be reflected in existing Policy for these countries where risk assessments are already in place.

- A number of scale insects were identified in this Draft (scale risk analysis) (e.g. *Eulacanium* spp.) as being a pest of apple and associated with parts of apple fruit that could be imported with fruit (such as the pedicel). More details are requested to understand to what extent these other scale species were considered in the current Review of apple imports from the PNW-USA. Only chaff scale received detailed risk analysis in the Review for the PNW-USA and it was found to be below Australia's ALOP. It is noted that the Review of apple imports from the PNW-USA is not mentioned in Appendix D. What is the reason for this?

APAL would also like to understand to what extent cross-referencing between the analysis of this Group (scale insects) and existing risk analyses occurred, and how they will be integrated.

- For example, discussion on existing policy such as exists for apple imports from China would be helpful. Similar to the point made above, at the very least under Section 6.3 'Review of Policy' some discussion and indication as to the

implications from this Group (scale) analysis on existing Policy for specific produce should be included. This is particularly important as Appendix D lists the results of previous pest risk assessments for individual species on specific commodities and but offers little clarity.

- While Section 3.1 provides some discussion on this point, more information is requested about plans to review any of the pre-existing policies for specific produce, particularly given the changes in indicative risk presented in this Draft for scale insects, and the fact that some of the policies are more than 15 years old.

In cases where Entry, Establishment and Spread differ in existing policy from the indicative risk profile, further information is requested around why this is the case. This would provide some indication that the broader implications have been considered and that policy remains contemporary.

Sincerely



Philip Turnbull
CEO