



**Submission to Biosecurity Australia in response to the Draft  
report for the non-regulated analysis of existing policy for  
apples from New Zealand**

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### ***Executive Summary***

Growcom supports Apples and Pears Australia Ltd (APAL) on the issue of apple imports from New Zealand. The 'standard commercial practices' of the NZ industry are not an acceptable quarantine measure as they do not provide an appropriate level of protection to the Australian apple and pear industry from fire blight, European canker and apple leaf curling midge. To accept this protocol as drafted would set a dangerous precedent. It would provide the opportunity for other exporting nations to argue acceptance of codes of practice in lieu of quarantine standards based on science. In addition, there is a significant imbalance between the requirements of this policy and the requirements placed on Australian growers exporting to other international markets, which places Australian growers at a disadvantage. Tellingly, even within Australia, there are stricter quarantine measures in place for interstate movement than those outlined in this policy.

Growcom requests a more appropriate level of protection which includes:

- Excluding fruit from export to Australia where a pre-harvest outbreak of Fire Blight is detected;
- Excluding or fumigating fruit from an area when a heavy infestation of apple leaf curling midge or leaf rollers occurs ;
- Cartons containing trash i.e. leaves and small twigs that are universally recognised as carriers of fire blight, be excluded from export to Australia until a review of procedures is completed;
- Excluding high risk areas for European canker such as Auckland and Otago from exporting fruit to Australia; and
- Should there be a regional outbreak of fire blight, suspension of trade to Australia until a review of procedures is completed and alternative protocols are established.

## ***Introduction***

Growcom is the peak representative body for the fruit and vegetable growing industry in Queensland, providing a range of advocacy, research and industry development services. We are the only organisation in Australia to deliver services across the entire horticulture industry to businesses and organisations of all commodities, sizes and regions, as well as to associated industries in the supply chain. We are constantly in contact with growers and other horticultural business operators. As a result, we are well aware of the outlook, expectations and practical needs of our industry.

The organisation was established in 1923 as a statutory body to represent and provide services to the fruit and vegetable growing industry. As a voluntary organisation since 2003, Growcom now has grower members throughout the state and works alongside other industry organisations, local producer associations and corporate members. To provide services and networks to growers, Growcom has about thirty staff located in Brisbane, Bundaberg, Townsville, Toowoomba and Tully. We are a member of a number of state and national industry organisations and use these networks to promote our members' interests and to work on issues of common interest.

The avoidance of pest and disease incursions is of vital importance to the viability of all rural industries. Australia's unique biodiversity and relatively disease-free status, along with our reputation as a supplier of fresh, high quality, clean produce must be maintained. Effective sanitary and phytosanitary controls contribute towards preventing the importation of exotic pest and diseases that lead to crop losses as well as a loss of market access.

Growcom is committed to working with its partners, government and other stakeholders to ensure that biosecurity standards are maintained at the highest level, and that quarantine risk assessments are based on sound science and transparent decision making processes. These activities leave the international community without doubt that Australia's quarantine and risk assessment regimes are developed and operated independently, and are based solely on sound scientific principles and analyses rather than industry protection.

The comments in this submission are in response to the Australian Government Biosecurity Australia draft report for the non-regulated analysis of existing policy for apples from New Zealand.

Growcom has reviewed the draft report and appreciates the opportunity to comment on issues relating to the importation of New Zealand apples.

### ***The Queensland industry***

The Queensland apple industry represents approximately 10 per cent of the national industry, with an annual farm gate value of \$67.5 million. The industry is predominantly located in the Granite Belt region near the border of Queensland and New South Wales. It employs around 180 full time staff which swells to 950 at harvest time. Industry stakeholders in Queensland are seriously concerned about the introduction of exotic pests and diseases into the region, particularly the fire blight bacterium (*Erwinia amylovora*). Fire blight in the Queensland growing region along with extensive rainfall and hail during the growing season would result in unrecoverable financial loss to the industry and the surrounding socio-economic communities.

Apples and Pears Australia Ltd (APAL), being the National Peak Industry Body for the commodities concerned, have prepared a submission on the *Draft report for the non-regulated analysis of existing policy for apples from New Zealand*, which Growcom strongly endorses.

### ***Key Points***

Our key areas of concern are listed below:

- This IRA process as outlined in the draft report denies apple growers procedural fairness because Australian stakeholders do not have access to the NZ Integrated Fruit Production Manual, which is deemed confidential. It is therefore difficult for growers and their representatives – who are the experts in the field - to assess whether fruit being “produced to export quality standard” is adequate to ensure that Fire Blight, European Canker and Apple Leaf Curling Midge could be prevented from entry into Australia;
- Biosecurity Australia has not provided the evidence of what science the Integrated Fruit Production system is based on. It is not possible to determine whether that underlying science has been ‘peer reviewed’ as other science underpinning an Import Risk Assessment is expected to be;
- It is not clear how Biosecurity Australia proposes to ensure that New Zealand’s Integrated Fruit Production system – the “standard orchard practices” - can operate to prevent Fire Blight, European Canker and Apple Leaf Curling Midge from entering Australia, because like any other code of practice, that code of practice will be open to the issues of:
  - Human interpretation and application of the standard practices, which invariably differ from grower to grower and region to region;
  - Human abuse or avoidance of procedures. Without a significant level of auditing there is no way of judging compliance to the standard orchard practices. In New Zealand there appears to be no single organisation that manages/audits the process across ALL export

- orchards to ensure accuracy and consistency, and deal with non-compliance;
  - Climatic events, particularly the one in ten year or longer events that are managed on an as needs basis;
  - Pest pressure, both on-farm and from neighbouring properties;
  - Choice and efficacy of application of control agents; and
  - Orchard canopy and design.
- Biosecurity Australia proposes to inspect the apple fruit for pests and diseases, but they fail to explain how they intend to do this given the bacteria that causes Fire Blight is not visible to the human eye;
- The proposal to replace quarantine protocols for Fire Blight with an industry code of practice is based on an unreasonable conclusion. That unreasonable conclusion is that the probability of entry, establishment and spread of *E. amylovera* is “extremely low”. It is unreasonable because :
  - Biosecurity Australia inspections will not / cannot detect *E. amylovera* on the apple fruit without specialist testing for bacteria;
  - Orchards infested with fire blight will not be excluded from exporting fruit; and
  - Two categorizations of “high” and one “extremely low” should not result in an “extremely low” categorization.
- Given Biosecurity Australia’s proposal to replace pre-border phytosanitary measures for Australian apples from New Zealand with ‘standard commercial practices’ developed, operated and policed by a foreign industry, they are setting a dangerous precedent for the importation of other agricultural products into Australia. Based on this precedent, it is likely that other countries will be able to argue to replace phytosanitary measures with a code of practice program based on ‘standard commercial practices’ for agricultural production and export freely into this country. This is unacceptable;
- The Biosecurity Australia proposal to inspect the apple fruit for trash (leaves and twigs) demonstrates a lack of understanding of the process - trash is rarely on the fruit itself but within the boxes and other packaging containing apples. Biosecurity Australia needs to inspect all of the cartons for trash (leaves and twigs) as well as the apple fruit for pests and diseases;
- The protocols proposed for fire blight in particular are much weaker than those required by New Zealand for the import of fruit from Australia in regard to Mediterranean and Queensland fruit fly. This is a significant disparity in the import / export arrangements between the two countries; and
- Biosecurity Australia proposed specific phytosanitary measures for codling moth for produce from WA and yet has not proposed any phytosanitary

measures for fire blight and canker when these diseases are considerably more serious to Australian fruit industries. Biosecurity Australia purports that visual inspection is not assessed as an effective measure for codling moth in WA due to the potential for infestations to be undetectable by visual means. Yet it has not reached the same conclusions for the bacteria causing fire blight. There is an incredible disparity between the two rulings, which we find totally unacceptable.

***Proposed solution***

At a minimum Growcom supports APAL in seeking an appropriate level of protection that includes:

- Excluding fruit from export to Australia where a pre-harvest outbreak of Fire Blight is detected;
- Excluding or fumigating fruit from an area when a heavy infestation of apple leaf curling midge or leaf rollers occurs ;
- Cartons containing trash i.e. leaves and small twigs that are universally recognised as carriers of fire blight, be excluded from export to Australia until a review of procedures is completed;
- Excluding high risk areas for European canker such as Auckland and Otago from exporting fruit to Australia; and
- Should there be a regional outbreak of fire blight, suspension of trade to Australia until a review of procedures is completed and alternative protocols are established.