



April 2025

## ***Draft report for the fresh pomelo from Vietnam risk analysis***

# **Supplementary response to stakeholder comments**

Stakeholders commented or raised concern around aspects of fresh pomelo imports from Vietnam that were outside the scope of the *Pomelo from Vietnam: biosecurity import requirements draft report*. Accordingly, our responses to these aspects are provided in this supplementary response paper. To review our responses to the comments raised that were in-scope of the risk analysis, please read **Appendix C** of the final report.

### **Issue 1: Concerns were raised regarding Vietnam’s capacity to comply with the recommended risk management measures and the effectiveness of their regulatory system.**

Australia accepts imports only when we are confident the risks of pests and diseases can be managed to achieve the appropriate level of protection (ALOP) for Australia. Trade will only be allowed if the exporting country can demonstrate it can meet the conditions that Australia imposes to ensure safe trade.

Our officers visited pomelo production areas and packing houses in Vietnam in October/November 2022 to observe commercial production, pest management and other export practices of fresh pomelo. Our observations during the visit, along with other supporting information provided by Vietnam, indicated that Vietnam has established standard commercial production practices for pomelo for export.

Before publishing import conditions in our Biosecurity Import Conditions database (BICON), we will verify that Vietnam can meet the import conditions. This verification process will include development of a government-to-government work plan with Vietnam, which will be signed by both Vietnam and Australia. The work plan will articulate operational aspects of pre-export production and management and outline key responsibilities.

If trade commences, all consignments of pomelo will be inspected by Vietnam’s Plant Protection Department prior to export to ensure import conditions are met. Consignments will be inspected again on arrival in Australia. If pests of biosecurity concern are found in any consignments of pomelo from Vietnam, Australia will carry out appropriate remedial action and request Vietnam investigate the source of the pest and apply corrective action. Australia may also review the pathway.

We will review the import policy after a suitable volume of trade has occurred. This may involve additional assurance activities to verify Vietnam’s implementation of the import requirements. For example, our officers may undertake an audit by visiting areas in Vietnam that produce pomelo for export to Australia. Ongoing trade performance is monitored as part of the department’s assurance program, and we take action where non-compliance is identified.

The policy will also be reviewed if there is reason to believe that the plant health status in Vietnam has changed.

## **Issue 2: Concerns were raised that adherence to Australian food standards was not considered when recommending risk management measures.**

The purpose of this risk analysis is to assess the biosecurity risks potentially associated with the importation of fresh pomelo from Vietnam. While food safety assessment is not within scope of this analysis, information regarding food safety requirements is included in Section 4.5 of the report: *Meeting Australia's food laws*.

Additionally, Australian law requires that all food, including imported fresh fruit, must meet the standards set out in the Australia New Zealand Food Standards Code, the food laws of each state and territory, and the requirements of the *Imported Food Control Act 1992*.

The same food safety laws that apply to domestic food also apply to imported food. It is Vietnam's responsibility to ensure that they can meet both Australia's food safety and biosecurity requirements.

## **Issue 3: Concerns were raised about why Australia must consider import proposals at the expense of the Australian horticultural industry, even if the risk is minimal**

We acknowledge that there is a strong supply of domestically grown horticultural produce and that imports of agricultural goods can directly compete with Australian agricultural goods. However, under our international obligations, our risk analyses cannot consider the potential economic impact of market competition or the net national benefit resulting from imports. Consumers can make informed decisions about what they buy based on quality, price and country of origin specified in labelling laws.

Australia (as a World Trade Organization (WTO) member) must meet its international obligations by assessing market access requests (import proposals) and developing the least trade restrictive and scientifically justified import conditions where required.

Our trading partners use the same principles when assessing Australia's market access requests.

WTO members are entitled to maintain a level of protection appropriate to prevent pests and diseases establishing within its territory. This is called the appropriate level of protection (ALOP). Australia's ALOP is expressed as providing a high level of protection for plant, animal and human life and health aimed at reducing risk to a very low level, but not to zero. If Australia was to take a zero-risk approach to biosecurity this would mean we would have no tourists, no international travel and no imports. Australia accepts imports only when we are confident the risks of pests and diseases can be managed to achieve Australia's ALOP.

As a member of the WTO, it is important that Australia continues to be recognised as a country that abides by, and champions, the global trade rules. As a global trading nation Australia benefits from these rules for our own exports but also works within the rules to protect human, animal and plant life or health.

The decision to import goods into Australia is a commercial decision between an importer in Australia and a supplier in the exporting country who can meet the import conditions. If trade occurs, the success ultimately depends on Australian consumers.

#### **Issue 4: Requests were made to consider participation from industry and/or technical experts during the in-country visit and discussions with the exporting country**

We value the expertise and input from industry and technical experts throughout the import risk analysis process. We are committed to continuing to seek your involvement at appropriate points in the process.

The primary mechanism for industry and technical experts to engage on the risk analysis is during our public consultation period on the draft report. We consider all technical comments received from stakeholders when finalising the risk analysis. We may also engage with industry and/or technical experts outside of consultation on the draft report, where appropriate. For example, we may seek information to improve our understanding of domestic production practices so that we can better compare with practices in the exporting country.

We undertake in-country visits during the import risk analysis process to verify the accuracy of information provided by the exporting country, and assess their production, pest management and export practices. We use this information, in conjunction with information from multiple other sources, to estimate the biosecurity risk and identify appropriate mitigation measures. We will continue to apply and use the most appropriate way to gather and review information. We have a thorough process in place which can include consulting with technical experts where required.

Throughout the risk analysis process, our discussions with the exporting country are government-to-government. This includes when we are developing the risk analysis, finalising it and verifying that the exporting country can meet the import conditions. This is the same principle applied when Australia is seeking market access to other countries.

#### **Issue 5: Concerns were raised by the potential for plastic waste to be generated by the importation of pomelo from Vietnam which would require disposal**

The purpose of this risk analysis is to assess the biosecurity risks potentially associated with the importation of fresh pomelo from Vietnam. Information regarding standard packaging requirements is included in Section 4.2.3 of the report: Packaging, labelling and containers. This includes ensuring that packaging is not contaminated with quarantine pests and that packaging complies with the department's import requirements, which will be published on [BICON](#). Any packaging is also inspected as part of the on-arrival inspection.

Requirements on how imported fruit are presented in packaging, or the use of plastic is not within scope of this analysis. Accordingly, this is not something we can put a requirement on when developing import conditions with Vietnam.

The decision to import goods into Australia is a commercial decision between an importer in Australia and a supplier in the exporting country who can meet the import conditions. If trade occurs, the preference and demand for how imported goods are presented and the packaging used is ultimately driven by Australian consumers.

## More information

Learn more about [Plant risk analyses](#)

Web [agriculture.gov.au/biosecurity-trade/policy/risk-analysis/plant/pomelo-from-vietnam](http://agriculture.gov.au/biosecurity-trade/policy/risk-analysis/plant/pomelo-from-vietnam)

Email [plantstakeholders@aff.gov.au](mailto:plantstakeholders@aff.gov.au)

### Acknowledgement of Country

We acknowledge the Traditional Custodians of Australia and their continuing connection to land and sea, waters, environment and community. We pay our respects to the Traditional Custodians of the lands we live and work on, their culture, and their Elders past and present.

© Commonwealth of Australia 2025

Unless otherwise noted, copyright (and any other intellectual property rights) in this publication is owned by the Commonwealth of Australia (referred to as the Commonwealth).

All material in this publication is licensed under a [Creative Commons Attribution 4.0 International Licence](#) except content supplied by third parties, logos and the Commonwealth Coat of Arms.

The Australian Government acting through the Department of Agriculture, Fisheries and Forestry has exercised due care and skill in preparing and compiling the information and data in this publication. Notwithstanding, the Department of Agriculture, Fisheries and Forestry, its employees and advisers disclaim all liability, including liability for negligence and for any loss, damage, injury, expense or cost incurred by any person as a result of accessing, using or relying on any of the information or data in this publication to the maximum extent permitted by law.