



Fruit Growers Tasmania Inc

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Draft report for the non-regulated analysis
of existing policy for apples from
New Zealand (a review)

SUBMISSION
TO BIOSECURITY AUSTRALIA
ON BEHALF OF THE

TASMANIAN APPLE & PEAR INDUSTRY

BACKGROUND

Fruit Growers Tasmania Inc (FGT) is a non-profit industry Association managed by a voluntary Board elected by growers. FGT represents approximately 60 apple and pear growing families in Tasmania (as well as around 120 stone fruit growers) and has a joint office with the Tasmanian Abalone Council Ltd also a non-profit industry Association.

The major apple growing regions in Tasmania are located in the Huon Valley down to Geeveston in the south; Spreyton in the North West and the Tamar Valley in the North. Several varieties are grown in Tasmania – Fuji, Jonagold, Red and Golden Delicious, Braeburn, Gala are the major ones.

There are numerous organizations relying on the sustainable future of the apple and pear industry for their own future sustainability and a sample are listed below –

Transport/Shipping Companies
Fuel Companies
Nursery suppliers
Beekeepers
Spray & Fertiliser companies
Pallet suppliers
Cascade Beverage Company juice production.

One of the major suppliers is Amcor who supplies the majority of all packing materials, ie cartons, trays etc to the apple and pear industry in the State.

In addition, there are the people and small business operators located within the growing regions that all rely heavily on the industry for employment and as their key customer base.

The economic impact on the growing areas and for the whole State in the event Tasmania's crop was subjected to an imported virulent disease or pest would be enormous. There would be a significant downturn in employment and economic stability throughout the State particularly when coupled with the growing families themselves and the indirect impact to those groups reliant on the industry.

This situation would be echoed around all commercial apple and pear growing regions in Australia.

INDUSTRY CONCERNS

Biosecurity Australia's proposal that no treatment or quarantine measures are needed for New Zealand apples to come into Australia has growers reeling !

Five years ago Biosecurity's assessment rightfully indicated that orchard practices could not guarantee Australia sufficient protection from the introduction of Fire Blight, European canker and other exotic pests that exist in New Zealand growing regions. Growers want to know why Biosecurity Australia have changed direction and are now allowing New Zealand to effectively set their own protocol.

The proposal from Biosecurity Australia is seriously deficient in providing specific information to justify the acceptance of Standard Orchard Practices as a genuine Export Protocol or the detail of the process to be adopted.

Growers are seeking this information and detail and have many questions, some of which are detailed below.

Tasmania has led the Australian apple industry in gaining export access to overseas markets for many years. This export success has been achievable mainly due to the disease free status of the industry in Tasmania. This has been achieved because growers have undertaken significant expenditure and time to develop appropriate infrastructure and increase their knowledge in order to meet importing countries protocols in existing markets as well as to seek out new markets.

Biosecurity Australia are now proposing that New Zealand producers will only be required to undertake the Standard Orchard Practices to be able to export apples into Australia. In fact, it appears that New Zealand does not even have a single organisation that would manage/audit the process across all export orchards to provide accuracy and consistency, let alone deal with non-compliance.

Who does Biosecurity Australia believe, will take responsibility for the management/audit and non-compliance because it appears from the document that Australian Quarantine officers will not be involved?

Growers wish to know, if in developing this proposal, Biosecurity Australia has considered the variation that will inevitably occur in the interpretation and application of New Zealand's Standard Orchard Practices from grower to grower and region to region?

Most horticultural industries around the world have Standard Orchard Practices designed to minimise the risk and spread of pests and diseases. Australian growers have for many years adopted quite stringent orchard practices which are reviewed/updated constantly. However in order to export fruit to most market destinations, there are protocols *set by the importing country* which have to be met.

Tasmanian growers have spent a lot of time and money on actions to protect their orchards from exotic pests and diseases at the same time position their industry to be able to meet protocols from importing countries and which has, subsequently established sound credibility in overseas markets.

Does Biosecurity Australia believe that the New Zealand Standard Orchard Practices are broader and/or better managed than those used by Australian growers and in fact, by all other orchardists around the world? If yes, in what way are they different and what is their audit/management process?

Australian growers have to meet many protocol requirements to export their product, including inspection visits from accredited Australian Officers and in some cases, also accredited Officers from the importing destination.

**Who sets the Standard Orchard Practices adopted by the New Zealand industry – will it be Biosecurity New Zealand or will it be the industry itself?
Will the New Zealand Standard Orchard Practices be audited by Biosecurity New Zealand or by an accredited QA Agency?**

The current Biosecurity Australia proposal allows New Zealand, *the exporting country*, to not only simply adopt Standard Orchard Practices as the export protocol but also to self-govern the whole process.

Growers want to know how Biosecurity Australia can justify the proposed arrangement with New Zealand as being a serious protocol designed to protect Australia's biosecurity integrity globally?

Does this not set a very dangerous precedent for any country wishing to export to Australia that they just have to have a Standard Orchard Practices document in existence?

The highly contagious bacterial disease of Fire Blight exists throughout the NZ apple industry but to date Australia remains free of this disease. It is common knowledge that once this particular disease establishes, there is no chance of eradication, rather growers can only attempt to manage some control of the disease. It is also fairly well accepted that countries who have imported product from countries where Fire Blight exists, then Fire Blight will establish, it is only a matter of when.

Will there be MRL testing for antibiotic residues? Will there be microbiological monitoring for the presence of Fire Blight for a period of initial shipments and what will be the acceptable limits for contaminated fruit?

There will be no guarantees that apples picked from orchards infected with Fire Blight will be excluded from export to Australia.

Growers want to know what Biosecurity's position is in regard to what measures Australian growers will be able to take in order to control Fire Blight in the future ?

In NZ the use of the antibiotic streptomycin is allowed for use by growers to try to control the disease. Chemical companies in Australia have not applied for registration of streptomycin in Australia because growers have, to date, had no need for it. Historically there has been reticence to register antibiotic treatment for any crops and to our knowledge, none have ever been registered in Australia.

CONCLUSION

The Tasmanian industry has worked very hard over many years to establish its good reputation in global export markets and this has been due mainly to the clean, green, disease free status of Tasmania.

Fruit Grower Tasmania Inc apple growing members are now very concerned at the recent Standard Orchard Practices being accepted as sufficient quarantine standard to protect Australia from a number of extremely damaging pests and diseases that are not present in Australia.

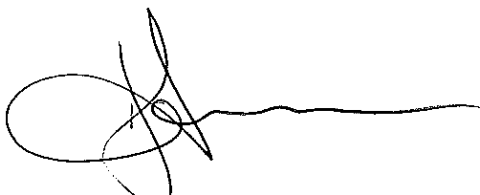
It also important to remember that it is not only the commercial apple and pear industry will be under the threat of introduction of new diseases (Fire Blight & European Canker) but our natural environment in Tasmania would also be at risk.

Growers are particularly concerned that -

- the very basic measures proposed in Biosecurity's latest recommendation would not provide adequate protection from the introduction of Fire Blight, European Canker and other pests and diseases and would set a very dangerous precedent for other countries seeking access to Australia for their fruit.
- the future viability of their orchards and the livelihoods of the whole Australian apple industry under Biosecurity's proposal will be at serious risk.

Biosecurity Australia has the responsibility to protect the Australian environment, industries and community from unwanted pests and disease. The import of New Zealand apples with such an inadequate process as that being proposed, will provide a vehicle with a very high risk to introduce unwanted pests and diseases into Tasmania that are not currently present.

Will Biosecurity also take responsibility for the devastation that Fire Blight will have on the industry? Because under this proposal, Fire Blight will be introduced to the Australian environment, growers just won't know exactly how long it will take.

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a series of loops and a long horizontal stroke extending to the right.

Jos Driessen
President - FGT