Office of the Chief Executive
Biosecurity Australia
GPO Box 858
CANBERRA ACT 2601

3 July, 2011

Submission

This submission is on behalf of Johnny Appleseed Holdings Ltd and has been prepared in response to the Biosecurity Australia (2011) Draft report for the non-regulated analysis of existing policy for apples from New Zealand.

Johnny Appleseed Holding is a large, integrated, family-owned horticultural company based in Hawkes Bay. Our family has been growing pipfruit in the region since 1904 and manages in excess of 500 hectares of pipfruit and stonefruit orchards.

Postharvest Disinfestation

We note your recommendations on fumigation for Codling Moth for WA and the Australia-wide concern regarding leaf rollers. In our view your protocol should also allow for postharvest disinfestation of these pests by cold storage and/or controlled atmosphere storage.

It is likely that the supply of apples from NZ will occur over a relatively long season as it does for your domestic supply. Later season supply necessitates the use controlled or modified atmosphere storage and such technologies have been shown to be extremely effective for the control of many quarantine pests, particularly Lepidoptera sub-species.

Over some years we have used a document prepared for ENZA by Hortresearch entitled "Low Temperature Treatment for Control of Quarantine Pests (L.E. Jamieson, B. C. Waddell, and P. G. Connolly). We have managed CA stores for 17 seasons and have found their mortality rates to be startlingly accurate. I have seen some subsequent studies with regard to specific pests of more recent times which have also proved useful to us. For Codling Moth for instance, 100% mortality in CA is achieved between 24 and 103 days, depending on the life cycle stage of the pest.

We appreciate you acknowledgement of such alternatives on page 3 of your draft which states "Australia will consider any alternative measure proposed by MAFNZ, providing that it achieves Australia's ALOP." We will write to MAFNZ to encourage development of the technical data you have requested.

Shipping fruit out of storage perhaps represents the most effective measure possible for lowering the pest quarantine risks to Australia. Moreover it achieves the objectives of the IPPC Recommendation - Replacement or Reduction of the use of Methyl Bromide as a Phytosanitary Measure (2008)[i]. It is for these reasons that we request you work towards agreement with your New Zealand counterparts as to the postharvest disinfestation protocols for 2012 and beyond. In no way should this matter serve to delay the implementation of the other measures that appear closer to agreement.

IFP Audits

We are surprised by the suggestion that some formal audit of NZ growers' IFP systems is being mooted. The import risk assessment for NZ fruit was based on industry pest data produced under a broad IFP framework. These IFP strategies are entrenched in the growers psyche and this is reinforced by many customer requirements. This framework was based on the Pipfruit NZ IFP manual, but the actual grower decision making was not audited to this standard. The spray diaries are audited, as are the pest outcomes (at packing).

In reality the pest data, which is unquestionably valid, represents IFP growers who were highly skilled and those less competent; customers specific IFP derivatives (e.g. Tesco's Nature's Choice); growers who targeted Taiwan and those that targeted Germany. Moreover, specific grower practices reflect seasonal, regional and block differences, tree age and a range of other factors. For the likes of Fireblight and European Canker for instance, most blocks in Hawkes Bay have never experienced problems with these diseases. As a result in many cases no formal block inspections or treatments have ever been undertaken. A block manager will naturally keep an eye out for symptoms of such diseases, but nothing more than that. In effect the risk factors affecting a block of apples result in the manager applying only part of the IFP manual that reasonably reflect the problems he is likely to experience.

On rare occasions a mangers judgement is proven wrong with regard to pests (but in our experience, not diseases), but this present little risk to an importing country. The problem may be dealt through good IFP practices, but even if it is not the following measures are in place:

1. The presence of pests is identified during harvest inspections. This data is usually sent to the packhouse with the consignment or the appropriate note is made on the packhouse consignment note.

2. The packhouse identify the problem though their Critical Control Point phytosanitary inspection.

3. The AQIS inspection identifies the problem and excludes the fruit from Australia.

If the risk assessment of Australian authorities concludes that NZ apples can be safely imported to Australia, then why the need for a new audited requirement? There cannot be any valid rationale for demanding the NZ operate to a higher standard than that on which the import risk assessment was undertaken. In our view sufficient protection is offered through official NZ and Australian phytosanitary inspection. If any additional measure is required then perhaps only inspection of the harvest bins should be required.

We request you remove the requirement for IFP growers to be audited.

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[i] http://www.daff.gov.au/animal-plant-health/plant/methyl_bromide_alternatives_information_system/replacement_of_methyl_as_phytosanitary_measure