

**MH & SM SMART PTY L TD  
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29 June 2011

Office of the Chief Executive  
Biosecurity Australia

Dear Sirs

We wish to make a submission to express our deep concern about the possibility of exotic pests and diseases entering this country with the unrestricted importing of New Zealand apples.

Recently it was announced that standard orchard practices in New Zealand can be adopted as a quarantine standard sufficient to protect Australia from a number of extremely damaging pests and diseases that are not present in Australia.

It is very difficult for growers such as ourselves 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 because we do not have access to the NZ Integrated Fruit Production Manual which is deemed confidential.

Could Biosecurity Australia advise what science the Integrated Fruit Production system is based upon? And has that underlying science been 'peer reviewed' as other science underpinning an import Risk Assessment is expected to be?

If Biosecurity Australia proposes to inspect the apple fruit for pests & diseases, how do they intend to do this given the bacteria that causes Fire Blight is invisible to the human eye?

If inspections cannot detect E amylovera on apples, without specialist testing for bacteria, and if orchards infested with Fire Blight will not be excluded from exporting fruit, then how does Biosecurity Australia arrive at a probability of entry, establishment and spread of E amylovera at “extremely low”? Indeed how can two (2) “highs” and one (1) “extremely low” give an “extremely low”?

Also if Biosecurity Australia proposes to inspect the apple fruit for trash (leaves & twigs) how do they intend to do this given that trash is rarely on the fruit itself but within the boxes and other packaging containing the apples?

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 regards to Mediterranean and Queensland Fruit fly.

We and our industry colleagues believe that the following changes should be implemented before the draft recommendations for New Zealand apple imports are accepted.

- \*Where a pre-harvest outbreak of Fire Blight is detected, fruit from that block or orchard should be excluded from export to Australia.

- \*When a heavy infestation of Apple Leaf Curling Midge or Leaf Rollers occurs in an orchard, either the fruit be excluded or fumigated.

- \*From each consignment at least 600 cartons should be inspected to ensure that no trash (leaves & twigs) is entering the country via the cartons.

- \*Should cartons contain trash, those suppliers should be excluded from exporting to Australia until a review of procedures is completed.

- \*High risk areas for European Canker such as Auckland and Otago should be excluded from exporting to Australia.

\*Should there be a regional outbreak of Fire Blight, trade should be suspended until a review of procedures is completed and alternative protocols are established.

We believe that these practices are consistent with practices applied by other countries to implement their sanitary-phytosanitary agreements and there is no reason why Australia should not adopt the same standards.

By trusting New Zealand without verifying their practices through an open and transparent audit system, we are putting our industry in jeopardy. We wish to keep our 'disease free' status as that is our competitive advantage in the market place.

We, therefore, ask that Biosecurity Australia do what they can to ensure that the above measures are implemented to protect our industry, our families and our communities.

Yours sincerely

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