

Mirrabooka Farms Operating Trust

PO Box 164

Orange NSW 2800

ABN: 17 476 083 007

4th July 2011

Dr Colin Grant

CEO, Biosecurity Australia

CANBERRA ACT

Re: Import Risk Analysis and Procedures for the Importation of
New Zealand Apples into Australia

Dear Dr Grant

We write as a family orchard business located in Orange NSW that produces apples and cherries for domestic markets on the Eastern seaboard of Australia. We would like to express our deep concern at the current stance of Biosecurity Australia regarding the procedures it has stated it will accept to allow the import of New Zealand apples into Australia – that is, to accept “standard orchard practices” as an adequate quarantine parameter to prevent the introduction of the disease Fireblight into Australia. This procedure also relates to other exotic pests and diseases of concern to Australian apple growers, including apple leaf curling midge (or leaf rollers) and European canker.

We believe that the decision to accept “standard orchard practices” as a procedure is a totally inadequate quarantine process. We fully support the position of Apple and Pear Australia in relation to the concerns that it has clearly stated in relation to this matter. It would seem that Biosecurity Australia is relinquishing any responsibility it may have to prevent the entry of Fireblight and other exotic diseases from New Zealand into Australia. In fact, Biosecurity Australia is relying on the New Zealand apple industry to self regulate – surely this must be a huge potential conflict of interests for New Zealand apple growers and exporters!

As fruit growers with a reasonably long history of fruit growing in the Orange region (commenced in 1920), we cannot understand or accept the risk that allowing the importation of New Zealand apples poses to our business. At the present time, Australian apple growers have a distinct competitive advantage due to the non-presence of a number of diseases and pests that occur in fruit growing regions in other countries. Our fruit is “cleaner” because we do not have to apply specific treatment to control these diseases and pests, particularly the antibiotic sprays for the control of Fireblight. The actions of Biosecurity Australia in allowing the importation of New Zealand apples put this long term competitive advantage at risk.

Mirrabooka Farms believes that Biosecurity Australia should consider some additional key points in relation to the importation of New Zealand apples, including;

- The climate in many key apple and pear producing areas in Australia is quite conducive to the spread of Fireblight if it were to enter this country. The impact of the disease is therefore likely to be higher than it is in countries such as New Zealand – has this been fully considered in assessing the potential risk of importing apples into Australia?
- To our knowledge, there are no products presently registered in Australia for the control of Fireblight. Informal discussions with personnel from pesticide regulatory authorities indicate that they would be unlikely to allow the registration of specific antibiotics for the control of Fireblight. Therefore, what control measures are proposed should the disease present itself in Australian apple and pear orchards?
- How does Biosecurity Australia rationalise the effective outsourcing of quarantine procedures and processes to another country that obtains business advantage from the potential sale of its exported fruit into Australia? The development of biosecurity standards and the implementation of them is something that should remain firmly in the control of bodies that are charged to protect of National biosecurity interests of Australia and its citizens.
- While Biosecurity Australia obviously expects that Australian apple and pear growers will have to foot the bill for cost of control measures on their own properties, has it considered the cost of control of Fireblight should it present itself on “rogue” apple seedlings that are commonplace along roadsides and in pasture paddocks, trees in backyard gardens and on other species that are susceptible to the disease, including Hawthorn bushes?

We look forward to your early response on the issues raised above, and urge Biosecurity Australia to conduct an urgent review into the proposed requirements surrounding the importation of New Zealand apples into Australia. Biosecurity Australia must accept full responsibility for the development and implementation of quarantine measures that will prevent the entry of exotic pests and diseases from New Zealand into Australia generally, and Australian apple and pear orchards in particular. We do not believe that the measures currently proposed by Biosecurity Australia will achieve this.

Yours Sincerely



Robert S. Pearce

Director



Ross C. Pearce

Director



Ian R.S. Pearce

Director