

**From:** Bob Heatley [mailto:director@selwynsnow.com.au]

**Sent:** Thursday, 30 June 2011 11:35 AM

**To:** BA - Plant Biosecurity Contact

**Subject:** Biosecurity Australia Advice 2011/06- Objection to the draft report for the non-regulated analysis of existing policy for apples from New Zealand (a review)

I write to object to the recommendations of the above mentioned report. I consider "standard orchard practices", as a level of biosecurity protection against a virulent bacterium to be totally unsatisfactory. Any procedures or protocols need to be fully documented, audited by a world recognised accreditation scheme, and then cross checked by Australian biosecurity offices to ensure compliance with a high hygiene standard in both supplying orchards and packing houses.

Further, unless there is documentation of hygiene practices how can there be an audit system or cross check? There clearly has to be a set of protocols for NZ orchardists and packing sheds to adhere to otherwise there is no level of protection at all.

I cannot understand how Biosecurity Australia can, in previous draft IRA's, set protocols and now turn around and say standard undocumented practises will be permitted to protect the Australian industry.

Fire Blight will get into Australia on the leaf and twig trash inevitably found in apple packing cases. Under that scenario I would be encouraging our industry bodies to make accountable Biosecurity Australia for incompetence in dealing with this issue.

The mere fact that protocols can go from a good level of protection to virtually none without release of creditable scientific advice to support such a change is incomprehensible.

Biosecurity Australia must immediately release creditable advice they have received to support their turn around on the level of protection offered to the Australian industry or stand accountable down the track

Regards

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