

27<sup>th</sup> June 2011

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

**Submission on the draft report for the non-regulated analysis of existing policy for apples from New Zealand (a review).**

To whom it may concern,

I write to comment on the draft report on the proposal to allow the importation of New Zealand apples released by Biosecurity Australia on May 4<sup>th</sup> 2011.

Australia was once a biosecurity island fortress, but the brick walls of that fortress, our biosecurity and quarantine programs, have been repeatedly cut back and undermined.

Western Australia in particular has been the envy of the world, as we did not have many of the world's major pests and diseases and as a consequence our fruit industry used less than 40 per cent of the pesticides applied annually by other fruit exporting nations.

However almost a decade ago, as a result of poor quarantine management, the disease "brown rot" of stone fruit was allowed to enter the state and it is now endemic, costing the fruit industry annually tens of millions of dollars.

Have we learnt nothing from this failure of quarantine?

Unfortunately it would appear that we have indeed learnt nothing, given that we are about to lower our biosecurity standards again under the recommendations of the draft report on apple imports from New Zealand. The report all but ignores the risks of serious disease outbreaks, especially for the bacterium Erwinia amylovora which causes fire blight.

The Western Australian Department of Agriculture and Food advises that a serious epidemic of fire blight is likely to decrease apple and pear production by up to 50 per cent. But it is not just apples and pears. A number of other species will be affected. The control of fire blight once established will not be easy. The Australian Quarantine and Inspection Service has identified sixteen genera plants that can act as hosts across Australia.

The latest proposals are an abandonment of the quarantine principles that have made us amongst the cleanest producers of high quality food in the world.

The draft report recommends specific risk management measures including:

- *“Application of the Integrated Fruit Production system, or an equivalent, to manage pests and diseases in the orchard.*
- *Consignments must be tested to ensure that only mature fruit is exported to Australia.*
- *There must be maintenance of sanitary conditions in dump tank water.*
- *High pressure washing and brushing of fruit in the packing house must be undertaken.*
- *A minimum of 600 fruit from each lot packed must be inspected and found free of quarantine pests.”*

There appears to be no proposed uniform standards of quarantine management and inspection proposed for New Zealand orchards.

Instead it is proposed that Australia rely on New Zealand's 'integrated fruit production system'—in effect a quality assurance program managed by farmers under an accreditation system. This system is not a quarantine program; it is a quality assurance program that is also used in South Africa, Australia and Argentina.

The purpose of the “integrated fruit production system” is to promote the product by standardising the fruit leaving the farm, not to prevent disease spread to another country. It is the same quality assurance program that exists in Australia, however in Australia it is not used as an alternative to quarantine and it does not allow access for Australian fruit into any overseas market. This double standard is not acceptable.

In addition, the New Zealand Integrated Fruit Production system of quality assurance does not apply a measure for the maximum residue levels of antibiotics on fruit before export. Fruit arriving here from New Zealand can carry antibiotics including streptomycin, which is banned in Australia in the interests of preventing antibiotic resistance in human health, but is still used in New Zealand orchards.

Curiously, in its haste to abandon our strong borders, Biosecurity Australia has shown itself willing to drop its standards to below that applied by the United States. The US applies stricter quarantine protocols to New Zealand apple imports than those proposed by Biosecurity Australia for imports into Australia. However, New Zealand has not been to the WTO to have the US protocols downgraded.

The new protocols for apple imports into Australia are not adequate and do not provide for proper inspection by trained and qualified personnel.

Instead they rely on every New Zealand backpacker working in an orchard having a good day everyday and getting it right when they are picking and sorting apples to identify diseased fruit. Given that the greatest threat to Australian fruit producers – fire blight – is not a notifiable disease in New Zealand, there is little incentive for New Zealand fruit producers, pickers or packers to identify infected fruit or prevent its' spread, including to Australia. This leaves me with little confidence that the protocols proposed by Biosecurity Australia will prevent this disease entering Australia.

This lack of biosecurity is of particular importance for Australian organic fruit producers. Organic producers will not be able to resort to antibiotic sprays to control fire blight, so the threat to this burgeoning industry is extreme. The draft report has not adequately addressed this threat.

This quarantine debacle is highlighted by one astounding and very disturbing fact.

**Biosecurity Australia has recommended protocols that allow for a minimum of 600 fruit samples from each consignment of fruit packed to be inspected and found free of quarantine pests for Australia. Six hundred pieces of fruit from each consignment may mean 600 pieces of fruit out of a number of containers of apples from a variety of sources. It may well mean only one apple in a million being inspected.**

Simple maths tells you therefore that the odds we are giving our national biosecurity and quarantine services of detecting a pest incursion is one in a million.

In addition to the other issues the draft report does not deal adequately with the issue of shipments of fruit arriving with trash—that is, the leaves and other plant debris. Such material is a likely vector of fire blight and risk of incursion is too high if such material is included in consignments. Any such contaminated consignments should be immediately rejected and returned to their country of origin, as they would be by the US.

For these reasons, and because the integrity of Australia's border biosecurity has already been compromised too frequently, I urge Biosecurity Australia to redraft its report for the non-regulated analysis of existing policy for apples from New Zealand to include proper and adequate border protection against disease incursion.

The report should be rejected in its' current form.

Thank you for the opportunity to comment on this report.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nola Marino'.

Nola Marino MP

Member for Forrest; Opposition Whip

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