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Sent: Monday, 4 July 2011 6:51 PM
To: BA - Plant Biosecurity Contact
Subject: Submission from Western Australia Fruit Grower in reponse to Draft IRA for NZ apples

Submission to Biosecurity Australia in response to the Draft report for the non-regulated analysis of existing policy for apples from New Zealand

Our family business, Newton Brothers Orchards in Manjimup, Western Australia, is over 80 years old, employs 60 people year round, up to 140 people at the height of our season, has an annual payroll of four million dollars, and is an important contributor to the economic and social wellbeing of our local economy.

As second and third generation Australian fruit producers, we write to request changes to the draft IRA report. We believe the proposed measures fall drastically short of those applied by other countries to implement their sanitary-phytosanitary agreements, and there is no reason why Australia should not adopt the same standards. Though we have several concerns, I refer here in particular to the lack of area freedom required for fireblight, european canker, and leaf-curling midge. The recent Chinese import protocol required area freedom for European canker – why the double standard for NZ? How did BA arrive at different conclusions for the same high-risk disease?

We were so concerned upon reading the recommendations, we wrote to Deans of Agriculture at top universities around Australia; we're aware that the views of a scientist may carry more weight than ours, and also, we understand that the ALOP process considers only the scientific evidence available. Whilst this is in theory a sound benchmark, it becomes problematic if we consider how under-funded scientific research is on the effect or potential effects of foreign pathogens on our flora and fauna, both native and introduced.

For more, I refer you to the attached reply from Professor David Guest, at Sydney University, who share our views, and has advised us that he will be making a submission of his own.

In summary, at a minimum we would like the following points addressed:

Transparency for all stakeholders:

- The Integrated Fruit Production manual (Pipfruit NZ Inc) which forms the basis of the import protocol, must be made available for us to assess before the report is complete
- We should have the right to submit comment on the NZ standard practices. At the moment we cannot, because the manual is, to our knowledge, being sequestered
- Demonstrate how NZ standard practices will implemented and audited, and who will incur the cost
- NZ orchards should be made to declare a fireblight outbreak

Australian authorities should be auditing NZ export orchards and packhouses:

- Is the Integrated Fruit Production manual audited?
- If a fire blight outbreak is detected, the orchard should be excluded from exporting to Australia
- We should not relinquish pre-border biosecurity responsibility to the NZ industry, which, it should be noted, stands to benefit commercially should Australian orchards become infected with their pests and diseases

Dangerous Precedent:

- European Canker was mitigated against for Chinese apple imports via Area Freedom. Why have high-risk European Canker infected growing regions of NZ been ignored?

- Will China request their protocols to be relaxed further for apple imports?
- Will other countries that have applied for entry, such as Chile and the US, also expect their protocols to be relaxed?
- What precedent is set if we accept the use of an exporter's standard orchard practice to protect our environment?

Fire Blight:

- No chemicals are registered in Australia to control Fire blight (*Erwinia amylovora*)
- There are no chemicals available in Australia to control Fire blight
- We are told the process for registering a chemical takes 12 – 18 months. Should orchards become infected in that period, we have no available means to protect or treat the trees – the orchards will simply die. How can this be deemed a reasonable level of risk?
- Streptomycin is the only known antibiotic chemical that can prevent infection. It has been banned in Europe. In WA, key apple growing regions of Perth Hills, Donnybrook and Manjimup are located in water catchments zones for human consumption. Even if we apply to register it, we think it would not be deemed appropriate to spray a chemical antibiotic in direct line with water runoff and catchment zones for human consumption
- Not studies on the effect of new pests and diseases, or newly introduced, strong chemical antibiotics on our local environment or water supply
- If the chemical is used to protect or treat Australian trees, the MRL for human consumption is zero; therefore Australian apples will not be able to be sold or consumed
- Visual inspections (600 pieces of fruit) will not identify fire blight as it is not visible to the human eye
- Have climatic variables been taken into account during risk assessments? Research shows that the Goulburn Valley NSW has on average 14 days of weather conditions per year that suit perfectly the spread of fireblight, whereas NZ only has two

Trash:

- Trash is proven to carry fire blight pathogen
- Inspection in packhouses in NZ should be mandatory, especially for systems which cannot detect trash, such as mechanical packers and tray fillers
- The cartons need to be inspected prior to export for trash, to ensure the pathogen does not reach our shores

Special Conditions needed for Western Australia:

We have the unique status of freedom from the serious pest codling moth - any growers applying to enter Western Australia should be required to demonstrate Area Freedom from codling moth

Apple Scab – though we recently lost area freedom (as a direct result of reduced government funding to carry out correct monitoring), this disease is not present in WA. We request protocols ensure this disease does not enter WA.

If these pests and diseases become established in Western Australia, as we pointed out above, we would first have to begin the lengthy application process to register new antibiotic chemicals for control. Presuming the Australian authorities would even consider introduced a chemical that has been banned in Europe, we would then have two options: we would face either increased chemical use – an unviable path for growers committed to becoming 100% organic - or face the possibility of allowing our orchards to succumb to disease and destroy productivity for up to 5-6 years. The latter obviously does not put food on the table, for grower or consumers. Further, with our commitment to growing organically in future, chemical treatment is simply not an option.

We need to ensure the correct phyto-sanitary protection is in place.

We urge Biosecurity Australia to give full consideration to the points we have raised. We do not doubt your commitment to professionalism, only wish to assist in ensuring we all work together to produce the right result for the future of our country's pristine growing environment. When we approach our work at Newton Brothers Orchards, we think first of the future generations who stand to inherit the results of what we do today.

Kind regards,

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