

NT & MA & AN PLUNKETT
ABN: 78 368 645 151

FJ LENNE PTY LTD
ABN: 47 004 512 832

255 McIsaac Road
ARDMONA, Vic 3629



Phone (03) 5829 0015

Fax (03) 5829 0324

Email info@plunkettorchards.com.au
www.plunkettorchards.com.au

Biosecurity Australia Advice 2011/06

I am a fourth generation fruit grower from Ardmona, near Shepparton in the Goulburn Valley, and I would like to raise some concerns about the currently proposed protocols for the import of apples from New Zealand into Australia.

Our business is based around the production and marketing of both apples and pears, and we are particularly concerned about the risk of the bacterial disease fire blight entering Australia. Our district is particularly vulnerable due to its climate, and also its large plantings of pears, which are extremely susceptible.

We have no concerns regarding competition from imported product, as in our case our marketing is heavily focused towards exports, and hence our concerns are based around minimising the risk of fire blight entering Australia.

Comments on the process of comment to the draft report (Biosecurity Australia Advice 2011/06)

This draft is based heavily off a document from New Zealand (the Integrated Fruit Production system) which is the basis of "standard commercial practices". Yet we as an industry are not able to have access to this document.

It is very difficult to provide constructive comment on this draft report based around an unavailable document. Given that the livelihood of my family and my staff are impacted by this report, it is an insult by Biosecurity Australia that we do not have the opportunity to review and identify potential issues that we may see within the New Zealand "standard commercial practices".

Comments on the draft report (Biosecurity Australia Advice 2011/06)

- How can it be that in the last Biosecurity report (2006) the tighter protocol of that report gave an appropriate level of protection (ALOP), but now in this report it is deemed that the ALOP can be achieved by "standard commercial practices" of New Zealand growers. It would appear that determining our ALOP is a very subjective process, potentially influenced by trade needs. Whilst appreciating that the protocol must be changed to meet WTO obligations, it is difficult to understand how Biosecurity Australia comes up with the same ALOP under two extremely different protocols, and how Australia has moved from a rigorous protocol to an almost non existent protocol.
- We feel it would be appropriate to exclude orchards from that export season where a fire blight outbreak is known to have occurred. The report indicates that somewhere between 5 and 10% of the crop is treated with Streptomycin/Blossom Bless, so these crops should be excluded. This would still leave 90% of the New Zealand crop able to be exported if needed, hence, a restriction such as this would be difficult to be deemed as trade restrictive, but would certainly lower the risk of fire blight entering the country.
- We are concerned that this reliance on an importing countries standard commercial practices as the basis for an import protocol sets an undesirable precedent for the import of other products into Australia.

- In our case for example, standard commercial practices control fruit fly within our orchards, but importing countries such as New Zealand, Indonesia, India etc require us to follow a protocol based on the assumption we have fruit fly (whether there is an out break or not), and we follow appropriate cool storage processes, which are audited by AQIS. Our point is that these countries DO NOT accept standard commercial practices as an acceptable control or treatment of that pest.
- Are there any other countries that would allow imports based on the exporting countries “standard commercial practices”.
- We would like to see more detail about how Biosecurity Australia ensures “standard commercial practices” would be followed, and how Biosecurity Australia responds to guidelines within these practices. The “integrated fruit production system” is described as an ever evolving document – will Biosecurity Australia be a party involved with any update to this system in years to come?
- China, Japan and Taiwan all seem to have far more stringent controls on the importation of New Zealand apples than Biosecurity Australia propose for export to Australia. Why is this the case? If those protocols are acceptable to the New Zealand industry, why is Australia accepting a protocol of higher risk?
- There seems to be discussion in the report on the experiences of NZ apple growers in dealing with fire blight, and how they manage the disease. There needs to be research into how pear growers manage with fire blight in New Zealand, as this would paint a more difficult scenario. It should be noted that New Zealand is a major buyer of Australian pears due to their inability to successfully grow pears due to the presence of fire blight.

In summary, whilst accepting that the previous protocol had to be altered in light of the WTO decision, we are extremely concerned that the current protocol will not give us an acceptable level of protection. It is important to remember that an outbreak here in the Goulburn Valley will not be a minor issue, as it often is in New Zealand, and as described in the draft report. In the case of our pears, total removal of pear blocks may be required.

We urge Biosecurity Australia to review the draft and add in a few key requirements, listed above. The document as it stands is simply not thorough enough to ensure that Australia remains fire blight free.

Andrew Plunkett
B.Ag.Sci (Hons)