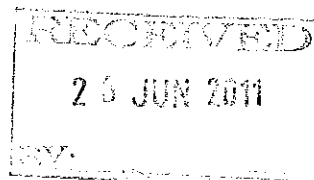


21 June 2011

245 Victoria Road
WANDIN North VIC 3139

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



RE: Proposed Importation of Apples from New Zealand.

We wish to lodge an objection to the current draft ruling on the importation of fresh apples from New Zealand.

The proposal that "well established commercial practices used by New Zealand apple producers address the concerns posed by fire blight, European canker and apple leaf curling midge" is flawed.

We do not have the opportunity to scrutinise these practices as the manual covering them is protected by a "commercial in confidence" smoke screen.

We do not have any opportunity to assess the verification of the adherence to these practices, nor of any third party independent auditing of these practices

Therefore we can have NO confidence in that ruling and therefore reject it as a suitable measure, especially as the New Zealand industry has been unable to stop the spread of outbreaks of fire blight within New Zealand, even with the availability of "antibiotic" spray controls (which the Australian industry are and will continue to be denied access to).

The proposed approval without equal scrutiny by the Australian public is a denial of natural justice and must not be allowed to continue.

We further note that although the WTO rejected the original Australian proposed Protocols as being too strict there was no ruling to say Australia had to abandon all restrictions.

The result we are now presented with, plus the Prime Minister's speech to the New Zealand Parliament suggests to us that the whole Import Risk Analysis process was a sham and an expensive waste of Taxpayer's money.

The proposal that the industry (in a foreign country) is to be the producer, inspector, auditor and rule maker for what is Australia's sovereign right is a TOTAL abrogation of Biosecurity Australia's duties. What is next, will you allow foreign beef producing countries (afflicted with "foot and mouth disease") to make the rules for how and what beef products they send to Australia.

If Biosecurity cannot properly carry out its duties it should be disbanded, before it "oversees" the destruction of the ability for Australia to feed itself.

Terry & Carolyn Burgi