

4th July 2011

Dr Colin Grant
Chief Executive Officer
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Dear Dr Grant

RESPONSE TO DECISION TO IMPORT APPLES FROM NEW ZEALAND

The Victorian Farmers Federation (VFF), Australia's largest state farmer organisation and only recognized consistent voice for rural Victoria, welcomes the opportunity to comment on the importation of apples from New Zealand.

Victoria produces 45 per cent of Australia's apples and 90 per cent of Australia's pear crop and has a farm gate value of \$347.5m. This means Victorian growers have the most to lose.

Victorian apple and pear (pome fruit) growers employ around 2000 permanent employees. Casual employment during harvest increases that number to around 8000. This does not include those employed in packing and processing facilities, wholesale markets, farm suppliers and other businesses supported by growers within their communities. Pome fruit growers are significant contributors to the economies of the rural communities in the Goulburn Valley, Harcourt, Gippsland and the Yarra Ranges.

The VFF believes the decision to replace pre-border phytosanitary measures with 'standard commercial practices' developed and managed by a foreign industry sets a precedence that could have implications for other agricultural industries. It has the potential to open the door for other countries to determine their own phytosanitary measures which could lead to the introduction of pests and diseases not currently in Australia.

In the matter of imported apples from New Zealand, the VFF wishes to support the concerns raised in Apple and Pear Australia Ltd's (APAL) technical submission and raises the need for:

1. The *NZ Integrated Fruit Production System* to be made available to industry and open to peer review required as part of other science underpinning an Import Risk Assessment. This provides grower and consumer confidence that measures are adequate to ensure that Fire Blight, European Canker and Apple Leaf Curling Midge do not enter Australia.
2. An explanation on how Biosecurity Australia plans to inspect fruit for pests and diseases considering that the bacteria that causes fire blight is not visible to the human eye.
3. An explanation on the disparity between protocols required by New Zealand for imported apples from Australia regarding Mediterranean and Queensland Fruit Fly and Australia's lenient protocols regarding imported apples from New Zealand.

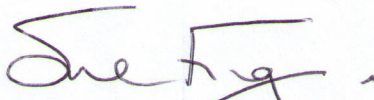
4. Biosecurity Australia to inspect a minimum of 600 cartons per consignment containing apples for trash (leaves and twigs) to ensure pest and diseases are not present.
5. Fruit treated by anti-biotics against Fire Blight must be excluded from export to Australia.
6. Ensuring monitoring for Fire Blight, Leaf Curling Midge and European Canker outbreaks/infestations are mandated and must be notifiable.
7. Terms such as "heavy infestation" to be defined numerically and not open to interpretation.
8. Importation of fruit to only be allowed in carton lines not bulk lines for repacking. This minimises the likelihood of trash and insects. Repacking in Australia may place fruit closer to orchards which are where repacking equipment is generally based. Repacking of fruit would significantly increase the risk of pest and diseases being introduced.

Recommendations:

At a minimum the VFF seeks an appropriate level of protection that includes:

- Where an outbreak of Fire Blight is detected, fruit from that block or orchard should be excluded from export to Australia;
- When a heavy infestation of apple leaf curling midge or leaf rollers occurs in an orchard, that the fruit be either excluded or fumigated;
- Each consignment has at least 600 cartons inspected to ensure that no trash is entering the country via trash in the cartons. Trash (leaves and small twigs) are recognised as carriers of fire blight. Should cartons contain trash, those suppliers should be excluded from exporting to Australia until a review of procedures is completed;
- Bulk lines for repacking are excluded from export to Australia;
- Fruit treated with antibiotics be excluded from export to Australia
- High risk areas for European canker such as Auckland and Otago be excluded from exporting to Australia; and
- Should there be a regional outbreak of fire blight, trade be suspended until a review of procedures is completed and alternative protocols are established.

Yours Sincerely



**SUSAN FINGER
PRESIDENT
VFF HORTICULTURE GROUP**