

To: Mr Bill Magee, Biosecurity Australia

### **Comments on the Import Risk Analysis for Chinese Apple**

Dear Mr Bill Magee,

First of all, I would like to congratulate you on your new position of General Manager of Plant Biosecurity, Biosecurity Australia. I hope we can further strengthen bilateral communication and cooperation to advance the sound development of bilateral agriculture trade within your term.

Thanks for the publication of Draft Import Risk Analysis Report on Chinese Apple in January 2009; your efforts in assisting the Chinese apple market access are greatly appreciated. After review, China side would present following comments on the draft report:

#### *1. Neonectria ditissima*

Due to more effective apple orchard management and pest controls, this disease has not been seen in Chinese apple production areas through many years observation. The referenced document provided in your report is about 20 years ago, and there are no updated relevant documents or reports. Thus we suggest this disease be removed from the pest list and the relevant risk management measures aborted.

#### *2. Sooty Blotch and Flyspeck Complex*

This bacterium is a type of saprophytic bacteria reported on 2006 by a Chinese expert. We have consulted with this expert and are informed that this bacterium is reported for taxonomies only, and it does not constitute any harm on the fruits. Thus we suggest this bacterium be removed from the pest list and the relevant risk management measures aborted.

#### *3. Bactrocera dorsalis* free areas

Both our sides have discussed a number of times on the issue of Fruit Fly Freedom Areas in the northern regions of China. Furthermore, Australian experts have conducted field inspections in September and December of 2007 respectively. However, on 6 March 2009, Australia published the FFA assessment report for Shandong, Hebei and Xinjiang only. Currently, many countries like the United States, Chile and South Africa etc. have recognized the apple and pear production areas in northern part of China as fruit fly freedom areas. It would be appreciated that Australia side would consider about the fact and recognize the other fruit production areas in northern part of China as fruit fly free areas as early as possible.

#### *4. Preclearance*

We agree that Australian experts come to China to conduct preclearance on the apples to be exported to Australia in the first year of trade. Taking exporting establishments' financial budget

into consideration, we suggest that the preclearance would not be carried out as an on-going practice. If there is any quarantine inspection issue coming up, our both sides can negotiate and work out the specific solutions.

#### 5. Pests Risk Level

China experts consider the risk level for some of the pests are assessed relatively too high. Please see the attachment for specific comments.

It would be appreciated if Australian side could simplify the relevant procedures after the consultation period for the IRA report and publish the final IRA report on Chinese apple as early as possible, so that Chinese apples could be exported to Australia in 2009 harvest season.

We look forward to your reply.

Best regards,

Lu Houlin

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General Administration of Quality Supervision, Inspection and Quarantine of  
People's Republic of China

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澳大利亚进口中国苹果风险分析报告草案反馈意见

Appendix: Submissions in response to the Draft import risk analysis report for fresh apple fruit from the People's Republic of China

有害生物 pests for apple	IRA 原文 Draft IRA report	修改建议 The amending suggestion on IRA	原因 Reason
丽新须螨 Flat scarlet mite ( <i>Cenopalpus pulcher</i> )	<p><b>4.2.2</b> The likelihood that <i>C. pulcher</i> will arrive in Australia with the importation of the commodity:HIGH. ...</p> <p><b>4.2.6</b> Based on the decision described in Table 2.4, that is, where the consequences of a pest with respect to one or more criteria are 'E', the overall consequences are estimated to be MODERATE.</p> <p><b>Plant life or health</b> E – Significant at the regional level</p> <p><b>4.2.7</b> As indicated, the unrestricted risk for flat scarlet mite has been assessed as 'low', which exceeds Australia's ALOP. Therefore, specific risk management measures are required for</p>	<p><b>4.2.2</b> The likelihood that <i>C. pulcher</i> will arrive in Australia with the importation of the commodity: MODERATE. ...</p> <p><b>4.2.6</b> Based on the decision described in Table 2.4, that is, where the consequences of a pest with respect to one or more criteria are 'D', the overall consequences are estimated to be LOW.</p> <p><b>Plant life or health</b> D – Minor significant at the regional level</p> <p><b>4.2.7</b> As indicated, the unrestricted risk for flat scarlet mite has been assessed as 'very low', which achieves</p>	<p>1、该虫最近信息为 1994 年版的《中国果树病虫害》，近 15 年来均无其发生危害的其他资料。</p> <p>2、多年来的田间调查已很难发现该虫，说明在我国经济意义不大，目前不是果树生产中的主要有害生物。</p> <p>3、NAPPO 检疫性有害生物预警系统中,记载该有害生物不能通过果实进行传播。(见参考)</p> <p>1.Flat scarlet mite was recently recorded by "Plant Diseases and Insects of Fruits in China"(Wang HY. et al, 1994)<sup>(1)</sup> published in 1994. Except of that, no more records about its damaging apple or any other fruits were found in recent 15 years in China.</p> <p>2.Results of the field survey indicated this pest has hardly been found in the field for many years and is not one of the most important pests in the apple orchards.</p>

	<p>this pest.</p>	<p>Australia's ALOP. Therefore, specific risk management measures are not required for this pest.</p>	<p>3.Warning System of Quarantine Pests by NAPPO recorded that this pest can not spread via fruits<sup>(2)</sup>。</p> <p>( Reference : Pathways: The flat scarlet mite is most often dispersed on propagative (vegetative) material such as nursery stock or budwood, and is not spread via fruit, seed, or by wind. There is no indication that the mite has been transferred outside Oregon, but the potential for movement on budwood or scionwood, as well as nursery stock, should be considered. )</p>
<p>桔小实蝇 Oriental fruit fly ( <i>Bactrocera dorsalis</i> )</p>	<p><b>4.5.2 Reassessment of probability of importation</b> The likelihood that <i>B. dorsalis</i> will arrive in Australia with the importation of the commodity: <b>MODERATE.</b> ... <b>4.5.6 Unrestricted risk estimate</b> ... As indicated, the unrestricted risk for Oriental fruit fly has been assessed as 'high', which exceeds Australia's ALOP. Therefore, specific risk management measures are</p>	<p><b>4.5.2 Reassessment of probability of importation</b> The likelihood that <i>B. dorsalis</i> will arrive in Australia with the importation of the commodity: <b>Very Low.</b> ... <b>4.5.6 Unrestricted risk estimate</b> ... As indicated, the unrestricted risk for Oriental fruit fly has been assessed as 'low', which exceeds Australia's ALOP. Therefore, specific risk management</p>	<p>中国对北纬 33 度以北地区进行多年监测，没有发现桔小实蝇，澳大利亚也认可北纬 32 度以北地区为桔小实蝇的分布极限，美方也确认中国对北纬 33 度以北地区为桔小实蝇非疫区。</p> <p>No Oriental fruit fly was found by China's National Fruit Flies Trapping Network from 2000 to 2008. in the northern China. Biosecurity Australia was agreed with that the northernmost border of <i>Bactrocera dorsalis</i> distribution in China is 30±2° north latitude. Furthermore, APHIS had</p>

	required for this pest.	measures are required for this pest.	accepted the opinion about the pest free area of northern China for oriental fruit fly.
<p>槭树绵粉蚧 apple mealybug ( <i>Phenacoccus aceris</i> )</p>	<p>1. <i>Probability of importation</i> The likelihood that <i>Phenacoccus aceris</i> and <i>Pseudococcus comstocki</i> will arrive in Australia with the importation of the commodity: <b>HIGH.</b></p> <p>...</p> <p>2. <b>4.8.7 Unrestricted risk estimate</b></p> <p>...</p> <p>As indicated, the unrestricted risk for mealybugs has been assessed as ‘low’, which exceeds Australia’s ALOP. Therefore, specific risk management measures are required for this pest.</p>	<p>1. <i>Probability of importation</i> The likelihood that <i>Phenacoccus aceris</i> will arrive in Australia with the importation of the commodity: <b>MODERATE.</b></p> <p>....</p> <p>2. <b>4.8.7 Unrestricted risk estimate</b></p> <p>...</p> <p>As indicated, the unrestricted risk for <i>Phenacoccus aceris</i> has been assessed as ‘very low’, which achieves Australia’s ALOP. Therefore, specific risk management measures are not required for this pest.</p>	<p>1、 槭绵粉蚧与康氏粉蚧在中国的发生情况不同 ,建议分开评议。</p> <p>2、 1980-2009 年中国与槭绵粉蚧有关的文献报道共有 6 篇 ,其中仅有一篇涉及槭绵粉蚧危害苹果( 姜双林等 , 1999 ) , 据该文报道 , 槭绵粉蚧发生于 20 年以上的老果园 , 新建果园未见发生。也未见报道危害果实。</p> <p>1. It is suggested that Comstock’s mealybug and apple bealybug should be assessed separately because of the significant difference in economic importance in China.</p> <p>2. six papers related with <i>Phenacoccus aceris</i> were published in China during 1980-2009. Of which only one is the report that <i>Phenacoccus aceris</i> damages apples (Jiang Shuanglin et al, 1999)<sup>(3)</sup>. It was said by this pest was often found in old orchards established before more than 20 years and few individuals were found in new-growing orchards. This pest does not feed on fruits, and is of no significant economic importance.</p>

<p>苹小卷叶蛾 Summer fruit tortrix moth – (<i>Adoxophyes orana</i>)</p>	<p>1. <i>Probability of importation</i> The likelihood that <i>A. orana</i> will arrive in Australia with the importation of the commodity: <b>LOW.</b> ... 2. <b>Plant life or health</b> E – Significant at the regional level 3. <b>4.10.7 Unrestricted risk estimate</b> ... As indicated, the unrestricted risk for summer fruit tortrix moth has been assessed as ‘low’, which exceeds Australia’s ALOP. Therefore, specific risk management measures are required for this pest.</p>	<p>1. <i>Probability of importation</i> The likelihood that <i>A. orana</i> will arrive in Australia with the importation of the commodity: <b>VERY LOW.</b> ... 2. <b>Plant life or health</b> D – Minor significant at the regional level 3. <b>4.10.7 Unrestricted risk estimate</b> ... As indicated, the unrestricted risk for summer fruit tortrix moth has been assessed as ‘very low’, which achieves Australia’s ALOP. Therefore, specific risk management measures are not required for this pest.</p>	<p>1、国内资料表明该虫不钻蛀果实，主要取食叶片、嫩芽，仅在果实和叶片相贴时才取食果实，且取食方式为嚼食果皮及皮下果肉，并不是蛀入果实内危害，建议更正澳方的错误描述。 2. 比照苹果蠹蛾，苹小卷叶蛾的经济重要性远小于后者。 1.<i>A. orana</i> mainly feed on leaves, shoots. The fruits are fed occasionally when fruits stick to the leaves. Larvae only chew fruits but not bore into. 2.Compared to codling moth, <i>A. orana</i> is of less economic importance in China.</p>
<p>香梨优斑螟 Pyralid moth (<i>Euzophera pyriella</i>)</p>	<p>1、 <b>4.13.6 Consequences</b> ... Based on the decision described in Table 2.4, that is, where the consequences of a pest with respect to</p>	<p>1、 <b>4.13.6 Consequences</b> ... Based on the decision described in Table 2.4, that is, where the consequences of a pest with respect to</p>	<p>1、陆承志、邓永贵(2004年)和宋美杰等(1998年)记载了香梨优斑螟在新疆梨园中的发生情况。香梨优斑螟危害苹果的相关报道很少，说明该有害生物在苹果上经</p>

	<p>one or more criteria are ‘E’, the overall consequences are estimated to be MODERATE.</p> <p><b>Plant life or health</b></p> <p>E – Significant at the regional level</p> <p>( P101 ).</p> <p>...</p> <p>2、</p> <p><b>4.13.7 Unrestricted risk estimate</b></p> <p>...</p> <p>As indicated, the unrestricted risk for pyralid moth has been assessed as ‘low’, which exceeds Australia’s ALOP. Therefore, specific risk management measures are required for this pest. ( P102 )</p>	<p>one or more criteria are ‘D’, the overall consequences are estimated to be LOW.</p> <p><b>Plant life or health</b></p> <p>C – Minor significant at the District level</p> <p>...</p> <p>2、</p> <p><b>4.13.7 Unrestricted risk estimate</b></p> <p>...</p> <p>As indicated, the unrestricted risk for pyralid moth has been assessed as ‘very low’, which achieves Australia’s ALOP. Therefore, specific risk management measures are not required for this pest.</p>	<p>济影响不大。</p> <p>2、比照苹果蠹蛾，香梨优斑螟的经济重要性远小于后者。</p> <p>1.<i>E. pyriella</i> can only cause direct harm to Xiang pear according to the research of Lu ( 2004 )<sup>(4)</sup>and Song ( 1998 )<sup>(5)</sup>. Few reports damaging apple were seen in latest 20 years. It may be concluded that the apple is not a optimal host of <i>E. pyriella</i> and the impact of the pest is unlikely to be noticeable.</p> <p>2.Compared to codling moth, <i>E. pyriella</i> is of less economic importance in China.</p>
<p>桃小食心虫..</p> <p>Peach fruit moth</p> <p>( <i>Carposina sasakii</i> )</p>	<p><b>Plant life or health</b></p> <p>E – Significant at the regional level</p> <p>(P92)</p>	<p><b>Plant life or health</b></p> <p>D – Minor significant at the regional level</p>	<p>比照苹果蠹蛾，桃小食心虫的经济重要性与后者相当。</p> <p>Compared to codling moth, <i>C.Sasakii</i> is of the same economic importance.</p>

<p>苹小食心虫 Manchurian fruit moth (<i>Grapholita inopinata</i>.)</p>	<p><b>1、4.14.6 Consequences</b> ... Based on the decision described in Table 2.4, that is, where the consequences of a pest with respect to one or more criteria are ‘E’, the overall consequences are estimated to be MODERATE. <b>Plant life or health</b> E – Significant at the regional level ... 2、 <b>4.14.7 Unrestricted risk estimate</b> ... As indicated, the unrestricted risk for Manchurian fruit moth has been assessed as ‘low’, which exceeds Australia’s ALOP. Therefore, specific risk management measures are required for this pest.</p>	<p><b>1、4.14.6 Consequences</b> ... Based on the decision described in Table 2.4, that is, where the consequences of a pest with respect to one or more criteria are ‘D’, the overall consequences are estimated to be LOW. <b>Plant life or health</b> D – Minor significant at the regional level ... 2、 <b>4.14.7 Unrestricted risk estimate</b> ... As indicated, the unrestricted risk for Manchurian fruit moth has been assessed as ‘very low’, which achieves Australia’s ALOP. Therefore, specific risk management measures are not required for this pest.</p>	<p>1. 在中国近 20 年很少有该种有害生物的危害报道，证明其经济重要性不大。 2. 在澳方的分析报告中，该有害生物与苹果蠹蛾比较，两者危害程度相似。 1. There are few research reports about <i>Grapholita inopinata</i> damage on apple in the latest 20 years. 2. Based on the draft IRA report, “<i>Grapholita inopinata</i> is rather similar as a pest to the widely distributed <i>Cydia pomonella</i>.... the impact of Manchurian fruit moth on plant life or health is rated as the same as codling moth.”</p>
<p>梨小食心虫</p>	<p><b>Plant life or health</b></p>	<p><b>Plant life or health</b></p>	<p>比照苹果蠹蛾，苹果不是梨小食心虫的主要寄主，梨小</p>



<p>Oriental fruit moth (<i>Grapholita molesta</i>)</p>	<p><b>E</b> – Significant at the regional level ( P109 )</p>	<p><b>D</b> – Minor significant at the regional level</p>	<p>食心虫的经济重要性小于苹果蠹蛾。 <i>G. molesta</i> is not a primary pest of apple. Compared to codling moth, <i>G. molesta</i> is of less economic importance in apple orchards.</p>
<p>白小食心虫 White fruit moth (<i>Spilonota albicana</i>)</p>	<p><b>1、 4.16.6 Consequences</b> ... Based on the decision described in Table 2.4, that is, where the consequences of a pest with respect to one or more criteria are ‘E’, the overall consequences are estimated to be MODERATE. <b>Plant life or health</b> <b>E</b> – Significant at the regional level ... 2、 <b>4.17.7 Unrestricted risk estimate</b> ... As indicated, the unrestricted risk for white fruit moth has been assessed as ‘low’, which exceeds Australia’s ALOP. Therefore, specific risk management measures are</p>	<p><b>1、 4.14.6 Consequences</b> ... Based on the decision described in Table 2.4, that is, where the consequences of a pest with respect to one or more criteria are ‘D’, the overall consequences are estimated to be LOW. <b>Plant life or health</b> <b>D</b> – Minor significant at the regional level ... 2、 <b>4.17.7 Unrestricted risk estimate</b> ... As indicated, the unrestricted risk for white fruit moth has been assessed as ‘ very low’, which achieves Australia’s ALOP. Therefore, specific</p>	<p>1. 在澳方分析报告中引用的 Hua ( 2006 ) 和 Zhang(2005)的资料均是作者引用以前的资料，并非本人近年来实际调查的结果。 2. 最近 20 年来，对该有害生物的研究较少，有关资料主要来源于其危害山楂的研究报道。 3. 近年来的果园调查中，很难发现该种有害生物，证明其经济危害意义不大。 1. Data in papers of Hua(2006)<sup>(6)</sup> and Zhang (2005)<sup>(7)</sup> cited in Draft IRA Report were from former materials published more than 20 years ago. No new information damaging apples is obtained during latest years. 2. Most of present research data obtained are about the pest damaging hawthorn or other plants (Wang 1999,</p>

	required for this pest.	risk management measures are not required for this pest.	Zhao 1993) <sup>(8,9)</sup> . 3. This pest can hardly be found in most apple orchards in filed investigation during recent years.
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有害生物 pests for apple	IRA 原文 Draft IRA report	修改建议 Suggest	原因 Reason
苹果枝溃疡病 European canker ( <i>Neonectria ditissima</i> )	4.20 European canker... 5.2.3 Risk management of European canker...	建议在“Draft IRA Report”中将4.20 European canker - <i>Neonectria ditissima</i> 以及 5.2.3 Risk management of European canker中相关的管理措施移除。  It should be deleted from the list of quarantine pests in “Draft IRA Report” and specific risk management measures are not required for this pest in 5.2.3	1、澳方依据文献 ( Ma CS 2006 ) 认为中国的甘肃、河北、河南、湖北、陕西和山西偶发该种病害，经查属于网路数据库资料，最初源于1979年出版的《中国农作物病虫害》；此后近30年再无报道。 2、据CPC ( 2006 ) 报道， <i>Nectria galligena</i> 仅在我国台湾省有分布； 3、多年来在果园的田间调查也未发现该有害生物； 1. Australian considered that <i>Neonectria ditissima</i> occurs sporadically in part of Gansu, Hebei, Henan, Hubei, Shaanxi

			<p>and Shanxi just by the reference of Ma (2006)<sup>(10)</sup> (see IRA p166). We found Ma's website (2006) were just cited data for plant disease management rather than a research paper, which traced back to the book of "Crop Pest in China" (1979)<sup>(11)</sup>. and since then there is no record about <i>Neonectria ditissima</i> in China for over 30 years.</p> <p>2. <i>Nectria galligena</i> only is recorded in Taiwan, China according to CPC (2006).</p> <p>3. No <i>Nectria galligena</i> was found in the pest survey in the apple orchard in recent years.</p>
<p>煤污病和蝇粪病</p> <p>Sooty blotch and flyspeck complex</p>	<p>...</p>	<p>建议在“Draft IRA Report”中将 Sooty blotch and flyspeck complex 以及 5.2.4 Management of <i>Diplocarpon mali</i>, <i>Gymnosporangium yamadae</i>, <i>Monilinia fructigena</i>, <i>Phyllosticta arbutifolia</i> and sooty blotch and flyspeck fungi 中相关的 sooty blotch and flyspeck fungi 的管理措施移除。</p> <p>We suggest that the SBFS should be deleted from the list of quarantine pests in “Draft IRA Report” and also the risk management measures should be obliterated.</p>	<p>本节涉及与煤污病和蝇粪病有关的真菌均为腐生菌，广泛存在于其它多种植物表面，主要利用果实表面的营养。其在自然界的分布非常广泛，美国真菌分类学家已经发现30种，随着研究的深入，发现种类会更多；中国真菌分类学家才开始研究，如果在其它国家研究也会得出同样结果；</p> <p>The fungi associated with Sooty blotch and flyspeck complex are all saprophytes, which exists in the surface of the various kind of plant to absorb the nutrition and does not affect the growth and development of the fruits. The complex of fungi widely distributed in the worldwide (Batzer, 2005, Batzer, 2008)<sup>(12,13)</sup>. In U.S.A, fungal taxonomists have found nearly</p>

			30 kinds of fungi in the Sooty blotch and flyspeck complex and also some types have been found in China. The similar results also could be achieved in the similar research in some other countries, so it is unnecessary to list these saprophytic fungi in this draft.
<p>苹果锈病 Japanese apple rust ( <i>Gymnosporangium yamadae</i> )</p> <p>苹果褐斑病 marssonina blotch (<i>Diplocarpon mali</i>),</p> <p>苹果褐腐病 apple brown rot (<i>Monilinia fructigena</i>),</p>	<p>1、 <b>4.17.2 Probability of entry</b> The likelihood that <i>Gymnosporangium yamadae</i> will arrive in Australia with the importation of the commodity: <b>MODERATE</b></p> <p>2、 <b>5.2.4 Management</b> AQSIQ would be required to inspect all export orchards prior to removal of bags and harvest for <i>D. mali</i> (marssonina blotch), <i>G. yamadae</i> (Japanese apple rust), <i>M. fructigena</i> (apple brown rot), <i>P. arbutifolia</i> (apple blotch) and SBFS fungi (sooty blotch</p>	<p>1、 <b>4.17.2 Probability of entry</b> The likelihood that <i>Gymnosporangium yamadae</i> will arrive in Australia with the importation of the commodity: <b>VERY LOW</b></p> <p>2、 <b>5.2.4 Management</b> AQSIQ would be required to inspect all export orchards prior to removal of bags and harvest for <i>D. mali</i> (marssonina blotch), <i>G. yamadae</i> (Japanese apple rust), <i>M. fructigena</i> (apple brown rot) and <i>P. arbutifolia</i> (apple blotch) to ensure that they are basically free from symptoms of the diseases.</p>	<p>1、<i>Gymnosporangium yamadae</i> 为转主寄生的专性寄生物，需要桧柏和蔷薇科植物来完成生活史，担孢子侵染后在苹果叶片正面产生性子器，侵染成熟果实现象极为罕见，在自然中不可能存在成熟果实感染后无症状的情况，也没有证据证明锈孢子可以在不亲和的果实上长期生存。</p> <p>2、果园防治和检测是风险管理的第一步，此后，登记的果农和企业对出口苹果还有许多工序要执行。</p> <p>1.<i>Gymnosporangium yamadae</i> is obligate heteroecious in that it requires Juniperus spp. and rosaceous to complete its life cycle (Farr et al. 2008)<sup>(14)</sup>. Infection from basidiospores on apples gives rise to pycnia borne in groups on the upper surface of apple leaves and infections on a mature fruit are really rare (Aldwinckle 1990)<sup>(15)</sup>. It is impossible that a mature apple infected shows no symptom. There are no</p>

<p>苹果圆斑病 apple blotch (<i>Phyllosticta arbutifolia</i>)</p>	<p>and flyspeck diseases) to ensure that they are free from symptoms of the diseases.</p>		<p>evidences that the aecia can survive on the non-compatible fruits for a long time. ) 2.Orchard control and surveillance is the first step for risk management, series of measures will be implemented by registered growers and enterprise for fruit export.</p>
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