



Department of Primary Industries & Water  
PO Box 303  
Devonport  
Tasmania 7310  
AUSTRALIA

+61 3 6421 7634 Telephone  
Andrew.Bishop@dpiw.tas.gov.au

20 March 2009

Plant Biosecurity  
Biosecurity Australia  
GPO Box 858  
CANBERRA ACT 2601

To whom it may concern,

**Tasmanian Government Comment:**  
***Draft Import risk Analysis Report for Fresh Apple Fruit from the People's Republic of China***

Please find attached the Tasmanian Government's comments on the *Draft Import Risk Analysis of Fresh Apple Fruit from the People's Republic of China*.

If you have any questions, please contact me on (03) 6421 7634 or Andrew.Bishop@dpiw.tas.gov.au.

Yours sincerely

Andrew Bishop  
**Manager**  
**BIOSECURITY POLICY BRANCH**

# TASMANIAN GOVERNMENT SUBMISSION

BIOSECURITY AUSTRALIA JANUARY 2009

## DRAFT IMPORT RISK ANALYSIS REPORT FOR FRESH APPLE FRUIT FROM PEOPLE'S REPUBLIC OF CHINA

Prepared by the Biosecurity Technical Group Apple Fruit Working Group, March 2009

### 1. BACKGROUND

These comments are submitted because apple fruit from China potentially pose a direct biosecurity threat to Tasmania's pome fruit industry, and to other plant industries in this State that might also be affected by pests and diseases associated with the import proposal. However, the Tasmanian Government believes the potential ramifications of new pests and diseases on apple fruit from China entering and establishing in Tasmania, go beyond this.

Our favourable biosecurity status is integral to, and at the heart of, the Tasmanian brand, and hence our ability to maintain and position ourselves as a unique source of a broad range of quality, natural produce and products for discerning national and international markets. Accordingly, a biosecurity threat to any single industry, such as pome fruit, is also a threat to how the whole Tasmanian brand is maintained, perceived and valued in the market.

Further, Tasmania's small size and reliance on primary industries means that even a modest impact on one industry can have relatively greater impacts on the State's economy and people, than is the case for larger, more diverse mainland economies.

These characteristics of the Tasmanian situation inform the following comment on the *Draft import risk analysis for fresh apple fruit from the People's Republic of China, January 2009*.

## **1. INTRODUCTION**

### **1.2.3 Existing Policy: Domestic Arrangements**

We request that Tasmania's unique quarantine status be reflected in this section. In particular, Tasmania's fruit fly freedom and the related import requirements should be highlighted, as has been done for Western Australia and apple scab.

### **1.2.4 Australian fresh apple fruit production and consumption**

We suggest that this section should break down the value of apple production by region/States. Additionally a statement indicating that, as many pests identified in this draft IRA report are polyphagous, the industries potentially affected by the introduction of a pest or disease with this commodity are much broader than just the apple industry, is suggested.

It should be noted that domestic trade restrictions that could be imposed in the event of an incursion associated with a new apple fruit pest or disease, may well have regional or nationally significant impacts. This point is expanded upon later in this submission.

## **2. METHOD FOR PEST RISK ANALYSIS**

### **2.2.2. Assessment of the probability of entry, establishment and spread**

In previous submissions we have expressed reservations about the use of quantitative and 'semi-qualitative' approaches to probability assessments. We note however some of these concerns have been addressed in this draft IRA report with a shift away from that process and the strictures it applies. We also note that the likelihood ranges applied in Table 2.1 are for 'guidance to the risk analyst and to provide consistency'. The broad issue is that methods for estimating the likelihood of entry, establishment and spread do not have sufficient regard to the kinds of uncertainties that typically attend predictions of complex biological and ecological interactions. We believe these results in a less conservative approach to estimating biosecurity risk against Appropriate Level of Protection (ALOP).

We understand that by nature, it is challenging to describe qualitative likelihood clearly and in a way that can be interpreted consistently by all stakeholders. However, applying numerical descriptions in the form of probability ranges to qualitative likelihood categories can give the misleading impression that there is a unique mathematical solution to likelihood, and that uncertainties about how a particular pest might behave or respond in a certain environment can be dealt with by invoking numbers. This approach does not reflect the true complexity of biosecurity risk. We recommend instead, being more explicit about the nature of uncertainty that attends an estimated parameter, and stating the assumptions that have been used to deal with it.

Assignment of probability ranges to qualitative likelihood statements is also problematic because the current probability ranges and associated written descriptions arguably, do not reflect community expectations of acceptable risk. Of particular

concern is that it is possible for ALOP to be met if, in the course of a single year's trade, risk is the product of a one in twenty chance of entry, establishment and spread, and the pest can be expected to have a moderate impact. It is unlikely that the community would find this a reasonable interpretation of acceptable biosecurity risk.

We have been given to understand that the indicative probability ranges for likelihood were established in the course of an exercise that used the likelihood and consequence estimates for previous import decisions to plot ALOP as a function of those two parameters. It is sensible to refer to previous policy however this approach assumes that previous decisions were made consistently and that they accurately reflect acceptable risk. It also assumes that acceptable risk remains stable over time.

1. *The Tasmanian Government* recommends that indicative probability ranges used to supplement descriptive likelihoods should be checked to ensure the resulting likelihood and consequence combinations that meet ALOP accord with community expectations for acceptable risk

The problem described above is compounded by the rules used to combine qualitative likelihoods for entry, establishment and spread, to yield an overall L (EES). When the same likelihoods are combined, whether for import and distribution, or entry, establishment and spread, application of the rules gives an estimate that is one class lower (ie. moderate x moderate = low), except in the case of high likelihoods. While the case for this can be made with reference to the current probability ranges, the effect is that likelihood estimates are driven down. This is a less conservative approach that is not appropriate, especially in situations of significant uncertainty. However, we acknowledge that some means of considering likelihoods collectively is required.

2. *The Tasmanian Government* recommends a more conservative approach to estimating likelihood of entry, establishment and spread could be achieved by replacing the current matrix of rules used for this purpose with:  
"When two likelihoods are different, the overall likelihood is the lower of two likelihoods, and when two likelihoods are the same, the overall likelihood is that same likelihood".

### 2.2.3 Assessment of Potential Consequences

#### **Plant life or health impacts**

The IRA has identified alternative hosts for the assessed pests and diseases but does not adequately describe some significant distribution patterns of these hosts which could be expected to influence impact, and likelihood of entry, establishment and spread, especially for polyphagous pests.

The intensive nature of agriculture that commonly occurs in many fruit growing districts means there is elevated opportunity for significant harm to occur in these areas. In Tasmania, pome fruit orchards are often adjacent to other commercial farms, orchards, vineyards and so forth. This may become increasingly so as more

development occurs around water resources, particularly the Derwent Valley, Tamar Valley and Huon Valley.

*3. The Tasmanian Government recommends that alternative host distribution should be clearly characterised in the Chinese apple IRA, and that BA should consider in detail how host distribution affects the likelihood and consequence estimates, and adjust these accordingly.*

### **Trade impact estimates**

The scoring for international trade has not been adequately assessed, and hence may have underestimated, the potential magnitude of impact of some pests and diseases. We note that the draft IRA report does make reference to possible impacts on trade with overseas markets but we believe this had been treated in a cursory fashion and is insufficient because it does not identify which markets in particular could be affected, or the potential extent of that impact.

For example, in the case of Tasmania, loss of the Taiwan market due to pest incursion could be expected to have an impact of major significance. It is also timely to underpin this comment by relevant recommendations 32, 33, and 34 from the recent review of Australia's biosecurity system led by Roger Beale that emphasized the importance of a thorough economic analysis.

*4. The Tasmanian Government recommends countries that list a pest or disease assessed in the Chinese apple IRA as a pest of quarantine concern, the Australian jurisdictions that export to those countries and the value of those exports, should be clearly identified in the IRA so that likely international trade impacts are more explicitly described.*

In addition, an incursion in any part of one state would probably stop trade to other states at least for a season or two until eradication was achieved or until most states became infested. This happened, for example, in the incursion of currant lettuce aphid, *Nasonovia ribisnigri*, in 2004 despite widespread acknowledgement that the new pest was not eradicable and would rapidly spread. In that incursion the poorly known national integration of the industry became critically apparent such as in the centralised production of seedlings in a few localities for distribution to many states and similarly, the supply chains for packaged salad mixes having long reaches and seasonal complexities involving many states. An incursion in one locality could have regional (E), not merely local (C), significance.

*International consequences:* An incursion in one locality in one state could stop international exports from all states, at least for a season or two, until the states completed surveys to validate their clean status. This would have national (F), not local (C), significance and have major significance for regions/states whose fruit industries rely on exporting.

Additionally, loss of international market access in one State due to an incursion may result in produce being sold domestically until the market access can be re-established. This could impact upon domestic producers in a negative manner. For example, in Tasmania last year 793 tonnes of cherries were produced of which 70%

were exported to Taiwan because of fruit fly freedom. It is likely that there would be a local domestic market distortion if this product could not be exported due to an incursion.

In the Draft IRA for Chinese apples the same concern recurs for several species, namely:

- Pear white scale, *Lopholeucaspis japonica*, **below** ALOP.
- Summer fruit tortrix, *Adoxophyes orana*, above ALOP.
- Peach fruit borer, *Carposina sasakii*, above ALOP.
- Manchurian fruit moth, *Grapholita inopinata*, above ALOP.
- Comstock's mealybug, *Pseudococcus comstocki*, above ALOP.
- Japanese pear weevil, *Rhynchites heros*, **below** ALOP.
- Oriental fruit fly, *Bactocera dorsalis*, above ALOP.
- White fruit moth, *Spilonota albicana*, above ALOP.
- Hawthorn spider mite, *Tetranychus viennensis*, above ALOP.
- Pyralid moth, *Euzophera pyriella*, above ALOP.
- Flat scarlet mite, *Cenopalpus pulcher*, above ALOP.
- Apricot weevil *Rhynchites auratus*, **below** ALOP.

For 10 of the 12 species listed above, raising the consequence for domestic and international trade will not raise the unrestricted risk because the rules for combining qualitative estimates prevent it. Also, 10 of those 11 species already exceed the ALOP. For one of those 11 species, pear white scale, *Lopholeucaspis japonica*, the unrestricted risk would rise from below to above the ALOP if the trade consequences were raised. However this change will not be sought by DPIW Tasmania because namely it is primarily a pest of citrus and incursions elsewhere have had minor impacts .

In summary it should be noted that domestic trade restrictions that could be imposed in the event of an incursion associated with a new apple fruit pest or disease, may well have regional or nationally significant impacts. This is because Australia's urban fruit markets operate on a national basis around sequences of fruit availability, from early harvests in the northern districts (eg. granite belt, QLD) to late harvests in the south (eg. Tasmania) to achieve supply continuity throughout the year. Supermarkets also operate on a national basis and continually move fruit and vegetables long distances across the country. Therefore it is difficult to see why domestic trade impacts are assessed mostly as significant at local and district levels.

Further, if the new incursion is a polyphagous pest, a potentially wide range of plant products not limited to apple fruit may have to be regulated, which may have regional or national consequences. This matter should be addressed in the IRA with a greater depth of analysis across these areas than is currently provided.

5. The Tasmanian Government recommends that these issues should be clearly identified in the Chinese apple IRA, and that BA should consider how the nationally-integrated character of fruit and vegetable trade affects the consequence estimates, and adjust these accordingly.

## **Eradication, control impacts etc**

This and previous IRAs have stated that some pests and diseases associated with a particular import could be controlled by chemical means if introduced to Australia. However, the relevant chemicals are not always identified. In Tasmania, strict chemical spraying programs are in place to meet the residue restrictions imposed by our major trading partners eg. Japan, USA, Taiwan and Europe. Therefore, although there may be effective chemical treatments for these pests and diseases, Tasmanian growers may not be in a position to use them if they wish to export overseas. Also, we note that some chemicals registered for use in mainland jurisdictions are not registered for use in Tasmania.

We note the IRA acknowledges potential for disruption to IPM programs and that costs may be incurred by producers as a result. This is particularly important to Tasmania. One of Tasmania's main product integrity market advantages is relatively restricted use of chemicals, made possible by our favourable pest status. The introduction of new pests and diseases could require increased chemical usage which could affect pest resistance mitigation strategies, and undermine current sustainability objectives, and values of the Tasmanian orchard industry. Increased chemical use could also be expected to have more far-reaching brand impacts.

*6. The Tasmanian Government recommends that the chemicals concerned and current registration status should be clearly identified in the Chinese apple IRA so that it is more apparent whether and in which jurisdictions these chemicals represent feasible control options. Where there are differences, we request BA adjust the indirect impact scoring accordingly.*

## **Environmental impacts**

This IRA assigns low scores for potential environmental impact. In many cases, these appear to be based on absence of evidence rather than evidence. We acknowledge the difficulty in predicting environmental impacts of pests and diseases known primarily for their effects in production systems but believe nonetheless that it is insufficient to assign a low score on the basis of 'no known consequence'.

*7. The Tasmanian Government recommends that the Chinese apple IRA should clearly articulate that low scores for environmental impact are based on assumption, unless potential for impact in the environment has been specifically tested and there is evidence to suggest consequences are likely to be insignificant – where that is the case.*

**Statement of uncertainty:** Tasmania recommends that the assessment for each species should include a statement of uncertainty surrounding the analysis, and that the level of uncertainty should be taken into consideration in the final assessment.

*8. The Tasmanian Government recommends that the Chinese apple IRA should explicitly state the uncertainty surrounding the assessment of each species in the analysis and that this uncertainty be considered in the decision making. The New Zealand import risk analysis process provides a example of how this can be achieved.*

### **Cumulative Impact**

BA conducts Import Risk Analysis (IRAs) on a commodity by country basis. BA has indicated that existing policy on the importation of apples from Japan and New Zealand, and pears and apple products from China has been taken into account in conducting the IRA for product from China where appropriate. We acknowledge this is a valid approach.

However, we observe that the conduct of IRAs on a commodity by country basis, may not adequately recognise that the risk posed by a pest or disease can be expected to increase as additional markets are opened for host material from countries with similar pest and disease profiles. IRAs should provide for assessment of new risk in the context of the existing level of risk. If these cumulative impacts are not taken into consideration, we believe there is potential for Australia's ALOP to be exceeded. This effect will have an even more substantial impact in relation to polyphagous pests.

*9. The Tasmanian Government requests clarification as to how cumulative risk has been taken into account and addressed.*

**Australian pome fruit industry:** We recognise the value of describing the Australian pome fruit industry in some detail since it is the sector likely to be most adversely affected by potential pests and diseases associated with Chinese apples. However the level of information provided in this IRA does not give a comprehensive picture of what is potentially at risk. Without this, it seems difficult to form any clear idea of the magnitude of potential impact.

The IRA could better illustrate what is at risk by presenting an analysis of the industry in terms of challenges it faces, levels of investment, growth or decline, and the relative importance of that growth or decline to the areas in which it is occurring. We understand figures could be gathered without too much trouble, which could inform a more robust and meaningful industry description, and hence, impact assessment. Additionally this assessment would enable regional impacts of the consequences of an introduction to be taken into account in the IRA.

Given the polyphagous nature of many of the pests assessed due consideration needs to be given to other potentially affected industries and the potential impacts of such pests.



10. *The Tasmanian Government recommends that BA further detail information in the IRA that describes more comprehensively the industries potentially at risk, to better inform the impact estimates.*

### **2.3 Pest Risk Management**

We note the unrestricted risk estimates for Chinese apples has taken into account commercial production practices in China (as described in draft IRA report section 3). Though descriptions are provided there is minimal information as to linkages with the elements of the production system and how those elements mitigate risk.

11. *The Tasmanian Government would like to see more detailed information as to how the system of production of apples in China (as described in the report) actually mitigates risk and the value of each of the production steps eg. the risk mitigation value of double-bagging of apple fruit.*

## **3 CHINA'S COMMERCIAL PRODUCTION PRACTICES FOR APPLES**

Commercial production systems for apples in China are described in the draft IRA report and this begins with a section about assumptions used to estimate unrestricted risk (Sect 3.1). We note 3.1 is largely a description of various verification exercises (eg. for fire blight status, production protocols) and does not state assumptions made about parameters or processes. Perhaps this section could be retitled or moved to Section 4 where some explicit discussion about assumptions applied to all the PRAs would be more appropriate. Particular assumptions used in each PRA should be also stated within the relevant discussion and linked to the type of uncertainty they are intended to address.

## **4. PEST RISK ASSESSMENTS FOR QUARANTINE PESTS**

### **Verification of Pest Free Status**

International Standards for Phytosanitary Measures (ISPM) should be used as a minimum to verify pest free status of China from pests of concern to Australia. Specifically the following standards should be applied:

- *Requirements for the Establishment of Pest Free Areas.* (1996) ISMP No. 4, FAO, Rome.
- *Guidelines for Surveillance.* (1997) ISPM No. 6, FAO, Rome.
- *Determination of Pest Status in an Area.* (1998) ISPM No. 8, FAO, Rome.
- *Requirements for the establishment of Pest Free Places of Production and Pest Free Production Sites.* (1999) ISPM No. 10, FAO, Rome.
- *Pest Reporting.* (2002) ISPM No. 17, FAO, Rome.
- *Establishment of Pest Free Areas for Fruit Flies (TEPHRITIDAE).* (2006) ISPM No. 26, FAO, Rome.

Verification of pest free status is particularly relevant to the assessment of risk associated with fire blight in China. We note that BA has reviewed materials

provided by China and other parties as to freedom status of various pests and diseases, in particular fire blight, and officers from BA have visited the apple production regions in question. We also understand that a Chinese survey report of three years duration demonstrating fire blight freedom has been provided to BA but not released publicly. We would like the opportunity to review that report ourselves.

*12. The Tasmanian Government would like to see evidence that any data supporting area freedom from fire blight and fruit flies in China meets at least, the relevant international standards, and if met, that measures are applied to ensure this pest free status is be maintained.*

#### 4.2 Pest specific matters

The Tasmanian Government made a number of comments to Biosecurity Australia on the original issues paper related specifically to the pests that were assessed and notes that many of these concerns have now been addressed in the draft IRA report.

Of 32 insects listed in Table 7 of the Asian pear import review (AFFA, 2003) as being of quarantine concern (on pathway) 23 are listed in Appendix A of the issues paper for Chinese Apples.

One not listed is the tree stink bug, *Halyomorpha picus* (Fabricius) **but** tree stink bug (or brown marmorated stink bug), *H. halys* Stal is listed – Inspection and/or management was nominated for this species in the Chinese Pear IRA for *H. picus*. Although *H. picus* does not appear in Japanese Fuji apple IRA, *H. halys* is listed as having a medium risk of being in pathway and hence requiring inspection for risk management. So it is likely, given its listing in Appendix A of the Chinese apples issue paper, that it will require risk reduction through inspection.

Note also that the congeneric or synonymous, *H. mista* is given Risk 1 status in New Zealand's 1999 requirement for Korean pears. Appendix A of the Draft IRA for Chinese apples added three pentatomid bugs, namely *Eurydema gebleri*, *H. picus* and *Homalogonia obtusa* (= *Halyomorpha obtusa* of Japanese Fuji IRA), to address a total of four, including *H. halys*. The Draft IRA reduces the assessment of risk compared to *H. halys* in the IRA for Japanese Fuji apples. This group of shield and stink bugs were assessed as not likely to remain on fruit when disturbed during harvesting and grading which seems a reasonable claim. However, *H. halys* appeared in the USA in 2001 and was added to the EPPO alert list in 2008 after its appearance in Switzerland via an unknown pathway.

*13. The Tasmanian Government recommends that BA investigate the pathway of the recent spread of H. halys to America and Europe before excluding the four species from the fruit pathway.*

Spider mite, *Eotetranychus pruni* (Oudemans, 1931) –Appendix A of the Draft IRA says it has not been considered previously but is unlikely to be in pathway because it feeds on leaf. However, many spider mites are said to primarily feed on leaves but some occasionally extend to fruit such as when populations are high or eggs are laid on the tree as an overwintering stage. South Africa requires inspection certificate for this pest on apples from USA.

San Jose Scale, *Diaspidiotus perniciosus* (Comstock, 1881) in Australia (NOT Tasmania). We accept it is not an issue for fruit but seek annotation of Appendix A to indicate that it has not been detected in Tasmania since early 1960s despite ongoing pheromone trap survey at ports and orchards for 20 years.

14. The Tasmanian Government requests Appendix A annotations to indicate a regular trapping program has not detected San Jose Scale in Tasmania since the 1960s.

The following species occur in Appendix A of Chinese apple issue paper, in Table 7 of the Chinese Asian pears import review (IAPC) and in the IRA for Japanese Fuji apples as requiring inspection and/or management. Upper case annotations are from Appendix 1 of IAPC.

Summer fruit tortrix, *Adoxophyes orana* - FRUIT, LEAF & SHOOT. ). Unrestricted risk LOW, exceeds ALOP. Consequences for domestic and international trade both significant at *district* level, overall consequences *moderate*. AGREE it exceeds ALOP but disruption of interstate and international trade in multiple fruit species could be significant at *regional* level for Tasmania. Such an upgrading of trade consequences from D to E will not however change estimation of unrestricted risk.

Peach fruit borer, *Carposina sasakii* - FRUIT & SEED (Highest risk status in NZ requirement for Korean pears). Unrestricted risk MODERATE, exceeds ALOP. Consequences for domestic and international trade both significant at *district* level, overall consequences *moderate*. AGREE it exceeds ALOP but comment that disruption of interstate and international trade in multiple fruit species could be significant at *regional* level for Tasmania. Such an upgrading of trade consequences from D to E will not however change estimation of unrestricted risk.

Manchurian fruit moth, *Grapholita inopinata* (*Cydia inopinata* previously) – Unrestricted risk LOW, exceeds ALOP. Consequences for domestic and international trade both significant at *district* level, overall consequences *moderate*. AGREE it exceeds ALOP but disruption of interstate and international trade in multiple fruit species could be significant at *regional* level for Tasmania. However, such an upgrading of trade consequences from D to E will not change estimation of unrestricted risk.

Comstock's mealybug, *Pseudococcus comstocki* – FRUIT, BUD, LEAF & ROOT. Unrestricted risk LOW, exceeds ALOP. Consequences for domestic and international trade significant at *district* (D) and *local* (C) levels respectively, overall consequences *low*. AGREE it exceeds ALOP but disruption of interstate and international trade in multiple fruit species could be significant at *regional* (E) level for Tasmania. Such an upgrading of trade consequences from D and C to E will change consequences from *low* to *moderate* but not change estimation of unrestricted risk.

Japanese pear weevil, *Rhynchites heros* (in Table 7 of issues paper as *R. coreanus* and *R. foveipennis*) – FRUIT. Unrestricted risk VERY LOW, under ALOP. Consequences for domestic and international trade both significant at *district* level, overall consequences *moderate*. AGREE it meets ALOP but comment that disruption of interstate and international trade in multiple fruit species could be significant at *regional* level for Tasmania. However, such an upgrading of trade consequences from

D to E will not change estimation of unrestricted risk. We note interception data for this species and comment made in the draft IRA report that it was not clear whether this was on a commercial consignment or fruit carried by passengers". We seek clarification on this point.

White fruit moth, *Spilonota albicana* –Unrestricted risk LOW, exceeds ALOP. Consequences for domestic and international trade both significant at *district* level, overall consequences *moderate*. AGREE it exceeds ALOP but disruption of interstate and international trade in multiple fruit species could be significant at *regional* level for Tasmania. Such an upgrading of trade consequences from D to E will not however change estimation of unrestricted risk.

Hawthorn spider mite, *Tetranychus viennensis* (in Appendix A as *Amphitetranynchus viennensis*.) –Unrestricted risk LOW, exceeds ALOP. Consequences for domestic and international trade both significant at *district* level, overall consequences *moderate*. AGREE it exceeds ALOP but disruption of interstate and international trade in multiple fruit species could be significant at *regional* level for Tasmania. However, such an upgrading of trade consequences from D to E will not change estimation of unrestricted risk.

Pyralid moth, *Euzophera pyriella* Unrestricted risk *low*, exceeds ALOP. Consequences for domestic and international trade both significant at *district* level, overall consequences *moderate*. AGREE it exceeds ALOP but disruption of interstate and international trade in multiple fruit species could be significant at *regional* level for Tasmania. However, such an upgrading of trade consequences from D to E will not change estimation of unrestricted risk.

Flat scarlet mite, *Cenopalpus pulcher* Unrestricted risk *low*, exceeds ALOP. Consequences for domestic and international trade both significant at *district* level, overall consequences *moderate*. AGREE it exceeds ALOP but disruption of interstate and international trade in multiple fruit species could be significant at *regional* level for Tasmania. However, such an upgrading of trade consequences from D to E will not change estimation of unrestricted risk.

Apricot weevil *Rhynchites auratus* was listed in the issues paper for Chinese apples but not considered in Tasmania's previous submission. The Draft IRA for Chinese apples provided a risk assessment. It had not been considered in previous IRAs. **Review:** Unrestricted risk very low, under ALOP. Consequences for domestic and international trade both significant at *district* level, overall consequences *moderate*. AGREE it meets ALOP but disruption of interstate and international trade in multiple fruit species could be significant at *regional* level for Tasmania. However, such an upgrading of trade consequences from D to E will not change estimation of unrestricted risk. We note interception data for this species and comment made in the draft IRA report that it was not clear whether this was on a commercial consignment or fruit carried by passengers". We seek clarification on this point.

We also request reconsideration of the consequence assessment of Oriental fruit fly, *Bactocera dorsalis*. We consider that the impact of this polyphagous pest would be of major trade significance nationally and warrants an overall consequence rating of extreme.

*15. The Tasmanian Government recommends that BA consider these entomological comments and observations and provide further clarification.*

#### **APPENDIX C: AUSTRALIA'S BIOSECURITY FRAMEWORK**

On P-271, reference is made to PIMC meetings and the comment is made that no proposals have been made from the Australian or state and territory governments to change the approach used by Biosecurity Australia to express ALOP. While this may be technically the case regards PIMC, the point should also be made that it has been raised as an issue by Tasmania in other committee forums and most recently represented in the Tasmanian Government's submission to the Beale review.

## REFERENCES

AFFA, 2003. Import of Asian ('Shandong') pear (*Pyrus pyrifolia* (Burm.) Nakai and *P. ussuriensis* var. *viridis* T. Lee) fruit from Shandong Province in the People's Republic of China. (cited above as IAPC).

Beale, R., Fairbrother, J., Inglis, I., and Trebeck, D. (2008). One Biosecurity: A Working Partnership. The Independent Review of Australia's Quarantine and Biosecurity Arrangements Report to the Australian Government. Commonwealth of Australia. ISBN 978-0-9803714-5-1.

AQIS (1998a) Final import risk analysis of the importation of fruit of the Fuji apple (*Malus pumila* Miller var. *domestica* Schneider) from Aomori Prefecture in Japan. Australian Quarantine and Inspection Service, Canberra, Australia. 58 pp.

Biosecurity Australia (2005b) Final extension of policy for the importation of pears from the People's Republic of China. Biosecurity Australia, Canberra, Australia. 97 pp. (this reference was not used when preparing the original comments from Tasmania to BA)

Biosecurity Australia, 2008. Issues paper for the import risk analysis for fresh apple fruit from the People's Republic of China.

MAFF NZ, 1999. Import Health Standard. Commodity Sub-class: Fresh Fruit/Vegetables. Korean pear, *Pyrus pyrifolia* from the Republic of Korea. 18 pp.