RIVERSBY PTY LTD

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28nd March 2006,

Re: Submission on Apple imports from New Zealand

To: Biosecurity Australia.

The protocol for the importation of apples from New Zealand suggests that an orchard inspection takes place at blossom time. If the orchard passes this inspection then the fruit is able to be exported to Australia.

On several occasions I have visited New Zealand looking at cultural practices and orchard management. And I can bring to your attention that a single inspection at bloom time will not determine that orchard block to be Fire blight free. I have seen for myself and been told by New Zealand growers that an orchard can be visually free of Fire blight, but given the right conditions the bacteria will ignite and infect the entire orchard.

To suggest a single inspection for the bacteria is adequate safe guard for the Australian industry is far from reality.

A minimum of three visual inspection starting at bloom and finishing the day prior to harvest may safe guard the Australian industry.

Having knowledge of the New Zealand fruit industry leaves me a little nervous that the NZ grower may walk the orchard and remove infected plant material prior to the inspection taking place. This practice takes place now as standard hygiene practice. If the visually infected material is removed by the grower, then that still leaves invisible material (including fruit) present on the tree.

If at the time of orchard inspection it is determined that the grower has walked the orchard to remove infected material, then that orchard should not be granted permission to export to Australia.

The issue of no buffer zones is one of great concern. I attended the Fire Blight Symposium held in Napier New Zealand. On the orchard trips around Hawke's Bay the group visited Vooglars Orchard. The owner Mr Paul Vooglar made the comment that his greatest problem in controlling Fire blight in his pear orchard was the neighbouring orchard. This orchard was approximately 10 meters away, and although it appeared symptomless, Mr Vooglar pointed out some branches that were in fact infected with Fire blight early in the year.

I fail to see that no buffer zones are in the protocols. If a neighbouring orchard, that is 10 meters away can infect the next orchard, then at least a buffer zone of 10 meters is not unreasonable.

Whilst on the orchard visit to Vooglars, the leaf curling midge was the first thing that caught the attention of the visiting Australians. Having not encountered this pest before it was of great interest to see it up close. The affect it had on the orchard production was amazing. The leaf curling midge had affected the photosyntheses that much that the orchards yield was so low that it was uneconomic.

The only solution to this and other pests that are found in New Zealand is to fumigate all apples that are exported from New Zealand to Australia.

The inspection procedure has a lack of clarity. Who is to conduct the inspections in the orchards, is it AQIS officers conducting all inspections, or is it AQIS officers in conjunction with NZ officers. If it is the latter then it is not good enough. This protocol needs to be clear, and leave nothing to be interpreted differently in the future.

Our family has been in the fruit industry for 3 generations, we realise that imported fresh fruit will at some stage be on Australian supermarket shelves. I believe this protocol does not give the Australian industry an adequate level of protection (ALOP).

I am extremely concerned for the pear industry in the Goulburn Valley Victoria. If Fire Blight gets in to this region it WILL decimate the entire fruit industry in the area and cost thousands of jobs, destroy companies like SPCA who will not be viable without pears. Fire Blight, European canker, and other pests such the leaf curling midge needs to have strong systems in place to keep them out of Australia, I think the suggested protocols don't give Australia an ADEQUATE LEVEL OF PROTECTION.

Kind	Regard	S
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Ian Bolitho,