

Submission on Import Risk Assessment
Application by New Zealand For Apple Export to Australia.
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I refer to the documents published by Biosecurity Australia on the above matter and wish to make the following comments in regard to the proposed arrangements.

1/ In dealing with the threats in regard to the disease Fireblight, I believe there are a number of measures in the protocol proposed which do not give an assurance of reaching Australia's appropriate level of protection.

These include:

The blocks to be registered and inspected are treated in each year as a stand-alone item. There is no reference back to previous years history of infections. It should be that there be either a period of suspension from export to Australia registration (say one or two years or until symptoms or the disease are definitely not present) or an increased regime of block inspections.

There is no buffer zone or exclusion zone around either the block to be registered or a block that has fireblight symptoms. This differs markedly from say the way we as fruit growers are treated with regard to "fruit fly" outbreaks. Given the numerous ways that fireblight is apparently transmitted this would seem to be at least a common sense approach until somebody scientifically proves that there is no need for such protection.

There is no mechanism to ensure that the orchard has not just been cleaned up of fireblight symptoms immediately prior to the inspections. There should be some restriction placed so that if symptoms have been removed in the previous say 6 months then the orchard/block is deemed to have "an infection " for that season.

Similarly there is no reinspection requirement if there is a "event" which would be likely to cause the spread of fireblight from other local sources, eg heavy rain, hail and other storms. This combined with the lack of buffer zones is alarming to say the least.

2/ In relation to European Canker, again the proposed protocols do not provide assurance of reaching Australia's appropriate level of protection. This again is particularly so for the inspection regime being a once off and not taking into account any outbreaks in the general area of the registered blocks post the inspection nor any natural events which could/would lead to an outbreak and possible spread to the export blocks.

3/ I believe the assessment severely underestimates the consequences of an outbreak of Fireblight in Australia. Given our climate differences with those countries where fireblight is already established (including New Zealand) the establishment and spread of the disease in Australia especially the Goulbourn Valley in Victoria would be both rapid and catastrophic. The implications for not just the growers affected directly but also the surrounding properties, the regional economies and the social disruption that would follow are just beyond imagination.

4/ Likewise the costs and practicalities of controlling/managing an outbreak are severely understated. Depending on the locality concerned and what infrastructure is involved the cost of replacement of an infected block far exceeds the costs listed in the report. As for the state/national cost you only have to refer to the Victorian State government for advice on the costs of checking the supposed outbreak in the Royal Botanical gardens some years ago. Our inability to ever access the antibiotic control sprays which are used to some degree of success overseas means that our ability to control any outbreaks are virtually nil. It should also be stressed that this disease once established in a fruit-growing region has never been eradicated.