Fruit Growers Victoria Ltd

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INTRODUCTION

Fruit Growers Victoria (FGV) represents 70% of Australia's pear industry, 30% of Australia's apple industry and 30% of Australia's stone fruit industry. The deciduous fruits peak industry body represents orchardists in the Goulburn Valley (GV), NE Victoria, central Victoria and throughout the southern regions of Victoria.

The GV fruit industry produces 400,000 tonnes of fruit pa and the other FGV regions add another 150,000 tonnes. The GVP value added of the GV fruit industry was \$734m in a study completed in 2000 and has continued production growth since that time. The GVP value added of FGV members exceeds \$1 billion and is an essential contributor to regional growth in Victoria and in marketed produce throughout Australia and overseas.

FGV members represent apples and pears in Australia's major production state. Importing NZ apples without guarantees of minimum risk to the introduction of any pest or diseases not present in Australia is paramount. Any importing of NZ apples can place at risk the entire pear industry and a significant proportion of the apple industry. Victoria grows about 1/3 of Australia's Pink Lady variety that also represents 1/3 of plantings and it is highly susceptible to fire blight.

Citrus canker has recently ravaged the citrus industry in Emerald Queensland, resulting in the removal of a staggering 700,000 trees after unsuccessful attempts to contain the disease when it was first detected. The total tree removal has destroyed a thriving industry in the area. Growers will be able to replant in two years, although there must be some apprehension, as well as investment concerns, for growers considering replanting.

Of 47 countries in the world that have fire blight there is only one country that has been able to identify how the disease entered the country. That country is Egypt and the disease was brought in on pear material. This fact alone suggests that water tight controls must be in place to address any likely risk.

NZ has a substantial apple industry, but few pears. Australia has apples and pears and most of the pears are in the GV. Pears are highly susceptible to fire blight. NZ doesn't have a meaningful pear industry but it does have fire blight. We have enough challenges of our own without being exposed to further pest and disease incursions.

RISK MANAGEMENT

1) FIRE BLIGHT (FB)

Fire Blight (FB) is rated in the IRA as the most serious bacterial disease affecting Malus spp, Pyrus spp, and other plants. Fruit and plant material are high risk carriers of the bacteria. The IRA proposes that the combination of an orchard free of symptoms of FB and disinfection by chlorine will meet Australia's ALOP.

The IRA recommended protocol for fire blight includes one orchard inspection at blossom time. If orchards are observed to be free from fire blight symptoms, they will be able to export fruit to Australia. We note that infection in an orchard can occur at any time. For late apple varieties this allows another 6 months for an outbreak to occur without another inspection.

Hence we strongly advocate continued inspections during the season and in particular prior to harvest. If outbreaks occur throughout the season there should be adequate measures in place to detect these outbreaks. Outbreaks occur during the season as a result of inclement weather and damage to foliage. Damaged leaves are particularly susceptible to infection, including insect damage.

If an orchard has recent previous detections of FB it should be ruled out for export. It is accepted practice that that a block with a history of pest or disease outbreak is more susceptible to outbreaks that a previously clean block and requires preventative management by growers to minimize pest and disease outbreaks. Therefore it is reasonable to expect that with a disease of the severity of fire blight that a ban would be placed on exports for two to three years after detection of the disease.

There is also the issue of the distance of a clean block from an infected block. The risk of an outbreak is greater, the closer the two blocks. A nearby infected block is a serious infection source. As well, fire blight infections in a neighbouring orchard in the current or the previous year should mean that the orchard is excluded from exports in the current year.

The likely risk of transferring the disease by an insect vector or other means must be greater when the blocks are closer together. The inability to set a buffer distance based on a sound understanding of likely carriers is an indictment on the process. It is a spurious argument that a block can be one tree or 200 trees.

It would also seem that a minimum number of trees would need to be defined to achieve the 95% confidence limit that detects visual symptoms if shown by 1% of the trees. We also argue that should a detection be found that suspension should continue for the following two seasons and that neighbouring properties would be included for at least the current season given the voracity of the disease. This argument has considerable added weight under the current protocol that proposes only one spring inspection.

Fruit Treatment

The treatment with chlorine is accepted as part of a series of measures. It is accepted as not being a treatment on its own. It is therefore imperative that other treatments or controls are effective in detecting an infection.

Ultimately fruit treatment for insect damage for pests not present in Australia is best conducted with fruit fumigation as this ensures clean fruit at destination.

Fruit Inspections

Trash is a carrier of FB. There is allowance in the inspection procedure for trash to be detected however we argue that trash will naturally move to the base of the container, be it a carton or a

bin, and unless measures are taken to sample at the base of the container, the trash will not be detected. It is essential that inspection measures ensure that trash is detectable in sampling procedures.

2) EUROPEAN CANKER

European canker (EC) is also present in NZ but not Australia. Like fire blight, the disease is also difficult to detect when fruit is inspected. European canker is not curable. A past outbreak in Tasmania took 30 years to eradicate and it was ultimately achieved by removing trees.

Again we have no visible symptoms on fruit. Exports will only be allowed from pest free places of production. Does that mean regions where EC is found would be excluded from exports? Does that mean one tree or 200 trees in the fire blight sample above? We believe that if EC is not as widespread as FB then the regions where EC is known to occur should be excluded from exports forthwith.

We note that the suggested protocol is for an autumn survey. Does that exclude all apple varieties from exports in that current season? The summary refers to suspension in that orchard/block for the coming season. Is that the current season or the next season? We believe that the ban on exports should be in place for any current season crop and extend for a further two seasons.

Similar circumstances apply to neighbouring properties and distances as outlined in the previous arguments regarding fire blight.

3) APPLE LEAF CURLING MIDGE (ALCM)

Insect pest incursion remains a significant threat under any inspection protocol. Time and time again pest incursion occurs due to sampling inadequacies due to the sample not detecting the insect, larvae, pupae or eggs. The only guaranteed option is fruit fumigation.

It is standard practise for much of our produce travelling to sensitive interstate markets within Australia, ultimately fumigation ensures control. Lengthy and expensive alternative inspection procedures can be considered, they have limitations as mentioned above, but ultimately fumigation is undertaken.

Reject or treat all lots where an infection is found following the 3,000 fruit sample? This practise is appropriate except that the fault is in the identification of the pest incursion in the initial fruit sample. So when it is not detected, the lot will not be fumigated and pest incursion will occur.

Presumably the seriousness of the pest, ALCM, justifies the high number of fruit in a sample. Similarly this highlights the need for adequate control to require fumigation.

4) LEAF ROLLERS

The proposed inspection for leaf rollers is a 600 fruit sample. Similar comments apply to those above for ALCM. Again fumigation is the assured option. Why would the inspection of a lot include two samples, a 600 fruit sample and a 3,000 fruit sample for different pests? Wouldn't a consistent sampling size be appropriate? All lots will be inspected for ALCM, so the 3,000 fruit sample size fits all.

5) WESTERN AUSTRALIA

It is interesting that no acceptable treatment for apple scab is considered appropriate to allow access of apples into WA. This premise is justified as there are already restrictions within Australia. However at an international level we are unable to enforce such restrictions and are

therefore required to recommend entry conditions that we would not normally impose on ourselves. This highlights the need to have a stringent protocol that secures Australia's ALOP.

Codling moth

NZ currently has a codling moth protocol for entry of apples to Taiwan. Note that the US has lost market access to Taiwan previously due to codling moth being found in three separate consignments of apples, despite the protocol.

Mealy bug

The inspection regime of 600 fruit could be similarly viewed with comments above on leaf rollers and the required protocol.

6) PRE CLEARANCE

The role of AQIS officers is paramount in the IRA process. We propose that orchard inspections for FB and EC will be conducted by AQIS officers rather than 'involved'. Should this be too onerous on inspection demands, it is imperative that AQIS staff manage the inspection process and actively audit selected sites within defined regions. Under a proposal below it would be feasible for AQIS staff to supervise the inspection at all sites as well as participating in that inspection.

We believe that Australian industry representatives should be present at nominated times during the season to monitor activities and report back to their industry on the integrity of the system. Such costs should be incurred by AQIS rather than the NZ industry.

We believe that there should be a ceiling placed on the number of orchards registering for export to Australia to minimise unnecessary applications for export clearance that incur costs of AQIS staff. Of course there will still be reasonable cost for NZ staff if they undertake the inspection, assuming these costs are met by the producer. We understand the cost of the procedures and we believe that growers have a responsibility to only nominate their orchard if they understand it to be free of these diseases.

There will be ample opportunity to source fruit from NZ orchards according to NZ figures of pest incidence. It may be necessary for their industry to allocate orchards for inspection and rotate these annually for export sales in Australia. It may be necessary to make this equitable for all of their industry by conducting a pool or cooperative arrangement for fruit entering Australia.

This will take the pressure off individuals seeking opportunity to supply, assuming that market conditions are conducive, and will prevent huge numbers of applications that will place untenable requirements on the inspection process. This may also be a ploy to speed up inspections or to bring down the orchard inspection process.

We believe that these factors need to be considered in any program that requires input labour and includes a strong contingent of AQIS staff to ensure accountability. We note that AQIS staff will also have a management responsibility in ensuring that packhouse procedures are followed. We note their involvement in audit processes to ensure accountability.

7) OPERATIONAL ARRANGEMENTS

Disinfection treatment in packhouses and prevention of contamination after disinfection. Prevention of contamination in storage, transport and handling

These issues are about preventing contamination from within the packhouse or further along the supply chain. The most obvious infection source post harvest is the pack house and we would expect fruit destined for export to be packed in designated premises specifically for that purpose. It would not be unreasonable to expect that one pack house, isolated from fire blight or EC outbreaks, may provide that resource in each region.

There is risk of contamination in the orchard when the fruit is picked, reduced by a clean inspection finding, and during transport to the pack house. Fruit temperature will be lowered in cool storage and this is likely to be conducted at any premises. The fruit will then be transported to the appropriate packhouse for packing, treatment and cool storage.

The packing line, coolstores and treatment facilities will all be available at the packhouse dedicated for this purpose. During re-storage and transport under tarpaulins or Tautliner the opportunity for reinfestation will be minimal. Produce at shipside can be expected to be free of recontamination opportunities. Shipping containers will be cleaned and free of all debris for further shipping.

For fire blight the IRA data indicates that handling of bulk fruit from NZ in orchard based packhouses posed a significant risk (Part B, p103). The risk is stated and a decision to ignore that risk is based on Australia's ALOP. However there is no need for fruit to enter Australia in bulk bins, our re-grading and packing costs are equivalent to or higher than those in NZ and product will be discarded at this end following bulk shipment.

Any intention to aim bulk shipments at a less than premium end of the market will incur losses for NZ shipments. While their intention is to obtain premium returns for premium product they do not need to bulk ship apples to Australia in order to be competitive in the market place. They will incur less costs, or only their own costs, by packing at home. Given the associated risk there is no need to consider or approve bulk shipments.

European canker can be readily spread from susceptible host plants other than Malus spp and Pyrus spp, pre-cooling will not reduce infections and washing will not control internal infections. Spores may contaminate fruit in the packing process. While packed fruit present negligible likelihood of becoming contaminated after packing (Part B, p114) there needs to be careful consideration of the impacts of bulk handling on infection levels and likely re-contamination.

8) CONCLUSION

We are fortunate that the island country of Australia has managed to keep major pests and diseases such as fire blight, European canker and apple leaf curling midge from its shores. It is appropriate that this should continue to be the case. There is little chance of recourse should an outbreak occur. We cannot expect to prevent trade as we are able to do between states in our own country but we do need to minimise the risk of overseas pest or disease incursion.

Fruit Growers Victoria represents apple and pear interests in the major production state of Australia. The impact of the global market and ever increasing price competition means that growers around the world are being forced to rationalise their operations and reduce costs. New pest or disease outbreaks will place additional and unsustainable cost burdens on our industry.

It is imperative that our pest and disease free status for fire blight, European canker and the major pests including apple leaf curling midge be retained in the future.

Yours faithfully,

Mark Paganoni Chairman FGV