

Submission on the Revised Draft Import Risk Analysis Report for Apples from New Zealand

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1.0 Summary

The Western Australian Fruit Growers' Association (WAFGA) is the peak pome (apple and pear), citrus and stone fruit industry body in Western Australia, representing more than 700 growers across the state.

In this submission WAFGA has, as we have done with our previous submissions, focussed primarily on the pest risks that are listed for Western Australia. As a component of an industry response WAFGA has had input into, and reviewed, the final submission from Apple and Pear Australia Limited. WAFGA fully supports the Apple and Pear Australia Ltd submission, with regard to these pests, and we feel that it is an unnecessary step to duplicate these concerns in this submission. WAFGA would however like to register its support for the comments on these pests that are included in the submission from Apple and Pear Australia Limited.

The current Draft Import Risk Analysis Report for Apples from New Zealand, (December 2005) lists five pests of concern to Western Australia however makes assessment on only three. In this submission WAFGA reviews the recommendations for these three, and also make comments on Oriental Fruit Moth. In this submission WAFGA has listed its key concerns with the current IRA. We have not provided a profuse amount of detail in relation to each concern, as our primary objective is to raise awareness of the concerns.

WAFGA believes that it is of primary importance to acknowledge the enormous difference that exists in the assessment between the current and previous Import Risk Analysis. The current IRA acknowledges the unique position of the WA apple industry and proposes that imports of New Zealand apples into Western Australia should not be permitted, unlike the previous IRA which rated the risk as 'Low'. WAFGA supports the current assessment for apple scab as being correct however believes that this significant change in assessment must call into question Biosecurity Australia's capacity to make assessments for Western Australia without extensive consultation with the local industry.

Western Australian does not have a legally binding cost-sharing agreement for the five identified pests of concern. Any incursion into Western Australia of these pests would result in the Western Australian industry having to meet the full costs associated with eradication, in contrast to pests of national concern where a national cost sharing agreement would result in the federal and state governments along with growers funding eradication at a pre-arranged funding arrangement.

WAFGA believes that Biosecurity Australia's assessment drastically understates the likely economic and social impact of these five pests for Western Australian growers.

The WAFGA therefore makes these comments/recommendations:

1. In this submission the WAFGA has focussed primarily on the pest risks that are listed for Western Australia. This is not to say that WAFGA has no concerns over the pests of concern to the whole of Australia (Fire blight, European canker, Apple leaf curling midge and Leafrollers). WAFGA has had input into, and reviewed, the final submission from Apple and Pear Australia Limited. WAFGA fully supports the Apple and Pear Australia Ltd submission, with regard to these pests. We feel that it is unnecessary to duplicate these concerns in this submission.
2. WAFGA supports the position that 'no satisfactory risk management could be identified for the disease apple scab. Therefore, it is proposed that imports of New Zealand apples into Western Australia should not be permitted'.

3. WAFGA recommends that should MAFNZ submit risk management strategies for apple scab in the future that Biosecurity Australia should engage in full consultation with the Western Australian apple industry.
4. WAFGA believes that the assessment for codling moth does not take into account the capacity for codling moth to enter Western Australia under the proposed protocols. The IRA does not take into account the impact that will be borne by the Western Australia industry should even a single codling moth be found in Western Australia. Lacking a State cost sharing agreement, the impact of an incursion will be felt at the district and local level however the IRA fails to factor this into its analysis.
5. WAFGA contests the grouping of two mealybug species together in this analysis given that information on *P. mali* is very limited. *Citrophilus mealybug* (*Pseudococcus calceolariae*) is a widespread pest throughout the eastern states of Australia, and is a serious pest of citrus in South Australia and in this analysis, WAFGA has identified significant consequences for the Western Australian fruit industry should this pest establish in Western Australia. No importation of mealybug should occur until greater understanding of the likely impact of *P. mali* is known.
6. WAFGA contests the recommendation that risk management would not be required for this oriental fruit moth as Biosecurity Australia note that 'later instar larvae that have not exited the apple fruit when harvested will not be affected by packhouse processes and that of larvae surviving inside apple fruit would survive the palletisation, quality inspection, containerisation and refrigerated transport to Australia. Oriental fruit moth has been eradicated three times from Western Australia and WAFGA believes that the IRA's proposed protocol would increase the risk to the Western Australian fruit industry.
7. WAFGA believes that the economic consequences of an incursion into Western Australia of apple scab and codling moth are considerable as there is no legally binding cost-sharing agreement. Therefore any incursion into Western Australia of these pests would result in the Western Australian industry having to meet the full costs associated with eradication. Biosecurity Australia makes analysis on a regional (or state) level however WAFGA considers that it would be reasonable, given the state's unique pest-free status and the likely full cost burden to its growers, to consider the effects of these pests at a district and local level. WAFGA believes that considering Biosecurity Australia's assessment at a regional level drastically understates the likely economic and social impact of these pests for Western Australian growers.
8. WAFGA calls into question Biosecurity Australia's capacity to effectively assess the risk faced by the Western Australian apple industry, based on comparisons between the current and previous IRAs. What seems incredible to WAFGA is that in February 2004 Biosecurity Australia was willing to allow the imports of New Zealand apples into Western Australia, claiming the risk was **Low**, whilst in December 2005 have prohibited it. This significant change in assessment must call into question their capacity to make assessments for Western Australia without extensive consultation with the local industry.

2.0 The WA Fruit Growers Association

The Western Australian Fruit Growers' Association (WAFGA) is the peak pome (apple and pear), stone and citrus fruit industry body in Western Australia, representing more than 700 growers across the state. Founded over 80 years ago, WAFGA is an agri-political organisation, which also funds research and promotion activities on behalf of fee-for-service paying growers.

WAFGA's structure comprises a Management Committee and three semi-autonomous commodity councils (Apple and Pear, Citrus, and Summer Fruit). Delegates on each of the commodity councils are appointed from the Association's five regional zones (Northern, Perth Hills, Central, Southern and South West).

WAFGA's primary objective is to ensure a profitable and sustainable industry for all Western Australian fruit growers through its agri-political, research and promotional activities.

3.0 Background

In this submission WAFGA will, as we have done with our previous submissions, focus primarily on the pest risks that are listed for Western Australia. This is not to say that WAFGA has no comment or anxiety over the pests of concern to the whole of Australia (Fire blight, European canker, Apple leaf curling midge and Leafrollers), as they are of concern to the Western Australian apple industry as well. Rather, as a component of an industry response WAFGA has had input into, and reviewed the final submission from Apple and Pear Australia Limited. WAFGA fully supports the Apple and Pear Australia Limited submission, with regard to these pests of national concern, and we feel that it is unnecessary to duplicate these comments in this submission. WAFGA would however like to register its support for the comments on these pests that are included in the submission from Apple and Pear Australia Limited.

The current Revised Draft Import Risk Analysis Report for Apples from New Zealand, December 2005 (in this submission Parts A, B and C of this are referred to as 'the current IRA') lists five pests of concern to Western Australia however makes assessment on only three (Table 1). In this submission WAFGA reviews Biosecurity Australia's recommendations for these three, and will also make comments on Oriental Fruit Moth, as this is also a pest of concern for the Western Australian stone fruit industry.

Pests of concern to Western Australia				
Common Name of Pest	Annual probability of entry, establishment and spread	Consequences	Unrestricted annual risk	Assessed for management measures
Apple scab	High	Moderate	Moderate	Yes
Codling moth	Low	Moderate	Low	Yes
Mealybugs	Moderate	Low	Low	Yes
Oriental fruit moth	Very low	Moderate	Very low	No
Oystershell scale	Very low	Low	Negligible	No

Table 1. Summary of the assessment of unrestricted risk of quarantine pests (Reprinted from the current IRA Part A, page 14).

3.1 Apple Scab

In considering this submission it is important to recognise and consider that apple scab is the most economically important disease of apples worldwide (Part B, page 219) and that it does not occur in Western Australia, which is probably the only apple-growing region where the disease is not established and endemic (Doepel, 1997).

Whilst Western Australia claimed area freedom from apple scab in 2000/01 it is not without some experience in dealing with incursions of the disease. Incursions have been recorded in the 1930 – 1941 period (Manjimup, Mt Barker, Porongorups and Kalgan River), 1947-48 (Manjimup and Pemberton), and during the period 1989-97 where small incursions were noted in orchards at Pemberton, Manjimup, Newlands, Donnybrook and in the Perth Hills (Doepel, 1997).

The last of these detections was on a single property was in the 1996/97 season, and following no detections in the subsequent four year period of intensive surveillance, Western Australia claimed area freedom from apple scab in season 2000/01.

Apple scab was again detected on a single property in November 2005, impacting upon the State's area freedom status. WAFGA and the WA Department of Agriculture are working together to eradicate the incursion, then through a program of surveillance will again apply for area freedom.

3.2 Background – Codling Moth

Codling moth is found in all of the world's major pome fruit growing areas except Japan and Western Australia (Anon 2004)². Codling moth is a declared pest in Western Australia and there have been over twenty eradications since 1903. The last outbreak, in Dwellingup was eradicated in 2001 (Anon 2004)².

Since that time, WAFGA and the WA Department of Agriculture have conducted an annual surveillance program which has involved traps being placed on commercial orchards, non-commercial orchards and townsites.

4.0 Submission on the current IRA

4.1 Australia's appropriate level of protection

The current IRA states that 'like many other countries, Australia expresses its appropriate level of protection (ALOP) in qualitative terms. Australia's ALOP, which reflects community expectations through government policy, is currently expressed as providing a high level of sanitary or phytosanitary protection aimed at reducing risk to a very low level, but not to zero' (Part B, page 3).

Any change to the current restrictions on the movement of apple fruit into Western Australia would surely increase the level of risk. This level of risk would be extremely difficult to quantify, however the WAFGA is not be required to do so through the IRA process, but rather is required to make a qualitative assessment of the risk.

The current IRA suggests that if granted access to Australia, New Zealand may be able to move approximately 20 million apples (or approx 1.9 million 18 kg cartons) annually to Australia (IRA Part B, page 18). As WA is 10% of Australia's population, we could assume that WA would be 10% of the destination for New Zealand apples, which equates to 190 000 cartons annually to WA, or about 170 containers per year.

Surely this additional movement of fruit represents a level of risk that is above a 'very low level' to a State that is currently free of these pests?

4.2 Likely inclusion of trash

WAFGA has concerns that the issue of the inclusion of trash (leaves and small twigs) in fruit cartons appears to have been not fully considered in the current IRA. It appears to have been left out of the consideration for apple scab, and the current IRA notes that trash 'does not present a special risk over and above that presented by fruit' (Part B, page 220), whilst the risk for viable codling moth eggs or larvae to be associated with trash after pack house processes would be 'minimal' (Part B, page 247). Similar minimal ratings are presented for viable mealybugs larvae (Part B, page 260), and viable oriental fruit moth larvae (Part B, 269).

WAFGA believes that this assessment vastly underrates the risk to the Western Australian apple industry. WAFGA has concerns that the likely movement of apples in cartons (we estimate nearly 2 million cartons) will contain some level of trash and therefore must represent a risk. The photograph below is of Granny Smith and Pacific Rose apples from New Zealand in a fruit retailer's market in Dalat a town in central Vietnam. It clearly shows leaf material attached to the Pacific Rose apples. The photograph was taken by the author in June 2005. WAFGA contends that there is a much higher potential for trash to be included in New Zealand apple shipments, than the current IRA suggests.

Further, the current IRA makes assessment that processing of fruit in the packinghouse will remove obviously damaged fruit but does not consider trash. WAFGA notes that the New Zealand industry has for some time had issues with the availability of short term harvest with numerous references to this issue in its trade publication, *The Orchardist*. Given this ongoing shortage of experienced labour in New Zealand, WAFGA questions any reference in the current IRA to the capacity of pickers or pack house staff, being able to remove all susceptible trash from nearly 2 million cartons of apples.

Please note that this photo was forwarded as a separate file.

4.3 Apple Scab

WAFGA believes that it is of primary importance to acknowledge the enormous difference that exists in the assessment between the current and previous IRAs.

The current IRA acknowledges the unique position of the Western Australian apple industry when it notes “No satisfactory risk management procedures could be identified for the disease apple scab. Therefore, it is proposed that imports of New Zealand apples into Western Australia should not be permitted” (Part A, page 1).

This is in stark contrast to the Revised Draft Import Risk Analysis Report for the Importation of Apples from New Zealand released in 2004 (in this submission Parts A and B are referred to as ‘the previous IRA’) which did not recognise this position, and but rather stated that the ‘unrestricted annual risk estimation of *V. inaequalis* was **Low** (Part B, page 319).

On this basis alone no application for access to Western Australia should be considered. WAFGA however recognises that the New Zealand industry has previously called into question the possibility that WA is free of apple scab.

In their 2004 submission (Anon 2004)³, the New Zealand commented that:

‘New Zealand understands that there is a complete ban on the movement of fresh apple fruit into WA from anywhere including the Eastern States of Australia and that whenever scab is detected in WA it is eradicated. However, evidence presented in the Report of “occurrence of several small outbreaks over some years” suggests that either the eradication campaigns have been inadequate and unsuccessful (i.e. not fully verified) or the state border controls over the movement of nursery stocks are weak.

If these of these is correct the assumption that WA is free of the pathogen has to be questioned, It is simply not tenable, based on the improbable nature of scab transfer on commercial fruit, to assert that all the incursions have been the result of spores arriving on illegally imported fruit.

Based on the regular reports of scab incursions in WA, and the above reasoning, New Zealand questions the validity of the claim that the state is free of the pathogen and consequently the need for any measures against the disease on fresh apple fruit’.

Similarly commenting on the current incursion, Pipfruit NZ Chairman Ian Palmer, “How could they exclude us from Western Australia on the basis of blackspot in the same week the Western Australian Government admits they are dealing with a blackspot outbreak?” (Anon 2005)¹.

Despite these concerns WAFGA believes that the current IRA has made the correct assessment on apple scab. The current WA apple scab incursion is under official control WAFGA and the WA Department of Agriculture implementing an eradication and surveillance program which will reinstate area freedom. This incursion does not represent ‘suitable risk management measures for apple scab’ and therefore WAFGA supports the conclusion in the current IRA that ‘mature apple fruit from New Zealand (and eastern Australia) be prohibited entry into Western Australia’ (Part B, page 245).

WAFGA also noted that ‘MAFNZ has not provided any proposed risk management strategies for apple scab’ (Part B page 245). WAFGA believes that should information be forwarded at some stage in the future that Biosecurity Australia engages in full consultation with the Western Australian apple industry.

4.4 Codling Moth

The WAFGA finds it incredible that Biosecurity Australia can suggest that the ‘unrestricted risk estimation for codling moth is **Low**’ (Part B, page 255) and that on that basis can propose risk management measures for the movement of New Zealand apples into Western Australia.

WAFGA believes that this assessment does not take into account the capacity for codling moth to enter Western Australia under the proposed protocols nor does it take into account the impact that will be borne by the WA industry should even a single codling moth be found in WA.

4.4.1 Probability of entry, establishment and spread

In reviewing the probability of entry, establishment and spread Biosecurity Australia has found that ‘the overall likelihood that codling moth will enter Western Australia as a result of trade in apple fruit from New Zealand, be distributed in a viable state to suitable hosts, establish in that area and subsequently spread within Western Australia’ is rated as **Low** (Part B, page 252).

WAFGA believes that Biosecurity Australia has not given any credence to Western Australia’s position of being free from codling moth in this assessment and in their assessment has really missed the implications of an incursion. Western Australia is currently free from codling moth, and that finding just one codling moth in the State can impact on that status. An imported codling moth does not have to enter, establish and spread, it just needs to enter, and Biosecurity Australia itself rates ‘the likelihood that codling moth will arrive in Western Australia with the importation of apple fruit from New Zealand’ as **Moderate**, descriptively described as ‘the event would occur with an even probability’ (Part B, page 41).

WAFGA therefore suggests that any importation of apples from New Zealand into Western Australia would place the current freedom from codling moth at a significantly higher risk than Biosecurity Australia is suggesting. This appears that this is an all too familiar scenario, as in WAFGA’s response to the Revised Draft IRA Report on the Importation of Apples from New Zealand issued in February 2004 (Anon 2004)¹, this concern was also raised. In that analysis, despite half of the Importation Steps being rated with a risk level of High, the previous IRA rated ‘the probability of importation of codling moth from one year of trade was found to be **Low**’ (Appendix A).

WAFGA’s position has changed very little with the assessment in the current IRA. The **Low** assessment of the likelihood of the probability of entry, establishment and spread is given despite much higher ratings (Table 2, page 15) being given for the risk associated with the pest’s potential to enter and then establish in Western Australia. Again the Western Australian apple industry is faced with a mathematical equation which can bring all of the High likelihoods down to an overall rating of **Low**.

4.4.2 Assessment of the Consequences

The current IRA lists the consequences of the entry of codling moth into Western Australia as **Moderate** at the regional level and makes assessments on direct and indirect impacts (Table 3). WAFGA has concerns over this rating as it again appears that the overall rating has been diluted.

WAFGA views the economic consequences of an incursion of codling moth for WA growers, the WA industry and the State Department of Agriculture are, we believe, are considerably greater than faced by the national industry should there be an incursion of fire blight.

An incursion into Western Australia of either codling moth would result in the WA industry having to meet the full costs associated with eradication. This is in contrast to Fire blight, where a national cost sharing agreement would result in the federal and state governments along with growers funding eradication at a pre-arranged funding arrangement.

WAFGA believes that the current IRA rating drastically understates the economic impact for Western Australian growers as the impact should be highly significant at both the district and regional levels (Table 3).

The assessment of consequences for pests of concern to Western Australia compared to the assessment of consequences to Australia for Fire blight.					
Indirect Impact	Fire blight	Apple scab	Codling moth	Mealybug	Oriental Fruit Moth
Control or eradication	E	E	E	C	C
Domestic trade or industry	E	E	B	B	B
International Trade	D	E	D	B	C
Communities	D	D	B	B	B

Table 3: Assessment of the consequences of pest and disease risks to the WA Industry (the current IRA, Part B).

4.4.3 Risk management for codling moth

WAFGA notes that the unrelated risk estimation for codling moth is rated as Low, which exceeds Australia's ALOP and therefore risk management measures are required, and that Biosecurity Australia acknowledges that visual inspection of fruit alone may not be an appropriate risk management measure.

WAFGA has strong concerns two of the three risk management measures relate to sourcing fruit from orchard areas that are pest free areas (Option 1) or areas of low pest prevalence (Option 2). This is despite noting that 'codling moth is common throughout New Zealand' (Part B, page 248), which would seem to restrict the implementation of either of these options.

4.5 Mealybugs

In the current IRA, two pests, Citrophilus mealybug (*Psuedococcus calceolariae*) and Mealybug (*Planococcus mali*) are considered together, on the evidence that they have similar biology. WAFGA would contend that in this instance, biology may not be a suitable comparison.

BA notes that 'Citrophilus mealybug is a widespread pest throughout the eastern states of Australia, and is a serious pest of citrus in South Australia' (Part B, page 259), but that 'information on *P. mali* is very limited' (Part B, page 259).

As with the codling moth risk rating, BA again seems to be diluting the risk faced by the Western Australian apple industry through the IRA process, which rates the 'unrestricted risk estimation for mealybugs is **Low**'. WAFGA believes that this assessment does not take into

account the capacity for mealybugs to enter Western Australia under the proposed protocols nor does it take into account the impact that will be borne by the wider Western Australian horticultural industry should either or both of these two species enter Western Australia. It seems that the Western Australian industry is being placed at a high risk from a pest which Biosecurity Australia readily admits it knows little about.

4.5.1 Probability of entry, establishment and spread

The WAFGA contests the finding of the current IRA that ‘the overall likelihood that mealybugs will enter the PRA area as a result of trade in apple fruit from New Zealand, be distributed in a viable state to suitable hosts, establish in that area and subsequently spread within Western Australia’ is **Moderate** (Part B, page 264).

Although a higher risk rating that the codling moth, WAFGA believes that this assessment also appears to drastically understate the pathway for a pest, which is exotic to WA, to enter and establish in WA (Table 2, page 15).

4.5.2 Assessment of consequences

WAFGA’s concern with these pests is that as well as apples, these mealybugs have the capacity to affect other crops, such as stone fruit and citrus which is an important component of the Western Australian horticulture Industry. In 2004/05 Western Australia’s citrus production was 16 289 tonnes whilst total stone fruit production was 13 669 tonne (Anon 2005)².

This IRA, and indeed the Draft Report, Extension of Existing Policy for Stone Fruit from New Zealand into Western Australia (July 2005), rate the probability of establishment and spread for Mealybugs as **High**.

WAFGA believes that this would have significant consequences for the Western Australian fruit industry and notes that in the current IRA, Biosecurity Australia note that ‘programs to minimise the impact of these pests on host plants may be costly and may include additional pesticide applications including crop monitoring’ with ‘the possible need to re-introduce or increase the use of organophosphate insecticides’ (Part B, page 266). Compounding this, the current RA notes that ‘existing control strategies in place for economically important mealybug species may be effective in minimising the impact of citropilus mealybug in Western Australia’ (Part B, page 266) which could also be interpreted as meaning that there may also be a need to introduce additional control strategies.

4.5.3 Risk management for mealybugs

WAFGA notes that the unrelated annual risk for mealybugs is **Low**, which is above Australia’s ALOP and therefore risk management measures are required, although has concerns that only visual inspection is listed as risk management.

4.6 Oriental fruit moth

Oriental fruit moth is a pest which has been eradicated from WA on three separate occasions resulting in a cost of several million dollars to the WA Government and industry and its inclusion in this submission comes some 12 months after it was reviewed as part of an IRA for NZ stone fruit into Western Australia (Biosecurity Australia (2005)²).

WAFGA believes that the risk rating for Oriental fruit moth seems to have been again much lower than the risk faced by the Western Australian apple industry through the IRA process,

which rates the ‘unrestricted annual risk for oriental fruit moth as ‘very low’, and notes that this is a lower level of risk than was rated in the stone fruit IRA (Table 4).

A direct comparison of the assessment shows that the step which is having the largest factor on the overall rating in the current IRA is Importation, rated as Very low, despite any evidence of a process in New Zealand that would remove affected fruit, despite Biosecurity Australia acknowledging that oriental fruit moth is present in New Zealand orchards and that it will lay its eggs on the leaves of apple trees and the mature fruit (Part B, page 270).

Biosecurity Australia note that ‘later instar larvae that have not exited the apple fruit when harvested will not be affected by packhouse processes and that of larvae surviving inside apple fruit would survive the palletisation, quality inspection, containerisation and refrigerated transport to Australia (Part B, page 271).

Despite this, Biosecurity Australia’s rating means that ‘risk management would not be required for this pest’ (Part B, page 278).

A comparison of the risk associated with Oriental Fruit Moth as listed in the current and stone fruit IRAs		
Analysis Factor	Current Apple IRA	Stone fruit IRA
Importation	Very low	Moderate
Distribution	Moderate	Moderate
Probability of Entry (importation x distribution)	Very low	Low
Probability of establishment	High	High
Probability of spread	High	High
Conclusion -Probability of entry, establishment and spread	Very low	Low
Consequences	Moderate	Moderate
Unrestricted risk estimate	Very low	Low

Table 4: A comparison of the probability of entry, establishment and spread, consequence and Unrestricted risk estimate of Oriental fruit moth for WA.

5.0 Impact on the Western Australian Apple Industry

The Western Australian apple industry is free from what we consider to be the ‘triple threat’ of fire blight, apple scab and codling moth, pests which are all present in New Zealand and considered as part of this risk analysis. As we have stated previously this submission will focus on the pests of concern for Western Australia.

The economic consequences of an incursion of apple scab and codling moth for Western Australian growers, the Western Australian apple industry and the State’s Department of Agriculture are, we believe, are considerably greater than faced by the national industry should there be an incursion of fire blight. Whilst the risk and the associated potential costs presented by mealybugs or oriental fruit moth are not as high, they are still of concern to WAFGA.

Western Australian does not have a legally binding cost-sharing agreement for the five identified pests of concern. Any incursion into Western Australia of these pests would result in the Western Australian industry having to meet the full costs associated with eradication. This is in contrast to Fire blight, where a national cost sharing agreement would result in the federal and state governments along with growers funding eradication at a pre-arranged

funding arrangement. It therefore should follow that the economic consequences for Western Australian growers should be rated higher than that of Fire blight to Eastern States growers.

Biosecurity Australia makes analysis on a regional (or state) level however WAFGA considers that it would be reasonable, given the state's unique pest-free status and the likely full cost burden to its growers, to consider the effects of these pests at a district and local level. Table 5 shows that the impact score of control or eradication of both apple scab and codling moth is significant at a regional level and highly significant at a district level, whilst those for mealybugs and oriental fruit moth is significant at the local level.

WAFGA believes that considering Biosecurity Australia's assessment at a regional level drastically understates the likely economic and social impact of these pests for Western Australian growers.

Indirect Impact	Fire blight	Apple scab	Codling moth	Mealybugs	Oriental Fruit Moth
District Level	Highly significant	Highly significant	Highly significant	Minor	Minor
Local Level	Highly significant	Highly significant	Highly significant	Significant	Significant

Table 5: Assessment of the district and local risk factors for pests of concern for Western Australia compared to Fire blight (Part B, page 37).

WAFGA also believes that because the current IRA will be the basis for determining whether or not apple imports should be allowed from other apple exporting countries in the future, the "future risk" posed to WA growers from these countries is something that needs to be considered.

Apple imports from New Zealand alone pose a risk to our industry in terms of apple scab, codling moth and fire blight, however if imports are allowed in the future from North and South America, China and South Africa present a cumulative risk to our industry. WAFGA believes that the current IRA will expose the Western Australian apple industry to unnecessary risks.

Finally WAFGA calls into question Biosecurity Australia's capacity to effectively assess the risk faced by the Western Australian apple industry, based on comparisons between the current and previous IRAs. Whilst we believe that the current assessment for apple scab is correct we wonder how it could have changed so significantly in the 22 months since the previous IRA was released. What seems incredible to WAFGA is that in February 2004 Biosecurity Australia was willing to allow the imports of New Zealand apples into Western Australia, claiming the risk was **Low**, whilst in December 2005 have prohibited it. This significant change in assessment must call into question their capacity to make assessments for Western Australia without extensive consultation with the local industry. WAFGA notes however that, unlike the previous IRA, no public meetings have been held in Western Australia to canvas the opinion of local growers. Whilst we appreciate that both the WA Department of Agriculture and WAFGA made submissions to the previous IRA, we cannot accept that there has been adequate consultation with the local industry since the release of the current IRA.

6.0 References

Anon (2004)¹. Revised Draft Import Risk Analysis Report for the Importation of Apples from New Zealand. Department of Agriculture, Fisheries and Forestry, Canberra.

Anon (2004)². Report on the trapping surveillance for codling moth in Western Australia 2003/04. WA Department of Agriculture, South Perth, Western Australia.

Anon (2004)³. Comments by the Government of New Zealand on Importation of Apples from New Zealand, Revised Draft IRA Report (February 2004). New Zealand – Ministry of Agriculture and Forestry, as printed in the NZ apple RDIRA stakeholder comments (Part 6).

Anon (2005)¹. After Seven Years, why play fair? Pipfruit New Zealand Incorporated, Media Statement 6 December 2005.

Anon (2005)². Annual Report for the year ended 30th June 2005. Agricultural Produce Commission.

Biosecurity Australia (2005). Revised Draft Import Risk Analysis Report for Apples from New Zealand. Part A, B and C. Biosecurity Australia, Canberra, Australia.

Biosecurity Australia (2005)². Draft Report for the Extension of Existing Policy for Stone Fruit from New Zealand into Western Australia. Biosecurity Australia, Canberra, Australia.

Doepel, R.F. (1997). Eradication of apple scab in Western Australia 1989-97. Agriculture Western Australia 1997.

Sharma, S (2004). Comments on Biosecurity Australia's Revised Draft Import Analysis for apples from New Zealand. Department of Agriculture, Western Australia.

Probability of entry, establishment and spread of codling moth		Probability of entry, establishment and spread of mealy bugs		
Analysis Factor	Importation Step	Rating	Importation Step	Rating
Importation	The likelihood that codling moth will arrive in Western Australia with the importation of apple fruit from New Zealand	Moderate	The likelihood that mealybugs will arrive in Western Australia with the importation of apple fruit from New Zealand	High
Distribution	The likelihood that codling moth will be distributed to the endangered area as a result of the processing, sale or disposal of apple fruit from New Zealand	Moderate	The likelihood that mealybugs will be distributed to the endangered area as a result of the processing, sale or disposal of apple fruit from New Zealand	Moderate
Probability of Entry (importation x distribution)	The likelihood that codling moth will enter the PRA area as a result of trade in apple fruit from New Zealand and be distributed in a viable state to the endangered area	Low	The likelihood that mealybugs will enter the PRA area as a result of trade in apple fruit from New Zealand and be distributed in a viable state to the endangered area	Moderate
Probability of establishment	The likelihood that codling moth will establish based on a comparative assessment of factors in the source and destination areas considered pertinent to the ability of the pest to surveys and propagate.	High	The likelihood that mealybugs will establish based on a comparative assessment of factors in the source and destination areas considered pertinent to the ability of the pest to surveys and propagate.	High
Probability of spread	The likelihood that codling moth will spread based on a comparative assessment of those factors in the source and destination areas considered pertinent to the expansion of the geographical distribution of the pest	High	The likelihood that mealybugs will spread based on a comparative assessment of those factors in the source and destination areas considered pertinent to the expansion of the geographical distribution of the pest	High
Probability of entry, establishment and spread	The overall likelihood that codling moth will enter Western Australia as a result of trade on apple fruit from New Zealand, be distributed in a viable state to suitable hosts, establish in that area and subsequently spread within Western Australia	Low	The overall likelihood that mealybugs will enter the PRA area as a result of trade in apple fruit from New Zealand, be distributed in a viable state to suitable hosts, establish in that area and subsequently spread within Western Australia	Moderate

Table 2: A comparison of the entry, establishment and spread risk for codling moth and mealybug

Appendix 1.

The importation steps and the likelihood of the codling moth being present at each step
(Source: Revised draft IRA Report – Importation of Apples from New Zealand, 2004)

Importation Step		Rating	Location
1.	The likelihood that codling moth is present in the source orchard in New Zealand.	High	Part B, page 322
2.	The likelihood that picked apple fruit is infested with codling moth.	Low	Part B, page 322
3.	The likelihood that clean fruit is contaminated by codling moth during picking or transport to the packinghouse.	Negligible	Part B, page 323
4.	The likelihood that codling moth survives routine processing procedures in the pack house.	High	Part B, page 323
5.	The likelihood that clean fruit is contaminated by codling moth during processing in the packhouse.	Negligible	Part B, page 324
6.	The likelihood that codling moth survives palletisation, quality inspection, containerisation and transportation to Australia.	High	Part B, page 324
7.	The likelihood that clean fruit is contaminated by codling moth during palletisation, quality inspection, containerisation and transportation.	Negligible	Part B, page 324
8.	The likelihood that codling moth survives and remains with fruit after on-arrival minimum border procedures.	High	Part B, page 324

WAFGA maintains that when combined, Importation Steps 1, 2, 4, 6 and 8 provide a clear, logical and realistic pathway to allow the entry of codling moth into Western Australia. As we noted in our previous IRA Submission, the WAFGA was confounded that “Biosecurity Australia’s mathematical equations can bring all of these High likelihoods down to an overall rating of Low”.