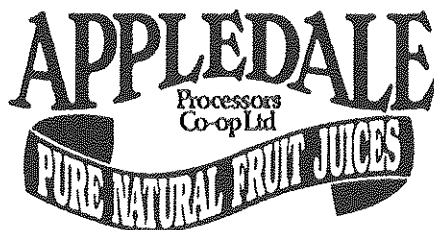


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30th March 2006

Technical and Administrative Services
Plant Biosecurity
GPO Box 858
Canberra ACT 2001
Email plantbiosec@daff.gov.au

Dear Sir/Madam,

Once again on behalf of the 55 commercial apple growers from the Orange district who are shareholders of Appledale Processors Co-operative Ltd, I would like to bring your attention to the following concerns with the present I.R.A on import of apples from New Zealand.

1. **Area Freedom-** the suggested protocols in the latest I.R.A include an orchard inspection at blossom time only the research would indicate that it is necessary to expand this inspection to another one before harvest on orchards that have a clean history, and also at any time a orchard might experience hail or sleet damage. Fireblight outbreaks are possible at times other than spring. As Growers we have all seen false blooms on shoots throughout the year right up to harvest – these can generate the fireblight bacteria.

2. **Buffer zones** – In our previous submission we expressed our concern and the current I.R.A has still not addressed this issue. To move away from the international standards by allowing hosts of both fireblight and insects within a smaller buffer zone is totally unacceptable. When a disease outbreak occurs in close proximity to an adjacent “clean” block the risk factor increases dramatically.
3. **Survival of Epiphytic populations**- The current I.R.A has still not scientifically dealt with the work of Ceroni at ali 2004 that reports that bacteria survived epiphytically for a period of up to 101 days. To a large degree this EA’s ability to survive as an epiphyte is mediated through its ability to produce an exopolysacharides (E.P.S.) capsule.
4. **Trash** – As growers we are aware that it is commercially impossible to remove all trash at time of packing even with the inclusion of a chlorine treatment (which in our own experience is impossible to hold at a set p.p.m level due to the breakdown by organic material), there will be some trash that can carry the fireblight disease and escape the inspection protocols proposed. **No risk** is the only risk that Orange apple growers will accept.
5. **European Canker** - New South Wales including the Orange district has a elevated risk of incursion because of two factors:-
 - Conducive climate
 - Change in the fungicide use spectrum in line with Integrated Fruit Production (I.F.P). This fungus has blatant (symptom less) phases in both fruit and twigs which would allow it to remain undetected through inspection. It also has an effective long distance dispersal mechanism (ascospores) which does not require specific vectors.

With the use of I.F.P systems of pest control in both Australia and New Zealand the control and eradication of European Canker which it is acknowledged to exist in New Zealand would create enormous problems for Australian growers to eliminate as our temperature and rainfall are very conducive to the spread of this disease. The suggested inspection protocol again does not address the risk exposure of the Australian industry to a disease that we currently do not have.

Biosecurity Australia has the responsibility to develop the I.R.A using only science and international standards. Orange apple growers believe that the scientific evidence is overwhelming that under the proposed I.R.A protocol fireblight **WILL** find its way into the Australian industry.

As we see this current I.R.A it all comes down to risk management. Biosecurity Australia works on minimal risk i.e. to allow trade and eliminate the possibility of New Zealand going to the W.T.O.

The Orange apple growers on the other hand are determined that the only acceptable risk is **NO RISK** and believe Australia should go to the W.T.O in preference to sacrificing another Australian industry.

Yours faithfully



David Gartrell

Chairman

Appledale Processors Co-Operative