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This is a submission in response to the Revised Draft Import Risk Analysis Report for Apples from New Zealand dated December 2005

As an orchardist I do not feel equipped to engage with Biosecurity on your own level in the detail of probability formulae and figures. I direct my comments to the summary – Part A – for extrapolation into the detailed report.

Page 4 “pathways” – I don’t see that the words “distributed close to and is” are appropriate. An individual piece of fruit which bears pests can arrive near a host by any number of routes, not only by the act of “distribution”, which implies to me the commercial movement of a quantity of fruit.

The first paragraph on page 5 says:

“In some cases, pests may be completely absent from some orchards and apples coming from these orchards will therefore be free of those pests. For example, for a pest known to be absent from orchards on the North Island of New Zealand, the overall probability of it being present on apples from the whole of New Zealand is lower than if it were widely distributed.”

This may be statistically true, but is otherwise absurd. Quite apart from the fact that no apple can come from “the whole of New Zealand”, it seems to me you could equally well argue the following proposition:

I intend to make a trip around Australia. I enjoy swimming and I intend to swim whenever possible on my journey. What should be my attitude to crocodiles? Crocodiles are found in northern waters. As crocodiles are known to be absent in southern waters, the overall probability of a crocodile being present in the water wherever I swim on the coast of Australia is lower. Wherever I swim in Australia, even in Darwin, the overall risk of my being eaten has become less and is therefore more acceptable. A statistician might dive off that wharf in Darwin, but I wouldn’t.

In the next paragraph the statement “very few of the pests of concern are primarily pests of apple fruit” seems to me to be totally irrelevant. Does the fact that they are pests of something else make them somehow less of a pest on apples?

Paragraph 6 suggests live insects may be noticed on arrival. This very much depends on who is there to do the noticing and how much they are informed and motivated and empowered to take some action if they do see a pest. I would not like to rely on it.

Page 6 paragraph 2 seems to me to overlook the certainty that establishment of a pest on any one of the group of potential hosts in Australia will lead eventually and inevitably to establishment on all other potential hosts.

Page 6 paragraph 5 - the assumption that pest dispersal will be uniformly to all points of the compass and diluted accordingly is based on the unlikely existence of calm weather and uniform

environment in all directions from the point of release or hatch. I would have thought it more likely that wind or the plant environment would send them all in one direction.

The limitations contemplated in the last sentence of paragraph 6 are pretty speculative. We all know that insects abound around available rotting fruit and that apples can last on the ground for months before they decay.

Again in the last paragraph on page 6, there is presumably no evidence that regulated importation is **not** a path for pest entry. The question has simply not been studied.

Nowhere in the summary is it indicated that Biosecurity have given sufficient weight to the difference Australia's climate would make to the spread of fireblight.

In the actual assessment of level of risk it is hard to see how the consequences of fireblight establishment could be set at any level below extreme, or how that risk could be ameliorated by a lesser chance of introduction or spread. If some devised matrix shows otherwise, I suggest it is flawed. On the question of likely spread, as the disease is not native to New Zealand, one can presume it was a single incident of introduction which eventually spread to infest the whole of that country. An analogous situation is the recent incident of the import of meat products into Japan from America. The inspection regime failed. The worst consequence that could flow from such a failure in relation to a particular shipment is that if that shipment turned out to be contaminated, the health of persons consuming it may be seriously affected. But that consequence would only attach to consumers of that particular shipment. If the inspection regime were restored to effectiveness, no further consequences could flow from that importation. On the other hand, if in one single shipment of apples fireblight went undetected by inspection, the consequence could be that the disease would be introduced into Australia irrevocably and for all time. A real Pandora's box.

With apple leafcurling midge, it is of concern to me that prevalence of the midge in fruit shipments is considered acceptable at any level.

Finally, the reliance on inspection regimes concerns me. In New Zealand the motivation of the inspectors needs to be high and may not be. The report also assumes the existence of an inspection "on arrival", which may not occur at all or may not be done by competent or properly motivated persons. Once one inspection fails and fireblight is released, the full extreme consequences will occur.

Science aside, it seems to me absurd to take any risk of introducing a disease with consequences as serious as fireblight to this country when we don't have to.

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