



March 16, 2006

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Biosecurity Australia
Technical & Administrative Services
Plant Biosecurity
Biosecurity Australia
GPO Box 858
CANBERRA ACT 2601

Dear Sir/Madam

Re: Submission in response to the New Zealand apple IRA

Joyson Orchards is a fourth generation Australian apple producer, with substantial interests across three states. Privately owned by the Joyce family of Lenswood, South Australia, the family has been an active advocate of the protection of the Australian apple industry for future generations.

The removal of restrictions on the importation of apples from New Zealand will have a detrimental effect on the long term viability of our industry.

We strongly support the stance of "zero risk" in relation to the potential for introduced disease to affect our industry. Our beliefs are centered on fundamental disease prevention as opposed to perceived financial impacts associated with New Zealand imports.

It is our firm opinion that the competitive advantage enjoyed by Australian agriculture including the Australian Apple & Pear industry is our "Clean Green" approach to agricultural production. An outbreak of fire blight would destroy our competitive advantage in the global market place.

Globally there are numerous apple producing countries that have significantly lower input costs. The only competitive advantage Australia maintains in exporting apples is that unique "Clean Green" image. The status quo must be maintained as the importation of New Zealand apples (through the potential for an outbreak of fire blight) has the potential to destroy this image and our position in global markets.

I urge those responsible to review the market implications of this "Clean Green" image. As recently as this season we have experienced New Zealand producers dumping apples in global markets for well under the cost of production yet Australian exporters have been able to maintain returns through well structured export programs such as the AFFCO Pink Lady export programs through its ability to supply "risk free" fruit. The feedback we receive from export customers is that this "risk free" fruit is our only competitive advantage.

Any increase in potential disease infestation (other than a position of "zero risk") can only be negative for the long term future of Australian apples. Outbreaks of either Fire Blight and/or European Canker would do significant damage to the industries global reputation and decimate farm incomes.

As a grower of significant volumes, Joyson welcome all comers, all Australian producers operate in a very competitive environment. We don't seek specialist protection and welcome the global shift towards free trade and the removal of subsidies.

Further, we do not wish to avoid competition from our fellow New Zealand growers (as we have been competing in global markets for decades) but we do seek "zero risk" of the health status of our crops and the potential to introduce disease.

No matter how stringent any proposed inspection programs are, no system is full proof. European canker which is prevalent in New Zealand is very difficult to detect. Trying to exclude farms or certain orchards or blocks that have had fire blight in recent years is subject to discretion and unfortunately human error.

We remain concerned that the debate seems to be moving towards protocols associated with importation of New Zealand apples and away from the key element of "zero risk" for the Australian apple industry.

We remain greatly concerned and seek your understanding and co-operation.

Kind Regards

Mark Joyce
Proprietor
Joyson Orchards