

27 March 2006

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

Re: Submission to Biosecurity Australia in response to the New Zealand apple IRA

The NSW Farmers' Association, as the largest state farming organisation in Australia, represents the interests of apple growers in NSW and is the state B-Class member of Apple and Pear Australia Limited ('APAL'). The Association also represents the interests of the full range of agricultural industries throughout NSW. As a result of this extensive range of industries which make up the membership, the Association is strongly committed to maintaining the competitive market advantage which comes from our clean green image and hence will strongly oppose any decision which may increase the risk of an exotic pest or disease incursion.

The Association supports the comprehensive technical analysis and report which has been submitted to Biosecurity Australia by APAL in response to the recent revised draft IRA. At a State level we offer the following information in support of the ongoing maintenance of a fire blight free status for NSW.

NSW is Australia's second largest producer of apples in Australia, growing 19 per cent of the nation's crop in 2004 and was the equal fourth producer of pears in 2004, growing 0.5% of the national output – the same as Queensland and Tasmania. NSW (including the ACT) produced 47,760 tonnes of apples (down from 62,302 in 2003), of which 10,794 tonnes was for processing. The gross value of production totals approximately \$50 million for the State.

An estimated 219 growers responded to the 2004 ABS apple survey and 85 growers responded to the pear survey. In order of production volumes the main varieties were Delicious – Striped + Block Red (41% of total production), Cripps Pink (10%) and Galas (10%)

NSW - Apple Summary 2004

Trees Under 1 Year	Trees 1 to 3 Years	Trees 4 and Over	Total Trees	Production (tonnes)	Processing (tonnes)
37,250	180,364	1,885,354	2,102,968	47,760	10,794

NSW – Pear Summary 2004 (excluding Nashi)

Trees Under 1 Year	Trees 1 to 5 Years	Trees 6 and Over	Total Trees	Production (tonnes)	Processing (tonnes)
1,150	1,715	25,971	28,836	674	54

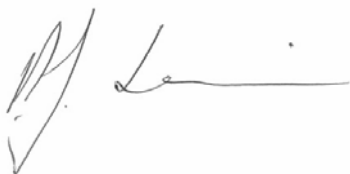
* Production and tree number information is based on data provided through the Australian Bureau of Statistics (ABS).

The Association understands the potential for fire blight to wreak havoc on this vibrant and profitable industry in NSW and other States. The following points in relation to fire blight need to be addressed in the current draft IRA before any serious consideration can be given to this proposal:

- The suggested protocols for fire blight include an orchard inspection at blossom time with only orchards that are free of fire blight symptoms being able to export to Australia. This should be expanded to include a second inspection for fire blight symptoms just prior to harvest. This needs to be done because, although outbreaks are most common in Spring, the literature shows clearly that outbreaks are possible at other times including the period between blossoming and harvesting.
- An additional inspection for fire blight symptoms should take place in orchards that have experienced hail, heavy insect infestation or any other event that damages the foliage of the trees. The literature indicates that damaged leaves provide excellent starting points for fire blight infection and any event that damages leaves will make an orchard more susceptible to infection.
- The IRA suggests that trash is no more risky than apples as a vector for fire blight. It is important that trash be excluded from all apple exports because the literature shows that trash is a high risk vector.
- The protocols need to include exclusion provisions for blocks that have had infections of fire blight in the previous year. Growers know that a block that has had a disease outbreak in the previous year is at higher risk of an outbreak the following year than a block where such an outbreak has not occurred. The IRA does not take this into account but treats all blocks as if the risk is exactly the same.
- Likewise, the protocols need to include exclusion for blocks that have fire blight outbreaks in close proximity. Growers know that where a disease outbreak occurs nearby, risk is increased.

As mentioned at the outset of this letter, the Association supports APAL's technical analysis of the risks associated with fire blight and the full range of pests and diseases covered by the draft. Until these concerns are properly addressed the NSW pome fruit industry cannot support the importation of apples into Australia from New Zealand.

Regards



Jock Laurie
President