

**Batlow Branch** 

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To: Technical and Administrative Services
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## Submission from Batlow Branch NSW Farmers re New Zealand apple IRA

Batlow Branch of NSW Farmers is made up of horticulturists that predominantly produce apples. On Behalf of these growers, I would like to bring to your attention our combined concerns at your recommendation contained in the Draft Import Risk Assessment for the importation of apples from New Zealand into this country.

We are of the belief that the importation of apples into this country would present a significant risk to our local fruit industry and place many growers, employees and community members at risk of a large reduction in both income and social cohesion. If Fireblight or any of the other pests or diseases found in New Zealand are introduced into this apple growing district, then the economic and social impacts would, in our opinion, cause significant hardship to an already depressed district. Apple growers are finding it difficult to maintain economic viability with the ever increasing cost structure in our industry. The threat of increased costs in combating outbreaks of introduced pest and disease would severely stretch most producers.

While the draft IRA does address, and tries to minimise, the risks associated with the importation of fresh apples, we are not convinced that the measures proposed are sufficient to exclude the possibility of pest and disease introductions.

As practicing apple growers we are fully aware of the devastation that an outbreak of Fireblight could cause to our district. We are particularly concerned, due to the high infection periods that we experience for this disease given our warm moist flowering season. It is our understanding that our district would experience a greater risk of infection than most of the areas in New Zealand where apples are grown.

We are not convinced that the level of orchard inspections outlined in the protocols of the draft IRA is sufficient to detect the presence of Fireblight. The protocols only include inspections of New Zealand orchards at flowering time for Fireblight. We believe that this disease can also infect orchards during the growing season given the right climatic conditions, i.e. hail, or leaf and bark damage caused by insects. This infected material could make its way to Australia if these orchards are allowed to export fruit. We have heard from many of our overseas growers that bark and leaf material can transport Fireblight more effectively that fruit itself. If this is true, then the risk to our industry is not acceptable with the proposed protocols. As growers we are fully aware that it is impossible to pick and pack apples without some leaf and bark material getting into the packed cartons. There would

need to be a much higher level of ongoing orchard and packed fruit inspection to reduce this risk.

The draft IRA protocols also do not effectively take into account previous outbreaks of Fireblight in New Zealand orchard areas. Surely the likelihood of infection in an orchard is significally increased if infection has occurred in a previous year in that orchard or surrounding orchards. There needs to be a greater emphasis placed on orchard history and increased inspection where Fireblight has previously been detected.

The Batlow growers have prided themselves on their adoption of Integrated Pest Management principles. If new pests were introduced to our area, then the resulting increase in costs and impacts on our current orchard husbandry would have a significant detrimental effect on all our previous good work. It is our understanding that some pest pressures occur in New Zealand that do not occur in our district. One such pest is apple leaf curling midge. This pest would require a large increase in insecticide usage for control if it were introduced into this district. We do not want, or would accept, the risk of any new imported pests in our district. We are currently locked out of some markets because of pests that we have in our district and do not want any more. Nothing less that a full fumigation protocol would be required to ensure that no new pest incursions are permitted from imported apples.

The Draft IRA is also unclear on inspection procedures for apples entering this country from New Zealand. We would like to know when these inspections will occur, how many and who bears the cost. Random inspections would not be acceptable to our industry as the risk to our industry from Fireblight and pests would be significant. Growers in our district would like more information and input into the protocols for the inspection procedures. We need to be assured that all steps have been taken to ensure that no risk to our industry will eventuate from the importation of New Zealand apples.

Another risk from the importation of New Zealand apples has been brought to our attention with the presence of European Canker in New Zealand orchards. This disease would be another blow to our struggling industry if it was to be imported along with New Zealand apples. We do not see enough safeguards in the Draft IRA protocols to convince us that European Canker would not enter this country. Apparently European Canker would represent a high risk if apples are imported from certain apple growing districts in New Zealand. We are aware that high rainfall and warm conditions are conducive to the spread of European Canker. We believe that inspections for this disease are not covered adequately in the draft IRA.

In closing I would like to reiterate the point that growers in our district would, in our opinion, face an unacceptable risk of pest and disease incursions if the importation of apples goes ahead from New Zealand under the draft IRA proposal.

There would need to be much tighter inspection protocols in place before importation of apples from New Zealand commences.

It would be ludicrous to import apples from New Zealand and risk the viability of this districts proud tradition of supplying high quality apples to the Australian public.

Greg Mouat Chairman Batlow Branch NSW Farmers