



ACN:067 524 369

PLUMMER ROAD, LENSWOOD, SOUTH AUSTRALIA 5240

Telephone: 61 (0)8 8389 8318 **Fax:** 61 (0)8 8389 8547 **Email:** robert@plummersbvo.com.au

To: Technical & Administration Services
Plant Biosecurity
GPO Box 858
CANBERRA ACT 2601
plantbiosec@daff.gov.au

I write this response to the revised draft import risk analysis report for apples from New Zealand on behalf of Plummers Border Valley Orchards Pty. Ltd.

Plummers Orchards is a family business established in 1900 with five generations of the Plummer family involved through the 106 years of operation. At Plummers we operate orchards on 150hcts primarily producing apples. In addition we operate cold storage and packing facilities. We are approved Woolworths suppliers and have been supplying Woolworths for 40 years. We operate as wholesalers and therefore source fruit from growers in Western Australia, Victoria and Tasmania when necessary.

In addition we have a share holding in Australian Farmlink Pty. Ltd., a company established to export Australian horticulture products. As exporters of apples we were involved in the set up of protocols and shipment of the first Australian Fuji apples to Taiwan and continued to export fruit to Taiwan until the free trade agreement forced unworkable restrictions on this market.

We have also exported Pink Lady apples in our own right as part of the coordinated Pink Lady Australia export programme to the United Kingdom. We continue to service a range of customers in South East Asia on a regular basis.

I write this brief summary of our operation to highlight the fact that the management and staff of Plummers Orchards do have an understanding of protocols and needs of different customers and countries of destination.

With this in mind I question the Revised Draft Import Risk Analysis actions in regard to: -

1. Orchard Management
2. Orchard Inspection
3. Packing Shed Practices
4. Supply Chain Practices

The IRA makes many references to the use of IPM practices used by New Zealand growers to control pest and diseases. We also have adopted the IPM principles of orchard management but they do not always solve unusual events and weather and pest conditions. Apple scab is a good example of IPM practice not necessarily being able to contain this disease in high pressure periods and seasons.

We have also found that the broad based use of mating disruption using pheromones, a practice that we adopted ten years ago and supported by IPM practice does not always have all the answers.

For the New Zealand industry to base all of its pest and disease management strategies and for Bio Security Australia to support this view is a dangerous position indeed.

The rate of inspection for both of the inspection options, option one, Inspection with treatment and option two Mandatory Treatment does not appear to meet the equivalent level of inspection required of Australian producers when exporting apples and pears to Taiwan, China and the U.S.A. If fruit is subjected to option two, Mandatory Treatment, the issue of pest incursion is reduced but the level of trash contamination is not adequately dealt with. Conversely with option one, Inspection with Treatment, the rate of inspection of 3000 units across the whole lot is a more satisfactory rate of inspection for the presence of trash but falls short on the possible detection of insect pests. I believe the only practical measures that Australia should insist upon is inspection at the rate of 2% of every individual registered block and orchard making up a lot of fruit and mandatory fumigation.

The risk management and draft operational framework also does not appear to adequately address the issue of inspection of pre packaged and specialty pack fruit. With the current trend of category managers sourcing and supplying fruit from large numbers of packing sheds and those sheds packing fruit into specialty packs including pre pack and trays of fruit completely covered with plastic wrap it is highly probable that packing sheds in New Zealand will be supplying such packages. How do the proposed inspection and treatment including fumigation deal with these issues?

The area of orchard inspection for the symptoms of Fire Blight and European Canker is of critical importance. The number of inspections



during the year, the vigilance and training of the inspectors and the ability of orchard inspectors to identify outbreaks of Fire Blight and European Canker within the orchards must be questioned. Together with a programme of removing infected limbs, fruit and leaves through pruning must leave doubt in everybody's mind about an orchard's freedom from these diseases.

The IRA does not appear to satisfactorily address the issue of disease affected trees in adjoining or neighbouring orchards. On a visit to orchards in the Okanogan Valley in British Columbia, Canada I observed Fire Blight in a pear tree one month from harvest, I was told by the fieldman who I was visiting the orchard with that all pome fruit trees within 100metres were at risk of infection. With this in mind I find it very concerning that there is no provision or demand for area freedom of the symptoms of Fire Blight in blocks of orchards adjoining registered export blocks.

This whole area of orchard inspection and frequency, the ability of inspectors to identify symptoms of Fire Blight and European Canker in trees which are in full leaf and standing three to four metres tall, the fact that orchardists are able to remove infected limbs, leaves and fruit from a registered block without informing the appropriate authority leaves me little confidence in the whole process and does not appear to meet the appropriate level of protection desired by the Australian Apple and Pear Industry.

The risk management and draft operational framework dealing with disinfection treatment in the packing house states that all apples for export to Australia must have been subjected to complete immersion in a water solution containing a minimum 100ppm available chlorine for a minimum of one minute. My observation of bin dumps and floatation tanks used to convey fruit to elevators is that not all fruit is immersed in water and in fact many apples float the entire distance of these tanks with 50% of the fruit being completely dry.

The reference in the Draft IRA to all fruit being trash free is in my opinion impossible to achieve. When fruit is being harvested most pickers attempt to harvest fruit cleanly with no leaves and buds attached but an inspection of any packing shed observing the leaf collectors on the water dumps, the area under the sorting tables and inspection of fruit in cartons after being packed will quickly show that trash free fruit is almost impossible to achieve.

This coupled with a low rate of after pack inspection by MAFNZ or their accredited agents is of little comfort to me as an Australian apple grower.

The issue of repacking and disposal of decaying fruit by Australian repackers is also of great concern. The numbers and types of skill and levels of quality assurance if any of the operation that may be involved in the importation, logistics and repacking are almost impossible to imagine. The result of this wide range of fruit handling expertise is that pest and disease incursion in this country is likely to not be identified early and as a result Australia will be invaded by a pest or disease it is currently free of.

Australian apple and pear growers have a right and demand that the relevant authorities who are charged with protecting our industry from pest and disease incursion use the most rigorous and effective methods available to protect our industries. Failure to do so will result in possible outbreaks of devastating diseases and pests.

The outbreak of the exotic bacterial disease, citrus canker in Emerald, Queensland, highlights the risks and the devastating effect on a region and the whole apple and pear industry of Australia will suffer the same consequences if Fireblight, another bacterial disease, and the numerous insect pests present in New Zealand and not in Australia were to gain access through less than effective quarantine protocols.

Yours Faithfully

John Plummer
Managing Director
Plummers Border Valley Orchards