



Apple & Pear Australia Ltd

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Response to the Biosecurity Australia
Issues paper for the import risk analysis for fresh
apple fruit from the People's Republic of China



September 2008

Introduction

The Australian apple and pear industry takes this opportunity to express to Biosecurity Australia its extreme disquiet over the proposal to import apples from China and particularly over the proposal that an initial IRA will be published in the short time forecast in the issues paper.

This document expresses in brief form a selection of the issues that the industry believes needs to be addressed by Biosecurity Australia in the course of a thorough import risk analysis.

This document does not include reference to all the issues that Australian apple and pear industry is likely to raise in the course of the IRA process. It is a response to the BA Issue Paper.

Access Request

The access request from China encompasses apples from the entire country. This is the first major concern. The current imports of pears are sourced from only four provinces and it may be appropriate to base an import protocol for apples on the pear protocols but only if the specific apple pests and diseases are examined separately and only for these specific places. The current IRAs are for Ya, Shandong and Fragrant pears from Hebei, Shandong and Shaanxi for Ya and Shandong pears and Xinjiang province for Fragrant pears. To date it seems that no pears have been exported to Australia from Shaanxi.

The map provided with the Issues Paper indicates the “main” apple growing areas, but if the request from China is for the entire country then every apple-growing region of China needs to be recorded and included in the IRA.

Further, Chinese provinces are, generally speaking, of similar area to a middle-sized European country. No one would sensibly suggest that a single protocol for importing any product could be put together for the “whole of Europe” so why would we do so for the whole of China?

Biosecurity Australia has already acknowledged that there are significant differences between provinces by specifying pear varieties and the provinces as individual combinations in previous IRAs. It should also be noted that the provinces from which pears are now permitted to enter Australia represent only about 28% of the entire area that is the subject of the Chinese request. The Australian apple and pear industry contends that extrapolating an apple IRA for the whole of China from a pear IRA for only four provinces is, at best, tenuous.

The Australian apple and pear industry suggests that;

- Every apple growing region in China must be surveyed and recorded for inclusion in the IRA
- Each different province that produces apples must be the subject of a separate IRA taking into account the variations in pest and disease occurrence and severity from one province to the next.

Fire Blight in China

The issues paper expends significant space on explaining why there should be confidence that fire blight does not exist in China. This may be the current official position but there is a high degree of scepticism in the Australian industry regarding this position.

In the Issues Paper section on fire blight, the references from international sources are all now more than 10 years old. This is clearly an issue when the situation regarding the importation of nursery trees is taken into account (see below). The AQSIQ report referred to in the second last paragraph of section 3.2 of the issues paper appears to be a letter from AQSIQ to BA. It is surely important for the details of this report to be published for analysis by stakeholders. If this is the paper by which the Chinese authorities claim full fire blight freedom, then it should be published in an appropriate international journal. Has it been? Finally, this paper refers only to three provinces of China whereas the issues paper lists nine provinces as being the main apple producing areas and the application for Chinese supply of apples to Australia is for the whole of the country. Please see the comments above regarding the range of the Chinese application.

Two recent visits to China by Australian industry people have provided opportunities for people with reasonable experience in the area to see tree symptoms that are highly suggestive of fire blight.

This debate is not confined to Australia but is acknowledged as an unofficial concern in other countries as well.

There have been three individual instances of Australian industry officials observing situations that give rise to grave doubts regarding the fire blight status of China. One of these observations was the subject of a detailed email sent to Biosecurity Australia in September 2007.

It is certainly not appropriate to dismiss the sighting of suspicious symptoms in China especially in the light of apparent unrestricted importation of trees from Italy and other European countries – acknowledged fire blight hosts.

Of particularly grave concern to the Australian apple and pear industry is China's apparent lack of measures to protect itself from fire blight. It appears that China imports large quantities of nursery stock without any requirement for it to be placed in quarantine. This is a well-known and open pathway for the spread of the disease. This practice also means that, even if it were well established that China is currently free of fire blight, that status could change at any time. The practice of tree imports was witnessed first hand by Darral Ashton and Jon Durham during a visit to Hebei province from 9th to 10th April 2006. During that visit both men saw a container of apple trees being unloaded. The container had arrived directly from a nursery in Italy and the contents had undergone no apparent quarantine treatment for fire blight or any other possible contaminant.

It is the strong contention of the Australian apple and pear industry that the situation regarding the major importation of nursery trees without quarantine requirements should not only be a significant issue to be investigated in the IRA for the importation of Chinese apples, but also flags a pressing need to re-assess the protocols for the importation of Chinese pears.

In June and July 2005, during a tour organised by the International Tree Fruits Association, Trevor Ranford, of South Australia, also saw symptoms strongly suggestive of fire blight.

The symptoms observed at the time were the subject of much discussion among the group, which included plant pathologists, researchers and growers from a number of countries including USA

and Canada, Australia, Mexico, Chile and France. Many of those in the group have long experience in dealing with the disease. Reference names can be supplied on request.

Electronic files of all photographs can be supplied on request



The Australian apple and pear industry considers that fire blight must be included in the pest risk analysis for China. It is not good enough to rely on previous PRA work carried out in regard to Chinese pears because pears are a different genus, there is an obvious difference in symptom development between apples and pears and the production techniques are different.

All of the above leads the Australian apple and pear industry to request in the strongest possible terms, that fire blight be included on the pest list for all Chinese provinces.

Other Pests and Diseases

APAL is of the opinion that comment on the pest and disease list is best left until the IRA is published at which time specialist personnel will be recruited to examine the list of pests and to analyse the material put forward by Biosecurity Australia. Any discussion regarding risks and risk mitigation can be undertaken at that time.

Notwithstanding the above, there are some issues that the Australian apple and pear industry would like to highlight for particular attention.

There are two pests in the published list for China that are present on the apple and pear industry's Industry Biosecurity Plan as being among the most undesirable. They are *Bactrocera dorsalis* (oriental fruit fly) and *Lymantria dispar* (asian gypsy moth). The Australian apple and pear industry will be looking very closely at the IRA's detailed analysis and conclusions regarding these two particular pests.

Another item of particular concern is Cedar Apple Rust that occurs in the USA pest list and for which there has been some specific information published. In China there is a rust problem of the same genus (*Gymnosporangium*) and so it would seem that this particular organism requires very close scrutiny.

Finally, there has been recent publicity regarding the spread of the citrus longhorn beetle from China to Europe. This pest has been transported on imported ornamental trees coming from China. Although this particular pest is unlikely to be an issue with apple imports, the situation in Europe points to the ease with which a destructive (also large and, one would have thought, easy to spot on inspection) pest can move from one country to another and also points up issues with export phytosanitary controls in China.

Conclusion

The Australian apple and pear industry holds grave concerns over the importation of Chinese apples and urges Biosecurity Australia to make a most detailed and in-depth exploration of all the issues surrounding this application especially those highlighted in this paper. This major new source of imported apples deserves to be treated as a whole piece of investigation in its own right. The Australian apple and pear industry would be most disappointed if the IRA for Chinese apples appears to be a re-working of the IRA for Chinese pears.