Thursday 4th September 2008

Plant Biosecurity
Biosecurity Australia
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Comment on Issue Paper on Apple Imports from China

Please find below my comments on the July 2008 Issues paper for the import risk analysis for fresh apple fruit from the People's Republic of China, issued by Biosecurity Australia.

The Fire Blight status of China

The Issues paper makes the following comments;

1. "*China maintains that fire blight is not present in the country and it is a quarantine pest for China.*" and "*Early in 2008, AQSIQ provided BA with a report of a biannual, three-year orchard survey (2005-2007) and laboratory testing for fire blight in apple and pear production areas of Shaanxi, Hebei and Shandong. The surveys and testing concluded that no fire blight has been found.*"

Only three provinces, out of the nine nominated as apple production areas were surveyed. This is not a complete survey of the areas from which apples may be sourced for export to Australia. All the areas from which apples are to be sourced should be surveyed.

Did the laboratory testing include the tests developed by Spanish researchers that look at viable but nonculturable (VBNC) states of fire blight? VBNC states of many gram negative bacteria are well documented. *Erwinia amylovora* is a gram negative bacteria that has only relatively recently been shown to exhibit VBNC characteristics. Testing in China should include the most up to date tests available.

If fire blight is a quarantine pest for China than concern should be raised that apple and pear budwood and nursery stock are reportedly sourced by Chinese growers from European countries where fire blight is endemic. The importation of nursery trees from New Zealand to Australia was stopped in the 1920's when fire blight was established in New Zealand. Fire blight is readily spread by budwood and importations of budwood into Australia are screened during plant quarantine periods of up to several years. Importation of nursery stock from Europe to China sets up a pathway for fire blight infection to China but may also be indicative of a lower level of PQ importance in China than in Australia. If a low level of importance is applied to importations it may also be applied to exports.

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2. *"Australian plant pathologists visited the pear production areas in 1997 and 1998 and found no evidence that fire blight was present in the provinces."* and *"An Australian plant pathologist visited additional pear production areas in Xinjiang and Shaanzi in 2005"*

Pear production districts do not include all the provinces that produce and will potentially export apples to Australia. These inspections may form a base of assessing the pest and disease status of Chinese production areas but pest freedom from one area should not be automatically extended to another area. Particularly because China is such a large country and covers so many climatic zones. There are many examples of differential pest status within states of Australia, with subsequent state based restrictions on movement of plant materials. This standard should be extended to any importing country.

3. *"Biosecurity Australia will review available information to confirm that China remains free of fire blight."*

Information available from China has already indicated that China is free of fire blight. For Australia to achieve its desired very low level of acceptable risk the available information should be sought from all sources, including experienced apple growers who have observed fire blight like symptoms in China.

Apple production in China

4. "In China, bagging of fruits is a routine practice for the production of export quality apple fruit, to provide protection from pests and diseases."

The routine bagging of apples occurs when fruit are small and after flowering which is the most infectious period of the production cycle. If fruit are to be infected with fire blight during the flowering stage then the bagging process will not prevent this. In fact the increased humidity within these bags may cause the bacteria to survive at higher levels. Bags are removed for "*two to four weeks prior to harvest*" which would enable ready spread of the bacteria to fruit surfaces by rain splash, or into calyx cavities by insects.

The low level of use of insecticides in China may be a concern for pest incursions. Apples have a calyx cavity that can serve as a hidden host for many insects. Such cavities are not as common in pear varieties, so the existing arrangements for pear imports may not apply to apples.

5. "China exports fresh fruit to 74 countries, but 10 countries accounted for 74% of all exports."

The countries listed either don't have an apple industry or if they do, they already have fire blight. Australia may be the first country that China wishes to export apple to that has a concern regarding fire blight. This should place a higher level of importance on China to demonstrate that fire blight does not exist in all the regions that grow apples and are being considered for sourcing export apples to Australia from.

Failure of New Zealand and Chinese export inspections

Attached is an article from the Nelson Mail newspaper. It reports on the failure of the export inspection arrangements for apples exported from New Zealand to China. Blame is attributed to growers, packing sheds and the New Zealand MAF Biosecurity. Some blame should also be extended to the Chinese authorities for approving a system with inspection design flaws or allowing supervisory flaws to occur. Note that the pest in question (woolly apple aphid) is not small, but 3 to 4 mm in length, and that "hundreds' were detected, many in a live state.

I have concerns that if an export inspection system approved by China and conducted by a developed and experienced exporting country like new Zealand can have such serious breaches then the level of protection expected and practiced by China may fall short of what Australia expects. At the very least it means that any IRA must be of the highest level and that information from China may need to be verified with a high level of scrutiny.

Thank you for this opportunity to comment. I may be contacted on (07) 4681 2931 or 0407762 888 if anything requires clarification.

Yours sincerely,

Stephen Tancred CPAg

Aphids in fruit put trade in jeopardy

By LAURA BASHAM - Nelson | Saturday, 09 August 2008

New Zealand exports to China have potentially been put at risk following a biosecurity failure.

MAF Biosecurity has suspended four exporters after woolly apple aphids were found in Hawke's Bay fruit sent to China. The breakdown in New Zealand's biosecurity system has much wider implications because other export markets could question its credibility.

The botch-up, which happened two months ago, was revealed at an exporters' session at Pipfruit New Zealand's annual conference in Nelson on Thursday.

MAF Biosecurity deputy director-general Barry O'Neil said the issue had caused serious concern. Chinese authorities had discovered hundreds of the aphids in several containers.

"We're not talking about one or two aphids," he said. While the aphids appeared to be dead, when they were put under heat some were apparently still alive, he said.

The consignments were treated with methyl bromide and allowed to remain in the market but Chinese authorities sent a warning to New Zealand.

MAF Biosecurity is carrying out a review into what went wrong. The problem had brought into question the credibility of New Zealand's phytosanitary certification, Mr O'Neil said.

"We have to have certification that is true." If there was a breakdown, it could affect not only apple exports but all New Zealand's horticultural exports, and even all exports, he said. "So we are very concerned."

The reason New Zealand could access 150 export markets was because of confidence in its phytosanitary certification, Mr O'Neil said. If there was a failure in one part, importing countries started to question what was going on in New Zealand.

Mr O'Neil said growers were supposed to supply fruit that was as pest-free as possible to packhouses, the packhouses had to inspect the fruit to ensure there were no pests that were prohibited in importing countries, and independent verification agencies had to make sure the inspections were carried out accurately. He believed there were errors on all three of those levels.

MAF Biosecurity also took some responsibility because it set up the system and signed the certification, he said. It wanted to work with the industry to ensure the issue was addressed.

"We are going to be harder where there are serious deficiencies identified in the packhouse. I expect if it happens again, there will be greater suspensions. "It's something we do not want to do but we have to retain the credibility of our phytosanitary system."

The Chinese authorities would be looking a lot harder at New Zealand exports, Mr O'Neil said. He would not name the exporters whose approval to process and export fruit has been withdrawn.

Pipfruit NZ chief executive Peter Beaven said there had been investigations, and its board had discussed the issue this week. He said the industry took the issue seriously and would work closely with MAF Biosecurity. Chinese officials would visit later this year, he said.

The scare comes as the pipfruit industry is increasing its exports to China, which have grown from 1 percent to nearly 4 percent of total exports in four years and are worth $19 million. "It is quite a concern that we have put that market at risk," Mr Beaven said.

The conference also had a technical session on controlling woolly apple aphid, which can damage trees and infest fruit.