Submission on the Draft Import Risk Analysis Report for Fresh Stone Fruit from California, Idaho, Oregon and Washington

April 2008

Prepared by: The Western Australian Fruit Growers’ Association

For: Plant Biosecurity
Biosecurity Australia
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Date: 27th June 2008
### Use of this Submission

The Western Australian Fruit Growers' Association requests that this submission not be distributed wider than is necessary to be fully considered in the inquiry process.

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1.0 Summary

The Western Australian Fruit Growers’ Association (WAFGA) is the peak pome, citrus and stone fruit industry representative body in Western Australia, representing more than 600 commercial fruit growers across the state.

In this submission WAFGA has continued its focus on the pest risks for Western Australia. While we have concerns with the risk to the national industry, we are aware that Summerfruit Australia Ltd, is preparing a whole of industry response and as such feel that it is appropriate that our submission only addresses the concerns of the Western Australian industry.

The Draft Import Risk Analysis Report for Fresh Stone Fruit from California, Idaho, Oregon and Washington lists ten pests of concern to Western Australia however makes assessment on only four, with the remaining six having previously been assessed in the Final Report: Pest Risk Analysis for Stone Fruit from New Zealand into Western Australia.

This combined approach finds that two pests for Western Australia, citrophilus mealybug and oriental fruit moth have an unrestricted annual risk above Australia’s appropriate level of sanitary or phytosanitary protection, and makes a risk management recommendations on them.

In this submission, WAFGA reviews the analysis and recommendations for these two pests and also requests further consideration with regard to codling moth, as this is a declared species in Western Australia under the Agriculture and Related Resources Protection Act (1976), and WAFGA has concerns that the current protocols expose the Western Australian industry to unnecessary risk and consequence.

WAFGA believes that Biosecurity Australia’s assessment drastically understates the likely economic and social impact of these three pests for the Western Australian industry, and makes these comments/recommendations:

1. WAFGA believes that Biosecurity Australia’s approach in adopting the existing policy is flawed in that it fails to recognise the significant differences in potential volumes of trade which exist between New Zealand and California, Idaho, Oregon and Washington. Stone fruit production in California, Idaho, Oregon and Washington vastly exceeds that from New Zealand, and the Northern Hemisphere producers have counter seasonal opportunities that New Zealand does not. Biosecurity Australia states that ‘One factor affecting the likelihood of entry is the volume and duration of trade. If all other conditions remain the same, the overall likelihood of entry will increase as time passes and the overall volume of trade increases’. Despite this, in adopting existing policy, Biosecurity Australia makes no assessment on the prevalence of pests in the production areas of the USA, or the volume of fruit likely to be moved under these protocols. WAFGA cannot accept that previous analysis of New Zealand is applicable or acceptable in this instance.

Recommendation:

That the Final Report – Pest Risk Analysis is not released until Biosecurity Australia make a detailed assessment of the prevalence of pests of concern to Western Australia in the relevant production areas of the USA, and also of the likely trade under the proposed protocols, and that these be consider in an analysis which considers more than a single year of trade.

2. WAFGA believes that Biosecurity Australia has significantly underestimated the consequences of the importation (as opposed to the consequences of entry, establishment
and spread) of codling moth, citrophilus mealybug and oriental fruit moth into Western Australia. WAFGA believes that the current assessment does not take into account the impact that will be borne by the Western Australia industry should even a single codling moth be found in Western Australia. Similarly, whilst they are not declared pests, Western Australia is free of both citrophilus mealybug and oriental fruit moth. The Consequence (direct and indirect) rating of Moderate (codling moth and oriental fruit moth) and Low (citrophilus mealybug) underrates the impact, cost and effect that the importation of these pests will have on the quarantine status of the Western Australian industry. Indeed, WAFGA has concerns that in this analysis Biosecurity Australia has not incorporated its own, most recent analysis of the impact of codling moth in Western Australia.

Recommendation:

That the Final Report – Pest Risk Analysis is not released until Biosecurity Australia consider its most recent analysis of the impact of codling moth to Western Australia and consults with WAFGA to conduct a realistic assessment of the consequences of the pest.

3. Biosecurity Australia recognises the differential in pest status which exists in Western Australia and Australia’s eastern states. WAFGA therefore requires that any protocol approved for the importation of stone fruit from California, Idaho, Oregon and Washington into Western Australia are at least as stringent as those which exist for fruit movement into Western Australia under existing protocols from Australia’s Eastern states.

Recommendation:

That the Final Report – Pest Risk Analysis is not released until Biosecurity Australia ensures that risk management processes for all stone fruit that is destined for Western Australia from California, Idaho, Oregon and Washington, irrespective of its point of entry, must be under protocols that are at least equivalent to those in place for the movement of fruit from Australia’s eastern states.

4. Biosecurity Australia highlights the importance of the SummerGreen™ Program in New Zealand as a management system, however makes no comment on a similar program in California, Idaho, Oregon and Washington.

Recommendation:

That the Final Report – Pest Risk Analysis is not released until Biosecurity Australia, benchmarks production practices in California, Idaho, Oregon and Washington against the SummerGreen™ Program.
2.0 The Western Australian Fruit Growers’ Association

The Western Australian Fruit Growers’ Association (WAFGA) is the peak pome, citrus and stone fruit industry representative body in Western Australia, with a membership of more than 600 commercial fruit growers. WAFGA conducts agri-political representation, research and development, communication and promotional activities with the primary objective of ensuring both a profitable and sustainable industry for all Western Australian fruit growers.

In 2004/05 WAFGA members produced 76,950 tonnes of fruit, with a total gross value of production exceeding $90 million. The Western Australian Department of Agriculture and Food has estimated that expected production increases over the next five years will see this gross value increase by another 20%. The vast majority of this produce is sold as fresh fruit, with some processing occurring for pome and citrus fruit. WAFGA members are situated from Kununurra to Albany and therefore are a vital part of the State’s current and future rural and regional economy.

3.0 Background

In this submission, WAFGA focuses on the pest risk assessments that are listed for Western Australia. This is not to say that WAFGA has no concern in the wider analysis for the whole of Australia however we are aware that Summerfruit Ltd. is preparing an industry response to pest risk assessments of national concern, and we feel that it is unnecessary to duplicate their position in this submission. WAFGA would however like to register its support for Summerfruit Australia Ltd. and its comments on the pest risk assessments for Australia’s Eastern States.

The Draft Import Risk Analysis Report for Fresh Stone Fruit from California, Idaho, Oregon and Washington (April 2008) (in this submission will be referred to as ‘the current IRA’) lists ten pests of concern to Western Australia (Table 1) however makes assessment on only four, with the remaining having previously been assessed in the Final Report: Pest Risk Analysis for Stone Fruit from New Zealand into Western Australia (Biosecurity Australia, 2006).

### Pest risk assessments for Western Australia

<table>
<thead>
<tr>
<th>Common Name of Pest</th>
<th>Annual probability of entry, establishment and spread</th>
<th>Consequences</th>
<th>Unrestricted annual risk</th>
<th>Assessed for management measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potato Bug</td>
<td>Low</td>
<td>Low</td>
<td>Very Low</td>
<td>No</td>
</tr>
<tr>
<td>Oystershell scale</td>
<td>Very low</td>
<td>Low</td>
<td>Negligible</td>
<td>No</td>
</tr>
<tr>
<td>Olive parlatoria scale</td>
<td>Very low</td>
<td>Low</td>
<td>Negligible</td>
<td>No</td>
</tr>
<tr>
<td>Peach white scale</td>
<td>Very low</td>
<td>Low</td>
<td>Negligible</td>
<td>No</td>
</tr>
<tr>
<td>Citrophilus mealybug</td>
<td>Moderate</td>
<td>Low</td>
<td>Low</td>
<td>Yes</td>
</tr>
<tr>
<td>Codling Moth</td>
<td>Extremely Low</td>
<td>Moderate</td>
<td>Negligible</td>
<td>No</td>
</tr>
<tr>
<td>Oriental Fruit Moth</td>
<td>Low</td>
<td>Moderate</td>
<td>Low</td>
<td>Yes</td>
</tr>
<tr>
<td>Cercospora leaf spot</td>
<td>Extremely Low</td>
<td>Low</td>
<td>Negligible</td>
<td>No</td>
</tr>
<tr>
<td>Cherry powdery mildew</td>
<td>Very Low</td>
<td>Low</td>
<td>Negligible</td>
<td>No</td>
</tr>
<tr>
<td>Plum pockets</td>
<td>Extremely Low</td>
<td>Low</td>
<td>Negligible</td>
<td>No</td>
</tr>
</tbody>
</table>

Table 1. Data from the current IRA and Biosecurity Australia 2006

In this submission WAFGA reviews Biosecurity Australia’s recommendations for citrophilus mealybug and oriental fruit moth, as they have been assessed as having an unrestricted annual risk as being above Australia’s appropriate level of sanitary or phytosanitary protection, and
also makes comment on codling moth, as this is as this is a declared species in Western
Australia under the Agriculture and Related Resources Protection Act (1976).

4.0 Submission on the current IRA

4.1 Australia’s appropriate level of protection

Biosecurity Australia state that ‘successive Australian Governments have maintained a
conservative, but not a zero-risk, approach to the management of biosecurity risks. This
approach is expressed in terms of Australia’s appropriate level of sanitary or phytosanitary
protection (ALOP), which reflects community expectations through government policy and is
currently described as providing a high level of protection aimed at reducing risk to a very
low level, but not to zero’ (the current IRA, page 11).

On previous occasions, WAFGA has commented that this ‘very low level’, expressed in
descriptive definition as ‘the event would be very unlikely to occur’ (the current IRA, page
16), but perhaps more accurately as an ‘indicative probability range of between 0.001 < P ≤
0.05’ (the current IRA, page 16) exposes the Western Australian industry to unnecessary
risks.

Through previous analysis ‘Biosecurity Australia has considered the importation of stone
fruit from New Zealand as an extension of existing policy. This existing policy includes policy
for the importation into Western Australia of cherry fruit from South Australia (completed in
September 2001), from New Zealand (completed in January 2003) and from Tasmania
(completed in January 2003) and subsequently apricot fruit from South Australia and
Tasmania (completed in October 2004)” (Biosecurity Australia, 2006).’

On this basis, Biosecurity Australia in the current IRA adopts the existing policy stating that
‘this assessment determined that for most pests that might be imported with stone fruit,
similar risks had already been assessed in existing pest risk assessments and that existing
quarantine conditions would address the risks’ (the current IRA, page 12). WAFGA has
concerns with this approach however as it does not take into account the relative sizes of the
two industries, their likely capacity for export or the pest pressure and orchard management
between the two countries.

The current IRA makes no estimate of the volume of stone fruit that could be exported under
these protocols, should they be approved. WAFGA believes that there will be significantly
more importation of stone fruit from California, Idaho, Oregon and Washington than the level
currently supplied by New Zealand, due to the combined factors of their; larger volume of
production (Table 2), strong record of being an export-oriented industry and a clear counter
seasonal supply opportunity. WAFGA maintains that this would represent a level of risk that
is above the notion of a very low level, to a State that is currently free of these pests.

New Zealand is currently a domestic focussed stone fruit producer that, in the past three
years, has exported a total of 2181 tonnes of stone fruit to Australia (data adapted from
www.summerfruitnz.co.nz). Of this, 2171 tonnes have been apricots, with exports of
nectarines and peaches totalling 10 tonnes, all of this trade occurring in 2006/07. This
compares with the USA, which in 2004 exported an approximate total of 5000 tonnes of
apricots, and about 150 000 tonnes of peaches and nectarines (figures calculated from
information presented in Pollack, S and Perez A. (2007), Boriss H and Brunke H (2006a) and
Boriss H and Brunke H (2006b)).
Comparison of apricot, peaches and nectarine production (tonnes*) from the USA, New Zealand and Western Australia

<table>
<thead>
<tr>
<th>Year</th>
<th>USA</th>
<th>New Zealand</th>
<th>Western Australia</th>
</tr>
</thead>
<tbody>
<tr>
<td>2004</td>
<td>1677 000</td>
<td>NA</td>
<td>6458</td>
</tr>
<tr>
<td>2005</td>
<td>1518 000</td>
<td>12280</td>
<td>7261</td>
</tr>
<tr>
<td>2006</td>
<td>1287 000</td>
<td>10025</td>
<td>3293</td>
</tr>
<tr>
<td>2007</td>
<td>NA</td>
<td>11914</td>
<td>NA</td>
</tr>
</tbody>
</table>

Table 2: Data adapted from information in Pollack, S and Perez A. (2007), Boriss H and Brunke H (2006a) and Boriss H and Brunke H (2006b), [www.summerfruitnz.co.nz](http://www.summerfruitnz.co.nz) and [www.apcwa.org.au](http://www.apcwa.org.au) *USA figures are in ‘short tonnes’ – a unit measure equal to 2000 pounds.

WAFGA believes that Biosecurity Australia’s decision to use existing analysis does not address the increased risk faced by the Western Australian industry. WAFGA believes that the likelihood of incursion increases with an increase in the volume of supply. Biosecurity Australia itself supports this position, when they state ‘One factor affecting the likelihood of entry is the volume and duration of trade. If all other conditions remain the same, the overall likelihood of entry will increase as time passes and the overall volume of trade increases’ (the current IRA, page 17).

On the basis that we have seen no estimation of the likely volume of trade, and with Biosecurity Australia’s admission of an increase in risk with time and volume, WAFGA rejects Biosecurity Australia’s methodology in considering ‘the likelihood of entry on the basis of the estimated volume of one year’s trade’ (the current IRA, page 17).

4.2 Assessment of the Consequences

WAFGA believes that the current IRA seriously understates the impact of the entry of many pests into Western Australia. In the current analysis, WAFGA sees that Biosecurity Australia has erred in two key areas, the probability of importation and their consequences.

Biosecurity Australia (2006) identifies that the probability of establishment and the probability of spread in Western Australia are high for citrophilus mealybug, oriental fruit moth and codling moth. WAFGA therefore considers that it would be reasonable, given the state’s unique pest-free status and the likely full cost burden to its growers, to consider the effects of these pests as being similar at a regional, district and local level, and as such their consequence rating should be higher that their current assessment.

4.2.1 Codling Moth

WAFGA notes with strong concern the variation in assessment of the ‘Probability of Importation’ for codling moth between the Draft Report: Extension of Existing Policy for Stone Fruit from New Zealand into Western Australia (Biosecurity Australia, 2005) and Biosecurity Australia 2006 from ‘Very Low’ in the 2005 draft to ‘Extremely Low’ in the 2006 final report. We can find only one new piece of information presented in the final report, being one sentence from a reference considered in the draft report, ‘Codling moth is considered to occur only very rarely on stone fruit’. WAFGA considers that the inclusion of this existing information does not appear to be significant enough to justify this change in assessment, as in a qualitative sense, it is a thousand fold reduction in probability (from 0.001 < P ≤ 0.05 to 0.000001 < P ≤ 0.001).
Codling moth is a declared species in WA (Agriculture and Related Resources Protection Act, 1976), and WAFGA views the economic consequences of even a single codling moth being found in Western Australia as "highly significant" at a regional level. An incursion into Western Australia of codling moth would result in the industry having to meet the full costs associated with eradication, surveillance and regaining area freedom. This is in contrast to pests of national concern which are addressed through the Plant Health Australia agreement where the federal and state governments along with growers act in a pre-arranged funding arrangement.

4.2.2 Citrophilus mealybug and oriental fruit moth

Whilst not declared species, the importation of citrophilus mealybug and oriental fruit moth will also result in significant consequences for the Western Australian fruit industry. Oriental fruit moth is a pest which has "already cost the WA Government and the fruit growing industry several million dollars to eradicate three outbreaks" (Biosecurity Australia 2005 [1]).

In a previous assessment of citrophilus mealybug, Biosecurity Australia, noted that "programs to minimise the impact of these pests on host plants may be costly and may include additional pesticide applications including crop monitoring" with "the possible need to re-introduce or increase the use of organophosphate insecticides" (Biosecurity Australia 2005 [2]). WAFGA believes that the potential increase in the use of organophosphate pesticides should increase the assessed consequences of the spread of mealybug, and also notes that these pesticides are likely to be removed from use in the medium term, leaving growers exposed to limited control options, again impacting of the rating of consequence.

Whilst these pests are managed in other parts of Australia, WAFGA does not believe that the Western Australian industry should be asked to accept them to accommodate Biosecurity Australia's approach of a conservative, but not zero-risk, mandate.

4.2.3 Alternate assessment of consequences

WAFGA has made a comparison of the Assessment of Consequences listed in Biosecurity Australia 2006 [1] and Biosecurity Australia 2006 [2]. It is important to recall that this is an analysis of effect, and as such the difference in the pest host status of apple/stone fruit is not applicable, as the pest is deemed to be present.

Despite these documents being released within four months of each other, with the apple IRA being the later, Biosecurity Australia has inconsistencies between their assessment. The degree of difference is highlighted in a comparison (Table 3) of the assessment of 'Indirect consequences on eradication and control' for codling moth. Given the assessment in Biosecurity Australia 2006 [1] is the basis for the current IRA, WAFGA believes that Biosecurity Australia has erred by not using the most recent analysis of this pest.

As such, the risk of codling moth in the current IRA seems to have been understated. Our assessment is that the consequences have been underestimated by Biosecurity Australia and should be of the highest level of significance for the regional/district and local level. Apparently, that codling moth is assessed to have little or no impact on the assessment factors "any other aspects of the environment" or the "environment" itself dilutes its overall consequences to Biosecurity Australia, but not to the industry which will be required to pay the costs of any future incursion.
**Comparison of ‘Indirect Impact’ for codling moth between the Stone Fruit and Apple Import Risk Analysis completed in 2006**

<table>
<thead>
<tr>
<th>Stone Fruit - Biosecurity Australia 2006 (1)</th>
<th>Apple - Biosecurity Australia 2006 (2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Additional programs to minimise the impact of this pest on host plants may be necessary in Western Australia.</td>
<td>The indirect impact on new or modified eradication, control, surveillance/monitoring and compensation strategies are significant at the regional level and highly significant at the district level. A rating of ‘E’ was assigned to this criterion.</td>
</tr>
<tr>
<td>Monitoring/surveillance will result in extra costs to control or eradicate codling moth.</td>
<td>If codling moth enters Western Australia again, the eradication program will be very expensive.</td>
</tr>
<tr>
<td>These costs would likely be borne primarily by pome fruit growers whose crops likely to be most severely affected by this pest.</td>
<td>It has already cost the Western Australia Government and fruit growing industry several million dollars to eradicate three outbreaks since 1993, including a two-year eradication campaign to control an incursion at Dwellingup.</td>
</tr>
<tr>
<td>It has already cost the WA Government and fruit growing industry several million dollars to eradicate three outbreaks since 1993; including a two-year eradication campaign to control an incursion at Dwellingup.</td>
<td>Insecticide usage within the Western Australian pome fruit industry would increase should codling moth become established and continue until such time as alternative control measures, such as pheromone disruption techniques, become established.</td>
</tr>
<tr>
<td>The economic consequences, as a result of eradication, control and management restructuring, would be significant to Western Australia.</td>
<td>The economic consequences, as a result of eradication, control and management restructuring, would be significant to Western Australia.</td>
</tr>
</tbody>
</table>

Table 3: Data taken from Biosecurity Australia 2006 (1) and Biosecurity Australia 2006 (2)

WAFGA has compared its assessment for codling moth with previous assessment (Table 4) and believes that our assessment is more realistic, as it does not average down the highly significant effect to the local industry. Whilst existing policy, WAFGA believes that the assessment of Biosecurity Australia 2006(1) should be reviewed as part of the review of the current IRA. When that occurs WAFGA requests that it is consulted to allow realistic assessment of the consequences of the pest.

4.3 Pest Risk Management

Cherry, apricot, peach and nectarines can be imported into WA from locations within Australia’s Eastern States, and from New Zealand under pre and post harvest protocols.

In a previous submission (dated 22nd September 2005, to the Draft Report: Extension of Existing Policy for Stone Fruit from New Zealand into Western Australia) WAFGA noted the difference between protocols for fruit from Australia’s eastern states, and those proposed from New Zealand. Our submission stated:


<table>
<thead>
<tr>
<th>Assessment</th>
<th>Annual probability of entry, establishment and spread</th>
<th>Consequences</th>
<th>Unrestricted annual risk</th>
<th>Assessed for management measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Biosecurity Australia, 2005&lt;sup&gt;1&lt;/sup&gt;</td>
<td>Very Low</td>
<td>Moderate</td>
<td>Very Low</td>
<td>No</td>
</tr>
<tr>
<td>Biosecurity Australia 2006&lt;sup&gt;2&lt;/sup&gt;</td>
<td>Extremely Low</td>
<td>Moderate</td>
<td>Negligible</td>
<td>No</td>
</tr>
<tr>
<td>WAFGA’s calculation</td>
<td>Very Low</td>
<td>High</td>
<td>Low</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Table 4: Comparison of risk estimation matrix. In WAFGA’s assessment we have assumed that the overall consequence in Biosecurity Australia 2005<sup>1</sup> should be ‘High’ (Where the impact score of a pest with respect to a single criterion is ‘E’ and the impact scores of a pest with respect to the remaining criteria are not unanimously ‘D’, the overall consequences are considered to be ‘high’).

"WAFGA does not support the phytosanitary measures proposed for Oriental Fruit Moth. The fact that fruit could be shipped to Western Australia from orchards with a known low level of infestation of Oriental Fruit Moth and Codling Moth (infestations can occur when in proximity to apple orchards, page 169) without any requirement for fumigation, or at the very least inspection by variety and by each export orchard involved in each consignment, is too great a risk for our industry to take.

The fact that the fruit will be coming from areas of low pest prevalence will reduce the likelihood that infected fruit will be picked up during on arrival inspections. Our concerns would be greatly alleviated if measures were put in place to ensure all fruit coming from areas known to be infected with OFM is fumigated prior to shipment.

We realise that due to protocols already in place mandatory fumigation may not be an option nevertheless we believe BA should attempt to implement protocols that mirror those already put in place by the WA Department of Agriculture for the importation of South Australian apricots into Western Australia. These protocols require inspections by variety and by individual orchards involved in exporting apricots.

WAFGA continues to be confused over BA’s insistence that the protocols proposed by BA are the same as those currently in place for the importation of South Australian and Tasmanian apricots in WA.

Recent correspondence from the WA Department of Agriculture’s Director of Plant Biosecurity confirms that this is clearly not the case. The major difference being that on arrival inspections are required by individual grower and by variety, and not by consignment. These protocols were in place last season and we must therefore ask the question again, why does Biosecurity Australia insist that the protocols are identical when clearly they are not?

Indeed it would appear that the WA Department of Agriculture is recommending that the protocols for the entry of fresh apricot fruit be further tightened with a requirement for 10% of all samples taken to be cut and inspected. We understand that these changes have been made to address detections of Oriental Fruit Moth found in apricots imported from South Australia and Tasmania and that the changes are based on a quantitative model used by the WA Department of Agriculture.

WAFGA encourages BA to take up the suggested protocols put forward by the WA Department of Agriculture as they have learnt from real life experience that OFM can and
does travel with imported fruit. WAFGA supports the work done by the WA Department of Agriculture to ensure that our industry has an appropriate level of protection based on a quantitative model.

WAFGA acknowledges that the current IRA proposes risk management processes but believes that all stone fruit that is destined for WA must be at the strictest level of these procedures, rather than to a level suited for areas of Australia which currently have citrophilus mealybug, oriental fruit moth and codling moth. Therefore, as we did in our 2005 submission, we request that any risk management procedures that are introduced for imported fruit destined for Western Australia, irrespective of its point of entry, are at least equivalent to those in place for the movement of fruit from Australia’s eastern states.

Finally WAFGA notes that Biosecurity Australia 2006 \(^{(1)}\) highlights the importance of the SummerGreen™ Program in New Zealand as a management system which includes (a) appropriate field sanitation programs, and (b) cultural and chemical control programs. Unfortunately this program is a closely guarded secret therefore it is not possible for WAFGA to benchmark it against production practices in California, Idaho, Oregon and Washington. WAFGA believes that this should occur, and that it would be remiss of Biosecurity Australia not to do so, given its importance in the pre-export protocols.
5.0 References

Agricultural Produce Commission www.apcwa.org.au


Summerfruit New Zealand www.summerfruitnz.co.nz