



New South Wales

DEPARTMENT OF PRIMARY INDUSTRIES

→ Ms Van Meekers

DGO08/697

Dr Colin Grant *29/9*
Chief Executive
Biosecurity Australia
GPO Box 858
CANBERRA ACT 2601

25 SEP 2008

Dear Dr Grant

I refer to the release by Biosecurity Australia (BA) in July 2008 of the Draft Import Risk Analysis (IRA) report for fresh Unshu mandarin fruit from Japan, for which stakeholder comment was requested.

NSW Department of Primary Industries submission is attached to this letter.

Comments by NSW Department of Primary Industries in the context of recent draft IRA submissions continue to be pertinent to this proposal. Further detail is provided in our submission.

Thank you for the opportunity to comment on this draft report.

Yours sincerely

D F HOCKING
ACTING DIRECTOR-GENERAL

Enclosure:



NSW DEPARTMENT OF
PRIMARY INDUSTRIES

Comments on the draft Import Risk Analysis report: Fresh Unshu Mandarin fruit from Japan

September 2008

Submission to Biosecurity Australia

by NSW Department of Primary Industries

Title: Comments on the draft Import Risk Analysis report for fresh Unshu mandarin fruit from Japan

Submission to Biosecurity Australia by NSW Department of Primary Industries.

Disclaimer:

The information contained in this publication is based on knowledge and understanding at the time of writing (September 2008). However, because of advances in knowledge, users are reminded of the need to ensure that information on which they rely is up to date and to check the currency of the information with the appropriate officer of New South Wales Department of Primary Industries or the user's independent advisor.

File reference: TRIM 2008/06090 DGO08/697

CONTENTS

Process

Pathogens

Arthropods

Operational procedures

A. Process

Two aspects highlighted in the draft IRA are that the quantity of fresh Japanese unshu mandarin fruit proposed for the Australian market is small and that existing trade arrangements operate between Japan and the United States of America (USA) and Japan and New Zealand (NZ).

The designated export areas in Shizuoka Prefecture, Japan, are four small blocks totalling 25 hectares. Total production for the 2006/07 season was projected to be about 600 tonnes. In contrast, citrus fruits are grown commercially in all Australian states except Tasmania. Citrus production is one of the largest horticultural industries in Australia. On average about 95,000 tonnes of mandarins are produced annually.

Unshu mandarins from the designated export areas in Shizuoka Prefecture, Japan, are currently supplied to markets in USA and NZ. The IRA notes that the export area does not have any phytosanitary conditions imposed by other countries. The implication seems to be that Australia should align with these existing arrangements in other countries.

The IRA does not offer any explanations why export processes are being pursued for such a small production area for a relatively standard product. NSW Department of Primary Industries is concerned that it may be a means of obtaining more widespread market access through using extensions to existing policy rather than independently assessing geographically diverse production areas.

A piece-by-piece extension of policy has been occurring for pome fruits from China. Biosecurity Australia noted in the July 2008 issues paper for fresh apple fruit from China that it plans to use, as the basis of the forthcoming draft IRA, the 2005 IRA which assessed importation of ya and Asian pears from four provinces across China. The 2005 IRA was, in turn, an extension of a 2003 policy which allowed importation of ya pears from two provinces on China's mid-north coast. The application from China to export apples to Australia is not restricted to provinces previously assessed in the pears IRA. It applies to all commercial apple-producing provinces and all commercially produced apple cultivars in China.

With regard to the risk of importation of citrus canker, the IRA notes that the volume of fruit imported relates directly to the level of risk. In this case, an expected low volume of imports was cited as a reason for supporting a low risk rating. This acknowledgment is significant in general in that it enables the converse implication to be made that large volumes of trade will increase the risk of importation of pests and diseases and impact Australia's appropriate level of protection. Once approval is granted for entry of a commodity, irrespective of the proposed volume of trade, a precedent is set for applications for greater volumes of trade from other areas in the same country or from other countries.

B. Pathogens

Existing policy enables the importation of fresh citrus into Australia from countries or areas free of citrus canker. Citrus canker, *Xanthomonas axonopodis* pv. *citri*, is present in Shizuoka Prefecture, Japan. It is a significant shift in policy for BA to move from accepting citrus from pest free areas to recommending the importation of citrus from areas with low pest prevalence. The IRA states that the export blocks have been monitored for citrus canker since 1968 and none has been detected but clarification is required of the extent that it would be possible for fruit on the pathway to be symptomless yet still be infected. It is accepted that unshu mandarin fruit rarely show signs of infection and are more resistant to citrus canker than other cultivars. However even the most resistant citrus varieties can develop symptoms if plant tissue is injured through insect or wind damage.

The current IRA also acknowledges that no data have been provided on the citrus canker status in areas adjoining the export blocks. Neither does the IRA mention whether, in this valley, mandarins are grown in areas other than the designated export blocks.

The consequences ranking for eradication of citrus canker, E – significant at the regional level, contradicts Australia's current national cost-shared response to the eradication of citrus canker in Queensland. The citrus canker response plan is significant at the national level and this should be reflected in the assigned ranking. When citrus canker was confirmed in Queensland, domestic trade in mandarins was halted. This was despite Queensland Department of Primary Industries and Fisheries conducting a pest risk analysis according to the BA model which recommended that the risk was extremely low. Equivalence should apply to international trade. The IRA notes that if citrus canker were to become established in Australia, access to markets free of citrus canker could be compromised. It seems contradictory that Australia is soon to be declared free of citrus canker yet the IRA recommends permitting imports from a country which has been designated as having citrus canker.

Comments made by NSW Department of Primary Industries about plant pathogens, especially *Mycosphaerella* species, in the 2002 technical issues paper on unshu mandarins from Japan, remain valid and do not appear to have been incorporated in the draft IRA.

The suite of *Mycosphaerella* species present in Australia is likely to be different from and much less severe than those occurring in Japan and the United States. Australian *Mycosphaerella* species cause greasy spot symptoms on leaves but do not affect fruit and the *Mycosphaerella* species providing closest molecular match with those isolated from Australian citrus leaves were from non-citrus hosts. If fruit infecting strains of *Mycosphaerella* pathogens were introduced and became established in Australia, comprehensive management systems would be essential, as is the case in the United States, and presumably Japan.

Further work should be undertaken to identify the pathogenic form of citrus scab present in Japan prior to importation of potential host material into Australia. The previous policy developed for the importation of Tahitian limes from New Caledonia mentioned that most pathotypes of *Sphaceloma fawcettii* have a narrow host range but a pathotype of concern, the Florida Broad Host Range pathotype, known from Florida and Korea, attacks nine citrus varieties including satsuma mandarins. This pathotype may have crossed from Korea to Japan.

The IRA determined that citrus tristeza virus was not a quarantine pest and a pest risk assessment was not conducted. Reasons given were that the disease is aphid and graft-transmitted and that establishment in Australia through imported fruit is unlikely. NSW Department of Primary Industries response to the 2002 technical issues paper acknowledged that importation of citrus fruit does not present a risk provided fruit is packed trash free. Trash-free packing is the standard presented in IRAs so while this standard is achieved the risk would be reduced to acceptable levels.

C. Arthropods

Three of thirteen Thysanoptera (thrips) species listed in the pest categorisation table were assessed by BA as potentially being on the mandarin fruit pathway. Even for thrips species that are established in Australia, differences of significance can occur at sub-species levels. Thrips, such as Western Flower Thrips, can have a very short life cycle and are resistant to many insecticides.

The NSW DPI submission on the draft IRA for capsicum from Korea noted that considerable risks relate to the chemical resistance profiles of thrips that may be introduced on foreign commodities (see NSW DPI submission on the draft IRA fresh paprika from Korea). The issue is not simply whether the species of thrips is exotic but what chemical controls have been applied and whether the resistance that has built up in thrips from other countries is different from the resistance profile of that thrips species in Australia. If so, the introduction of those thrips would override Australia's chemical control options for thrips.

In the unshu mandarins IRA, risk assessments for pink citrus rust mite and citrus red mite relied on previous policy determinations developed for the importation of sweet oranges from Italy. If previous IRAs are to be used as a platform for the assessment of pests the information should be reviewed and up-dated in the current IRA because the provenance may be different. The absence of this information gives that impression that important details may have been overlooked.

The risk assessment for pink citrus rust mite is based on standard cultivation practices, but there is no indication given that 'standard practices' in Italy are the same as standard practices in Japan. Although the risk rating has been designated as low, which exceeds Australia's appropriate level of protection, and specific risk management measures are required, this rating still underestimates the risk posed by pink citrus rust mite.

Pink citrus rust mite has a high entry potential because it is likely to be on harvested fruit, it is small in size and can easily escape detection. It also has a high potential for spread because the species can easily be dispersed by wind. Control of *Aculops pelekassi* is mostly achieved by chemical methods but the mite has developed resistance to some of the chemical control options. When calculated through the risk sequence, the risk rating is moderate, rather than low.

Similarly, previous policy determinations were applied to the armoured scales. One group of scales, including *Parlatoria ziziphi*, was assigned an unrestricted risk rating of very low and dismissed from further consideration. The pest list indicates that this organism infests citrus fruit and that eggs are laid on fruit. The IRA for sweet oranges from Italy indicated that *P. ziziphi* is an example of a pest for which field practices may not give complete control, is difficult to remove from fruit during cleaning and packing house procedures and can survive storage and transportation. The risk rating for this pest should be reviewed.

The current IRA assessed three additional armoured scales. Again the risk may have been underestimated for example, in the probability of distribution. Fruit could easily be distributed widely and the skins be discarded near a suitable host. Armoured scales are polyphagous and resilient. The risk rating for armoured scales should be reviewed.

Adoxophyes moths are mentioned as pests with a very wide host range including fruit crop plants, tea, ornamentals and eucalypts. The probability of establishment has been ranked as high and the IRA noted that favourable climatic conditions occur across much of Australia. It therefore seems inconsistent that the consequences impact score only ranks these pests as significant at the regional level rather than at the national level.

D. Operational Procedures

The front-line phytosanitary measure recommended for mites, mealybugs, thrips and other insects is 'inspection'. Previous NSW Department of Primary Industries submissions mentioned the difficulties of reliably detecting small, cryptic pests by visual inspection. These concerns remain. There is no indication given about how sufficiently rigorous visual inspection will be achieved because the operating procedures have not been presented in this document. Pink citrus rust mite, for example, is tiny (140-155 μm) and examination requirements for identification are very specific. This mite can easily be overlooked on plant surfaces or misdiagnosed. The procedures and specific standards that are to be used for inspection should be presented for stakeholder review.

The surveillance trapping grid for Orange fly is very coarse in the production area at Fujieda City (see IRA Figure D2). Protein baits used in the traps may also be inappropriate for attracting this species. Quarantine pest data sheets on *Bactrocera tsuneonis* indicate that this fly is not known to be attracted to any male lures and may not be attracted by protein sources because it only attacks citrus fruits.

The Australian Fruit Fly Exclusion Zone standard trapping grid for surveillance monitoring for Queensland fruit fly, using Cuelure is 400m in residential areas and 1km in rural areas. These distances have been determined based on the effective distance that the male attractant plume will disperse.

Japan should be required to increase the trapping density in the Unshu mandarin export production areas, research the effectiveness of current lures and alternatives such as wet citrus lures and develop specific treatment schedules for Orange fly.

Although information has been provided about the packing shed, there are some gaps in the details. For example:

- what is the pre-processing standing time in the packing shed prior to processing?
Bulk fruit is said to be transported immediately from the orchard to the packing shed but there is no indication about how quickly it is then processed.
- does processing include waxing?
This is a requirement for the importation of sweet oranges from Italy. A minimum level of consistency between IRA documents, especially those dealing with parallel commodities such as citrus, is expected and should be provided by BA.
- will Australia require that fruit is dipped?
The IRA mentions that Japanese unshu mandarins exported to the USA are to be dipped but that the same product to NZ is not to be dipped.
- are packing houses screened to prevent moths flying in?
Adoxophyes moths, for example, are pests on tea, a commodity which is grown in proximity to the designated export areas (see IRA Figure 3.4).

To manage the risks of accidental introduction of moths on or in export containers, it should be mandated that pheromone or light traps are set up to monitor for lepidopteran pests in packing houses.

The IRA proposes a systems approach to manage the citrus canker risk. The system presented included:

- registration of orchards
- regular inspection for symptoms
- post-typhoon surveillance
- mandatory copper spray regimes and post-harvest chemical treatment, and
- restrictions on movement of host material into the export areas.

The systems approach does not specify that all of the components are required. Is this the case or are some of the components optional? It also seems that the recommended approach is strongly dependent on the proficiency of inspectors in knowing and understanding citrus canker. Records should be kept which establish the qualifications of authorised inspectors to certify freedom from citrus canker.