DRAFT IRA ON NEW ZEALAND APPLES – AN OVERVIEW

The draft import risk analysis (IRA) on apples from New Zealand has followed the process set out in the *Import Risk Analysis Process Handbook.* This process was developed in consultation with stakeholders, and is based on scientific and technical information gathered in recent years.

The draft IRA paper is a large and complicated document: Australia's quarantine decisions, like those of all World Trade Organization (WTO) members, must be underpinned by scientific risk analysis if our policies are to withstand intense scrutiny from other countries. The full draft IRA is available on the Biosecurity Australia Web site: **www.affa.gov.au/docs/market_access/biosecurity/appnzira.html**
or in hard copy from Biosecurity Australia, GPO Box 858 Canberra ACT 2601.

The WTO *Agreement on the Application of Sanitary and Phytosanitary Measures* — the SPS Agreement — makes it clear that if member countries restrict imports to protect plant life and health, they must either adopt an international standard or base the measure on a risk analysis that is based on realistic scenarios, not theoretical possibilities.

The draft IRA sets out Biosecurity Australia's preliminary view on whether conditions can be specified that would allow entry of New Zealand apple fruit while maintaining Australia's very conservative approach to quarantine risk management.

The draft IRA will be open for public comment for 60 days. **Stakeholders are encouraged to make their views known and to contribute to the risk analysis process through written submissions to Biosecurity Australia, GPO Box 858 Canberra ACT 2601.**

Biosecurity Australia has sought advice from Australian and international scientific experts on fireblight. The opinion of these experts is that Biosecurity Australia's approach is scientifically sound; however, all stakeholders are encouraged to examine the scientific analysis closely and to raise any issues of concern during the consultation period.

How does this IRA relate to the 1998 IRA on New Zealand apples?

New Zealand's 1995 application (which led to the 1998 IRA) was for importation of **apples from anywhere in NZ, without any other measures** to manage the risks posed by fireblight.

Given that it was possible apples could be sourced from infected orchards, a primary concern was that a small number of infected apples may have been imported. Therefore, that approach was rejected because NZ's claim that mature apple fruit free from trash could not introduce fireblight into Australia was not adequately demonstrated. The government's position on this has **NOT** changed: the management measures set out in the draft IRA focus on ensuring that orchards producing apples for export to Australia do not have evidence of fireblight. Excluding the possibility of infected fruit being imported significantly reduces the likelihood that fireblight could become established in Australia due to imports of apple fruit from New Zealand.

NZ's current application asked Australia to consider all possible risk management procedures: the IRA will determine if import conditions using one or a combination of methods can be developed that would meet Australia's strict quarantine requirements.

How does the IRA process work?

A risk analysis is a technical process that involves several steps.

First, all the pests and diseases that are possibly associated with apples in New Zealand are compared with those that occur in Australia.

Second, the IRA assesses the pests or diseases that don't occur in Australia to see whether they occur on fruit and, if so, how likely it is that they might enter, become established and spread in Australia.

Third, the damage each pest or disease could cause if it became established in Australia is estimated. The likelihood of entry, establishment and spread is then combined with the consequence to give a risk rating for each pest or disease, and the need to manage each risk is determined.

Finally, methods of managing any unacceptable risks are evaluated to see if these risks can be effectively managed.

What did the analysis show?

The risk analysis showed that eight insects, one mite, one bacterium and one fungus require quarantine management.

Biosecurity Australia proposes that the risks associated with the insects (apple leaf curling midge; New Zealand flower thrips; five species of leaf rolling moths; and a mealy bug) and the mite (apple blister mite) can be addressed by either:

- a pre-harvest orchard survey in combination with enhanced quarantine inspection on arrival in Australia; or
- pre-export phytosanitary certification by the NZ Ministry of Agriculture and Forestry (MAF NZ) in combination with enhanced quarantine inspection on arrival in Australia.

Enhanced quarantine inspection in Australia would be necessary because the standard methods used for fruit inspection may not be enough to reliably detect these pests on apples. This is because they may be hidden in the cavity at the calyx end of the fruit or, in the case of the mite, they are too small to be seen with the naked eye. These problems can be addressed by inspection under microscope.

Biosecurity Australia proposes that the risk from European canker could be effectively managed by ensuring orchard blocks are free from this pest through survey and certification by MAF NZ.

Biosecurity Australia proposes that the risk posed by fireblight could be effectively managed by using a systems approach that combines a range of measures, each of which contributes to significantly reducing the likelihood of imported fruit carrying the bacterium responsible for fireblight. The result is a robust strategy that reduces the risk to an acceptably low level:

- export from registered export blocks (REBs) with no evidence of fireblight infection for at least two seasons;
- the use of detection zones free of all other host plants around REBs;
- registered packing houses;
- detection surveys at several growth stages;
- trash minimisation;
- fruit disinfestation;
- strict segregation to prevent cross contamination or substitution; and
- phytosanitary inspection and certification.

MAF NZ would have responsibility for the proper implementation of the system. The Australian Quarantine and Inspection Service (AQIS) would systematically audit the procedures. The steps necessary to implement these requirements are outlined in attachment 1.

How can it be safe to allow trade in apples from a country that has fireblight?

There is no evidence from anywhere in the world that fireblight has been introduced into a country on apples from another country.

This is supported by research that shows:

- there is no evidence that apples grown in healthy orchards are infected;
- hosts are only receptive to infection during flowering or if they have an open wound; and
- the risk of introduction is further reduced by the very low likelihood of a vector transferring the bacterium from a discarded apple to a receptive host.

Provided apples are more than 60 cm from sites on the same tree that show signs of disease, it is very unlikely that the movement of apples could lead to the establishment of fireblight. However, as the consequences of an outbreak are likely to be extreme, Australia's very conservative approach to risk management has been followed in the draft IRA, which proposes ensuring apples are sourced from healthy orchard blocks separated by a 50-metre-wide detection zone, and the additional safeguard of a disinfectant dip. This additional level of security will ensure that no apples for export are infested with the bacterium.

These conditions could be met through a series of orchard inspections at key growth stages in the harvest season and the preceding season. Biosecurity Australia proposes that inspections be carried out at blossoming, fruitlet stage and pre-harvest; if a block or its detection zone shows any symptoms it would not be eligible to export to Australia.

To ensure the apples do not become contaminated during post-harvest handling, several hygiene procedures are proposed. Security measures to prevent substitution of fruit and a rigorous, systematic audit will also ensure procedures are being complied with.

What is block freedom?

Following the international standard *Requirements for the Establishment of Pest Free Areas*, block freedom is where individual management units within an individual property are intensively surveyed to verify that these areas, including their surrounding detection zones, are free and remain free of disease. This approach is already widely used for the movement of commercial fruit in Australia, into and out of Australia and between other countries. Australian apple and pear exports to the United States, apple exports to Taiwan, citrus to Korea and various fruits to New Zealand use a block freedom approach, as does citrus from Argentina to the United States.

Isn't fireblight all over New Zealand?

No. The bacterium that causes fireblight occurs widely in NZ, but the major export apple production area of Hawke's Bay experiences significant localised damage due to fireblight about once every 10 years. The balance of the export apple crop is produced in areas where the disease occurs less frequently or is rare.

Do other fireblight free countries accept NZ fruit?

Yes. The European Union, Japan, Argentina, Brazil and Chile accept apples from New Zealand.

How do the proposed Australian conditions compare with Japan's conditions ?

The Australian conditions are more stringent than those applied by Japan.

The Japanese protocol requires a chlorine dip under the supervision of a Japanese quarantine inspector. Japan also requires registration of designated export areas surrounded by a buffer zone, with both areas inspected three times in the year of export.

The Australian conditions adds to these arrangements a second season of inspection and auditing before exports are permitted.

Attachment 1

Implementation of the proposed fire blight protocol

Pre-implementation

		IVA[1]	MAFNZ	AQIS
Step 1	Phytosanitary procedures (for example, inspection and ensuring product integrity) and responsibilities documented. These documents will provide a basis for subsequent audits	X[2]		
Step 2	Documentation approved by the New Zealand Ministry of Agriculture and Forestry (MAFNZ)		X	
Step 3	Documentation approved by AQIS			X

Season 1

		IVA	MAFNZ	AQIS
Step 4	Notice of intention to export made to MAFNZ	Audit	Audit	Audit
Step 5	Each grower registered and a logbook established	X	Audit	Audit
Step 6	Each proposed block and detection zone physically identified to enable registration and location of blocks at survey and harvest	Audit	Audit	Audit
Step 7	Blocks registered	X	Audit	Audit
Step 8	AQIS notified of details of registered growers, block and detection zones		X	Audit
Step 9	Blossom survey conducted	X	Audit	Audit
Step 10	Fruitlet survey conducted. AQIS would undertake its **first audit** at this time, allowing its officers to verify this orchard survey	X	Audit	Audit[3]
Step 11	Pre-harvest survey conducted	X	Audit	Audit
Step 12	MAF audit conducted at any stage during season 1		X	Audit

[1] Independent Verification Agency eg AgriQuality New Zealand (formerly MAF Qual)
[2] Indicates responsibility for activity
[3] underlining indicates observation of activity undertaken as a component of audit.

Season 2

		IVA	MAFNZ	AQIS
Step 13	Blossom survey conducted	X	Audit	Audit
Step 14	Fruitlet survey conducted. AQIS would undertake its **second audit** at this time, allowing its officers to verify this orchard survey	X	Audit	Audit
Step 15	Packing house and cold store registration undertaken	X	Audit	Audit
Step 16	AQIS notified of details of registered packing houses		X	Audit
Step 17	Pre-harvest survey conducted	X	Audit	Audit
Step 18	Post hail survey conducted if required	X	Audit	Audit
Step 19	Picking bins cleaned and labelled 'For Australia'	Audit	Audit	Audit
Step 20	Packing line sanitised to prevent cross contamination	Audit	Audit	Audit
Step 21	Fruit harvest begins and fruit placed in clearly labelled field bins with a minimum of trash	Audit	Audit	Audit
Step 22	Post harvest security procedures to prevent substitution	Audit	Audit	Audit
Step 23	Field bins segregated at packing shed	Audit	Audit	Audit
Step 24	Anti bacterial dip applied to fruit	Audit	Audit	Audit
Step 25	Fruit packed on a dedicated, sanitised packing line	Audit	Audit	Audit
Step 26	Trash removed at fruit sorting	Audit	Audit	Audit
Step 27	Fruit handling procedures to prevent cross contamination	Audit	Audit	Audit
Step 28	Damaged fruit removed at sorting	Audit	Audit	Audit
Step 29	Phytosanitary inspection of fruit	X	Audit	Audit
Step 30	Bins of sorted fruit segregated in storage to prevent cross contamination	Audit	Audit	Audit
Step 31	Fruit packed into new cartons to prevent cross contamination	Audit	Audit	Audit

Step 32	Cartons segregated in storage to prevent cross contamination	Audit	Audit	Audit
Step 33	Cartons and storage bins labelled for integrity and traceback	Audit	Audit	Audit
Step 34	Phytosanitary certification undertaken and MAFNZ certificate issued		X	Audit
Step 35	Shipping containers sealed to prevent substitution		X	Audit
Step 36	MAFNZ audit at any stage during second season		X	Audit
Step 37	AQIS would conduct **third audit**			X
Step 38	Documentation checked by AQIS on-arrival			X
Step 39	Consignment and documentation reconciliation by AQIS on-arrival			X
Step 40	Systematic AQIS quarantine inspection of samples			X

Consignments fail unless all conditions are met. If significant or repeated cases of non-compliance are detected imports will be suspended pending review and offending parties excluded. On-arrival activities may be undertaken as part of a pre-clearance program.