



Reference: 08/13312

Department of
Primary Industries and Fisheries

26 JUN 2008

Mr John Cahill
Chief Executive
Plant Biosecurity
Biosecurity Australia
GPO Box 86
Canberra ACT 2601

Dear Mr Cahill

Biosecurity Australia Advice 2008/12
Draft import risk analysis report for stone fruit from the USA

I refer to the *Draft Import Risk Analysis Report for Fresh Stone Fruit from California, Idaho, Oregon and Washington* (the draft IRA report) and your request for comments by 27 June 2008.

The draft IRA report proposes that the importation of fresh stone fruit from the USA be permitted, subject to a range of quarantine measures.

The Queensland Department of Primary Industries and Fisheries (DPI&F) notes that Biosecurity Australia (BA) has identified a number of quarantine pests, associated with the proposed importation of stone fruit from the USA, which require risk mitigation measures to reduce the risks to an acceptable level. These pests include apple maggot, fruit boring moths, leafrollers, mealybugs and thrips.

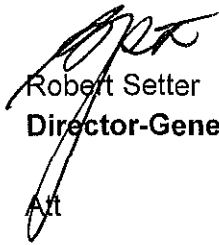
The draft IRA report proposes applying the same quarantine measures adopted under existing import policy for importation of cherries from the USA and New Zealand and other stone fruit from New Zealand for management of comparable quarantine risks associated with the importation of stone fruit from the USA.

The DPI&F has reviewed the draft IRA report and has a number of substantive concerns as detailed in the attached document.

Thank you for the opportunity to comment on the draft IRA report. DPI&F will appreciate receiving a response on how the issues raised are to be addressed in any further review leading to the finalisation of this IRA.

If you require any further information regarding this matter, please do not hesitate to contact Dr Marcelle O'Brien on telephone 07 3239 3472 or marcelle.o'brien@dpi.qld.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Setter', is written over the printed name and title.

Robert Setter
Director-General (Acting)

Att

**Department of Primary Industries and Fisheries' response to
Biosecurity Australia's Draft Import Risk Analysis Report for Fresh
Stone Fruit from California, Idaho, Oregon and Washington**

June 2008

Insufficient data for stakeholder assessment

This draft import risk analysis (IRA) report has proposed risk mitigation measures for leafrollers, mealybugs and thrips. However, development of final import conditions for apple maggot, peach twig borer and *Grapholita* moths will be dependent on the USA Animal and Plant Health Inspection Service providing additional scientific information supporting the efficacy of treatments that reduce the level of risk in line with Australia's appropriate level of protection (ALOP).

Comments on draft reports are the only opportunity for stakeholder input in the IRA process. Stakeholders cannot assess the efficacy of treatments if they have not been disclosed in the draft IRA report. It appears premature of BA to propose importation of stone fruit from the USA without having sufficient scientific data to demonstrate that available treatment measures can adequately mitigate the risks of all identified quarantine pests.

Pest risk management for apple maggot, peach twig borer and *Grapholita* moths (pages 159-159)

Irradiated stone fruit is not permitted to be sold in Australia due to regulations managed by Food Standards Australia New Zealand (FSANZ). Proposing consideration of a risk mitigating treatment for stone fruit, such as gamma irradiation, that renders the fruit unsaleable in Australia does not appear to be a satisfactory treatment option. Risk mitigation options should be restricted to treatments that are currently available in Australia. If available treatments cannot mitigate risk to meet our ALOP then the application for importation should be rejected.

Citation referencing

All references to the Australian Plant Disease Database (APDD) should include the accession number, as the reference is incomplete without this. Inclusion of the accession number ensures that the exact accession referred to can be located. This is especially important when scientific names are changed or isolates are re-identified.

Peach latent mosaic viroid (page 205)

This pest is no longer recorded as being present in New South Wales in the APDD.

Volume of trade (page 18)

Anticipated volume of trade is not adequately addressed, that is, how much is a 'substantial share of the market'?

Details of importation

There is no mention in the draft report of:

- a. disposal of trash and unsaleable fruit
- b. how the fruit is to be shipped i.e. will fruit arrive in bulk bins or prepacked ready for sale?

If bulk bins are to be used then pests and diseases that affect leaves, terminal shoots and twigs (for example leaf rollers and *Maireina marginate*) must be considered as these plant parts will be included in bulk bins of fruit as trash.