



Ms. Louise van Meurs
Plant Biosecurity
Biosecurity Australia
DAFF
GPO Box 858
Canberra ACT 2601

Your Ref:
Our Ref:
Enquiries:
Date: 27 June 2008

Dear Louise

**SUBMISSION TO THE DRAFT IMPORT RISK ANALYSIS REPORT FOR FRESH STONE FRUIT
FROM CALIFORNIA, IDAHO, OREGON AND WASHINGTON**

I refer to Biosecurity Australia Advice 2008/12 dated 29 April 2008 inviting comments on the Draft Import Risk Analysis Report for Fresh Stone Fruit from California, Idaho, Oregon and Washington.

Thank you for the opportunity to comment on the proposal. Preliminary review of the risk analysis report by the Department of Agriculture and Food Western Australia (DAFWA) indicates that there are a number of issues that DAFWA would need to examine in detail to consider supporting the risk analysis. Some of these issues include:

- inconsistencies in methodology between the US stonefruit, Indian Mango and Korean Capsicum import risk analyses
- issues with the apparently inconsistent determination of pests with existing policy
- effect of increased volume and how/if this has been addressed in the import risk analysis
- assumptions relating to contaminating pests
- changes to the determination of consequences including changed definitions for consequence categories
- how production practices in the US have been considered in the risk analysis as they appear not to be mandatory
- impact of the tolerances associated with each grade for the various stonefruit
- issues arising from the grouping of pests
- consistency of the risk analysis with Western Australia's requirements for stonefruit from South Australia.

It has not been possible for DAFWA to thoroughly review this draft risk analysis report within the specified time period as Biosecurity Australia has sought comments on two risk analysis documents at the same time and consequently the time available per risk analysis report has been inadequate to undertake a proper review. Some initial comments are provided in the attachment for your consideration (Attachment 1).

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There are some apparent inconsistencies in the risk analysis; for example, in the New Zealand stonefruit import risk analysis, the likelihood of importation of *Podosphaera clandestina* is listed as 'very low' while it is listed as 'low' in this risk analysis. The risk analysis has omitted a number of quarantine pests for Western Australia. A review of the scientific literature and online databases indicates that at least 50 organisms have not been listed in the draft report but can be associated with stonefruit production in the proposed source region of the USA. Of the 50 organisms listed, 33 organisms are of potential quarantine concern to Western Australia.

DAFWA is not able to support the risk analysis at this stage however DAFWA will be able to consider supporting this proposal after Biosecurity Australia's consideration and satisfactory resolution of concerns and issues raised in this letter and in the Attachment 1.

Stone fruit from the USA is currently prohibited in Western Australia. DAFWA will consider modifying the existing legislation to allow the entry of USA stone fruit on the satisfactory resolution of the issues raised in this letter, those that arise from further discussion and demonstrated equivalence with stone fruit from South Australia into Western Australia.

It is appreciated that the DAFWA's lack of support for the draft risk analysis may delay the import of stone fruit from the USA. However, to facilitate the completion of the final risk analysis report and to initiate trade pending the resolution of these matters, DAFWA is willing to consider stone fruit from the USA on the basis of mandatory fumigation with methyl bromide at rates equivalent to those in the Final policy extension for the importation of fresh apricot (*Prunus armeniaca*) fruit from South Australia and Tasmania into Western Australia (Part A), either pre-shipment or on arrival.

I trust that we can engage in the outstanding issues and come to mutually acceptable solutions so that trade in USA stone fruit can occur in a timely, safe and ongoing manner.

Yours sincerely



Shashi Sharma
DIRECTOR PLANT BIOSECURITY

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