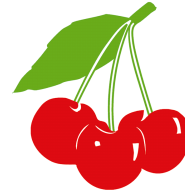




Apple & Pear Growers
Association of SA Inc.

Fruit Growers South Australia

6 Frederick Street Phone: (08) 8349 4556
CAVAN 5094 Fax : (08) 8349 5316
Email: aplpear@ozemail.com.au



Cherry Growers Association
of SA Inc

26th April 2008.

Quarantine and Biosecurity Review Secretariat
Department of Agriculture, Fisheries and Forestry.
GPO Box 858,
CANBERRA. ACT. 2601.

Dear Sir/Madam,

RE: Quarantine and Biosecurity Review.

The following submission is submitted by Fruit Growers South Australia representing the Apple and Pear Growers Association of South Australia Inc and Cherry Growers Association of SA Inc. Both individual organisations have had extensive but varied levels of involvement with Quarantine and Biosecurity over many years. On behalf of our constituent members we would offer the following broad comments into the inquiry:-

- 1) Overall we find the Quarantine and Biosecurity processes and systems very bureaucratic, cumbersome, lacking transparency and not industry/grower friendly. At times the processes are very slow to achieve useful commercial gains and when those gains are achieved the ongoing systems then fail to achieve the best commercial results. In all industry and growers are very frustrated with the overall process.
- 2) The cost in human and financial resources to fully participate in both the Import Risk Analysis and Market Access processes is very high. At times some industries find it impossible to resource the necessary activities.
Past involvement within the Import Risk Analysis process relating to the importation of apples from New Zealand has cost the Apple and Pear Growers Association of South Australia and the individual members of the industry in excess of \$500,000.

In addition we supported the efforts of the national organisation, Apple and Pear Australia Limited, through the direct involvement of our staff in the preparation of the past technical responses. A copy of the last technical response for the Australian Apple and Pear Industry is attached as Appendix A for the information of the Review Panel. Hopefully this document will give the Panel members an idea of the effort and expertise given by industry to the IRA process.

The concern for Industry is how this documentation and the information contained was virtually dismissed by both the Risk Analysis Panel and the Eminent Scientist Group.

If industry had a close involvement with the process, particularly in the early stages, and the consultation was truly consultation then the need to prepare and submit such documents would not be necessary.

This and other previous documents have highlighted many aspects including the

- (a) flaws in the Risk Matrix and Model,
- (b) areas in which the science has conflicting evidence and/or results,
- (c) areas in which scientific evidence is lacking or new research needs to be undertaken,
- (d) areas where personal judgements have replaced scientific evidence.

Even with all of that information Biosecurity Australia still decided to recommend the importation of apples from New Zealand.

How can their decision be based purely on science?

- 3) The simple but basic message from industry is that Biosecurity and Quarantine must protect Australia from exotic pests and diseases that pose a risk to human health, agriculture, forestry, fisheries and the environment within the tightest possible regime. In doing so the Australian Government at all times must stand strong within the international community and defend our Biosecurity and Quarantine processes and systems.
- 4) We believe that Quarantine and Biosecurity both at the National and State levels are inadequately funded by the relevant Government's. Primary Production and the production of food supplies for both the domestic and international market needs to have the same basic status as health, education, terrorism, etc. Food along with water is the basic building blocks in health and education.
The next world conflict could be about access to a food supply. Australia must maintain and increase its status as a world food supplier.
To achieve this requires an increased level of resources, both financial and human.

The following points are raised in consideration of the more specific issues raised within the issues paper:-

- a) Industry would support the continued division of Quarantine and Biosecurity and their roles and responsibilities. We would even further encourage the division within each of the sectors to have the following sectional divisions

- Biosecurity – Imports
- Biosecurity – Exports
- Quarantine – Imports
- Quarantine – Exports

The issues and requirements for Export activities and Import activities are at most times very different and we believe at times there is cross-over which causes unnecessary barriers for achieving a result in a particular area.

For instance the importation of apples from New Zealand or any other country must be well separated and defined from the Australian industry's desire to export apples to China or Taiwan.

A simple hierarchal flow chart could be developed which details

- (1) the relevant organisations,
- (2) their linkages with each other,
- (3) their linkages with other Agencies,
- (4) their linkages with Industry and the Community, and
- (5) the specific roles and responsibilities.

The maintenance of Quarantine and Biosecurity within the Department of Agriculture, Fisheries and Forestry appears to be logical to ensure there are linkages and co-ordination with other aspects of Agriculture, Fisheries and Forestry. In supporting that it is important that the processes, particularly in the area of appeals, the Eminent Scientist Group and the final decision making, are appropriately independent, transparent and have outcomes consistent with the information presented.

Industry believes that in relation to the IRA process DAFF representatives making the decisions have been too close to the process and therefore seen as supportive of their colleagues and/or the system even when they may not have fully supported the decisions. There is a lack of independence through the chain of those making the decisions. Processes must be put in place to ensure those making crucial decisions along the chain are totally independent and removed from unacceptable peer pressure.

- b) While there has been a rapid growth in international trade and travel it is essential that Australia maintains and even expands the

high levels of Quarantine and Biosecurity at all international points of entry.

We would believe that the majority of risk pathways (entry by air or sea, illegal entries) are already well defined and it is now about ensuring the processes and systems are operating 24/7 all year round and are adequately and appropriately resourced.

The current problems being seen across the world in relation to insufficient food supplies makes it more important than ever that Australia retains its ability to grow high quality and nutritional produce utilising our pest/disease free status to be able to satisfy to the requirements of the international demands. We can continue and expand our role as a major food producing nation but only if our cost of production is kept in check. One of our current advantages is that we do not have many of the exotic pests like Fire Blight, European canker, Cherry Fruit Fly, BSE or 'mad cow disease'.

- c) We would believe that the natural pathways like migratory animals/birds, wind movement and sea currents have not been adequately considered. In our experience with the IRA on apples from New Zealand these natural systems were poorly debated and considered.

Industry believes that new and consistent Research and Development must be undertaken in this area particularly in relation to those pests/diseases already highlighted as being of major concern to industry and the environment eg., those plant pest already categorised within the Plant Health Emergency Response process.

In addition, new and increased surveillance must be undertaken in those regions of Australia highlighted as being places where these natural pathways may reach the coastline eg where migratory birds might land, wind patterns and sea currents, to check that pests/diseases are known not to exist within those areas.

- d) The issue of Australia's Appropriate Level of Protection is one of the most contentious issues in relation to Quarantine and Biosecurity. While the inquiry might not wish to consider the particular level of very low versus zero, we believe the inquiry must consider what the ALOP of 'very low' actually means. Currently there is a statistical model being used by the Australian Government, through Biosecurity Australia, to determine the level at which the risk might be for a particular pest and/or disease. From the industry point of view we believe that this model has major flaws and does not adequately quantify or qualify what 'very low' risk or any other category of risk means, therefore making it very difficult to work with particularly in dealing with the IRA process.

Submissions presented to Biosecurity Australia over the past decade by the Apple and Pear industry have covered our concerns

and we believe that they still have not been adequately addresses by the Government or Biosecurity Australia.

The following is an extract from the Australian Apple and Pear Industry submission that details some of the concerns of industry:-

“ALOP:

While the Australian Apple and Pear Industry does not oppose the conduct of the IRA, the Industry does not accept that the IRA is an occasion for shifting the level or nature of Australia's risk acceptance with respect to pome fruit pests and diseases. If there is to be any shift in Australia's ALOP that is a matter for the government at ministerial level and not for Biosecurity Australia or the RAP.

The Australian Apple and Pear Industry understands that Table 1 below may well be a product of work which has been undertaken over the last several years

Table 1 Risk estimation matrix

Likelihood of entry, establishment and spread	High	Negligible risk	Very low risk	Low risk	Moderate risk	High risk	Extreme risk
	Moderate	Negligible risk	Very low risk	Low risk	Moderate risk	High risk	Extreme risk
	Low	Negligible risk	Negligible risk	Very low risk	Low risk	Moderate risk	High risk
	Very low	Negligible risk	Negligible risk	Negligible risk	Very low risk	Low risk	Moderate risk
	Extremely low	Negligible risk	Negligible risk	Negligible risk	Negligible risk	Very low risk	Low risk
	Negligible	Negligible risk	Negligible risk	Negligible risk	Negligible risk	Negligible risk	Very low risk
		Negligible	Very low	Low	Moderate	High	Extreme

Consequences of entry, establishment and spread

The Industry notes that Table 1 on its own does not and cannot describe a level of risk tolerance. In order for Table 1 to have any content it is necessary to define what is meant by each of the descriptors of "consequences of entry, establishment and spread" and what is meant by each of the descriptors of "the likelihood of entry, establishment and spread".

The Australian Apple and Pear Industry recommends that it is inappropriate for Biosecurity Australia to proceed on the basis that Table 1 is a representation of Australia's ALOP. Table 1 cannot be

a representation of Australia's ALOP unless and until a responsible government official indicates that it reflects Australian government policy. The Industry suggests that the proper official to make that decision is the Minister for Agriculture Fisheries and Forestry.

Further, once the content to the descriptors used in Table 1, and found elsewhere in the 2005 DIRA is considered, it is clear that Table 1 does not reflect Australia's ALOP as it is understood by Australian policymakers, with whom the Industry through APAL has had detailed discussions.

RISK MODEL

A key criticism of the revised 2005 DIRA (BA 2005) is that the so-called "bucket model" is used throughout to interpret and assist with the elicitation of model probabilities. This has the effect of ignoring the natural variation inherent in pest and disease rates. Disease and pest transmission processes typically have hot-spots in time and space where the prevalence is much higher than the overall average rate associated with the bucket model, and it is these hot spots that represent the greatest threat of disease or pest incursion. The bucket model ignores this important source of variation, which affects risk calculations.

The Australian Apple and Pear Industry recommends that given the comments and/or criticisms relating to the Risk Model the Model must be adjusted to reflect these comments/criticism OR a more effective Risk Model must be utilised by Biosecurity Australia to continue any further consideration of the application to import apples from New Zealand."

Industry would believe that the current ALOP is not a 'conservative approach to manage Quarantine and Biosecurity' and we would not believe it reflects the current community expectations. In fact we believe it fails both industry and community expectations.

While it is necessary to have some definition and we accept in life there is no such thing as zero risk we should work as hard as possible to achieve zero risk.

Let's consider the scenario of an apple/pear grower

- Family business in the Adelaide Hills
- Fifth or six generation growing, packing and exporting apples
- Invested millions of dollars in infrastructure in the orchard, water, packing shed, distribution and marketing chain.
- Four or five families living off the business
- Employs 50 people full time and a further 100 seasonal workers.
- Family members are heavily involved in industry and community activities.

As a result of the decision by the Australian Government, based on the advice of Biosecurity Australia, to import apples from New Zealand (a country in which the bacterial disease – Fire Blight – is endemic), Fire Blight enters the Adelaide Hills, infects the apple/pear trees and the orchardist is put out of business.

This scenario is a result of an ALOP based on a rubbery risk model built around two words ‘very low’ and not supported with effective qualitative and quantitative information and based on somebody's personal judgements when the relevant science is not available.

What is the economic and social loss to the business, the families, the employees and the local community? We would suggest it will be far greater than the Australian Government and the agencies making these decisions would ever appreciate or understand.

- e) Industry would believe that the ALOP is there to protect the industry, community and/or the environment from the introduction of exotic pests and/or diseases. The issue of ‘least trade restrictive’ should not be a consideration at least until the assessment is complete, the appropriate protocols detailed and the work plan designed.
- f) The wider implications of social, environmental and economic aspects must always be considered and given high prominence in relation to developing Quarantine and Biosecurity arrangements. As highlighted in d) above an incorrect decision by the Government and/or Government Agencies can have a significant impact at the enterprise, industry and community level. If we continue to not consider these implications the primary producer will be driven from commercial production and Australia will eventually become a net importer of horticultural produce.
- g) We would believe that the **community does not understand or accept** why the Australian Government would allow a product to be exported to Australia when it is grown in a country that has an exotic pest/disease that if it were to enter Australia could devastate an industry, a community and/or the environment. Particularly when Australia may produce sufficient of that crop to satisfy the domestic needs.
For instance why import apples from New Zealand when the science shows that mature apples can transport pests/diseases like Fire Blight, European canker and Wheat Bug. Or why import cherries from the USA when they can carry Powdery Mildew or Cherry Fruit Fly.
Past Australian Government's have failed to explain and/or convince the community of the policies that they have operated under in relation to importation of horticultural products.
From an industry perspective, we understand that any consideration of an application to import produce must be

considered under the International arrangements and must not be an 'industry protection mechanism'.

What industry cannot accept is when

- (1) decisions relating to an import application fail to be made purely and totally on scientific grounds, and/or
- (2) applications to export product to other countries are not considered in the same manner as Australia considers import applications.

Australia consistently fails to achieve acceptable reciprocal rights for the export/import of like products. For instance USA cherries can enter Australia when treated with Methyl Bromide at low temperatures eg. 6°C, while the USA protocol for Australian cherries is at 21°C. There is no International 'level playing field' and the WTO and the SPS agreements have consistently failed to achieve consistency of protocols for world trade.

- h) The risk assessment process has in the past failed the Australian Industry and Community.

The Import Risk Analysis process has suffered from poorly defined rules and processes. In addition there have been changes in the rules part way through an IRA process. Government and Government Agencies have moved the 'goal posts' when placed under scrutiny by industry and/or the community. This highlights to industry that those developing the processes and rules have failed to get them right in the beginning. Having been involved for at least fifteen years in the process the Apple and Pear Growers Association of SA would believe that the Government Bureaucracy have consistently failed to adequately consult with the industry and/or community and have failed to take notice of the practical advice offered. At times the Bureaucracy has been extremely and blatantly arrogant and dictatorial in their decisions.

While the level of communication and involvement of industry has improved there is still a way to go. For instance industry has virtually no input into the establishment of work plans relating to new imports into Australia. Given the experience industry has in operating an orchard and/or packing facility and/or their knowledge of how pests/diseases act and react within the orchard environment, industry would believe that such knowledge/experience would be invaluable to AQIS in advising on a particular protocol.

Again Industry is most concerned that AQIS in particular has consistently failed to involve Industry in the development and implementation of import work plans. Their lack of transparency in this process has left Industry feeling that AQIS

- (1) is 'trying to hide' something, and/or
- (2) don't trust/respect Australian industry or growers, and/or
- (2) is working in the best interests of the exporting country.

As a result at times there is a lack of trust in AQIS and the process they have developed and are implementing.

Notwithstanding these comments we believe that the process has changed significantly in the past few years and the level of communication and trust has improved **BUT** there is still a long way to go.

In relation to Market Access, Industry believes that this process has improved over the past few years. Again we would believe this has only occurred as a result of Industry and the community raising a range of concerns. Some of the issues and resultant actions that have been instrumental in making improvements include:

- (1) The concern of industry that trade decisions were interfering in scientifically based import and export assessments resulted in the establishment of Biosecurity Australia. This we believe was an important step forward.
- (2) Market failure and the close of the Taiwan market in December 2005. The action by the then Minister for Agriculture, Peter McGauran, in making available Government funds to assist in the research on Fruit Fly was important and much appreciated by Industry. The momentum generated in Fruit Fly R&D must be maintained by the current and future Governments in partnership with industry to ensure successful re-entry and entry into important overseas markets.

Industry would believe that the work undertaken by the Horticultural Market Access Committee through Horticulture Australia Limited has been instrumental in raising issues relating to Market Access.

The most concerning issue for Industry is that there is still a lack of resources – both financial and human – being made available to Market Access.

- i) While the role of the Eminent Scientist Group was an important step forward in the IRA process, the Apple and Pear Industry believes that the initial process and actions of the Panel failed both the process and Industry.

The terms of reference were too restrictive and Industry did not believe that the Group was sufficiently independent particularly from the Department (DAFF) and Biosecurity Australia.

As a result Industry did not believe it received a sufficient and acceptable hearing from the Eminent Scientist Group as part of the Apple IRA.

We have not had any experience with the Eminent Scientist Group since their role has been changed. The most important aspects will be that

- (1) the Panel is completely Independent from Biosecurity Australia and DAFF,
- (2) they report directly to the Minister,
- (3) there is representation on the Panel from a wider base of Scientists and not just from Government Agencies,
- (4) there are practicing Scientists involved on the panel
- (5) the terms of reference are in no way restricted by Government policies or Agency pressures.

j) Industry would believe that the Quarantine and Biosecurity Framework does not adequately analyse and manage the risk to the Environment. In the case of a disease like Fire Blight, Industry would believe there is a complete lack of knowledge and understanding of how this bacteria might affect the Australian Landscape and Environment. We would believe there should have been, at a minimum, a modelling process of the likely impact of Fire Blight on the environment undertaken before any decision to import New Zealand apples was approved by the Secretary of DAFF and ultimately the Australian Government.

Industry does not believe that there is sufficient expertise/knowledge within Biosecurity Australia to assess the affects of specific exotic pests/diseases on the unique Australian Landscape and Environment. Similarly we do not believe there is expertise/knowledge within Environment Australia to make such assessments.

Overall we would believe this is a major gap within the whole Import Risk Assessment process and needs to be addressed in the process going forward.

k) Industry does not believe the appropriate feedback loops exist within the whole Quarantine and Biosecurity process.

There is a lack of

- (1) true partnership between the Government Agencies and Industry particularly at the 'grass roots' grower level, and
- (2) trust in the process and systems resulting a 'them and us' mentality, and
- (3) transparency right throughout the process, and
- (4) appropriate information being made available to industry.

We would believe that the sharing of pest and disease information, particularly relating to those pests/diseases being detected at pre-border, border and post-border, with industry has been extremely poor. With the establishment of Plant Health Australia and Industry Biosecurity Plans we believe the sharing of information may improve. AQIS appears to be the agency most negative in supplying appropriate pest/disease information.

- l) Up until recent times Industry would have said that, in most cases, emergency response plans were inadequate to manage an outbreak of an exotic pest/disease.

The development of Industry Biosecurity Plans and appropriate pest/disease contingency plans have been a major step forward in improving Australia's ability to respond to an outbreak.

The draft contingency plan for Fire Blight was an important tool for Industry and Government in dealing with the alleged outbreaks of Fire Blight in the Melbourne and Adelaide Botanic Gardens in 1997. Without the draft document the process would have struggled to achieve an acceptable outcome and any programmes would have been very ad hoc.

The question is have we learnt from that experience and are we better prepared?

While we now have Apple/Pear and Cherry Industry Biosecurity plans and Industry is developing the other appropriate 'tools' we are not convinced that Industry and individual growers are sufficiently and well resourced to manage and survive a major exotic pest/disease outbreak. Also, we do not believe Governments' at National, State and/or Local levels have adequate resources – financial and human – to manage a major exotic incursion. More importantly the Agencies involved with the Environment, Natural Resources and Human/Social Health are not capable of dealing with any major incursion.

- m) Industry would believe that the current cost-sharing arrangements between Commonwealth, State and territory Governments, any affected industries and any affected communities still has a long way to go. While the arrangements that have been developed through Plant Health Australia and the ERRD Deed has set a good foundation and is continually being modified we know the system, structure and process has not been truly tested with a major exotic incursion.

All we can do is be ever vigilant, endeavour to put the best possible systems and programmes in place and ensure that we learn from any incursion no matter how small.

We would believe that appropriate exotic weeds with major affect on a particular commodity should be ultimately included with the relevant industry plans.

Industry does not believe that incursions that have principally environmental impacts are well considered and prepared for within the current plans and/or structures.

- n) Industry believes that legislation and regulations should regularly be reviewed and up dated. The system should be such that the legislation sets the broad framework in which all parties can

operate but the processes allow for simple and effective modifications, when required, to be undertaken in an efficient and timely manner. So often we see legislation taking years to change and as a result substantial social and economic damage occurs.

- o) Industry would believe that at times the Commonwealth and State/Territory legislative process does not operate effectively and/or in a complimentary manner. Much more effort must be made to have consistent legislation and regulations across Australia. As industry and growers operate in a number of State jurisdictions it is essential to remove those burdens and additional cost relating to inconsistent legislation/regulation.

For industry to continue to compete in an ever increasing competitive global market Government's must work even harder to reduce/minimise the burden of inconsistent legislation/regulation and Government 'red tape'.

Specific legislation relating to 'minimising State, Territory or Local Government action which would have an effect of frustrating a Commonwealth decision or its actions to implement an SPS agreement would be overridden' is not supported by Industry. More importantly it is essential that the Commonwealth Government and Government Agencies ensure that their decisions and actions are relevant to all Australians and protect the individual/industry/community no matter where they might undertake their business. If all decisions are truly based on scientific information and take into account the specific issues of the appropriate regions throughout Australia then legislation is not required. Unfortunately many of the past IRA's and other programmes undertaken by AQIS and/or Biosecurity Australia have failed to adequately consider regional and local issues within their processes and final decision.

Given the changing nature of the WTO rules and the development of new SPS Agreements it is essential that the process within Australia changes and is maintained current. If regional, property and/or block freedom is to be a major part of the process then appropriate controls and protection must be developed and implemented. If the import permit is the most appropriate tool then it should be considered. If another 'tool' can be used and/or developed then it should be developed.

The Fruit Fly Zone within the Riverland is a major advantage for those industries able to export overseas. The Fruit Fly programme implemented by the South Australian Government through Primary Industries and Resources SA, and supported by the horticultural industries, is essential in maintaining that area freedom and the associated export opportunities. Any action to dilute this system would be strenuously fought by Industry and the

Community. Any action by Government(s) to strengthen these 'tools'/processes/systems to maximise the advantages for these specific regions/properties/blocks would be strongly and pro-actively supported by Industry.

- p) Industry believes that the division or roles and responsibilities between Government (Federal, State, Local), Government Agencies, Industry and individuals is not at all well defined, understood or implemented. Quarantine and Biosecurity at times lacks cooperation and shared responsibilities. As discussed above areas like development of import work plans is not a shared responsibility, which is of major concern to Industry. While there may be appropriate interaction between the relevant Agencies at Commonwealth and State/Territory level the linkage between those Agencies and Industry and the Community is extremely poor. There needs to be a greater development of partnership between the Agencies and the relevant and appropriate industry groups and/or individuals. In addition there needs to be improved trust, transparency and communication between all parties. As far as the 'grass roots' grower is concerned they see themselves completely disenfranchised from the process and the final results. We would believe the community also feels the same. A lot more work needs to be undertaken to develop a seem-less system that all within the chain are comfortable with. Given that the community (through their taxes) and industry (through their statutory levies and general taxes) pay for the process and are also the ones financially and socially affected by an incursion it is essential that they be seen and treated as true partners in the process. Plant Health Australia could be seen as an improved model in which Commonwealth and State Governments and Industry are co-operating in a true partnership.
- q) Given the complex nature of the process it is important that the right checks and balances are in place to ensure the integrity and transparency of the process and final decisions. The Director of Animal and Plant Quarantine is the overall manager of the roles, responsibilities, processes and decisions of the Quarantine and Biosecurity sections under their control. We do not believe that they should be responsible for making the final decision(s) in relation to the acceptance of the recommendations of their Section. The decision should be the responsibility of a higher authority. If the Director of Animal and Plant Quarantine was also to be the Secretary of the Department of Agriculture, Fisheries and Forestry then we would believe they would not be the appropriate person to make the final decision as they would not be a higher authority.

As the Australian Government establishes the country's Appropriate Level Of Protection, signs off on SPS Agreements and introduces associated legislation it should be their responsibility to sign-off on any decisions made under these systems and processes. Government has a responsibility to ensure that the right decisions are made that not only consider Australia's international obligations but also gives due consideration to all aspects including the social, economic and environmental issues and community and industry interests. Government cannot continue to 'pass the buck' back to the bureaucracy on decisions that are squarely their responsibility.

- r) Industry believes that AQIS has a conflict of roles and responsibilities in their dual role of facilitation and regulation. This conflict causes practical problems for the growers involved in export/import at the very basic levels. We believe that the two roles and responsibilities should be separated to ensure transparency in the process.

- s) Industry believes that the cost-recovery process is a negative and limiting factor for the development of good Quarantine and Biosecurity. The export of produce has a positive benefit not only to the individual undertaking the export but also to all sectors - community, region, state, national – and the relevant economies. As indicated above the whole process of Quarantine and Biosecurity must be elevated to the same level as health and education and funded in the same way through the Australian taxation system. Industry also believes that Governments at both national and state level have failed to adequately resource the facilities required for research and development, diagnostics and surveillance. In fact they have allowed these facilities to be 'run down' and in many instances closed. As a result we are facing a shortage of facilities and skilled people to undertake the necessary work to support our Quarantine and Biosecurity requirements. There is no obvious succession planning within the research sector to ensure the maintenance and growth of skilled staff to undertake the required work. Urgent action needs to be undertaken to implement programmes of infrastructure development and expansion, skills development and succession planning if Australia is to continue to be an important player in the areas of Quarantine and Biosecurity and ensure we remain relevant in the global market.

- t) From a 'grass roots' grower perspective they would have little if any knowledge of the Quarantine and Exports Advisory Council and what its roles and responsibilities might be. More importantly they would have no knowledge of what such a group has achieved in improving Quarantine and Biosecurity within Australia. If this

group is to continue it needs to show relevance to Industry and the producer base.

- u) The consultative arrangements in the past, particularly relating to the Import Risk Analysis, has been far from acceptable from the 'grass roots' grower perspective.

All forms of Government have consistently failed to truly consult with industry and the community. The process of writing a draft discussion paper and then putting it out for comment is not the appropriate method of consultation.

Agencies need to

- start with a blank sheet of paper,
- engage industry and the community in discussions, debate and 'brainstorming',
- listen to what industry/community has to say,
- take the information and issues back and prepare an appropriate issues paper,
- seek agreement from the industry/community on the issues paper,
- then prepare the appropriate discussion paper for consultation.

In this way industry/community will feel more engaged and ultimately have some ownership of the process and the results. The final result will be one that has greater acceptance by all involved. Again transparency, integrity and trust are all parts of good consultation. So often in the past one or more of these ingredients has been lacking.

Similarly other aspects of Quarantine and Biosecurity education and awareness programs and processes have been poorly communicated.

With the establishment of Plant Health Australia and the associated mechanisms, programmes and 'tools' industry is hopeful that education and awareness programs, that have relevance to industry, will be developed and implemented and will assist in improving aspects of Quarantine and Biosecurity. Unfortunately one of the missing components of the Plant Health structure is the involvement of Quarantine and Biosecurity representatives.

AQIS and BA must become integral and active participants in the Plant Health Australia model and process if we are to further develop and implement good Quarantine and Biosecurity systems.

Overall Australia's Quarantine and Biosecurity programmes and processes have developed and improved but there is still a long way to go to achieving the best possible results for all involved in the process.

We look forward to the opportunity to expand on these and other points directly with members of the Review Panel. In the meantime if more

information and/or explanation is required please contact the Association on 08 8349 4556.

Your due consideration of this submission would be appreciated.

Yours faithfully,

Trevor M Ranford B.Sc., Dip MP (AIMSA), CPMgr.
General Manager
Apple and Pear Growers Association of SA Inc and
Cherry Growers Association of SA Inc.

APPENDIX A:

TECHNICAL INDUSTRY RESPONSE TO IMPORTATION OF APPLES FROM NEW ZEALAND REVISED DRAFT IRA REPORT

**A HARD COPY HAS BEEN POSTED TO THE
SECRETARIAT**