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Response to the 'Draft report for the review of import conditions for fresh potatoes for processing from New Zealand' issued 3rd July 2012 by Biosecurity, DAFF.

Dear Sir/Madam
2012

24th September

The Potato Processors Association of Australia Inc, (hereafter known as PPAA) wishes to strongly urge the Biosecurity division of DAFF to reconsider their position on the application from New Zealand Ministry for Primary Industries to import fresh potatoes into Australia. The PPAA does not make this appeal lightly or without substantial scientific basis to support its view. Our members have reviewed the application; we have also sought comment from one of Australia's leading entomologists, Dr Paul Horne. Dr Horne is involved in extensive research with Psyllids in collaborative projects with New Zealand researchers. PPAA have also consulted with Dr Kevin Clayton-Greene, a renowned scientist of vast experience who has been the Australian technical lead on the subject of Psyllids and the Zebra Chip complex since 2009. In this role Kevin has been advising both the Processed and Fresh Potato Industry Advisory Councils on the ever evolving research findings from New Zealand and around the globe as well as providing key recommendations for funded work such as the collaborative research between Australia and New Zealand conducted by Dr Paul Horne.

Our views are completely removed from the political discussion of free trade between our two nations. Further, three of the major processors, McCain Foods Pty Ltd, Simplot Australia Pty Ltd as well as Frito-Lay all have substantial capital investment in manufacturing facilities in New Zealand. Our members speak purely to protect Australia from the devastating disease complex known as 'Zebra Chip' which is thought to be caused by the bacterium, *Candidatus Liberibacter solanacearum* and transmitted by the vector the Tomato Potato Psyllid, (*Bactericera cockerelli*). Neither of which are believed to be present today in Australia. Also, we are

concerned at the risk of entry of Potato Cysts Nematode, *Globoderra Pallida* which is well known to cause extensive losses and increased costs across the many global regions where it prevails, including New Zealand.

Our concerns are raised in respect to the following key areas:

1/ The lack of scientific evidence to support the statement made by the 'final pest risk analysis report of 2009' where it identified two potential pathways to introduce infected psyllids into Australia. "*Bactericera cockerelli* may be associated with any aerial part of the plant, and while they feed primarily on leaves, psyllids and their eggs may also be present on stems or aerial fruit of the host plant"

The report does not take into account the fact that the lifecycle of the Psyllids can range from 30 to 80 days from egg lay to adult stage (Graham Walker, Plant and Food Research, New Zealand, data presented at NZ Psyllid conference, July 2012). It is therefore perfectly feasible for eggs to be transported on the tubers and find their way to Australia only to hatch and find a suitable host plant to colonise.

As Paul Horne states in his comments (see Appendix 1), he has asked the question "Can TPP adults lay eggs directly on tubers in the absence of a leafy substrate?" This critical scientific question has not yet been tested by trials. To assist in effectively assessing the risks associated with importing fresh potatoes the PPAA believes this work is needed.

2/ With the conditions of transport stating that 'door ajar container transport' is allowed the question must be asked "What is stopping live Psyllids escaping from such containers?". Dr Andrew Pitman from Plant and Food Research, New Zealand recently described (at the Psyllid 2012 Conference, 26th/27th July 2012, Auckland, NZ) his were observations on crops in the Canterbury district (an area where Zebra chip is not at epidemic levels) that were senesced and ready for harvest. He found that on some 'bolter' plants with significant 'regrowth' of green tissue there was heavy infection with all life stages of the Psyllid. When tested for LSO, these plants were found to be at levels he described as 'seriously infected', far higher levels than those from infected psyllids tested from the North Island infections. It would only take an infected adult Psyllid/s to fly from a 'door ajar' container and find a suitable host plant species such as *Solanum nigrum*, Black Nightshade.

3/ Again, quoting Paul Horne he states that recent work in the USA shows that tubers can test free of *Candidatus Liberibacter solanacearum* and then later will be found to be infected with 'Zebra Chip' after some months in storage. It is clear that testing for the bacterium in tubers is fraught with difficulty and scientists are still at the early stages of learning and discovering about the life cycle of the pest and the associated pathways for the bacterium.

4/ It is not known whether our Australian species of native Psyllids can carry *Candidatus Liberibacter solanacearum*?

5/ PPAA members are concerned about the risk of entry of further Potato Cyst Nematode (PCN) species and races into Australia. *Globodera pallida* species of PCN is known to occur in New Zealand as well as a 2nd race of *Globodera rostochiensis*. Neither of these have been found to occur in Australia. It is widely accepted that *G. pallida* is extremely difficult to control once established. Australia is one of the only regions in the world where known PCN infections are limited to just the one species (Ro1 *G. rostochiensis*). New potato varieties are relatively easy to breed for resistance to *G. rostochiensis* and extremely difficult to breed for resistance to *G. pallida*. PPAA believes the existing protocol conducted by New Zealand for PCN testing of land and crops to be very inadequate when compared to other testing standards for trade. We believe that this testing protocol needs to be far more robust before further consideration is given for export of fresh potatoes to Australia.

PPAA Request:

- DAFF Biosecurity conduct a thorough, up to date scientific review of the most recent science literature and advice from respected scientists involved in the research of Tomato Potato Psyllid as well as conducting a more thorough assessment of the risks associated with other diseases present in New Zealand which pose a threat to Australia.
- DAFF Biosecurity review the risk associated with 'door ajar' container transport for incursions of adult Tomato Potato Psyllids by them escaping to areas around the ports in Australia and colonising suitable host plants/weeds.
- Research work is done to assess if Psyllids can lay eggs on tubers rather than only on leaves/stems and whether or not eggs can be transported as part of any soil residue left on tubers after harvest. Also, that a more thorough review is conducted to assess the risk of importing Psyllid eggs and/or nymphs into Australia as clearly 'tubers brushed practically free' of soil would not necessarily leave them free of the Psyllid eggs or live nymphs if harvested from a paddock where crops were infected with Psyllids. Evidence such as that quoted above from Dr Andrew Pitman shows that even crops well senesced may still be heavily infected with live Psyllids
- MAFBNZ Export Compliance Programme for the Provision of Additional Declarations (PCN and potato wart) be reviewed by a reputable Australian nematologist for risk of importing *G. Pallida* or other species of *G. rostochiensis* into Australia.

In addition to the above, PPAA has reviewed the response to the draft report written by Dr Kevin Clayton-Greene on behalf of Ausveg (see appendix 2). We strongly

endorse this detailed scientific review of the report and are concerned by its content in highlighting so many shortfalls in DAFF Biosecurity procedures lack of current robust scientific risk assessment. We request all of the questions and criticisms raised by Dr Clayton-Greene be answered or challenged before DAFF progresses with any further action on its intentions in this regard.

We look forward to further discussion on this very critical subject and welcome as much consultation as necessary to arrive at a policy that is scientifically sound in nature.

Yours sincerely

David Antrobus

Vice-Chairman PPAA