

Paraphrased summary of the comments and responses to proposed changes to import conditions for Californian table grapes

Stakeholder comment	Biosecurity Australia response
<p>1 Californian table grapes still constitute a high-risk pathway for GWSS and the lack of any live or dead interceptions for only one season of trade should not translate into a lower risk level.</p>	<p>There is no evidence that the GWSS is associated with the pathway of commercially picked, packed and shipped Californian table grapes:</p> <ul style="list-style-type: none"> no interceptions of GWSS were made by AQIS last season; half the shipments came from GWSS infested areas; table grapes imported into New Zealand from California for the last six to seven years have been free of GWSS at inspection by the New Zealand Ministry of Agriculture and Forestry; and no GWSSs have been found by APHIS during pre-clearance inspection of hundreds of thousands of tonnes of Californian table grapes for export to third countries. <p>Importantly, only table grapes that have been inspected and pre-cleared by AQIS in California as being free from live quarantine pests, including GWSS, will be eligible for shipment to Australia for on arrival fumigation.</p> <p>The detection of a live GWSS during a pre-clearance inspection will result in the suspension of all exports until the problem is investigated. If a dead GWSS is found during a pre-clearance inspection, then an investigation will be conducted by AQIS and APHIS to evaluate the relationship of GWSS to the table grape pathway.</p>
<p>2 Concern that on arrival fumigation may allow the escape of insects that might survive shipment.</p>	<p>The Australian standard methyl bromide fumigation schedule is used to treat imports for a range of quarantine pests, including other hosts of GWSS from California (cherry and citrus fruit).</p> <p>Only table grapes that have been inspected and pre-cleared by AQIS in California as being free from live quarantine pests, including GWSS, will be eligible for shipment to Australia for on arrival fumigation.</p> <p>AQIS will only allow on arrival fumigation of Californian table grapes under a secure quarantine regime;</p> <p>Two types can be used, fumigation chambers and fixed tent facilities inside quarantine approved</p>

		<p>premises (QAPs);</p> <p>As available fumigation chambers are small and located at some distance from the points of entry for table grapes, it is expected that fixed tent facilities inside QAPs will be the preferred fumigation facilities for the 2003 season;</p> <p>Fixed tent facilities retain the desired security characteristics by allowing grapes to be unloaded from containers into secure environments, brought up to temperature and then fumigated under gas tight arrangements that are also insect proof and of a known volume.</p>
3	No technical evidence has been provided supporting the reduced inspection regime.	<p>There is no evidence that the GWSS is associated with the pathway of commercially picked, packed and shipped Californian table grapes – see BA response to Stakeholder comment 1.</p> <p>There is no scientific justification for maintaining a level of inspection higher than the accepted AQIS standard for fruit.</p>
4	As a consignment may be composed of more than one lot, a method of identifying each lot is required for efficient tracking. It is not clear what alternatives will be implemented to facilitate the tracking of individual lots arriving as part of a palletised consignment.	<p>AQIS/APHIS have a trace back system in place that allows identification of the registered growers, the packinghouses, the methyl bromide treatment facilities and the batch lots of each individual treatment.</p> <p>The pallet card on each pallet allows trace back through the phytosanitary certificate to the treatment facility. Any failure of fumigation will result in the suspension of the treatment facility and rejection of fruit from all growers in the inspection lot.</p> <p>Box stamping requirements will continue for incomplete pallets.</p>
5	It is not clear whether sampling of an inspection lot comprised of multiple lots fumigated in any 36-hour period will be statistically justified to provide an acceptable level of confidence in detecting the pest infestations.	<p>The only change to the sampling methodology for the 2003 work plan has been a reduction from a 920 to a 600-bunch sample per inspection lot. It is standard practise for inspection lots for imports from and exports to the US to be formed by aggregating treatment and grower lots over a period of time (often 24 hours). The treatment facilities for table grapes in California are small and involve the aggregation of only 2 or 3 fumigation treatments over a 36 hour period.</p>
6	No supporting evidence has been provided for the proposed reduction in fumigation dosage. The higher rates provided	<p>The increased methyl bromide fumigation rate was one of the three elements included specifically to address the uncertainties about GWSS prior to the 2002 season.</p> <p>However, as there is no evidence that the GWSS is</p>

	greater certainty against pests considered marginal for control at the Australian standard.	<p>associated with the pathway of commercially picked, packed and shipped Californian table grapes following a review of this issue, there is no technical justification to maintain the increased rate of fumigation.</p> <p>Only table grapes that have been inspected and pre-cleared by AQIS in California as being free from live quarantine pests, including GWSS, will be eligible for shipment to Australia for on arrival fumigation.</p> <p>The Australian standard methyl bromide fumigation schedule is used to treat imports, such as cherry and citrus fruit from California, for a wide range of quarantine pests.</p>
7	No justification for respective quarantine services in USA and Australia to follow their standard operating procedures for fumigation certification and measurement purposes.	Under the WTO Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement), Australia is required to recognise as being equivalent other members' phytosanitary measures that are not identical but which have the same effect.
8	If the grapes imported in the 2002 season were sourced from GWSS free areas then the protocols would not have been fully tested last season.	The inaugural export season began in June 2002 and ran through until November 2002, with a total of 347 consignments, comprising 91,740 cartons. Table grapes were shipped from Tulare, Kern and San Luis Obispo Counties. GWSS is found in the majority of Kern County and in one big pocket in Tulare County. Half of the shipments came from infested areas. There were no detections, live or dead, of GWSS.
9	Will inspections in California pick up GWSS eggs if present inside or on bunches of grapes?	Eggs of GWSS are not laid in or on bunches of grapes.
10	Tight packing of cluster bags into boxes may result in inadequate penetration of methyl bromide.	Packing requirements for table grapes are based on standard commercial practice and are the same as for the 2002 season. Cluster bags were used last season and no problems were experienced with penetration of methyl bromide or survival of quarantine pests.