

ADDITIONAL SUBMISSION FROM TRISH MACFARLANE

To:-

The Hon Rosemary Armitage MLC

Hon Ivan Dean MLC

Hon Kerry Finch MLC

Hon Tania Rattray MLC

Hon Josh Willie MLC

Thank you for the opportunity to provide you with additional information.

Firstly I would like to thank the DPIPWE Staff that have been involved in on-farm inspections on the ground, coming to our farm, inspecting our plants and respecting our Organic Certification practices. They have been extremely helpful, respectful and professional and we are so very grateful for their assistance. Without personnel like Tania Jensen working as hard as she has done over the past 3 seasons, organising market access for Victoria and South Australia, we would not have been able to export to the mainland except for NSW and Queensland.

1. Please note:- Tasmanian blueberry farms could not export to Western Australia during the 2018 production season (except for "All plant and plant products within a 200km radius of a detection of BBR is prohibited". Email from Tania Jensen DPIPWE on 9th June 2017). Lloyd Klumpp stated on the 13th July, 2018 to the Committee the following:-

MR KLUMPP – "We know fruit fly shuts down our markets and has shut down our markets in the face of what happened recently.

CHAIR – So does the rust with blueberries.

MR KLUMPP – No it hasn't.

CHAIR – It could.

MR. KLUMPP – It hasn't. We have worked very hard to make sure it hasn't. There are three jurisdictions, Victoria, South Australia and Western Australia free of blueberry rust. They accept all our products at the moment because of the surveillance we do and the arrangements we put in place".

This is not correct. IT HAS shut down the W.A. MARKET!!!

2. As a grower, since the 2014 outbreak, we have had to complete additional documentation to be sent with our freight consignment notes in relation to export to Victoria, South Australia and Western Australia. I have included examples of how the documentation has now changed. Changes have gone from a simple certificate in 2014 to a full manual in 2018. This is attached **in Appendix 1, 2, 3 and 4**. In the 2018 season we were required to be exporting as per ICA 31 requirements and these have now become quite costly to the farmer with internal in-orchard inspections of the farm (fortnightly), fruit inspections before collecting from orchard (600 count), packing line and despatch inspections (pieces of fruit count of 600 at each inspection), together with supporting documentation at each inspection needing to be kept, and a number of export documents that need to be filled out prior to despatch from the farm. Packing of pallets is more time consuming as there are label requirements on trays that have been inspected immediately prior to despatch, together with strict wrapping and labelling on the actual pallet itself. The pallets are also now required to be “fully enclosed” during transport which is not ideal for the storage of the fruit as there is no airflow through the produce. These ongoing costs to blueberry farmers are beginning to add up.

3. Possible sources of transmission appears to be wide ranging....some information suggests wind transmits from plant to plant, some suggest “up to several hundred metres”. There are varying reports. DPIPW’s current stance on this according to the information provided in a manual that was given to growers exporting to Victoria and South Australia in November/December 2017 for the 2018 Season:-

(Please note that I have highlighted some of the relevant information below, however there is more detail contained in **Appendix 4**).

“Pest Free Place of Production Protocol (TAS BBR01) Tasmania – Blueberry Rust Fruit 2017-2018 Fruit Export Season”, appears to be from plant to plant or a buffer zone of 400 metres.

(a) Life Cycle (Reference made to the “Blueberry Plant Protection Guide 2015-16; NSW DPI Management Guide”).

(b) Host Plants – “There are no pest records of BBR on Rhododendrons, Pieris and Azaleas.....”

(c) Means of Spread.

- (d) Buffer Zones “An appropriate buffer zone for blueberry rust in accordance with ISPM 10 is around the perimeter of a PFPP. This is based on “The rust spreads by airborne spores mainly via the wind, which are generally deposited close to their source”
- (e) Surveillance – 3 DPIPWE inspections together with fortnightly grower inspections which must be recorded and maintained and kept for audit purposes.
- (f) Requirements – A list of procedures to be followed by farmers who are exporting to VIC/SA.
- (g) Secure Conditions and System Documentation – transportation requirements for shipments and accompanying documentation.

The second part of the Manual Titled **“Blueberry Pest Free Places of Production Compliance Arrangement (TAS BBR01)”**.

- (a) Scope – If there are two blueberry properties within 400 metres of each other and one is an accredited Pest Free Place of Production and the other is not, then both farms are not accredited.
- (b) The farm owner is expected to also inspect fortnightly a minimum of 600 or 2% of the orchard plants in the crop – (DPIPWE Appendix 1 Page 20).

The third part of the Manual Titled **“Farm Biosecurity Guidelines Tasmania Blueberry Rust 2017-18 Export Season”**.

- (a) Farm Imports – “If you are unsure of the condition of imports, either do not accept them or place in an isolated area for a period and watch it for signs of pests and Diseases”.
- (b) People, Vehicles & Equipment
- (c) People – “It is highly recommended that you do not allow people onto the property if they have previously worked or visited other blueberry production sites”
- (d) Production Practises – Pest & Disease Prevention
- (e) Pollination Services – “Do not accept hives that are transferred directly from other blueberry orchards”.

The 10 pages at the end of **Appendix 4** is the documentation that is required to be completed by all farm owners/employees in order for produce to be exported to Vic/SA.

4. Consideration also needs to be given to the fact that on some sources of information pertaining to Blueberry Rust, it is mentioned that packaging is also a possible source of transmission. If farms pack punnets in the field, is this a greater possible source of transmission? It is suggested that spread can be via infected plants and fruit, packaging, equipment, clothing and hands.
5. In relation to the current incursion (IP1), the independent blueberry growers have always stated that at the Infected Property i.e. Sulphur Creek, the evergreen plants need to be defoliated and/or cut to the ground. This does not involve removal of plants. We have stated this fact from the very beginning i.e. in August 2016. Defoliation as a minimum needs to occur in May, which is when most of the deciduous Northern Highbush varieties will have lost most of their foliage. This would then coincide with a minimum of 8 weeks break before leaf break, with a view to reduced levels of inoculum being present, so that any chemical usage in Spring would therefore hopefully eliminate the rust. We have raised this issue with DPI/PWE/Biosecurity on a number of occasions since August 2016 and they have not been able to provide us with any conclusive evidence as to why this would not work

Defoliation - Even Lloyd Klumpp mentions on 13th July 2018 in his discussions with the Committee "There is work happening in research and development on blueberry rust, mostly in the blueberry infected states, and internationally. Some of that work is being conducted in New South Wales, particularly on defoliation". He also states "I would like to see that research." Attached is some information taken from various websites all stating problems with rust from a premature defoliation point of view, export restrictions, market access and possible sources of transmission, etc. (Appendix 5). Please note that premature defoliation is defoliation which occurs during the growing/picking seasons and not during the winter period.

6. "NSW growers using Southern Highbush blueberries redevelop blueberry beds in years 8-12, so the production cycle is from year 4 to year 8 to 10 (6 years)." PLEASE NOTE: That the plants are then removed and replaced with new plants, so the process starts all over again. This is confirmed by (Appendix 6)(NSW Department of Primary Industries September 2015 Primefact 133 Phillip Wilk & Melinda Simpson. Please note that Southern Highbush varieties are evergreen and so are Rabbiteye varieties.

It is interesting to note that some of the major growers are now growing their blueberry plants in pots in the field in substrate now. There are many instances of this around Australia. Some have even taken the steps of converting in-ground plantings to substrate in some states of Australia, or are planning this in the near future.

7. I have also attached information taken from the Department of Agriculture Victoria's website (Appendix 7) "the detection of blueberry rust in Victoria was caused by a breach in Victoria's quarantine entry conditions". I have also highlighted other information for your reference.

8. Electrolysed Water – This issue was brought up in TIA's submission and we thank them for the information provided. We have had the opportunity to discuss this with Professor Roger Stanley. We have also since the DPIPW Biosecurity On-farm Hygiene workshops had discussions with Michele Buntain from TIA in relation to this issue together with other matters. We believe that the process of Electrolysed Water is definitely one that should be vigorously pursued. The environmental benefits of using something like this as opposed to chemical treatments should be explored. We did express our concerns around only a trial being conducted here in Tasmania on IP1, as in our opinion, a full treatment program needed to be in place as an absolute minimum requirement. We did suggest that IP1 plants should be treated with the Electrolysed Water and a scientific trial to be done on a farm in NSW/QLD to determine its feasibility. The last thing that we want to do is to allow the blueberry rust spore numbers/inoculum to increase, although David Bardon (Costa Manager) did suggest in his evidence at their meeting with the Committee that he believed that in the beginning there were only low levels of rust and then later stated that he believed they were free of rust. The suggestion is that Electrolysed Water be used as a sanitiser/cleanser and this may keep the yellow pustules from spreading which in turn would reduce the inoculum. If this is done in between their

spray program (which I think is usually fortnightly) this should keep the rust well under control. The costs associated with Electrolysed Water I believe are as low as \$0.03 per litre, which would be a considerable saving in comparison to the current cost of undertaking a spray regime. I am not a scientist, but surely this, together with alternating sprays, defoliation and removal of infected stems/leaves would be a good first step into getting the rust under control in the first place, together with the possibility of having the rust eradicated further down the track.

9. Many Independent Blueberry Growers are of the opinion that the importation of Evergreen Varieties to Tasmania needs to be banned (including the retail trade). Banning of the importation of all blueberry plants (no matter what variety they are) from NSW and Queensland, as well as any State that has a future outbreak of Blueberry Rust. Ongoing management of evergreen plants up to individual owners is possibly leaving the door ajar as far as future incursions are concerned. Defoliation needs to be mandatory in future in relation to any existing planting of evergreen plant material in this state.
10. The Tasmanian Independent Growers have always stood behind the decision that "eradication of Blueberry Rust" is what we need to secure the future of our industry. This was confirmed at the meeting with DPIPWE back in August 2016 and we have not changed our stance since.
11. Current Infected Properties – we do not have any up to date information from Biosecurity Tasmania. We know that there are now 5 infected premises. The initial incursion in 2014 is classed as a separate incursion and that incursion is now closed. The Sulphur Creek incursion is being treated by Biosecurity Tasmania as a new incursion.

12. Sulphur Creek (IP1) – According to David Bardon when he spoke to the Legislative Committee, clearly stated that in his opinion he believed that they were now rust free. What testing, if any, has been done since 2016 to determine what their level of infection is? Interestingly they have made it quite clear from the beginning that they understood that there were low levels of infection of rust on their property.

Next 2 incursions (IP2 and IP3) – small (100 plants each) – One property is under management and the other we are not sure. Can this be clarified?

IP4 – under management – Not sure of the current status of this farm since being discovered with rust in October 2017.

IP5 – under management – 600 plants – currently Biosecurity has allowed the use of copper spray together with burning of cuttings.

13. It is very important to note that the Schwinds property (2014 incursion) is still rust free. They only had 2 out of 3 of their orchards removed. The remaining orchard was only 50 metres from the two that were removed. Surely this is some proof that firstly rust doesn't appear to travel very far, together with having deciduous varieties, that this breaks the rust cycle.

14. Attached as **Appendix 8** is a copy of Rosalie Daniels Report on Blueberry Rust entitled "Development of effective and sustainable disease management for blueberry production in Australia" – BB13002. This report was conducted over a number of years, was published through Hort Innovation and was partly funded by the Australian Blueberry Growers Association (ABGA). The Final Report was only provided in the last couple of weeks. Attached for your information is a copy of the Milestone Report (Number 108) dated 28th February 2017 which is a progress report on BB13002 (**Appendix 9**). Highlighted are some pages that may be relevant to our current situation in Tasmania at the moment, particularly in relation to understanding the disease itself, however there is a lot of information in this report that requires a lot of time to read and comprehend. I believe that there is still a lot of research to be done on blueberry rust, but this report is certainly an extremely welcome start. Please bear in mind that this is based on NSW growing conditions and perhaps in the future we may be able to contribute further studies on Blueberry Rust based on Tasmanian growing conditions.

15. Dean Metcalf mentioned in his meeting with the Committee that Anthracnose was previously detected on plants at Sulphur Creek some years ago. This resulted in destruction of some plants. He also mentioned plants being in isolation for a period is something that the committee should consider. We agree with his assessment and would suggest that a minimum 12 month timeframe is what should be required. Symptoms usually start in Spring and based on the fact that DPIPW have found a farm (IP5) at the end of May (when most northern highbush would be well advanced in leaf drop at this time of the year), in order to ensure that the whole cycle is completed, from beginning Spring (say 2018) to end of Spring the following year (say 2019) would be a minimum. Is it feasible that this quarantine station responsibility should be done in the State that the plants are being exported from. I believe that there have been strict quarantine requirements in the past with garlic (tissue culture I think) that have taken up to 2 years to be cleared through biosecurity.

16. More clarification as to when changes were made from/to ICA29 and ICA31 treatments. Dean Metcalf from Fruit Growers Tasmania mentioned these and dates as to when these changes came into effect please would be appreciated and which states it related to? Why were these changes made and based on what evidence? Why did they change back and based on what evidence? I have attached some information from the NSW DPI dated January 2017 and September 2017 in relation to this matter which is applicable to South Australia (Appendix 10). But this is all the details we have been able to find.

17. Another issue is the fact that there are cases of infected properties and non-infected properties being present at the same time at Local markets around the State (both north as well as south). Some farms have taken the decision to lease storage space for the production season (i.e. 3-4 months) and storing their market gear i.e. trestle tables, marquee, etc. so that these items are not returned to their farm whilst the infected property is at the market. Farm attendees to the market change their clothes prior to returning to the farm and bag them so that these can be washed upon return to the farm. This also includes hats, gloves, shoes, etc. Vehicles are washed down prior to coming back to the farm at a local drive through car wash, which also does the underneath of the car. Market attendees have asked to be placed at the

opposite end of the market or alternate weeks to the infected grower, so that this hopefully limits any possible contact.

18. The Tasmanian Biosecurity Alert System is still not working. I personally registered on the DPIPWE Website online 16th August, 2014 after receiving extremely helpful advice from Tania Jensen DPIPWE by e-mail on 16th October, 2014. Update on two new infected properties March 2017 (not notified). Update on change from eradication to management May 2017 (not notified). The matter was also brought up at both of the Biosecurity On-Farm Hygiene meetings in Grove 11th September 2017 and Exeter 15th September 2017. I personally e-mailed Lloyd Klumpp on 22nd February, 2018 advising him that the Alert System was off line yet again. He was checking with Public Info as to what was happening. I attended the Fruit Fly information session in Beaconsfield 23rd February, 2018 and advised Biosecurity that the Alert System was once again off-line. It was fixed with a couple of days of this meeting. However when IP5 was detected, no Alert was raised. It was simply an e-mail from Lloyd Klumpp dated 7th June, 2018 which was sent out to the growers on their list. We still do not know whether this problem has been rectified. The broader community (including media) was not notified either of IP5. The system appears to have been turned off on a number of occasions since 2016. Biosecurity Tasmania have also made no secret that they do not know all of the growers in Tasmania, so to only notify those on their list is questionable. Notification should have happened across all forms of communication, whether that be through the DPIPWE alerts system, newspaper and television media, social media, etc.

19. PUBLIC LEGISLATIVE COUNCIL GOVERNMENT ADMINISTRATION B
COMMITTEE-BLUEBERRY RUST IN TASMANIA 13/11/2017
(WHITTINGTON/KLUMPP)45

Dr WHITTINGTON -That is another good point. Another thing I have read in the submissions is that we might be inadvertently moving rust from one property to another during our surveillance. We have really strong protocols around how we maintain hygiene on ourselves and this happened with IP4. Once we go onto a property and in this case there is a suspect plant, the people who were involved in that inspection effectively go offline until that issue is resolved. There is then a potential waiting time before they can then restart work in the field. We are acutely aware that we could be a vector if we did not manage that really carefully. All of those things come into play about where our staff travel and how frequently and all those sorts of things".

What is the potential waiting time before team members can restart work in the field if they have been to an infected property? Considering this fact, would it be unreasonable to suggest that the same rule needs to be applied to workers/pickers on infected farms. Is Biosecurity still keeping teams separate i.e. "Clean Teams and Dirty Teams" is the terminology that onground DPIPWE staff have used in the past.

20. Page 18 of DPIPWE's Submission dated 30th October, 2017. "An Incident Management Team (IMT) was formed that met regularly (approximately 3 times/week) and an update to growers was distributed after those meetings via the Fruit Growers Tasmania representative who was part in the group, as well as other communication activities that Biosecurity Tasmania undertook". As an FGT member at the time, we were never informed of these meetings and no information was ever passed on to members. So the question as to what information was given to FGT? Who was on the committee? Are there copies of any information that DPIPWE thought was being provided to members.

21. Page 34 & 35 DPIPWE's Submission dated 30th August, 2017 – Impact if Blueberry Rust is Established in Tasmania "The major issue with establishment of blueberry rust will be ongoing access to regulated markets. Unregulated markets such as QLD and NSW will accept fruit even if it is affected by blueberry rust. Successful blueberry industries in these states are able to access the Tasmanian and other regulated markets despite the presence of blueberry rust. **Organic blueberry growers will be most significantly impacted by blueberry rust establishing in Tasmania, Victoria and South Australia are the primary markets for organic Tasmanian exported fruit; Western Australia is a lesser market. If special long-term market access agreements cannot be put in place, growers producing blueberries organically for export into these States would lose their interstate market access.** Organic orchards may be able to apply organic fungicides; however it would be necessary to ensure this was done in compliance with protocols and labelled use. Growers producing blueberries via conventional production systems will be able to retain access to regulated markets provided they can undertake the necessary chemical applications. **However, production costs may increase for both conventional and organic producers as a result.** In this respect, it will be important to set up the Interstate Certification Assurance (ICA) Scheme in Tasmania to enable producers to self-treat and self-certify their own fruit under ICA 31. This scheme operates nationally for the movement of plants and plant products.

The scheme has not been set up in Tasmania because there has never been a significant demand given that Tasmania enjoys area freedom from a range of pests and diseases of biosecurity concern. Setting up the scheme would be managed by Biosecurity Tasmania as the auditor." Please note comments relating to production cost increases for growers.

22. Suggestion of a "Register of workers on infected premises" that could be accessible by Blueberry Farmers located on the DPIPWE Website allowing blueberry growers to register their details with a login?? This would enable farmers to do a search on names to make sure that they haven't been on infected farms before. Any suggestions as to how better manage this would be greatly appreciated.

23. There are blueberry growers that have also been impacted by Fruit Fly. These farms have been able to access a compensation package. Blueberry Growers have been offered \$1,000 to assist with implementation of on-farm hygiene practices. Is this still considered to be sufficient based on the increased procedures that have been placed on growers?