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Department of Agriculture, Fisheries and Forestry
plantstakeholders@aff.gov.au

To whom it may concern,

Assessment of alternative measures for the importation of fresh Cavendish bananas from the Philippines: issues paper

Thank you for the opportunity to provide feedback on the issues paper, in relation to the Biosecurity Import Risk Analysis (BIRA) for the importation of commercially produced fresh Cavendish banana fruit from the Philippines for human consumption.

Importance to the banana industry

The Australian Banana Growers' Council (ABGC) strongly opposes banana imports that could compromise Australia's national food security and the prosperity of regional communities.

- Australia does not require imported bananas. Australian growers produce more than enough high-quality fruit to meet domestic demand year-round, ensuring a reliable and consistent supply for consumers.
- Permitting banana imports would create unacceptable biosecurity risks. Imported bananas have the potential to introduce exotic pests and diseases that could devastate banana farms, threaten growers' livelihoods, and harm the regional communities that depend on the industry.
- The Australian banana industry is a significant contributor to the national economy. It generates approximately \$1.3 billion annually, supports more than 540 farming businesses, and provides employment for around 18,000 people, making it a vital part of Australia's agricultural sector and regional economies.
- Industry data for 2024–25 shows that more than 368,701 tonnes of bananas were produced, with an estimated farm-gate value of approximately \$719 million.
- Australia also benefits from a strong biosecurity advantage. Unlike many banana-producing countries, Australia remains free from several of the world's most destructive banana diseases. Production is concentrated in three key growing regions: Far North Queensland, Northern New South Wales, and Carnarvon, Western Australia. Protecting this unique disease-free status is essential to safeguarding the future of Australia's banana industry.

Feedback on issues paper

The issues paper is an important component of the Biosecurity Import Risk Analysis (BIRA) process. It provides:

- an overview of Australia's biosecurity policy framework
- background information on the assessment of alternative measures
- information on the commodity under assessment
- an overview of the risk assessment methodology
- a summary of the BIRA process, including opportunities for stakeholder consultation.

The ABGC appreciates the opportunity to provide feedback at this early stage of the BIRA process. We request that the Department carefully considers the following comments during the preparation of the draft report.

1.

Context	Pathogens and pests of bananas and all other crops have continued to expand their geographic ranges since 2008 when the last IRA regarding the import of Cavendish bananas from the Philippines was conducted.
Question	Can the Department detail what evidence they will require from the Philippines as a minimum for them to claim freedom from particular pathogens or pests?
Reason	Up-to-date and independently verifiable evidence is needed from the Philippines regarding the presence and absence of pests and pathogens in their country. Taking into consideration that high priority pathogens and pests, including; blood disease, Eumusae leaf spot, phytoplasmas, several viral diseases, and numerous insect pests are caused by different organisms with vastly different epidemiological parameters.

2.

Context	In the Issues Paper, the key pests and pathogens are grouped according to their common names, such as mealybugs, fruit flies, viruses, etc. Each of these groups consist of many different species, for example, mealybugs contain about 2,300 different species. Mealybugs, as a group, were estimated to have an unrestricted risk estimated as low and therefore do not achieve the appropriate level of protection for Australia, according to the 2019 group PRA. Therefore, measures will be required to lower their risk. (<i>Final group pest risk analysis for mealybugs and the viruses they transmit on fresh fruit, vegetable, cut-flower and foliage imports</i>, Department of Agriculture and Water Resources, January 2019)
Question A	Will the BIRA only consider the risk for bananas or will the assessment include the risk of these pests for establishment and spread across all horticulture and agricultural production, including Australia's natural environment?
Question B	Mealybugs are difficult to control and rapidly develop resistance to pesticides. Will the BIRA consider resistance to pesticides, including data on sensitivity to proposed control measures for mealybugs and other insects when considering alternative control measures?

Question C	What inspection regime does the Department deem acceptable to ensure that no live mealybugs are imported into Australia, where will these inspections take place in the Philippines, and how will compliance be validated?
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3.

Context	On page 5 of the Issues Paper, banana fruit is defined as the entire finger, comprising the pulp and peel (including the flower end, with possibly some dried floral remnants attached, and the pedicel) and a portion of the crown.
Question	If floral remnants are considered a part of the fruit for the purpose of the BIRA, can the Department provide a quantitative measure of how much “dried floral remnants attached” are allowed?
Reason	Wording of “with possibly some dried floral remnants attached” is ambiguous.

4.

Context	If the risk of a pathogen or pest is estimated at above very low, then control measures will need to be implemented.
Question	Can the Department provide an overview of how they seek to validate and confirm the effectiveness of control measures proposed by the Philippines?

5.

Context	To move banana fruit between states, Australian growers must comply with existing Australian Interstate Certification Assurances (ICA).
Question	Can the Department confirm that imports from the Philippines must comply with all of the same ICA criteria as Australian growers?

6.

Context	For the bacterium, <i>Ralstonia solanacearum</i> phylotype IIb causing Moko, there are no effective chemical controls. As a result, this disease can only be controlled through rouging, local on-farm biosecurity and quarantine. There are several common weed hosts which can be infected by this pathogen and remain asymptomatic, as well as many Heliconia species used as ornamental plants in Australia, which are susceptible host plants.
Question	How will the Department take these additional risk factors into consideration in their risk assessment?

7.

Context	Being grown, processed and packed in the tropics, banana consignments are prone to picking up hitchhiker pests. These include insects such as mosquitos, frogs, geckos, toads, ants, rats, reptiles and weeds. These pests can pose a significant risk to human health, animal health, and to Australia's agricultural production.
Question	How will these hitchhiker pests be assessed in the BIRA and how will the impacts beyond bananas be taken into consideration?

8.

Context	In the planned BIRA, a different process to assign risk will be used than in the 2008 IRA for bananas from the Philippines.
Question	Since the Department has stated that they will not reduce the ALOP, can the Department clarify that no risk estimates will be reduced for the pathogens and pests as outlined in the 2008 IRA?

9.

Context	When the previous draft IRA report was released in 2000, there was no prior notice to industry. This made it difficult to commission experts to review the draft report. Biosecurity Queensland addressed this issue during the July Q&A session stating that previously BQ were only given 2 weeks.
Question	Can the Department provide a 30-day notice period to all stakeholders prior to the publication of the draft BIRA report?
Reason	Given the significance of the subject matter and that this is the first official BIRA being conducted by DAFF, we think this is a reasonable request.

10.

Context	While Banana Bunchy Top Virus is in Australia, it has been contained to areas in northern NSW and southeast QLD through significant and sustained biosecurity efforts by the banana industry. The Philippines has related strains of this virus, such as the Abaca Bunchy Top Virus and the Asian subgroup of the Banana Bunchy Top Virus.
Question	Can the Department confirm that these will be considered as separate Exotic High Priority Pests as listed in the 2020 Banana Industry Biosecurity Plan, Version 3.2 January 2020?

11.

Context	While Panama wilt Tropical Race 4 is mentioned in the Issue Paper, there are many additional VCG groups of <i>Fusarium oxisporum</i> f.sp. <i>cubense</i> exotic to Australia, as outlined on Page 11 of the 2020 Banana Industry Biosecurity Plan.
Question	Can the Department confirm that they will take these additional VCG groups into consideration in addition to Panama wilt Tropical Race 4?

12.

Context	Countries with black Sigatoka require 65 fungal sprays per year to control the disease. Economic impact from black Sigatoka is significant as growers can suffer up to a 50% loss in productivity. In this context, the APVMA continues removing more chemicals, which can increase the difficulties experienced by affected growers.
Question A	Can the Department confirm that the negative environmental impacts of using more chemicals in the Great Barrier Reef catchments will be considered?
Question B	As chemical tools are removed from Australian production systems, how would Australian growers be expected to control these diseases, such as black Sigatoka?

13.

Context	While the Issues Paper groups the key pests and pathogens together, there is a lot of diversity within these groups. Within the Banana Industry Biosecurity Plan, Version 3.2, January 2020, approximately 154 pests and pathogens are listed individually, as per Table 1 below (114 invertebrates, 8 bacteria and phytoplasmas, 13 fungi, 1 oomycete, 13 nematodes and 5 viruses).
Question	Can the Department confirm that the BIRA will consider all of these individual pests and pathogens and that they will not be assessed on a grouped basis?

Table 1 Names of biotic threats to the Australian banana industry. See Threat summary table form Biosecurity Plan for the Banana industry Version 3.2 January 2020.

Note that this list is focussed on bananas only and does not include threats to other horticultural industries or Australia's native flora and fauna and does not contain any new information which has come to light after January 2020.

Scientific name	Common name
Invertebrates	
<i>Allonychus braziliensis</i>	Brazilian mite
<i>Calacarus citrifolii</i>	Citrus grey mite
<i>Oligonychus orthius</i>	Spider mite
<i>Oligonychus velascoi</i>	Coconut mite
<i>Oligonychus zeae</i>	Maize spider mite
<i>Raoiella indica</i>	Red palm mite
<i>Tetranychus abacae</i>	Abacean mite
<i>Tetranychus amicus</i>	Banana mite
<i>Tetranychus andrei</i>	Andrei mite
<i>Tetranychus piercei</i>	Spider mite
<i>Tetranychus tumidus</i>	Tumid mite
<i>Tetranychus yusti</i>	Yustin mite
<i>Adoretus compressus</i>	Rose beetle
<i>Adoretus sinicus</i>	Rose beetle
<i>Adoretus versutus</i>	Rose beetle
<i>Basilepta viridipenne</i>	Banana leaf and fruit scarring beetle
<i>Basilepta sanguinea</i>	
<i>Colaspis hypochlora</i>	Banana fruit scarring beetle
<i>Exopholis hypoleuca</i>	Cockchafer
<i>Gonophora riffa</i>	Leaf beetle
<i>Hedylepta blackburni</i>	Coconut leafroller
<i>Ligyrus ebenus</i>	Black sugarcane chafer

<i>Metamasius hemipterus</i> syn. <i>M. sericeus</i>	West Indian cane weevil/ Silky cane weevil
<i>Nodostoma subcostatum</i> (syn. <i>Basilepta subcostatum</i>)	Banana leaf and fruit scarring beetle
<i>Odoiporus longicollis</i>	Banana stem boring weevil
<i>Oribius inimicus</i>	Grey weevil
<i>Oryctes rhinoceros</i>	Coconut rhinoceros beetle
<i>Pentarthrum musae</i>	Weevil
<i>Philicoptus demissus</i>	Peel-scarring weevil
<i>Philicoptus iliganus</i>	Peel-scarring weevil
<i>Philicoptus stringifrons</i>	Peel-scarring weevil
<i>Phyllophaga plaei</i>	Scarab beetle
<i>Phyllophaga vandinei</i>	Scarab beetle
<i>Popillia pulchripes</i>	Chafer beetle
<i>Rhynchophorus palmarum</i>	South American palm beetle
<i>Scapanes australis</i>	Rhinoceros beetle
<i>Stenommatius musae</i>	Weevil
<i>Strategus anachoreta</i>	Scarab beetle, Coconut beetle
<i>Sybra alternans</i>	
<i>Temnoschoita quadripustulata</i>	Weevil
<i>Bactrocera dorsalis</i>	Oriental fruit fly
<i>Aleurocanthus woglumi</i>	Citrus blackfly
<i>Aleurodicus dugesii</i>	Giant whitefly
<i>Aleurothrixus floccosus</i>	Citrus whitefly, woolly whitefly
<i>Aphis odinae</i> (syn. <i>Toxoptera odinae</i>)	Mango aphid, Sapium aphid
<i>Aspidiotus coryphae</i>	Scale
<i>Aspidiotus elaeidis</i>	White Banana scale
<i>Aspidiotus excisus</i>	Green scale
<i>Brachylybas variegatus</i>	Brown coreid bug, passionvine bug
<i>Corythaica gossypii</i>	Cotton lacebug

<i>Diaspis boisduvalii</i>	Bosiduval scale
<i>Dysmicoccus grassii</i>	Pio barinoso
<i>Pseudococcus elisae</i>	Banana mealybug
<i>Nipaecoccus nipae</i>	Spiked mealybug, Coconut mealybug
<i>Dysmicoccus neobrevipes</i>	Grey pineapple mealybug
<i>Pseudococcus jackbeardsleyi</i>	Jack Beardsley mealybug
<i>Rastrococcus invadens</i>	Mango mealybug
<i>Rastrococcus spinosus</i>	Philippine mango mealybug
<i>Pseudococcus comstocki</i>	Comstock mealybug
<i>Monalonion sp.</i>	Banana stainer bug
<i>Monathia monotropidia</i>	Tingid
<i>Mycetaspis personata</i>	Masked scale, masked aspidiotus
<i>Erionota thrax</i>	Banana skipper butterfly
<i>Frankliniella invasor</i>	Thrips
<i>Aleurocanthus woglumi</i>	Citrus blackfly
<i>Aleurodicus dugesii</i>	Giant whitefly
<i>Aleurothrixus floccosus</i>	Citrus whitefly
<i>Aphis odinae</i>	Mango aphid
<i>Aspidiotus elaeidis</i>	White banana scale
<i>Diaspis boisduvalii</i>	Boisduval scale
<i>Nipaecoccus nipae</i>	Spiked mealybug
<i>Prodromus clypeatus</i>	Mirid bug
<i>Pseudoparlatoria ostreata</i>	Acalypha scale
<i>Sophonia orientalis</i>	Leafhopper
<i>Stephanitis typica</i>	Banana lace bug
<i>Tessaratomia papillosa</i>	Lychee stink bug
<i>Amatissa</i> spp. (including <i>A. cuprea</i> and <i>A. fuscescens</i>)	
<i>Antichloris eriphia</i>	Leaf caterpillar

<i>Antichloris viridis</i>	Leaf caterpillar, Banana moth
<i>Artona catoxantha</i>	Coconut leaf moth
<i>Caligo ilioneus</i>	Owl-eye butterfly
<i>Cheromettia lohor</i>	
<i>Cheromettia sumatrensis</i>	
<i>Colaspis hypochlora</i>	Banana fruit scarring beetle
<i>Cryptothelea fuscescens</i>	Bagworm
<i>Darna trima</i>	Nettle caterpillar
<i>Erionota thrax</i>	Banana skipper butterfly
<i>Homophylotis albicilia</i> (syn. <i>Artona albicilia</i>)	
<i>Mahasena</i> spp. (including <i>M. corbeti</i> and <i>M. hoching</i>)	Bagworm, coconut case caterpillar
<i>Neodecadarchis flavistriata</i>	Sugarcane bud moth
<i>Nicetosoma papuana</i> (syn. <i>Diacrisia papuana</i>)	Tiger moth
<i>Opisina arenosella</i>	Black headed caterpillar
<i>Opogona sacchari</i>	Sugarcane moth, banana moth
<i>Opsiphanes tamarindi</i>	Banana green worm, narrow-banded owl butterfly, tamarind owl
<i>Parasa lepida</i>	Nettle caterpillar
<i>Platynota rostrana</i>	Peel feeding caterpillar, orange leafroller
<i>Sesamia nonagrioides</i>	Mediterranean corn stalk borer
<i>Setora nitens</i>	Coconut nettle caterpillar
<i>Sibine</i> spp.	Saddleback, saddle worm
<i>Spilosoma strigatula</i> (syn. <i>Arctia strigatula</i>)	
<i>Spodoptera albula</i>	Costa Rican armyworm
<i>Spodoptera frugiperda</i>	Fall armyworm
<i>Spodoptera littoralis</i>	Cotton leafworm
<i>Taenaris</i> spp. including <i>T. dimona</i> and <i>T. myops</i>	
<i>Telchin licus</i> (syn. <i>Castnia licus</i> , <i>Castnia licoides</i> , <i>Castniomera licus</i>)	Giant stem borer, White stem borer, Banana stem borer

<i>Thaumatotibia leucotreta</i>	False codling moth
<i>Aularches miliaris</i>	Northern spotted grasshopper
<i>Eutropidacris cristata</i> (syn. <i>Tropidacris cristata</i> , <i>T. dux</i>)	Romaleid grasshopper
<i>Oxya chinensis</i>	Rice grasshopper
<i>Segestidea defoliaria</i> (syn. <i>Eumossula gracilis</i>)	Tettigoniid tree-hopper
<i>Sexava nubila</i>	Coconut treehopper
<i>Echinothrips mexicanus</i>	Thrips
<i>Frankliniella invasor</i>	Thrips
<i>Lissachatina fulica</i>	Giant African land snail
Pathogens – Bacteria & Phytoplasmas	
Banana wilt associated phytoplasma	Banana wilt
<i>Candidatus Phytoplasma asteris</i>	Banana elephantiasis
<i>Candidatus Phytoplasma novoguineense</i>	Banana wilt / Bogia coconut syndrome
<i>Dickeya paradisiaca</i>	Rhizome rot
<i>Ralstonia solanacearum</i> phylotype IIB	Moko, Bugtok, Tapurok
<i>Ralstonia syzygii</i> subsp. <i>celebesensis</i>	Blood disease
<i>Xanthomonas campestris</i> pv. <i>musacearum</i>	Banana bacterial wilt
<i>Xanthomonas arboricola</i> pv. <i>celebensis</i>	Leaf stripe
Pathogens – Fungi	
<i>Acrodontium simplex</i>	Leaf speckle
<i>Cercospora hayi</i>	Brown spot
<i>Drechslera musaesapientum</i>	Leaf spot
<i>Fusarium oxysporum</i> f.sp. <i>cubense</i> (exotic VCG groups)	Fusarium wilt / Panama disease
<i>Haplobasidium musae</i>	Malayan leaf spot

<i>Marasmiellus scandens</i>	White thread blight
<i>Marasmius</i> spp.	Bunch rot
<i>Mycosphaerella eumusae</i> (= <i>Pseudocercospora eumusae</i>)	Eumusae leaf spot
<i>Phyllosticta</i> spp. <i>P. cavendishii</i> and <i>P. musarum</i>	Banana freckle
<i>Pseudocercospora fijiensis</i> (= <i>Mycosphaerella fijiensis</i>)	Black Sigatoka
<i>Uromyces musae</i>	Banana rust
<i>Rosellinia bunodes</i>	Black root rot
<i>Rosellinia pepo</i>	Black root rot
Pathogens – Nematodes	
<i>Helicotylenchus crenacauda</i>	Spiral nematode
<i>Heterodera oryzae</i>	Rice cyst nematode
<i>Hoplolaimus indicus</i>	Lance nematode
<i>Hoplolaimus pararobustus</i>	Lance nematode
<i>Longidorus laeviscapitatus</i>	Needle/dagger nematode
<i>Meloidogyne enterolobii</i>	Root-knot nematode
<i>Meloidogyne exigua</i>	Root-knot nematode
<i>Meloidogyne megadora</i>	Root-knot nematode
<i>Mesocriconema sphaerocephala</i>	Ring nematode
<i>Scutellonema</i> spp.	Spiral nematode
<i>Trichodorus coomansi</i>	Stubby root nematode
<i>Tylenchulus musicola</i>	Citrus-type nematode
<i>Xiphinema</i> spp.	Dagger nematode
Pathogens – Oomycetes	
<i>Trachysphaeria fructigena</i>	Cigar end rot

Pathogens – Viruses	
Abaca bunchy top virus	Abaca bunchy top
Banana bract mosaic virus	Banana bract mosaic
Banana bunchy top virus (Asian subgroup)	Bunchy top
Banana streak virus	Banana streak disease
Sugarcane mosaic virus (abaca strain)	Sugarcane mosaic

Conclusion

Australia's banana industry is a significant contributor to the national economy, regional employment and domestic food security. Maintaining Australia's strong biosecurity system is fundamental to protecting an industry that has been built on decades of investment, innovation and responsible biosecurity practices.

The ABGC urges the Department to apply a rigorous, science-based and precautionary approach throughout the BIRA process. Any decision regarding market access must fully consider the likelihood and consequences of introducing exotic pests and diseases, as well as the potentially irreversible impacts on growers, regional communities and Australia's agricultural reputation.

We look forward to continuing to engage constructively throughout the assessment process and trust that the Department will give full consideration to the concerns and recommendations outlined in this submission before preparing the draft report.

Yours sincerely,



Leon Collins
ABGC Chair



Leanne Erakovic
CEO

