



October 13, 2010

Plant Biosecurity
Biosecurity Australia
GPO Box 858
Canberra Act 2601
plant@biosecurity.gov.au

RE: Draft Pest Risk Analysis Report for Candidatus Liberibacter Species & their Vectors associated with Rutaceae

COMMENTS FROM CALIFORNIA CITRUS MUTUAL

California Citrus Mutual (CCM) is a citrus producers' trade association located in the heart of our citrus production area. Our membership is statewide and consists of 2,000 growers farming over 200,000 acres. Our industry consists of 271,000 acres throughout the state; however, not all of that production is exportable to Australia. We too are extremely sensitive to the introduction, spread and potential contamination of the Asian Citrus Psyllid (ACP) and the catastrophic disease Huanglongbing (HLB).

Our comments are limited to the potential introduction of ACP via fresh fruit. We would be remiss in not acknowledging the thoroughness of the document, the transparency and sufficient time for interested parties such as ourselves to review and comment. It is appreciated. While we believe there are conclusions not necessarily accurate, as they apply to California oranges, we commend the Department for a well written and thorough document.

We concur with Biosecurity's conclusion that the likelihood of HLB infected fruit arriving from California into Australia is *very low*. Unlike other diseased ravaged areas such as Florida and Brazil our ability, or more accurately our desire, to blend diseased fruit with non-diseased fruit is nonexistent. As an industry totally dedicated to fresh production there are too many safeguards in place to insure only the best quality is packed for fresh shipment. This includes size, grade, and flavor quality control measures. From our perspective, as an industry with the reputation of the finest navel oranges in America, there is no way we would or could mask and dilute diseased fruit in our fresh shipments. A category stipulating "nonexistent" would be more accurate for California.

As we understand the document one major reason for the *very low* classification is because seeds may be a vehicle for disease transmission. We would remind Biosecurity that California navel oranges are seedless and thus would not be a purveyor of HLB in that manner.

Biosecurity believes that oranges are a host or vector for psyllid travel. We respectfully disagree as it relates to California. There is an assumption, not stated but implied, that psyllids are docile and once landing on fruit stay on fruit. Assuming that the psyllid population is endemic in a production area, which they are not in California, there simply is no documentation that psyllids reside on fruit for perpetuity.

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The document indicates that harvested fruit, or binned fruit, from an area with a large population is going to transport psyllids. Furthermore, the report acknowledges that packing house procedures should be sufficient to eliminate psyllids. However, Biosecurity contends a chance may exist that psyllids will reattach or hitchhike on fruit **after** the packing process. That simply is not viable in California.

Psyllids may fall off a tree while harvest is underway. They may fall into a harvesting bag and dumped into a bin. If all that takes place it means there is an endemic population and they are fairly dormant. According to research in Florida psyllids are active however unless conditions are extremely cold and/or fruit is not handled. A vibrant psyllid would fly because of the jostling, handling and dumping process. If they fly there is no incentive for them to hitchhike or re-land on fruit because orange fruit is not an attractant nor is it a food source. If fruit is not a host then Biosecurity must be suggesting it is more of a transportation vehicle. This too would be a nonexistent possibility for California citrus because of our processing or handling methods.

The draft PRA stipulates that psyllids on fruit are of moderate risk. Is this before or after the fresh packing process? For California the categorization should be *very low* on field harvested unwaxed fruit prior to packing. After fresh packing the classification should be nonexistent. Biosecurity overlooked elements of our packing process which are washing, waxing and the drying components. Fruits are dried for three to five minutes at 100 degrees and this is an additional safeguard.

We concur that psyllids can survive long periods of time without food. But the documentation cited reports a period of 55 hours and a second study at 95 hours. Transit time to Australia is a minimum of three weeks. There is no documentation that supports the contention that psyllids will survive that long without a food source.

Page 135 of the PRA Biosecurity argues that nymphs could mature into adults if eggs are laid on the fruit. The document also argues that foliage with fresh fruit is a carrier. The document cites two interceptions. One find was a baggage interception in Houston from Belize and one on bulk citrus from Mexico into Texas.

Neither of those examples is applicable to fresh, commercial California citrus. California citrus does not contain any leaf matter once packed. California citrus is subject to rigorous packing house procedures already acknowledged as effective. Mature California citrus has never been determined to be a viable host as psyllids are not attracted to fruit.

Eggs would not be deposited on California citrus fruit. Young nymphs need green foliage to survive. Fresh packed California citrus does not contain green foliage and so immature stages would not be able to survive and mature into adults.

Citrus Mutual contends that it is unnecessary to place any restrictions on California citrus exports because of ACP or HLB introduction. There are no known discoveries of HLB in California. Psyllid detections have been limited to urban areas. These urban areas are being treated by the California Department of Food and Agriculture with two insecticides. We acknowledge that a few acres of commercial citrus and four packing houses are in quarantine areas but that is because our industry takes extraordinary precautions to protect the industry.

ACP detections are limited in number and volume. There have been two detections in two different grove locations in Imperial County. Imperial County production is not a major export area to Australia. Subsequent trapping has clearly supported the contention that these were hitchhikers and not an endemic population. Both groves were treated with insecticides and both are subject to rapping and visual inspections. **There has not been a repeat find in these two locations.**

The industry has an intensive partnership with state and federal authorities for detection and survey work in commercial areas. Just as Biosecurity wishes to protect its citrus industry so do California producers. The California trapping program is widespread, serviced and second to none around the world. The California Department of Food & Agriculture has 43,000 traps located in urban areas adjacent to citrus production. There are five traps per square mile. In areas within a three-mile radius of commercial citrus CDFA traps citrus at a rate of 15 traps per square mile.

The citrus industry is supporting a trapping program in commercial areas. As mentioned earlier we have approximately 271,000 acres of citrus. **All** of that citrus is trapped with one trap every half mile on the grove perimeter. Furthermore, personnel conduct visual inspection of citrus as they collect the traps. Stated another way it is one trap per forty acres or sixteen traps per square mile

When psyllids are trapped, whether it is the two found over a year ago in a commercial area or those in an urban environment they are forwarded to labs to determine if an HLB infection has occurred. To date the answer has been **no**. *An ACP population is not endemic in citrus production and HLB has never been discovered.*

Therefore, we contend that commercial areas are not populated with psyllids. We concur with Biosecurity that the packing process, should there be psyllids in an area, is sound for removing psyllids. We argue fruit is not a viable carrier of psyllids for California citrus. We therefore conclude that the need for any mitigation or export criteria is premature.

We would submit that the negative trapping program must continue adjacently to and in commercial areas. We concur that traps should be located at packing operations. This should be no greater than what is already in place as a federal/state/industry program.

Once again we thank and appreciate the opportunity to address comments and conclusions in Australian PRA for HLB and ACP transmission via export.

Cordially,



Joel Nelson
President

JAN/ldm