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Established Pests and Diseases Discussion Paper  
National Biosecurity Committee Secretariat  
Department of Agriculture  
GPO Box 858  
Canberra ACT 2601

Dear Sir/Madam

**Managing established pests and diseases of national significance in a new way**

Australian Pork Limited (APL) is the national representative body for Australian pork producers. APL is a producer owned not-for-profit company combining marketing, export development, research and innovation and policy development to assist in securing a profitable and sustainable future for the Australian pork industry.

APL welcomes the opportunity to comment on the discussion paper "Managing established pests and diseases of national significance in a new way". APL notes the proposed policy principles to managing Established Pests and Diseases of National Significance (EPDNS), specifically:

- onshore management of established pests and diseases focuses on asset-based protection to minimise impacts;
- the management of established pests and diseases is a shared responsibility between landholders, community, industry and government;
- to achieve asset-based protection, government gives priority to supporting industry and community leadership and actions;
- governments will work with stakeholders to support innovation for more effective pest and disease management;
- enforcement intervention should be the minimum necessary to achieve the desired result;
- where there is a national interest to intervene, established pests and diseases assessed as being nationally significant will have an associated national management plan or strategy; and,
- the list of established pests and diseases deemed nationally significant is regularly reviewed against the relevant assessment criteria and principles.

APL offers qualified support for this new approach, noting the following specific concerns.

- Clarification of the management of those pests and diseases which would become established after its implementation;
- Assurances that this new approach will not impact on the levy and R&D matching contribution systems;
- How industry will be able to provide input in determining what is "nationally significant"; and
- More rigour is required in the approach to the concept of eradicability.

## **New diseases**

APL is concerned that this approach does not provide an adequate framework for dealing with EPDNS which become established (or nationally significant) in the future. If an exotic disease outbreak was to occur, and that disease was to become established, then APL is of the view that there are particular circumstances where the management of a particular disease ought to be explicitly the responsibility of government. As an example, where the disease entry occurred because of a failure in at-border quarantine, or where the response efforts were inappropriately managed in such a way that eradication was abandoned.

The proposed approach requires additional principles to ensure that governments, as much as practicable, implement actions to resolve an EPDNS before moving to management under this framework. Such additional principles would not be inconsistent with those already articulated.

Moreover, APL suggests avoiding potential future conflicts of resource cost shifting from government to industry through governments “electing” to allow a new pest or disease to become established, thereby rendering it a problem of “asset holders”.

## **Collective action through levy investment**

APL seeks clarification around the meaning of “giv[ing] priority to supporting industry and community leadership and actions, and, work[ing] with stakeholders to support innovation for more effective pest and disease management”.

While not explicitly dealt with in the paper, APL seeks reassurance that this shift in policy will not immediately change the Rural Research and Development Priorities, of which Biosecurity is one. How (if at all) these principles interact with the R&D matching system is important and APL would like to see this point elaborated. Levies should neither be quarantined from, nor mandated for, the implementation of an EPDNS approach.

## **National significance**

APL considers that the process for determining “national significance” to be important. Governments should work cooperatively with industry on a satisfactory model before anything is implemented.

Industry must have input into the listing and review process. National significance should be reviewed biennially, and an out of session review process needs to be available.

## **Eradicability**

The discussion paper refers several times to whether a pest or disease is eradicable, or “considered eradicable” but lacks clarity about who is responsible for determining this. Whether something is eradicable is as much a function of resources as the organism itself, or the particulars of the outbreak. Eradicability ought to be expressed in these terms, such as “too expensive to eradicate”, “limited public benefit from eradication”, or similar.

A notion of something not being considered eradicable could directly impact that assessment. Therefore, APL suggests that the concept of eradicability needs to be elaborated and the passive construction “generally considered” be avoided.

Yours sincerely



Deb Kerr  
General Manager Policy