



31 July 2015

National Biosecurity Committee
Secretariat Department of Agriculture
GPO Box 858
Canberra ACT 2601

|

RE: Modernising Australia's approach to established pests and diseases of national significance

National Farmers' Federation (NFF) is the peak body representing farmers and the broader agriculture sector across Australia and is one of Australia's foremost and respected advocacy organisations.

NFF's membership comprises the lead farmer organisations from the jurisdictions and a wide range of national commodity councils.

Australian farmers and the agribusiness sector underpin Australia's food security and contribute to global food and fibre security, directly through production and indirectly through transfer of knowledge and skills to other nations. The continued profitability of farm businesses underpins the ability of the sector to expand and take advantage of the opportunities of a growing global population with an ever-increasing demand for high-quality, safe food.

Please find attached NFF's submission to the National Biosecurity Committee in response to its discussion paper entitled, *Modernising Australia's approach to established pests and diseases of national significance*. This submission is presented on behalf of all NFF's member organisations, some of which may also have chosen to submit under their own letterhead.

Yours sincerely

A handwritten signature in black ink, appearing to read "Ron Cullen".

Mr Ron Cullen
Chairman
NFF's Biosecurity Taskforce

Att.

NATIONAL FARMERS' FEDERATION SUBMISSION TO THE NATIONAL
BIOSECURITY COMMITTEE ON ITS PAPER ENTITLED:

*MODERNISING AUSTRALIA'S APPROACH TO ESTABLISHED PESTS AND DISEASES
OF NATIONAL SIGNIFICANCE*

31 JULY 2015

Introduction

National Farmers' Federation (NFF) acknowledged the timeliness of the National Biosecurity Committee (NBC) discussing new ideas to manage established weeds, pests and diseases that have a significant impact at a national level.

Roger Beale AO and his Panel, in their 2008 Report, *One Biosecurity: a working partnership*, emphasised the importance of a true partnership when dealing with matters of biosecurity in Australia:

The central theme is the development of a seamless biosecurity system that fully involves all the appropriate players—business, other nations, the states and territories and the Australian community—across pre-border, border and post-border risk management measures.

It could be argued that, since the Beale Report, strong partnerships have been forged between the various levels of government; however, for the most part these have excluded “the Australian community” and industry organisations.

Recent steps have been taken by the NBC to correct this anomaly: industry bodies are now invited to attend components of NBC meetings and the NFF has been afforded observer status on the governments' National Communications Network.

These recent changes are structural in nature and important to appropriate policy development covering matters of relevance to industry. However, the real challenge for achieving a true and successful partnership lies in the capacity of all governments in Australia to work equally with industry in monitoring and managing existing pests, diseases and weeds and participating in programs around preventing and/or responding to incursions of unwanted pests, diseases and weeds.

In developing the first national framework for managing established pests and diseases of national significance under the Intergovernmental Agreement on Biosecurity (IGAB), the NBC recognises that “*Industry and landholders know best how to manage biosecurity threats on their property or affecting their industry*” and that they are well positioned “*to lead initiative and collective action, with the support of governments.*” [Rona Mellor, Department of Agriculture Media Release, 1 June 2015]

Unfortunately, as is so often the case, funding is, and will continue to be, an issue; nevertheless, by approaching biosecurity in an appropriate manner and in partnership with governments, effectiveness can be maximised and expense minimised. Should added financial responsibility be required of industry, a co-operative approach to how such funds are to be raised and the extent to which governments recognise their obligations to the community and as landholders need thorough discussion and agreement.

With production losses quoted by the Department at more than \$620 million per annum (2009) attributable to pest animals and a further \$4 billion per annum (2004) in costs associated with weeds in Australia, there appears strong justification for collective action. The emphasis must be on *collective*.

Producers have much to offer, particularly with their knowledge and experience around dealing with the chronic impacts of pests, diseases and weeds on their productivity and profitability.

The proposed framework to address established pests and diseases of national significance

The following comments relate to the headings and points within the NBC Discussion Paper.

Maximising returns from biosecurity investments

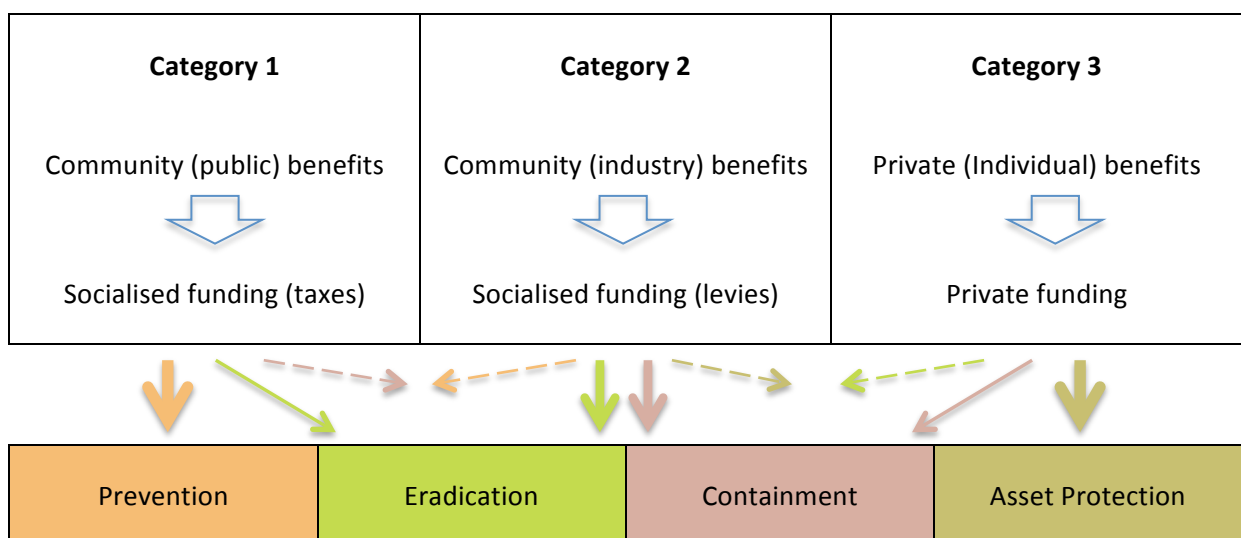
Prior to addressing the specific questions posed in the paper, comment is offered around the basic tenet behind the overall proposal. This is summarised quite neatly through the use of the “generalised invasion curve” on page 5 and the paragraph immediately following:

Public benefit from protecting private assets is generally lower, particularly compared with other activities where government can play a role such as prevention or early detection of incursions. The benefits of managing an established pest or disease accrue predominantly to the owner of the land or the owner of the asset, so asset-based management may be the most cost-effective for an individual and/or as the basis for collective action by a community or industry.

The principle is sound. It is based on ‘beneficiary pays’ where, it is argued, greater benefit for the community (i.e., taxpayer) comes from Prevention while the more direct benefit for landholders comes from Asset-Based Protection; hence the justification for governments spending more than industry at the Prevention end of the scale and industry spending more than governments at the Asset Protection end (noting that governments will play some role in protecting their own assets.)

An additional way of presenting this concept that adds a different ‘flavour’ is to overlay it with the ‘market failure’ principle. (This is mentioned later in the NBC paper but only briefly.) There will be times, for example, when asset protection will be beyond the capacity of individual private landholders even though they may be the primary beneficiaries, meaning collective action would be necessary and socialised funding required.

This is reflected in the diagram below where three clear categories of funding are shown. Categories 1 and 2 are the two forms of socialised funding appropriate to the market-failure principle, with funding from these categories allocated according to the extent to which the broader community benefits (hence taxpayer funding) or the industry community benefits (hence levy payer funding).



Juxtaposing the three Categories against the four pillars from the NBC diagram helps to demonstrate an appropriate flow of funds: expenditure of taxpayer funds (Category 1) tends to be more justified

on the left of the graph than on the right, with the reverse applying to private funds (Category 3); the expenditure of levy funds (Category 2) is justifiable where the benefits would flow predominantly to individual producers but where market failure exists, i.e., where individual producers would be unable or unwilling to fund initiatives in their own right.

Of course, there are occasions when governments, as responsible landholders themselves, must be the primary funders of asset-based protection. (Again this is acknowledged in the NBC paper.) Taxpayer funds are justified in such circumstances under the principle of beneficiary pays because it is the taxpayer, in reality, who owns the assets over which the governments have custodianship. NFF is particularly keen for this to be acknowledged regularly by governments and for them to work enthusiastically with private land/asset holders when managing established pests, diseases and weeds of national (*and* regional) significance.

In terms of calculating who contributes how much and to what, it will be important to acknowledge in-kind contributions, not just from governments but also from private landholders who spend the bulk of their work as carers of the land and their livestock.

Proposed Policy Principles

1. *Are the proposed policy principles appropriate and practical?*
2. *Are the proposed policy principles sufficient?*

Given the focus of this section on asset-based protection and based on the diagram on the previous page, NFF considers the proposed policy principles to be appropriate.

In terms of the list being sufficient, the following additional principles are presented for consideration:

- a) where onshore pests, diseases or weeds are established but have been contained, governments have a lead role in co-ordinating the prevention of spread to areas known to be free of the pests, diseases or weeds;
- b) as landholders in their own right, governments have a lead role in managing established pests, weeds and diseases harboured in community assets (where impacts are less significant) and preventing their spread¹
- c) even though certain established pests, diseases or weeds are present in Australia, the Federal Government is responsible for optimising its efforts at preventing further introductions from overseas, particularly if the pests, diseases or weeds are regionally confined and are the subject of containment measures to mitigate further spread.

REASONS:

This section does give the impression, at least initially, that landholders will have to bear most of the responsibility for minimising impacts (“...*onshore management of established pests and diseases focuses on asset-based protection to minimise impacts*”). While it is stated that “*government gives priority to supporting industry and community leadership and actions*” and “*governments will work with stakeholders to support innovation for more effective pest and disease management*”, it is unclear what this means. The addition of the above principles (or something similar) would provide an acknowledgement that governments will maintain an over-arching responsibility ‘beyond the farm gate’.

As a general comment, the policy principles as they stand are quite broad; further comment from NFF may be warranted once the detail behind the points becomes clearer².

¹ Examples include environmental weeds escaping to agriculture; weed seeds and non-productive, introduced grass seeds spreading by vehicles traversing private properties or reserves; feral cats impacting on nearby conservation areas; crop diseases / pests harboured in headlands or nearby bushland

Proposed national significance / national interest test

3. *Should listing of established pests and diseases of national significance be for a defined period or open ended?*
4. *What form of review should be required to maintain the listing of a pest or disease as an established pest or disease of national significance?*
5. *What is an appropriate time for such a review?*

In answer to these questions, NFF believes:

- a) listing of established pests, diseases and weeds should be open-ended, with the criteria for future listing firmly agreed;
- b) a model worth considering for determining and reviewing the list is that used recently by the Rural Industries Research and Development Corporation (RIRDC) for the Australian Pesticides and Veterinary Medicines Authority (APVMA) for prioritising agvet chemicals / animals combination for upcoming attention; and
- c) following determination of the initial list and a formal review within 12 months, the list and priorities should be reviewed biennially, with the opportunity through some formal mechanism of amending the list out of session if required.

REASONS

Of more importance than the list itself is the period for its review and the flexibility to add and subtract new items when deemed necessary. Having said this, a concerted effort to establish the list in the first instance is important. Part of the establishment process should be discussion around prioritisation of resource usage, or at least methodology for establishing prioritisation. Unless a pest, disease or weed is eradicated (and hence dropped from the list), only the prioritisation should be amended from review to review, meaning the list is kept as an open-ended 'inventory'.

In the opinion of a number of attendees, the approach adopted recently (June 2015) by RIRDC for prioritising APVMA's upcoming work program in terms of establishing label requirements for certain agricultural and veterinary chemicals worked very well. By reports it was based on a long-held practice in the US, and more recently Canada, for the same purpose. Under the watchful eye of excellent facilitators, it made a very difficult task quite manageable. To expedite an outcome, plant and animal industries were represented at separate workshops. An annual review is being considered. This concept forms the basis for the comments under (b) and (c) above.

In addition to listing important pests, diseases and weeds, there needs to be agreement on desired outcomes and necessary actions to achieve such outcomes.

Proposed roles and responsibilities of government and other stakeholders

6. *Are the proposed roles and responsibilities clear, particularly in relation to your role?*
7. *Are the proposed roles and responsibilities appropriate and practical?*

In answer to these questions, NFF believes the proposed roles and responsibilities of each group require some clarification (see below).

² For example, where there is 'national interest', will there be an associated national management plan or strategy? If so, what will it look like and how will it fit in?

REASONS

As the concept evolves, greater clarity is expected around such things as:

- the roles and responsibilities for industry;
- who is responsible if a particular strategy fails;
- definitions for stakeholder groups and what is expected of them; and
- the process and approach when some parties refuse or lack enthusiasm to participate.

NFF appreciates the acknowledgement by governments that:

- as landholders in their own right, they are equally responsible for asset management where relevant;
- industry organisations and community groups have an important role in promoting collective action, supporting relevant research and development and providing industry input into identifying pests, diseases and weeds of national significance; and
- risk creators need particular attention.

Suggested additional commentary under this section includes discussion around the need for a punitive approach for risk creators who either unnecessarily cause the spread of unwanted pests, diseases or weeds or inhibit the management of them through lack of care or engagement, and whether special attention to 'fringe groups'³ and/or multi-land users⁴ is needed in developing management and control strategies at the regional level.

What would change?

Suggested changes for the future management of pest, diseases and weeds being put in this paper by the NBC are refreshing and eminently supportable. NFF welcomes the governments' acknowledgement that *"better results are achieved when governments work with relevant industry, community, environment and local landholders groups to help build momentum for management of established pests and diseases of national significance"*.

Benefits of a co-ordinated approach

8. *What are the issues with establishing and maintaining effective collective action?*
9. *How can the coordinated approach be best implemented across the various stakeholder groups?*
10. *How do you see yourself (or your interest/industry/organisation) contributing?*

In answer to these questions, NFF believes:

- a) once a list of pests, diseases and weeds of national significance is agreed and prioritisations allocated, the most significant challenges to establishing and maintaining effective collective action lie in the quality of government/industry consultation⁵, the gathering of meaningful baseline data against which to measure progress and the determination of an effective and sustainable funding model;
- b) the best implementation across stakeholder groups clearly rests with the degree of 'ownership' instilled in the minds and actions of all relevant parties and the model adopted to create such ownership; and
- c) its contribution would be by way of co-ordinating the efforts of its member organisations to

³ Fringe groups would cover, but not be limited to, peri-urban farmers

⁴ Multi-land users include users of land for agricultural and resource purposes simultaneously

⁵ All relevant industries, including small niche industries, should be consulted.

ensure the list of pests, diseases and weeds is comprehensive and industry's and individual-producers' exposure to future funding commitments is appropriate to a cost-effective program in the pursuit of positive outcomes.

REASONS

The following sentiment is espoused in the NBC paper: *"The proposed approach would mean interventions would be cost-effective and driven by outcomes (such as asset protection and damage mitigation), rather than by inflexible and expensive activity-based designs (such as reliance on regulation). It would also enable governments to make more strategic investments."*

While NFF supports this approach in the main, it is concerned to ensure:

- a balance is found between policies affecting few landholders on large properties with those affecting many landholders on small properties;
- consultation between environment and livestock groups is conducted in a spirit of co-operation for the benefit of Australia generally; and
- an appropriate model is adopted such that the theory of co-operation between all interested parties is converted to practice.

Of the case studies provided in the NBC paper, the National Wild Dog Action Plan most exemplifies what is being suggested as the way forward. A more recent example lies with the strategy recently developed for collective action to eradicate Red Witch Weed, or *Striga asiatica*.

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