

IGAB Review Secretariat
Department of Agriculture and Water Resources
GPO Box 858
CANBERRA ACT 2601

Via email: igabreview@agriculture.gov.au

8 March 2017

Dear Sir/Madam,

Intergovernmental Agreement on Biosecurity (IGAB) Review - Draft Report

Introduction

Cotton Australia welcomes the opportunity to provide comment and, as the industry representative body, speak on behalf of cotton growers regarding the *IGAB Review - Draft Report*.

Biosecurity is a key issue facing Australian's 1200 cotton growers, as endemic and exotic pests and diseases pose a significant threat to cotton productivity, business viability and industry sustainability.

The cotton industry is committed to minimising the impact of biosecurity incursions on cotton growers by ensuring cooperation and collaboration on key policy and RD&E priorities with all government and industry participants in the biosecurity system.

Executive Summary

Cotton Australia is committed to supporting biosecurity policy and RD&E initiatives that enhance our industry's biosecurity risk profile, expertise, preparedness and responsiveness. Although the industry is adequately managing cotton-specific biosecurity risks, national leadership and coordination of collaborative approaches to biosecurity policy and RD&E, as outlined IGAB Review Draft Report, would deliver significant outcomes to the cotton industry by supporting risk management across broader farming systems and landscapes.

Cotton Australia is broadly supportive of the IGAB Review Draft Report recommendations and advocates for establishment of a structured and transparent prioritisation and implementation process, which focuses on continued stakeholder engagement. In addition, Cotton Australia makes the following specific recommendations;

Recommendation 1. The roles and responsibilities of stakeholders are mapped to the components of the Australian biosecurity system.

Recommendation 2. Further clarification is provided for the definition of 'industry' for the purposes of this review.

Recommendation 3. Further clarification is provided for the incomplete sentences as listed in Table 1: Draft roles and responsibilities of national biosecurity system participants.

Recommendation 4. A national statement of intent is drafted by the NBC, including engagement with representatives from primary industries, environment and community groups.

Recommendation 5. Biosecurity be included within scope for the Department of Agriculture and Water Resources' Non-Tariff Measures Working Group.

Recommendation 6. Formalisation of arrangements between agricultural and environmental agencies along the biosecurity continuum including appointment of a Chief Environmental Biosecurity Officer, an Environmental Biosecurity Committee and an environmental biosecurity representative to NBC.

Recommendation 7. A nationally coordinated process is implemented for biosecurity risk prioritisation, which engages all stakeholders along the biosecurity system.

Recommendation 8. Option 1: *Establishing a new stand-alone entity for cross-sectoral biosecurity R&I* is not supported.

Recommendation 9. Redirection of Australian Government funds currently directed to existing RDCs (matching funding) toward a new biosecurity R&D entity is not supported.

Recommendation 10. Option 2: *Addressing cross-sectoral biosecurity R&I within an existing RDC (or other existing structure)* is supported for further investigation.

Recommendation 11. Nationally agreed biosecurity RD&E priorities are developed through engagement with representatives of primary industries, environment and community groups.

Recommendation 12. Industry and regionally specific biosecurity RD&E issues continue to be prioritised for RD&E investment by the Australian Government, in addition to nationally-agreed and endorsed priorities.

Recommendation 13. The structure, membership and governance of NBC are reassessed prior to agreement of NBC-endorsed national biosecurity RD&E priorities.

Recommendation 14. Terms of Reference for NBC are revised to include "*provision of leadership and coordination for NBC Committees and sub-Committees*".

Recommendation 15. Terms of Reference for NBC are revised to include "*promoting cooperation, collaborating and consistence across and between Australian government and non-government stakeholders in the biosecurity system*".

Recommendation 16. Membership of NBC is expanded to include representation from primary industries and the environment, including AHA and PHA, in preference to creating an Industry and Community Advisory Committee.

Recommendation 17. Options for default cost-sharing arrangements are tabled for discussion at upcoming AHA/PHA meetings to ensure alignment with EADRA and the EPPRD.

Recommendation 18. A single data and knowledge sharing platform be implemented, and that minimum standards and specifications are agreed for data sets.

Intergovernmental Agreement on Biosecurity Review – Draft Report

1. Overall Comments

The Intergovernmental Agreement on Biosecurity Review - Draft Report (IGAB Review Draft Report), provides a good overall summary of Australia's biosecurity system, clarification of system components, and opportunities to improve the efficacy, efficiency and transparency of the system.

A suggested pathway for implementation of the draft report recommendations should be provided to stakeholders, outlining a structured and transparent process which includes; prioritisation of recommendations; integration of clear stop/go points; continued stakeholder engagement and; a robust monitoring and evaluation framework.

2. Knowing and owning our roles and responsibilities

IGAB Review Feedback Request 1. The Review Panel seeks feedback on the draft roles and responsibilities of national biosecurity system participants.

Cotton Australia welcomes the efforts of the IGAB Review Committee in providing clarity around 'shared responsibility', namely articulation of roles and responsibilities of parties along the biosecurity continuum. Mapping these elements to the relevant components of the biosecurity system would provide greater clarity to stakeholders regarding the framework in which they are required to operate.

Further definition is required around the term 'industry'. It is not clear whether the roles and responsibilities outlined in this document apply to industry organisations representing non-agricultural commodities, such as tourism and recreation that also benefit from a robust biosecurity system. The IGAB Review Committee is respectfully requested to address the incomplete sentences from Table 1 (e.g. *"promoting partnerships between governments, industry and the community, where a peak body..."*).

Cotton Australia supports the Review Committee's observations that in moving toward a culture of shared responsibility, it is the role of industry, government and community to change conversations around biosecurity. This includes removing negative associations associated with terminology such as 'risk creators' and integrating best practice for biosecurity, into everyday activities. Fundamental cultural change, facilitated by removal of current barriers to participation in the biosecurity system, may help deliver against desired outcomes associated with acknowledgment, understanding and undertaking of general biosecurity obligations.

IGAB Review Draft Recommendation 1. The NBC and the proposed ICAC should lead the development of a draft National Statement of Intent for public consultation

Draft recommendation 1 is strongly supported as an essential step toward formalising a close consultative arrangement between government and industry and may assist in ensuring ongoing industry support and engagement during the IGAB recommendation implementation phase.

Cotton Australia strongly supports inclusion of industry, environment and community in National Biosecurity Committee (NBC) discussions. To reflect evolution toward a more inclusive biosecurity framework, consideration should be given to expansion of membership of NBC to include representation by industry, environment and community. Implementation of this recommendation may render the formation of an Industry and Community Advisory Committee (ICAC) as redundant.

Recommendation 1. The roles and responsibilities of stakeholders are mapped to the components of the Australian biosecurity system.

Recommendation 2. Further clarification is provided for the definition of ‘industry’ for the purposes of this review.

Recommendation 3. Further clarification is provided for the incomplete sentences as listed in Table 1: Draft roles and responsibilities of national biosecurity system participants.

Recommendation 4. A national statement of intent is drafted by the NBC, including engagement with representatives from primary industries, environment and community groups.

3. Market access is key

IGAB Review Feedback Request 2: The Review Panel seeks feedback on the total effort and costs associated with demonstrating area freedom by jurisdictions, and the value of that trade.

Australian cotton products benefit from a reputation of being free from pests and diseases and do not currently require demonstration of area freedom by jurisdiction to address non-tariff barriers to market access. However, Cotton Australia broadly supports science-based and risk-aligned approaches to building trade relationships and protecting market access. As such, the IGAB Review Draft Report recommendations relating to clarification of roles and responsibilities associated with international and domestic market access, surveillance for pests and diseases which threaten market access and, greater collaboration between government and industry stakeholders appear warranted.

IGAB Review Draft Recommendation 2: The Primary Industries Technical Market Access and Trade Development Task Group should seek to enhance engagement with industry.

Cotton Australia supports the recommendation of the National Farmers Federation (NFF) to include biosecurity within scope for the Department of Agriculture and Water Resources’ Non-Tariff Measures Working Group, where the NFF would represent the interests of Australian cotton farmers. This opportunity should be considered in conjunction with IGAB Review Draft Recommendation 2.

Recommendation 5. Biosecurity be included within scope for the Department of Agriculture and Water Resources’ Non-Tariff Measures Working Group.

4. Stronger environmental biosecurity

IGAB Review Draft Recommendation 8: Jurisdictions should institute formal arrangements between agriculture and environment agencies.

Cotton Australia supports recommendations of the IGAB Review Draft Report to identify, align priorities and institute formal arrangements between environmental and agricultural agencies and biosecurity structures (EADRA, EPPRD, NEBRA).

IGAB Review Draft Recommendation 10: The Australian Government should establish the senior, expert position of Chief Environmental Biosecurity Officer within the environment department.

The appointment of a Chief Environmental Biosecurity Officer in the Department of Environment and Energy is supported, to report on the effectiveness of environmental biosecurity arrangements and achievements. Clarification on how this position would interact with stakeholders is required.

IGAB Review Draft Recommendation 11: The NBC should establish and resource a new Environmental Biosecurity Committee (EBC).

Development of an Environmental Biosecurity Committee, comprising government, environment, plant and animal biosecurity experts may be beneficial in prioritising the national biosecurity risks impact the environment. However, the ongoing roles, responsibilities, funding arrangements and areas of engagement for this Committee should be carefully considered to avoid unnecessary duplication in the system, particularly in reference to the Plant Health Committee and Animal Health Committee.

Additionally, membership for NBC should include representation for environmental biosecurity.

Recommendation 6. Formalisation of arrangements between agricultural and environmental agencies along the biosecurity continuum including appointment of a Chief Environmental Biosecurity Officer, an Environmental Biosecurity Committee and an environmental biosecurity representative to NBC.

5. Building the national system

IGAB Review Draft Recommendation 14: The NBC should lead five-yearly national-level risk prioritisation for emerging animal, plant and environmental risks and pathways.

The implementation of a nationally coordinated process for national-level biosecurity risk prioritisation involving engagement with all participants in the national biosecurity system is supported. This process should be designed to complement, rather than compete with, existing processes and resources for biosecurity threat identification, including risks that are specific to localised areas or specific industries.

National-level risk prioritisation processes should be sufficiently inclusive to enable alignment with all existing initiatives that deliver similar outcomes. This may include the Plant Health Committee national priority pest list, State-based notifiable pest lists, industry biosecurity plans, surveillance programs and IGAB Review Draft Report Recommendation 13: *Jurisdictions should adopt a systematic approach to determine and plan for national priority animal, plant and environmental pests and diseases.*

The role of industries in assisting with national-level biosecurity risk prioritisation should be considered, where industry-specific investments and networks, can support national approaches. For the cotton industry, the annual process for preparedness and responsiveness evaluation may complement identification and implementation of national priorities. Specific components of this annual review include; diagnostics and contingency planning, prioritisation of HPPs, establishment of surveillance programs, BMPs and on-farm biosecurity plans, owner reimbursement costs and RD&E capability.

Recommendation 7. A nationally coordinated process is implemented for biosecurity risk prioritisation, which engages all stakeholders along the biosecurity system.

6. Research and innovation

IGAB Review Feedback Request 3: The Review Panel seeks feedback on the following options for a new entity for cross-sectoral biosecurity R&I.

The cotton industry is committed to supporting biosecurity RD&E initiatives that enhance our industry's biosecurity risk profile, expertise and response preparedness. The industry values and prioritises the need to maintain scientific and extension capacity that understands the cotton system and can integrate response measures into the system, or ultimately provide support in any transition to managing a new threat.

Investment in cotton biosecurity RD&E continues to be of high priority to Australian cotton growers, as reflected in the number of biosecurity-related research projects that are annually recommended to the Cotton Research and Development Corporation (CRDC) for investment by Grower-led R&D Advisory Panels (20% of total spend).

The cotton industry has an established network of extension officers and technical specialists, who provide practical advice to growers, particularly in respect to meeting legislative and best practice requirements for managing on-farm biosecurity risks.

Although the cotton industry is adequately managing cotton-specific biosecurity risks, there is a clear need for leadership in the cross-sectoral biosecurity RD&E investment space, to address national priorities that decrease risk across farming systems, landscapes and communities. It is also recognised that efficiencies could be gained by increased collaboration with other industries and jurisdictions, as recently illustrated by the Rural R&D for Profit Round 3 cross sectoral project around pest surveillance.

Cotton Australia supports the development of national biosecurity R&D priorities, on the provision that sufficient flexibility is maintained within the system to continue to permit investment in grower-identified industry-specific biosecurity RD&E priorities.

In alignment with the National Plant Biosecurity Strategy recommendations, our preferred future is a simple, coordinated, effective and cost-efficient approach to managing biosecurity risk through research,

surveillance, diagnostics and extension. Cotton Australia asserts that a national framework for biosecurity R&I should be positioned to deliver against outcomes associated with;

- Coordination of capacity and capability for preparedness, surveillance and incident response;
- Providing a mechanism to deliver long-term capacity and research outcomes, across all agricultural, environmental and community landscapes; and
- Cost-effective delivery of biosecurity RD&E outcomes.

Cotton Australia still maintains the position that cessation of the Plant Biosecurity CRC should be used as an opportunity to streamline and simplify the environment for Biosecurity R&D, rather than create new entities that are potentially duplicative, competitive or inefficient.

As such, Cotton Australia does not support Option 1 as proposed in the IGAB Review Draft Report. Instead, Cotton Australia support is maintained for investigating mechanisms to address cross-sectoral biosecurity R&D within existing structures (Option 2).

To implement Option 2, Cotton Australia recommends the appointment of a coordinator or team within an established structure, which can provide leadership including prioritisation of outcomes across stakeholders, coordination of funding, refinement of processes around engagement between stakeholders (i.e. talking to research providers), development of an implementation plan and development of a process for accountability and outcome reporting to stakeholders.

Existing structures such as the Rural Industries Research and Development Corporation, PHA (potentially through the National Biosecurity R&D Strategies) or even a commodity-specific RDCs may be positioned to provide cost-effective coordination and leadership for cross-sectoral biosecurity RD&E. These arrangements may not require significant changes to current funding models however, may require minor changes in membership, governance and/or charter to deliver against desired objectives.

Cotton Australia does not support redirection of matching RDC funds towards cross-sectoral R&I entities as industry-specific and nationally-agreed biosecurity priorities and capacity may not always align.

For additional information, Cotton Australia encourages the IGAB Review Committee to refer to the submissions, made to the Plant Biosecurity CRC in response to the Keogh and Goucher report: A sustainable and nationally coordinated plant biosecurity RD&E system for Australia (10 May 2016), made available at <http://www.pbcrc.com.au/smartbiosecurityscience/submissions>

IGAB Review Draft Recommendation 15: The sectoral committees of the NBC should develop an agreed set of National Biosecurity R&I Priorities.

To ensure industry buy-in for national biosecurity RD&E priorities, arrangements for ongoing investment in cross-sectoral biosecurity RD&E should be established before national priorities are agreed upon and endorsed by NBC (IGAB Review Draft Report Recommendation 15).

Recommendation 8. Option 1: *Establishing a new stand-alone entity for cross-sectoral biosecurity R&I* is not supported.

Recommendation 9. Redirection of Australian Government funds currently directed to existing RDCs (matching funding) toward a new biosecurity R&D entity is not supported.

Recommendation 10. Option 2: *Addressing cross-sectoral biosecurity R&I within an existing RDC* (or other existing structure) is supported for further investigation.

Recommendation 11. Nationally agreed biosecurity RD&E priorities are developed through engagement with representatives of primary industries, environment and community groups.

Recommendation 12. Industry and regionally specific biosecurity RD&E issues continue to be prioritised for RD&E investment by the Australian Government, in addition to nationally-agreed and endorsed priorities.

Recommendation 13. The structure, membership and governance of NBC are reassessed prior to agreement of NBC-endorsed national biosecurity RD&E priorities.

7. Strengthening governance

IGAB Review Feedback Request 4: The Review Panel seeks feedback on the proposed Terms of Reference for the NBC.

Cotton Australia welcomes the opportunity to provide feedback on the NBC draft Terms of Reference. This is seen as an important step in providing transparency around the NBC's roles and responsibilities, and an opportunity for engagement with non-government participants in the biosecurity system.

In regard to suggestions for "better coordination and linkages between the committees and sub-committees to ensure greater transparency, sharing of information, cross-sectoral utilisation of the work of the committees" (page 65), an additional Term of Reference should be considered that states that leadership and coordination for NBC Committees and sub-Committees is to be provided by NBC.

The Terms of Reference should be further revised to reflect the role of NBC in promoting cooperation and collaboration across both government and non-government stakeholders, to deliver against outcomes associated developing NBC-endorsed national biosecurity R&I priorities.

Cotton Australia shares the concerns of other industry stakeholders that NBC cannot deliver against these Terms of Reference without ongoing and meaningful engagement with the plant, animal and environmental sectors. As suggested in the IGAB Draft Review Report, opportunities should be considered for non-government stakeholders to be afforded a more direct means of input to the work of NBC, and to improve transparency for non-government stakeholders within the biosecurity system.

However, continued engagement with industry at this level should be undertaken in a manner that does not increase complexity or duplication within the system. Hence, in preference to installation of an Industry and Community Advisory Committee, Cotton Australia advocates for a more inclusive structure for NBC. Expansion of membership for NBC to include ongoing direct representation for industry and the environment would better reflect a biosecurity system designed around 'shared responsibility'.

Additionally, membership of NBC should be revised to reflect an ability to deliver against desired outcomes. Without representation from industry, environment and community (including stewards of

public lands), it is unlikely that NBC can adequately deliver against the desired outcome associated with being, “responsible for biosecurity matters, and tasked with managing a national, strategic approach to emerging and ongoing biosecurity policy issues (2012 IGAB, p. 19)”. Similarly, the ability of NBC to strengthen national biosecurity aligned with the proposed draft Terms of Reference (page 64, Box 9) would be greatly enhanced by direct industry feedback and participation.

Recommendation 14. Terms of Reference for NBC are revised to include “*provision of leadership and coordination for NBC Committees and sub-Committees*”.

Recommendation 15. Terms of Reference for NBC are revised to include “*promoting cooperation, collaborating and consistence across and between Australian government and non-government stakeholders in the biosecurity system*”.

Recommendation 16. Membership of NBC is expanded to include representation from primary industries and the environment, including AHA and PHA, in preference to creating an Industry and Community Advisory Committee.

8. Funding our national system

IGAB Review Feedback Request 5. The Review Panel seeks feedback on cost-sharing options to ensure a more rapid-response to an exotic pest or disease incursion.

As an active participant in emergency biosecurity responses, Cotton Australia advocates that decisions in response to biosecurity incursions need to be undertaken rapidly to either a) increase the likelihood of successful eradication in a cost effective manner, or b) to allow industry to immediately respond to incidents where eradication is not feasible. Disagreement around the feasibility of eradication has the potential to delay an incident response and the chances of successful eradication.

The proposed options for implementation of default cost-sharing arrangements may assist in containing initial incursions and warrants further investigation. However, any decision regarding cost-sharing arrangements needs to be consistent with EADRA and the EPPRD and, should be subject to further discussion at the most appropriate AHA/PHA forum. As such, Option1 and 2 are not supported.

Additionally, Cotton Australia advocates that the implications for default cost-sharing arrangements should be mindful of the risks associated with unsuccessful eradication (e.g. incidental spread and development of resistance issues) and should also consider the implications of crop quarantine or destruction without previously asserting eligibility for owner reimbursement costs.

Until these matters are resolved through mechanisms aligned with EADRA and EPPRD requirements, Cotton Australia advocates that options to expedite the decision making process should be investigated, including initiatives that deliver improved preparedness (e.g. identification of Affected parties, control options and likely pathways), faster decision making and/or, enhanced responsiveness.

Recommendation 17. Options for default cost-sharing arrangements are tabled for discussion at upcoming AHA/PHA meetings to ensure alignment with EADRA and the EPPRD.

9. Maintaining system performance

IGAB Review Draft Recommendation 38: Data and knowledge sharing should be a core commitment of jurisdictions under the IGAB. Minimum standards and specifications should be agreed for data sets.

Cotton Australia advocates that a single biosecurity data and knowledge sharing center should be agreed upon by all government and non-government agencies and established as soon as possible. It is important that this agreed option be simple to implement for data collection, analysis and extraction, and that a single platform is used to address plant, animal and environmental biosecurity concerns. This system should also be aligned with cross-sectoral R&D priorities and existing surveillance networks.

Recommendation 18. A single data and knowledge sharing platform be implemented, and that minimum standards and specifications are agreed for data sets.

Conclusion

Cotton Australia considers that simplification and streamlining of Australia's biosecurity system will help to deliver a cost-efficient yet effective model for protecting agricultural productivity and environmental assets.

Cotton Australia is broadly supportive of the IGAB Review Draft Report recommendations pertaining to improving collaboration and coordination between government and non-government stakeholders to deliver a flexible biosecurity system with shared outcomes for all participants.

To ensure implementation of the IGAB Review Draft Report recommendations in a timely manner, Cotton Australia advocates for development of a structured and transparent framework for recommendation prioritisation and implementation that is held accountable to a robust monitoring and evaluation framework. Ongoing stakeholder engagement is also an essential component of the implementation phase, to ensure alignment of outcomes for all participants in the biosecurity system.

Cotton Australia looks forward to working with the Department of Agriculture and Water Resources, State Government and other industry bodies to improve the efficacy and efficiency of Australia's biosecurity system.

Cotton Australia welcomes any opportunity to provide further information on its position. For more information, contact Nicola Cottee, Policy Officer on (02) 9669 5222 or nicolac@cotton.org.au.

Yours sincerely,



Nicola Cottee

Policy Officer, Research Direction and Stewardship

Cotton Australia